Calabasas 2030 General Plan Update

Program Environmental Impact Report Addendum

Site 11, Calabasas Commons

Project Location:

- Site 11 – 4719 Commons Way

Project Description:

- Building A - 101 residential units and 2,033 square feet of ground floor retail.
- Building B - 18 residential units and 22,130 square feet of ground floor retail and restaurant uses, and an open space community plaza.

PREPARED FOR:

City of Calabasas
Planning Division
Department of Community Development
100 Civic Center Way
Calabasas, California 91302

PREPARED BY:

EcoTierra Consulting
633 W. 5th Street, 26th Floor
Los Angeles, California 90071

October 2023

TABLE OF CONTENTS

APPENDICES

LIST OF FIGURES

LIST OF TABLES

I. INTRODUCTION

A. INTRODUCTION

This document is an Addendum to the Final Program Environmental Impact Report (PEIR) for the 2030 General Plan Update that was certified by the Calabasas City Council on October 13, 2021. The City of Calabasas (City) prepared this Addendum to evaluate potential environmental effects associated with changes to the 2030 General Plan, and more specifically to address proposed changes to the stated uses on Site 11 as identified in the City's adopted 2021-29 Housing Element.

B. PURPOSE, INTENT, AND LEGAL AUTHORITY FOR ADDENDUM

This Addendum was prepared pursuant to CEQA Guidelines § 15164(a), which allows a lead agency to prepare an addendum to a previously certified EIR if some changes or additions to the previously certified EIR are necessary but none of the conditions described in CEQA Guidelines § 15162 requiring preparation of a subsequent EIR are present. CEQA Guidelines § 15162 states that no subsequent EIR shall be prepared unless one or more of the following occurs:

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

- 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, shows any of the following:

    - The project will have one or more significant effects not discussed in the previous EIR;

    - Significant effects previously examined will be substantially more severe than shown in the previous EIR;

    - 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;

    - 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 project proponents decline to adopt the mitigation measure or alternative.

Public Resources Code (PRC) § 21166 provides that unless one or more of the conditions set forth are met, no subsequent or supplemental environmental impact report is required.

The PEIR considered the development of 12 potential development sites for new housing projects within the City with a total of 1,305 dwelling units and 148,853 square feet of net new commercial space, including 202 units and 44,393 square feet of net new commercial space on the Site 11, which is currently developed with the Commons Shopping Center (the EIR Project.) This Addendum describes the proposed modifications to the EIR Project in connection with the proposed demolition of the existing 33,091 square-foot movie theater and the development of Site 11 with 24,163 square feet of ground-floor commercial space and up to 119 multi-family residential units, including 12 Low Income units (the Current Project). This Addendum provides a comparison of the potential environmental effects associated with those modifications to the impacts of for each of the environmental issue areas evaluated in the PEIR. The analysis demonstrates that the proposed modifications evaluated in the Addendum would not result in conditions meeting the criteria set forth in CEQA Guidelines § 15162. Therefore, pursuant to PRC § 21166 and CEQA Guidelines §§ 15162 and 15163, preparation of a subsequent or supplemental EIR is not required.

C. LEAD AGENCY

The *CEQA Guidelines* define lead, responsible and trustee agencies. The City of Calabasas is the lead agency for the EIR Project and the Current Project because it holds principal responsibility for approving the projects. There are no responsible or trustee agencies for this project.

D. ENVIRONMENTAL IMPACT REPORT BACKGROUND

The City of Calabasas distributed an Initial Study and Notice of Preparation (NOP) of the Calabasas General Plan Update PEIR for a 30-day agency and public review period starting on February 8, 2021 and ending on March 9, 2021. The Draft PEIR was released for a 45-day public review from July 30, 2021 to September 13, 2021. The Final PEIR was certified by the Calabasas City Council on October 13, 2021.

The PEIR fulfilled the requirements for a program EIR. Although the legally required contents of a program EIR are the same as those of a project EIR, program EIRs are typically more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a project EIR. As provided in Section 15168 of the CEQA Guidelines, a program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a program EIR provides the City (as Lead Agency) with the opportunity to consider broad policy alternatives and program-wide mitigation measures and provides the City with greater flexibility to address environmental issues and/or cumulative impacts on a comprehensive basis.

Agencies generally prepare program EIRs for programs or a series of related actions that are linked geographically; are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways. By its nature, a program EIR considers the “macro” effects associated with implementing a program (such as a general plan update or specific plan).

Once a program EIR has been prepared, subsequent activities in the program must be examined in the light of that program EIR to determine what, if any, additional CEQA documentation needs to be prepared. If the program EIR addresses the program’s effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the scope of the program EIR. Additional environmental documents may not be required (CEQA Guidelines Section 15168(c)). When a lead agency relies on a

program EIR for a subsequent activity, it must incorporate applicable mitigation measures and alternatives developed in the program EIR into the subsequent activities (CEQA Guidelines Section 15168(c)(3)). If a subsequent activity would have effects not identified in the program EIR, in other words, if a project is not exempt from environmental review per CEQA and the CEQA guidelines or other California law, then the lead agency must prepare additional CEQA documentation. In this case, the program EIR still serves a valuable purpose as the first-tier environmental analysis. The CEQA Guidelines (Section 15168(h)) encourage the use of program EIRs, citing five advantages:

1. Provision of a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR.
2. Focus on cumulative impacts that might be slighted in a case-by-case analysis.
3. Avoidance of continual reconsideration of recurring policy issues.
4. Consideration of broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them.
5. Reduction of paperwork by encouraging the reuse of data (through tiering).

The PEIR was prepared to analyze potentially significant environmental impacts associated with reasonably foreseeable development under the General Plan Update and addresses appropriate and feasible mitigation measures or project alternatives that would minimize or eliminate these impacts.

E. ADDENDUM SCOPE AND CONTENT

This Addendum evaluates whether the Current Project would result in new or substantially more severe significant environmental impacts compared to the impacts disclosed in the PEIR. For each issue, the analysis summarizes the conclusions of the PEIR and compares the impacts to the Current Project. The analysis then concludes whether the impacts of the Current Project are the same, higher, or lower than the EIR Project. From this conclusion, the analysis determines whether the Current Project would result in any effects that would meet the criteria set forth in CEQA Guidelines Section 15162. Similar to the PEIR, this Addendum evaluates the following topics:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials, and Wildfire
- Hydrology and Water Quality
- Land Use/Planning
- Noise
- Population and Housing
- Public Services, including Police and Fire Protection Services
- Transportation
- Utilities and Service Systems
- Wildfire

- Effects Found Not to be Significant (Agricultural and Forestry Resources, Energy, and Mineral Resources)

Evaluation of Alternatives

CEQA requires a comparative evaluation of a proposed project and alternatives to the project, including the "No Project" alternative. The PEIR addressed a reasonable range of alternatives for the EIR Project. There is no new information indicating that an alternative that was previously rejected as infeasible is, in fact, feasible, or that a considerably different alternative than those previously studied would substantially reduce one or more significant effects on the environment.

F. ADOPTION AND AVAILABILITY OF ADDENDUM

In accordance with CEQA Guidelines Section 15164(c), an addendum to an EIR need not be circulated for public review but can be included in or attached to the certified EIR and presented to the decision-making body. The decision-making body shall consider the addendum with the certified EIR prior to making a decision on the project (CEQA Guidelines Section 15164(d)).

Although public review is not required, this Addendum is available to the public at the City of Calabasas, Community Development Department, 100 Civic Center Way, Calabasas, California 91302 and will be made available as an Attachment to the Staff Report that will be provided when the Project is scheduled for consideration by the decision-making body.

II. PROJECT DESCRIPTION

A. PROJECT SUMMARY

Overview of Approved Project

The Certified PEIR analyzed the environmental effects of the General Plan Update that amended the City of Calabasas 2030 General Plan by replacing the then-current Housing Element with the 2021-2029 Housing Element and updating the Land Use Element of the General Plan to reflect the new Housing Element. The General Plan Update also included updates to the Circulation Element to incorporate the vehicle miles traveled (VMT) metric required under CEQA and modifications to the Safety Element to reflect recent changes to State law (California Government Code Section 65302(g)), including evacuation routes, climate change vulnerability assessment, measures to address vulnerabilities, and comprehensive hazard mitigation and emergency response strategy. The 2021-2029 Housing Element provides a plan for how the City will achieve its Regional Housing Needs Assessment (RHNA) allocation as required by State law (California Government Code 65584.04). The Housing Element identified 12 potential development sites for new housing projects within the City, including the 25-acre Site 11, which is located in the northern portion of the City of Calabasas and comprises six parcels. As described in the Certified PEIR, Site 11 is developed with the Commons Shopping Center and has a net residential unit potential of 202 units and the potential for 44,393 additional square feet of commercial space. See Figure II-1, Project Location Map.

Modifications to Approved Project

The Current Project for Site 11 proposes the demolition of southwestern portion of the Commons Shopping Center, which is developed with an existing 33,091 square-foot movie theater and 139 surface parking spaces, and the construction of two mixed-use buildings (Building A and Building B), including approximately 24,163 square feet of ground-floor commercial space and 119 multi-family residential units, incorporating at least 10 percent (or 12 dwelling units) set aside as Low Income. Building A would include 101 new residential dwelling units and 2,033 square feet of ground floor retail. Building B would include 18 new residential dwellings units and 22,130 square feet of ground floor retail and restaurant uses, along with a new open space community plaza (open to the public). A total of 270 parking spaces would be provided for the new residential uses; 225 parking spaces would be provided within Building A, and 45 parking spaces would be provided within Building B. Parking for existing Commons Shopping Center commercial land uses will remain and the proposed new commercial uses would be provided within the reconfigured surface parking lots. The Current Project would remove 139 existing commercial parking spaces and add 11 new commercial parking spaces, resulting in a net loss of 128 parking spaces and a future total supply of 931 parking spaces to be shared among the commercial land uses throughout

the Commons Shopping Center.[1] Additional site improvements include landscaping, grading, and restriping of the existing surface parking area. The Current Project would develop fewer residential units and less commercial square footage on Site 11 than the 201 residential units and 44,393 square feet of commercial space analyzed in the PEIR.

B. ENVIRONMENTAL SETTING FOR SITE 11

Project Location

Site 11 is located at 4719 Commons Way in the City of Calabasas (City) and is associated with Assessor Parcel Numbers 2068-003-021 (Project Site). The Current Project would be developed on an approximately 11.7 acres (510,484 square feet) portion of Site 11 (Current Project Site) comprising one parcel of land on the southwestern portion of the Commons Shopping Center (see Figure II-1, Project Location Map, and Figure II-2, Aerial View of Project Site).

Regional access to the Project Site is provided by the Ventura Freeway (US 101) located directly north. Local access to the Project Site is provided by Calabasas Road, Park Sorrento, Civic Center Way, and Park Granada. Along Park Granada, Metro Local (Line 161) provides local bus service, and the Los Angeles Department of Transportation (LADOT) Commuter Express (Line 423) provides bus service to Downtown Los Angeles.

Existing Conditions

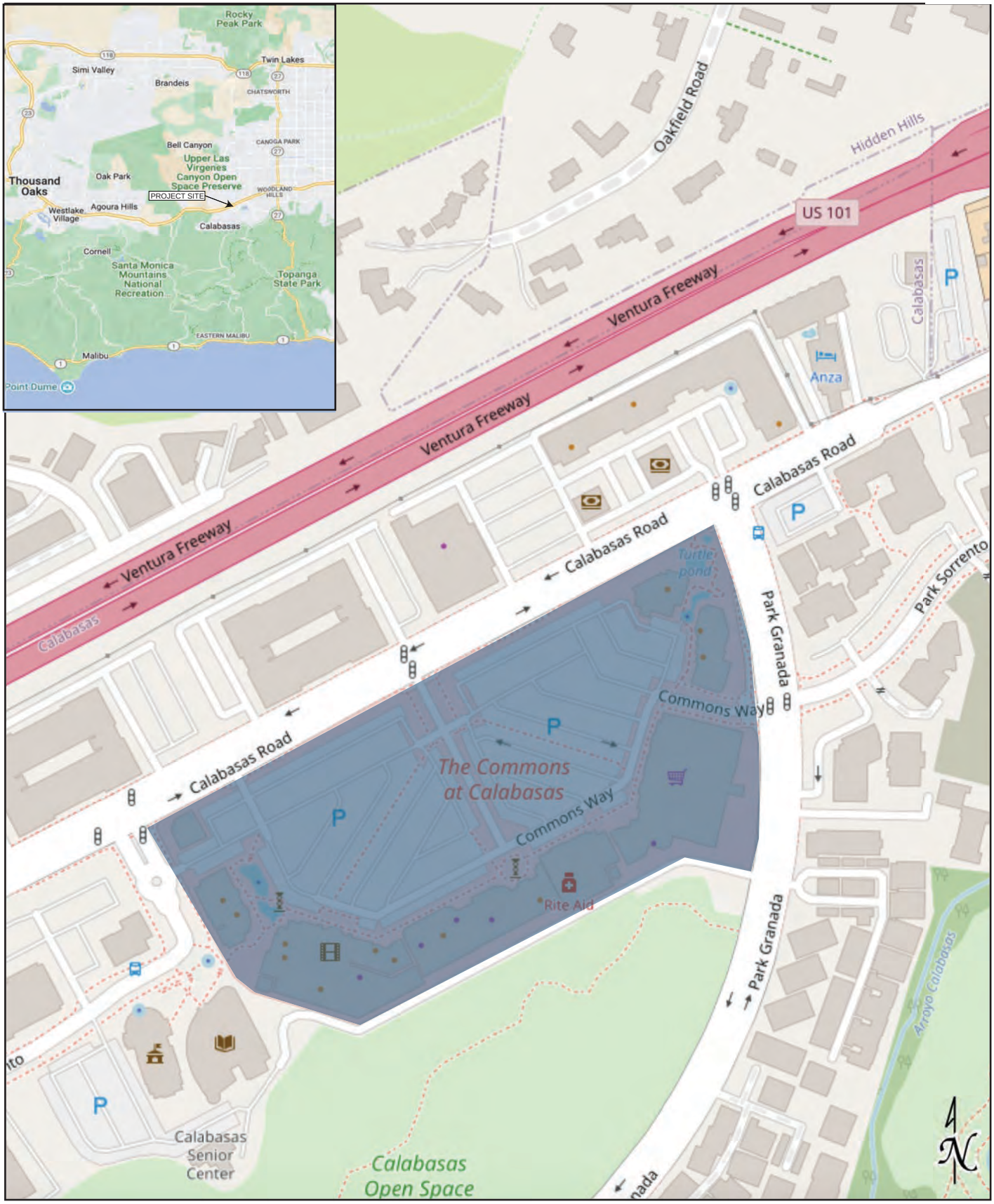
Site 11 is a 25-acre property consisting of six parcels and is developed with the Commons Shopping Center. The 220,000 square-foot shopping center includes a mix of high-end retail, dining, and entertainment uses, and includes surface parking and public spaces.[2] The Current Project Site is comprised of the southwestern portion of the Commons Shopping Center and is developed with an existing 33,091 square-foot movie theater, retail and restaurant land uses, and 139 surface parking spaces. The Project Site is accessed via two vehicular driveways on Calabasas Road, and separate driveways on Park Sorrento and Park Granada.

The Project Site has a General Plan Land use designation of MU 0.95 (Mixed Use, maximum FAR of 0.95). The Project Site is zoned CMU (Commercial, Mixed Use).

---

[1] *The 931 parking spaces would be shared by the commercial uses throughout the Commons Shopping Center and would exceed the maximum commercial land use parking demand of 896 occupied parking spaces. (KOA, Technical Memorandum, The Commons at Calabasas – Future Commercial Development Parking Assessment, April 25, 2023.)*

[2] *City of Calabasas 2030 General Plan, V-Revised 2021-2029 Housing Element, March 2022.*



Project Site

Source: OpenStreetMaps, October 2022.

Figure II-1
Project Location Map

Project Site

Source: GoogleEarth, March 2020.

Figure II-2
Aerial View of Project Site

Surrounding Land Uses

To the north of the Current Project Site, across Calabasas Road, is a two-story office use and associated parking. The eastern portion of the Commons Shopping Center is comprised of retail shops and associated parking and is adjacent to the Current Project Site to the east. To the south of the Current Project Site is a landscaped hillside and Park Granada, a roadway. West of the Current Project Site is Calabasas City Hall and Calabasas Library. Other uses in the Current Project area include hotel uses, office uses and other commercial retail stores, restaurants, and services.

C. PROJECT COMPONENTS

Current Project Overview

The Current Project proposes demolition of part of the southwestern portion of the Commons Shopping Center, which is developed with an existing 33,091 square foot-movie theater and 139 surface parking spaces, and the construction of two mixed-use buildings (Building A and Building B), including approximately 24,163 square feet of ground-floor commercial space and 119 multi-family residential units, incorporating at least 10 percent (or 12 dwelling units), set aside as Low Income Units. Building A would include 101 new residential dwelling units and 2,033 square feet of ground floor retail. Building B would include 18 new residential dwellings units and 22,130 square feet of new ground floor retail and restaurant uses, along with a new open space community plaza (open to the public). A total of 270 residential parking spaces would be provided for the new residential uses; 225 parking spaces would be provided within Building A and 45 parking spaces would be provided within Building B. In addition, a net of 931 parking spaces would be shared among the commercial land uses throughout the Commons Shopping Center.[3] Additional site improvements include landscaping, grading, and restriping of the existing surface parking area. Refer to Table II-1, Current Project Development Summary, for a tabular summary of the Current Project.

Table II-1
Current Project Development Summary

Land Use	Amount
Land Use to be Removed	
Movie Theater	33,091 sf
Land Uses to be Added	
Residential Units (du)	
Building A	
One-Bedroom	24
Two-Bedroom	67
Three-Bedroom	10
Subtotal Building A	*101 du*

[3] *The 931 parking spaces would be shared by the commercial uses throughout the Commons Shopping Center and would exceed the maximum commercial land use parking demand of 896 occupied parking spaces. (KOA, Technical Memorandum, The Commons at Calabasas – Future Commercial Development Parking Assessment, April 25, 2023.)*

Table II-1
Current Project Development Summary

Land Use	Amount
Building B	
One-Bedroom	6
Two-Bedroom	12
Subtotal Building B	*18 du*
Total Residential	**119 du**
Commercial (sf)	
Building A	
Commercial	2,033 sf
Subtotal Building A	*2,033 sf*
Building B	
Commercial	22,130 sf
Subtotal Building B	*22,130 sf*
Total Commercial	**24,163 sf**
New Residential Vehicle Parking Spaces	
Building A Residential	225
Building B Residential	45
Total New Residential Vehicle Parking Spaces	**270**
Commercial Vehicle Parking Spaces	
Existing	1,059
To Be Removed	139
New Spaces	11
Total Commercial Vehicle Parking Spaces	**931**
Bicycle Parking Spaces	
Building A	
Residential	112
Commercial	1
Subtotal Building A	*113*
Building B	
Residential	20
Commercial	4
Subtotal Building B	*24*
Total Bicycle Parking Spaces	**137**
Open Space (sf) (Provided to comply with CMC 17.12.130.B.5)	
Common Open Space	
Interior Common Open Space	600 sf
Exterior Common Open Space	11,895 sf
Subtotal Common Open Space	*12,495 sf*
Private Open Space	
Balconies	5,355 sf
Subtotal Private Open Space	*5,355 sf*
Total Open Space	**17,850 sf**

du = dwelling units; sf = square feet
Source: Steinberg Hart, April 2023.

Buildings A and B

Building A would comprise five stories of residential uses above three levels of parking, including one at grade, one above grade, and one subterranean, and an adjacent new commercial retail tenant space aligned with the existing commercial retail and restaurant spaces. A total of 225 new vehicle parking spaces would be provided. Building A would also provide 112 new bicycle parking spaces for residents, and one new bicycle parking space for the commercial uses, for a total of 113 new bicycle parking spaces. Building B would be comprised of a complex of four separated above-ground buildings (Buildings B-1 through B-4), two of which (Buildings B-2 and B-3) would include two stories of residential uses above one level of commercial uses, a third (Building B-4) that would include one story of residential uses over a commercial space, and a fourth (Building B-1) that would be developed as a one -story commercial space. Buildings B-2 through B-4 would be connected by and situated over one level of subterranean parking. A total of 45 new residential vehicle parking spaces would be provided in the subterranean parking structure. Building B would provide 20 new bicycle parking spaces for residents, and four new bicycle parking spaces for the commercial uses, for a total of 24 bicycle parking spaces for Building B.

The Current Project would provide approximately 17,850 square feet of community open space pursuant to Calabasas Municipal Code (CMC). The Current Project would provide an additional 21,794 square feet of community open space in addition to the 17,850 square feet of required community space. Building A would include a fitness room, residential work room, rooftop pool deck with a bocce court, rooftop seating areas, and private balconies. Building B would include fire pit, bocce court, event lawn, tenant only patio, and private balconies.

Building A proposes to reach a height of 85 feet, plus rooftop appurtenances, and Building B proposes to reach a height of 53 feet, plus rooftop appurtenances. The total floor area would be approximately 396,077 square feet, including 186,758 square feet of new residential floor area and 209,319 square feet of new and existing commercial floor area to remain. The resulting Floor Area Ratio (FAR) would be 0.47:1. The Current Project floor plans are shown in Figures II-3 through II-16.

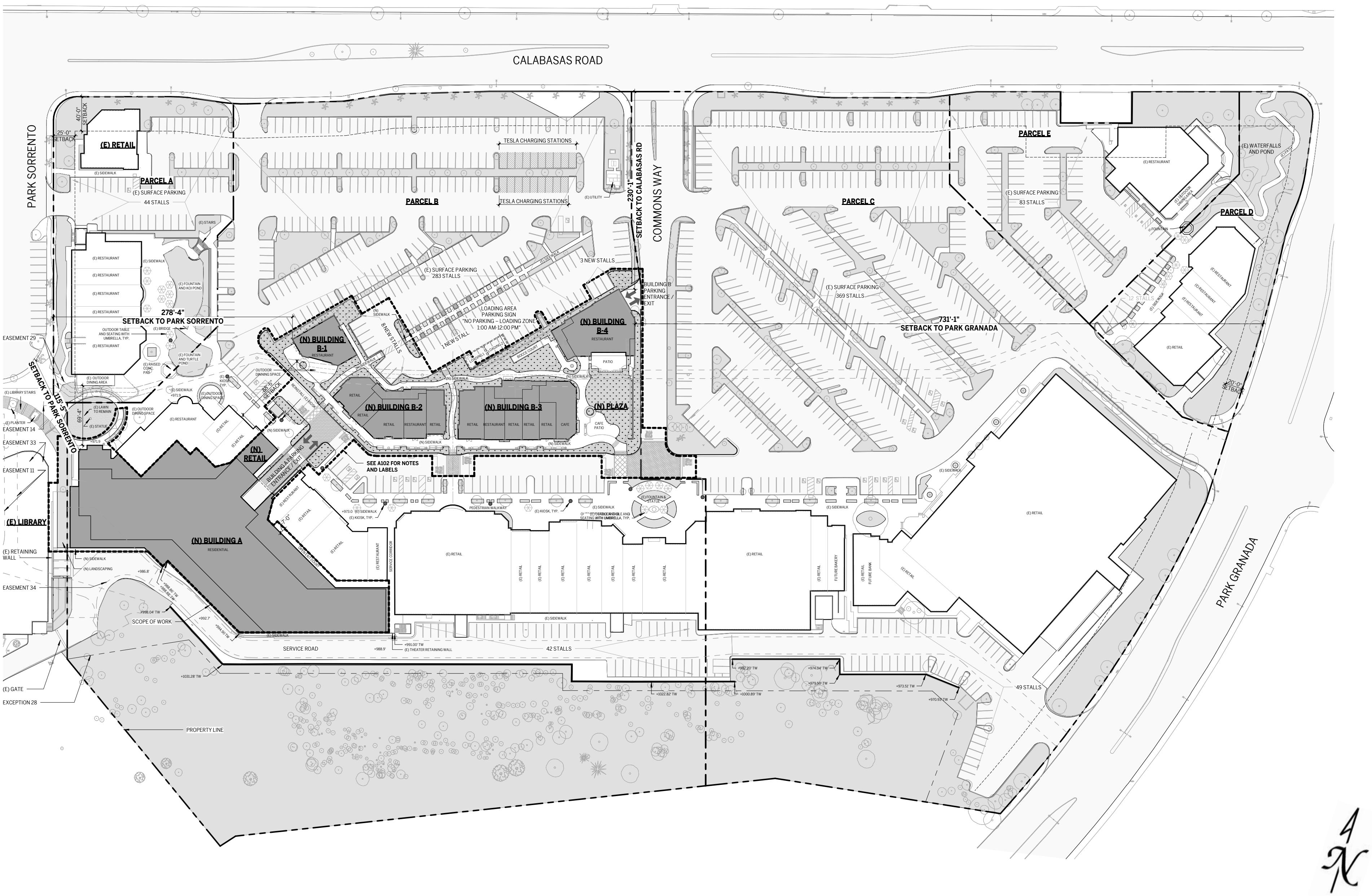
Design and Architecture

The Current Project design is intended to create a stronger “town center” environment accomplished through close attention to planning, scale, and architectural details. Building B was inspired by the desire to create more of a “main street” experience in The Commons and includes four distinct above-ground buildings separated to create an intimate village feel. Locating Building A across from the proposed Building B creates an active, pedestrian scale street, lined with shops and restaurants. A significantly sized open space plaza complements the new “village” area providing a distinct sense of place. This open space area may be programmed for temporary community events and used organically throughout the year.

Building A has been designed to complement the existing Commons buildings by introducing a contemporary aesthetic that incorporates soft earth tones typical of Calabasas and The Commons architecture, which allows the structure to blend into the surrounding topography. Landscaping along the façades also will help to conceal and soften edges, so the building further blends into the hillside to the south.

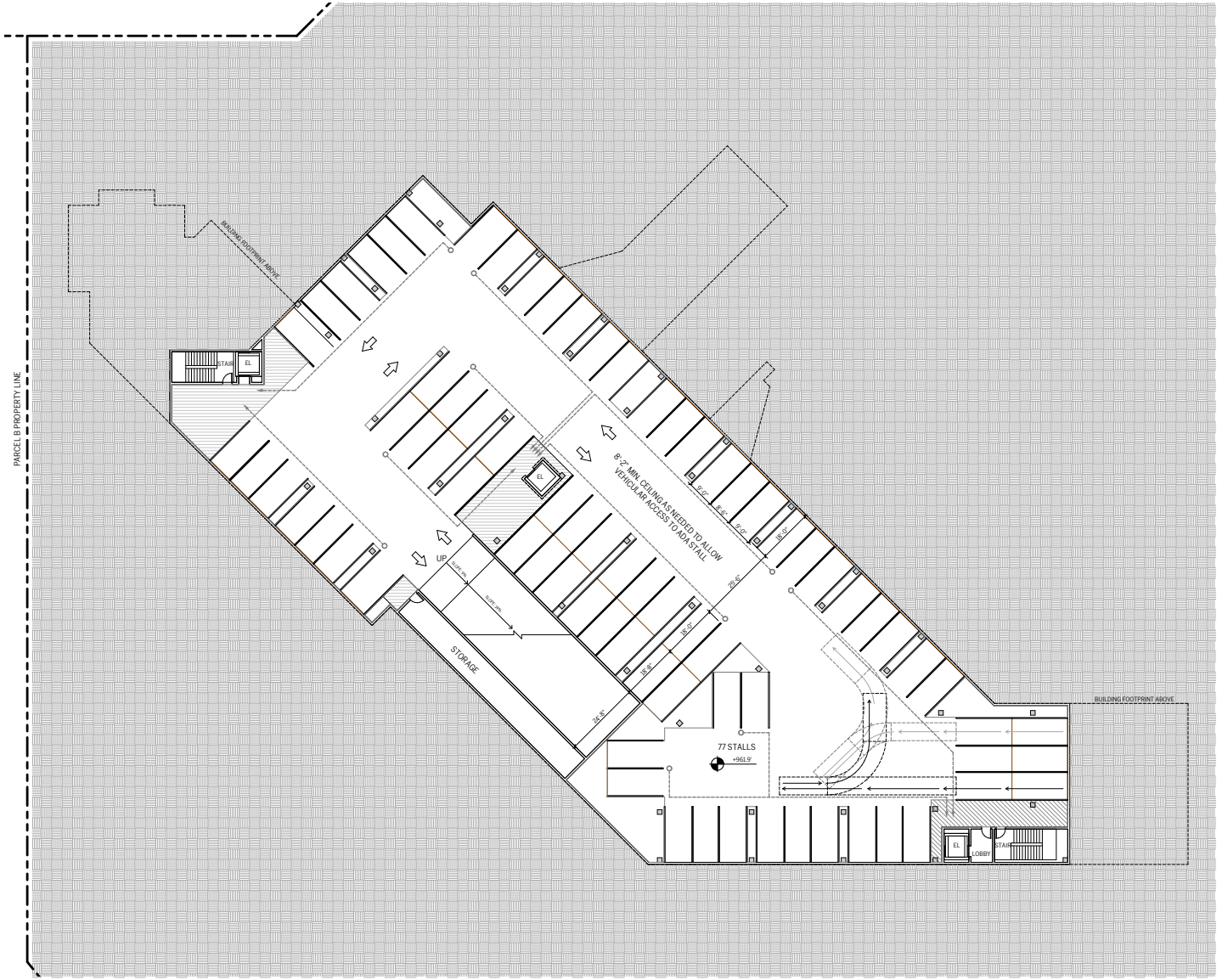
As noted, the upper residential levels of Building A are set back from the retail ground floor façade below so that the residential apartments will not be visible from the sidewalk near the retail spaces (new and existing). In addition to the building setback at the upper levels, the massing of Building A will be softened by incorporating landscaping, articulation, and step backs in the façade at the upper levels and penthouse. Deep balconies, shadow lines, and recessed windows will provide additional architectural details to increase articulation, visual interest, and necessary private open space. The color and materials palette will be similar to the existing architecture in The Commons. Parking will be located behind the existing and proposed retail stores, entirely within the existing theater footprint, and screened from public view. Additionally, the rooftop deck and mechanical screens will be coordinated and will include landscaping to blur the designations between resident-occupied and mechanical areas.

Whereas Building A has intentionally been designed with a distinct yet complementary contemporary architectural aesthetic, Building B has been designed to mirror The Commons existing architecture in terms of both materiality and style. Retail storefronts, doors, and patio furnishings will be influenced and customized by future tenants to add to the visual interest and authenticity while trees, paving, curbs, accessories, and lighting will match the existing pedestrian sidewalks. Additionally, Building B serves as a transitional zone as viewed from Calabasas Road, by terracing the height southwards to Building A in the rear portion of the Current Project Site.



Source: Steinberg Hart, August 2023.

Figure II-3
Overall Site Plan



PARKING SCHEDULE

LEVEL P2

ADA SPACES:	3
STANDARD SPACES:	63
TANDEM SPACES:	11
	77

LEVEL P1

ADA SPACES:	2
STANDARD SPACES:	58
TANDEM SPACES:	11
	71

LEVEL B1

ADA SPACES:	0
STANDARD SPACES:	66
TANDEM SPACES:	11
	77

GRAND TOTAL	225

PLAN LEGEND

- PROPERTY LINE
- BUILDING FOOTPRINT ABOVE
- UNEXCAVATED AREA
- ADA WALKWAY
- VEHICLE MANEUVERING CLEARANCE
- PEDESTRIAN PATH
- (E) EXISTING
- (N) NEW

Source: Steinberg Hart, August 2023.

Figure II-4
Building A-B1 Parking Level

PARKING SCHEDULE

LEVEL P2

ADA SPACES:	3
STANDARD SPACES:	63
TANDEM SPACES:	11
	77

LEVEL P1

ADA SPACES:	2
STANDARD SPACES:	58
TANDEM SPACES:	11
	71

LEVEL B1

ADA SPACES:	0
STANDARD SPACES:	66
TANDEM SPACES:	11
	77

GRAND TOTAL	225

PLAN LEGEND

- PROPERTY LINE
- BUILDING FOOTPRINT ABOVE
- UNEXCAVATED AREA
- ADA WALKWAY
- EXISTING BUILDING
- VEHICLE MANEUVERING CLEARANCE
- PEDESTRIAN PATH
- (E) EXISTING
- (N) NEW

Source: Steinberg Hart, August 2023.

Figure II-5
Building A-P1 Parking Level

PARKING SCHEDULE

LEVEL P2

ADA SPACES:	3
STANDARD SPACES:	63
TANDEM SPACES:	11
	77

LEVEL P1

ADA SPACES:	2
STANDARD SPACES:	58
TANDEM SPACES:	11
	71

LEVEL B1

ADA SPACES:	0
STANDARD SPACES:	66
TANDEM SPACES:	11
	77

GRAND TOTAL 225

PLAN LEGEND

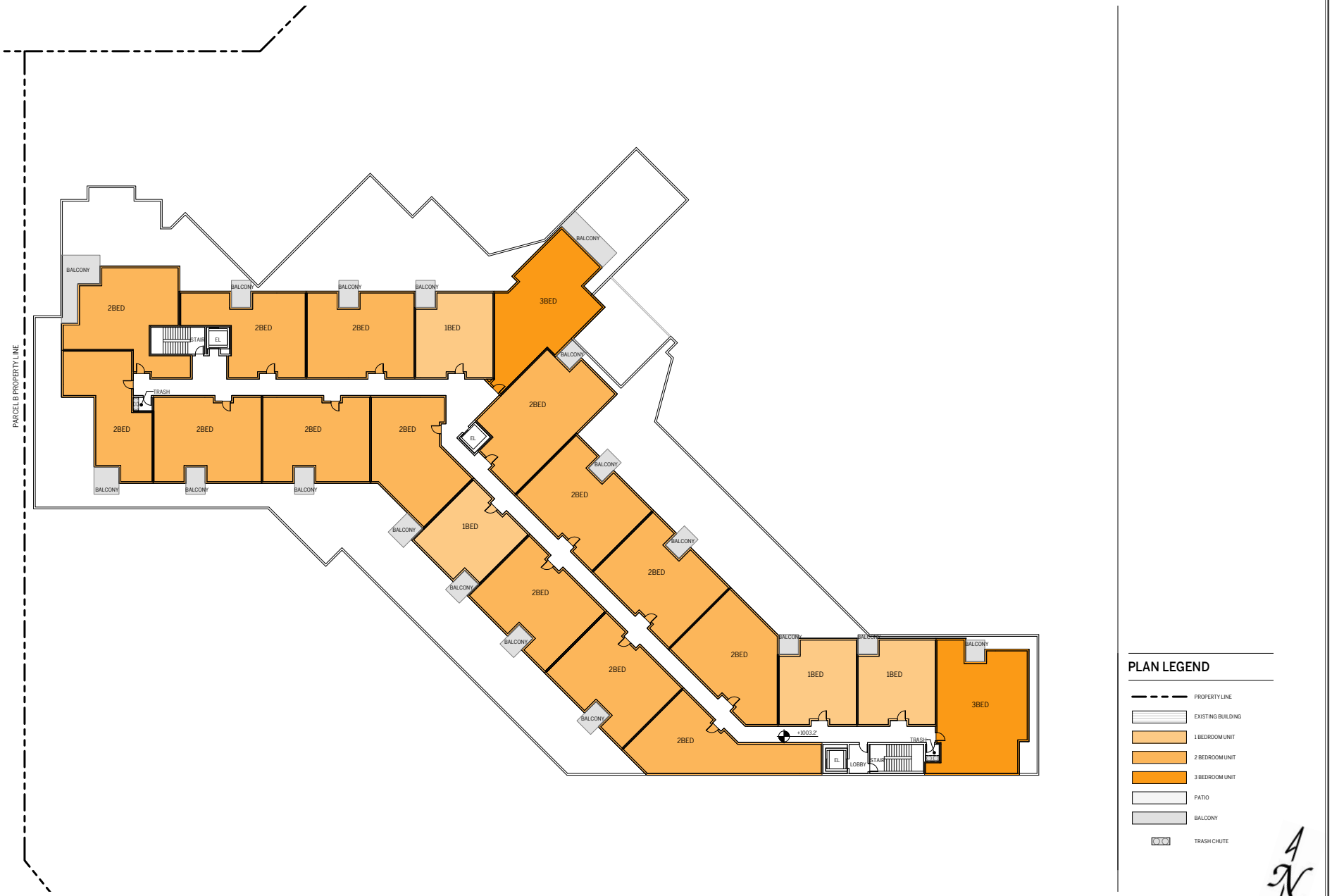
- PROPERTY LINE
- BUILDING FOOTPRINT ABOVE
- UNEXCAVATED AREA
- ADA WALKWAY
- EXISTING BUILDING
- VEHICLE MANEUVERING CLEARANCE
- PEDESTRIAN PATH
- (E) EXISTING
- (N) NEW

Source: Steinberg Hart, August 2023.

Figure II-6
Building A-P2 Parking Level

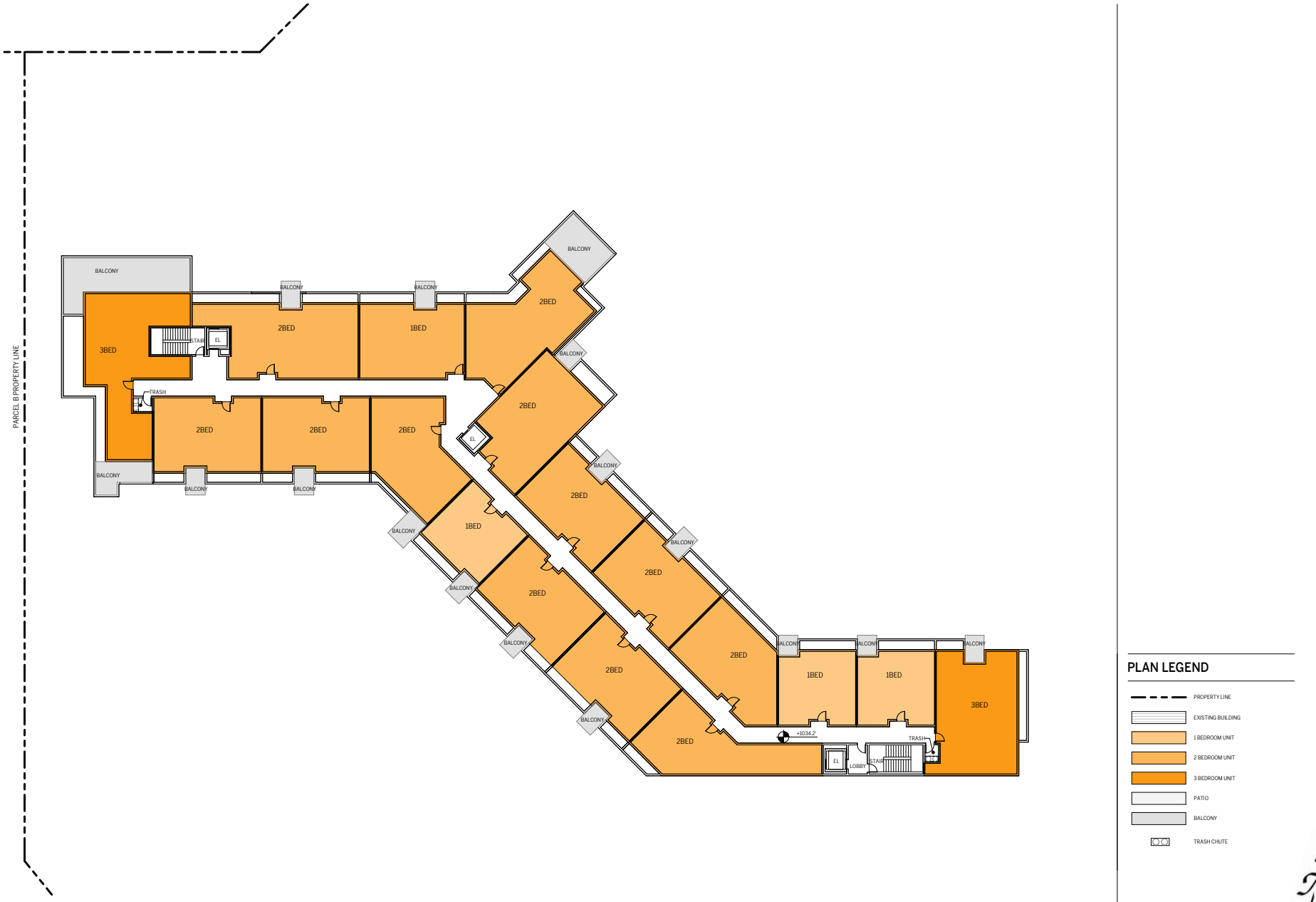
Source: Steinberg Hart, August 2023.

Figure II-7
Building A-R1 Residential Level



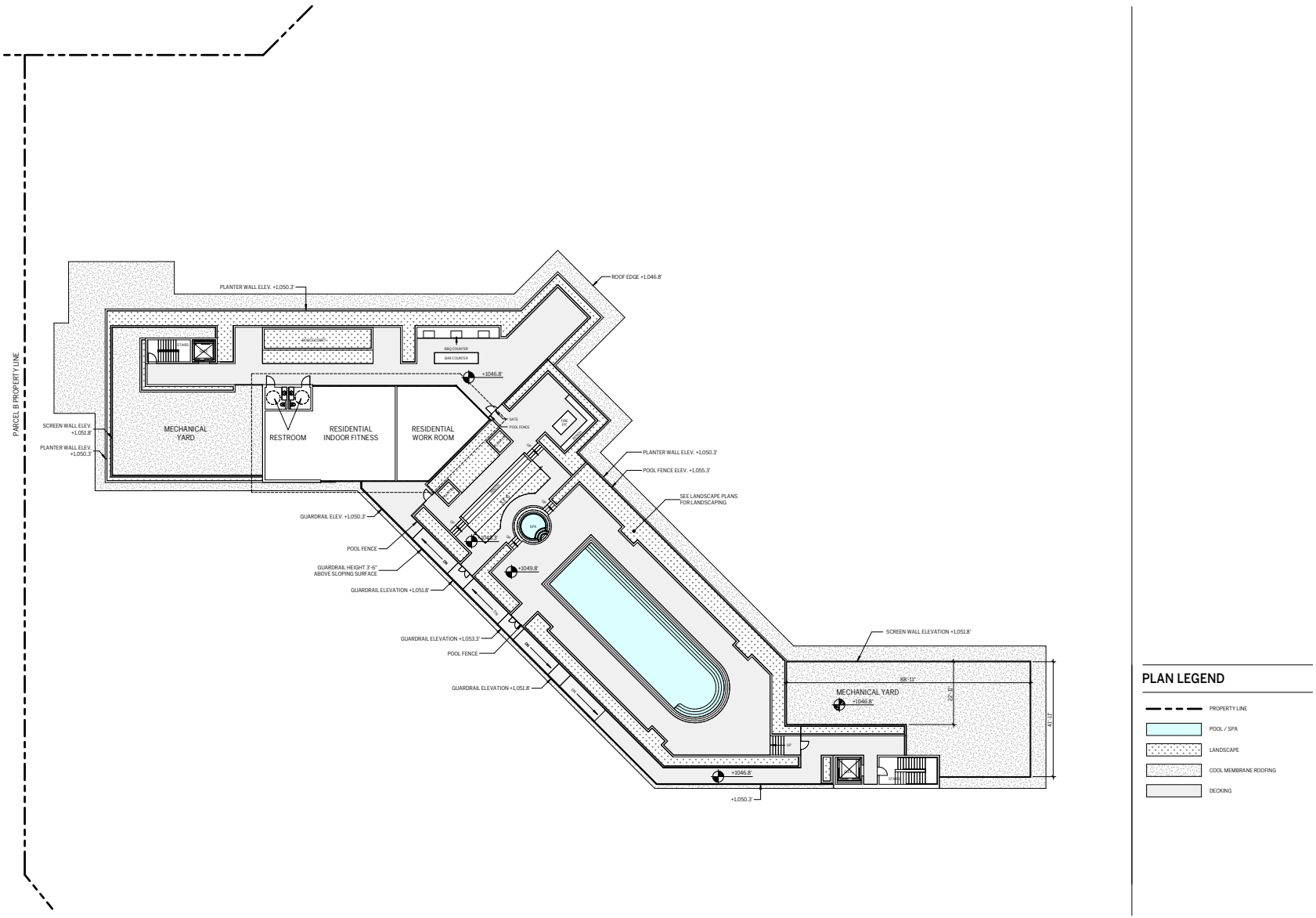
Source: Steinberg Hart, August 2023.

Figure II-8
Building A-R2-R4 Residential Levels



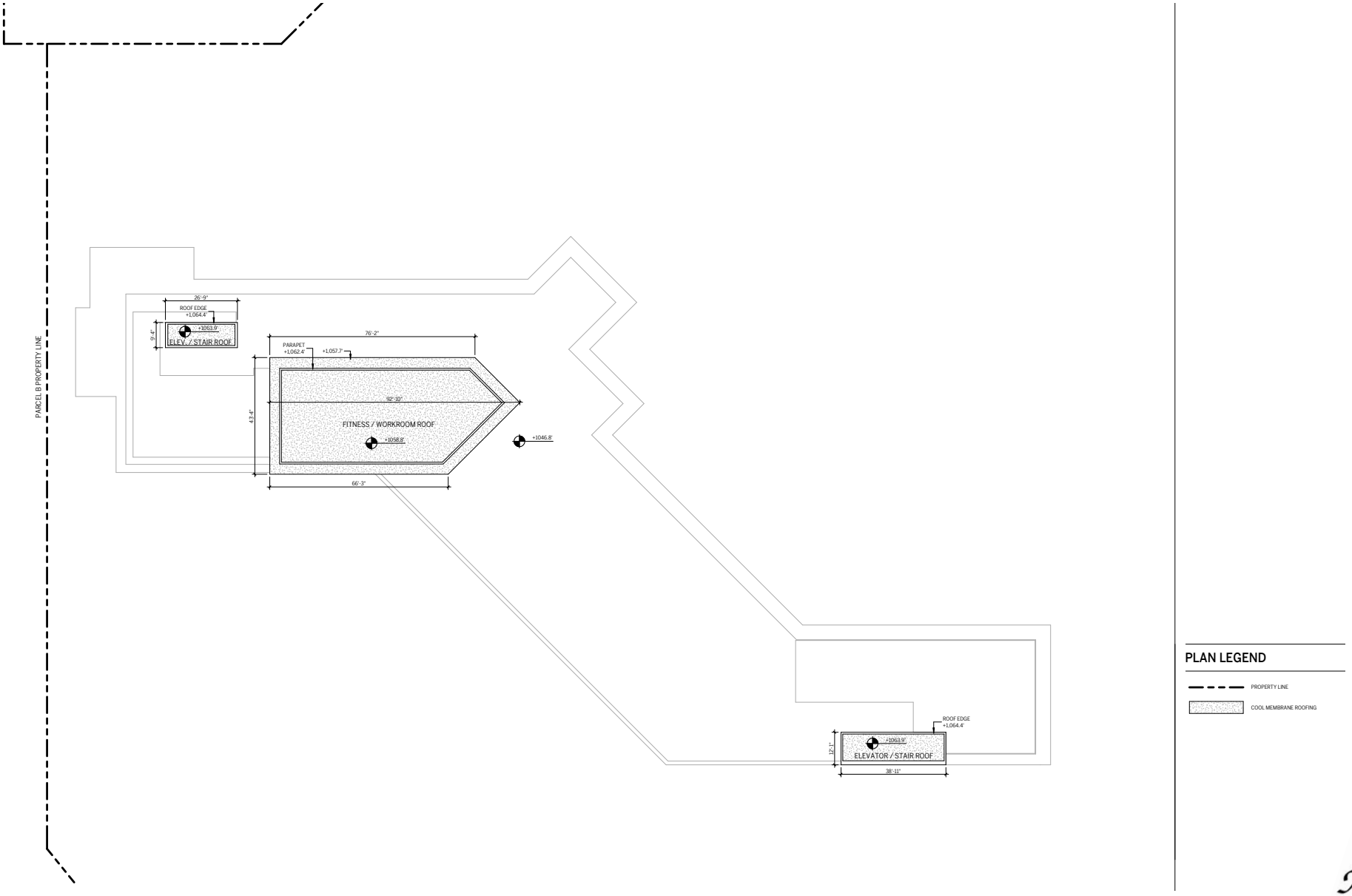
Source: Steinberg Hart, August 2023.

Figure II-9
Building A-R5 Residential Level



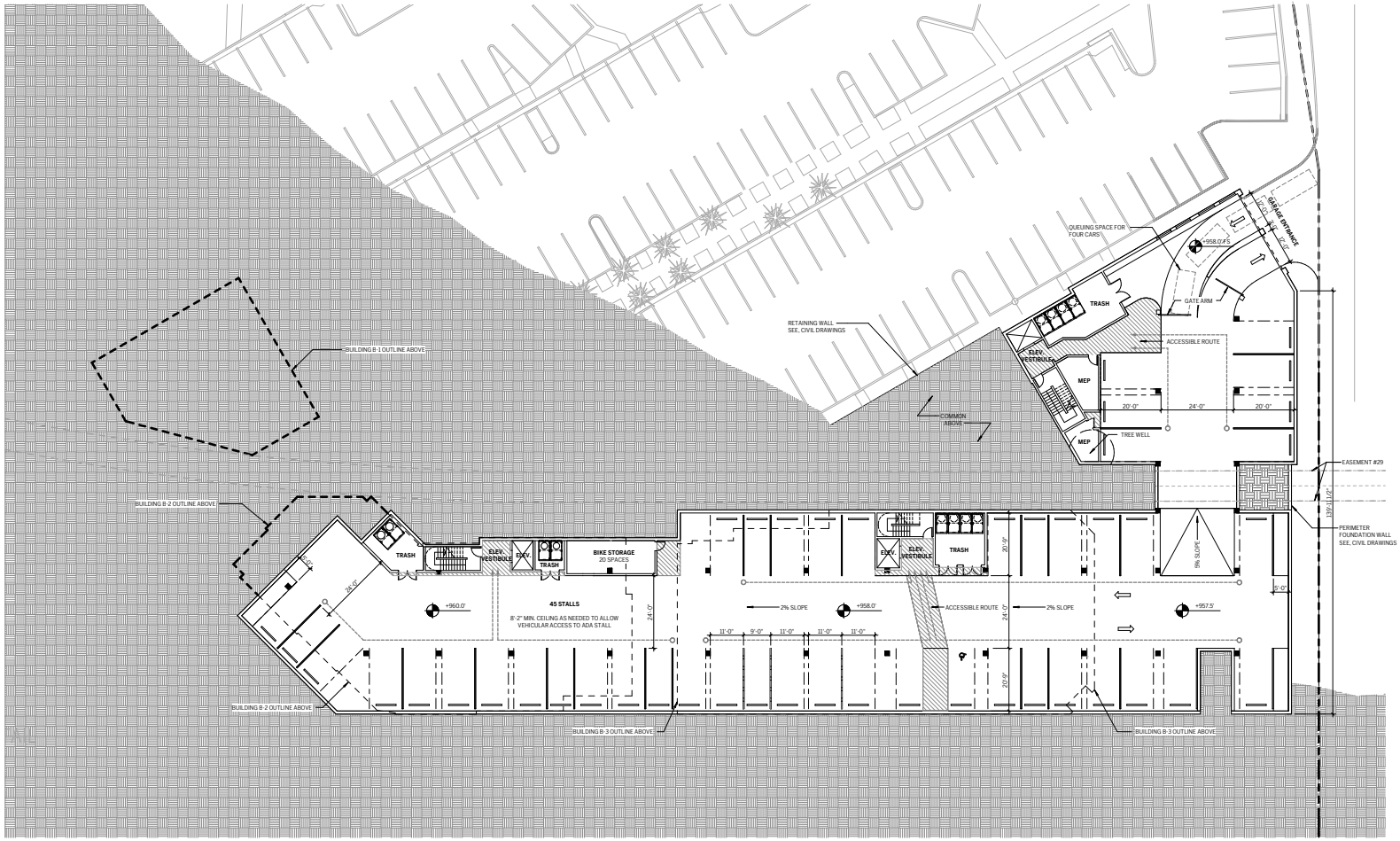
Source: Steinberg Hart, August 2023.

Figure II-10
Building A-Roof Deck



Source: Steinberg Hart, August 2023.

Figure II-11
Building A-Roof



PARKING SCHEDULE

LEVEL B1

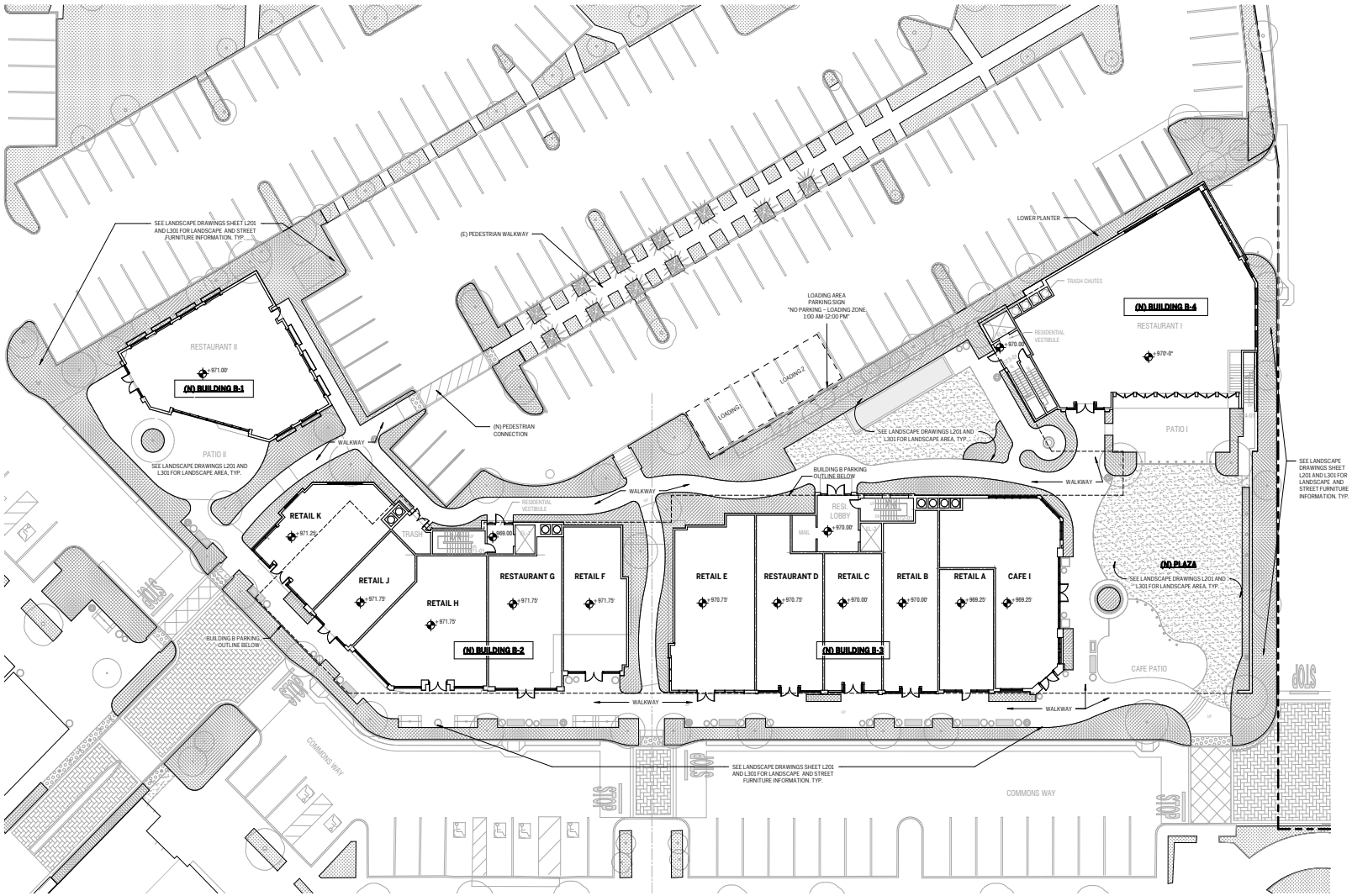
ADA SPACES:	1
STANDARD SPACES:	44
	45
GRAND TOTAL	45

PLAN LEGEND

- PROPERTY LINE
- BUILDING FOOTPRINT ABOVE
- UNEXCAVATED AREA
- ADA WALKWAY
- VEHICLE MANEUVERING CLEARANCE
- PEDESTRIAN PATH
- (E) EXISTING
- (N) NEW
- WASTE CHUTE

Source: Steinberg Hart, August 2023.

Figure II-12
Building B-B1 Parking Level



GEN

1.

2.

3.

PARKING SCHEDULE

LEVEL B1

ADA SPACES:	1
STANDARD SPACES:	44
	45
GRAND TOTAL	45

PLAN LEGEND

- PROPERTY LINE
- BUILDING FOOTPRINT ABOVE
- UNEXCAVATED AREA
- ADA WALKWAY
- VEHICLE MANEUVERING CLEARANCE
- TREE
- WASTE CHUTE
- (E) EXISTING
- (N) NEW

Source: Steinberg Hart, August 2023.

Figure II-13
Building B-Level 1

PLAN LEGEND

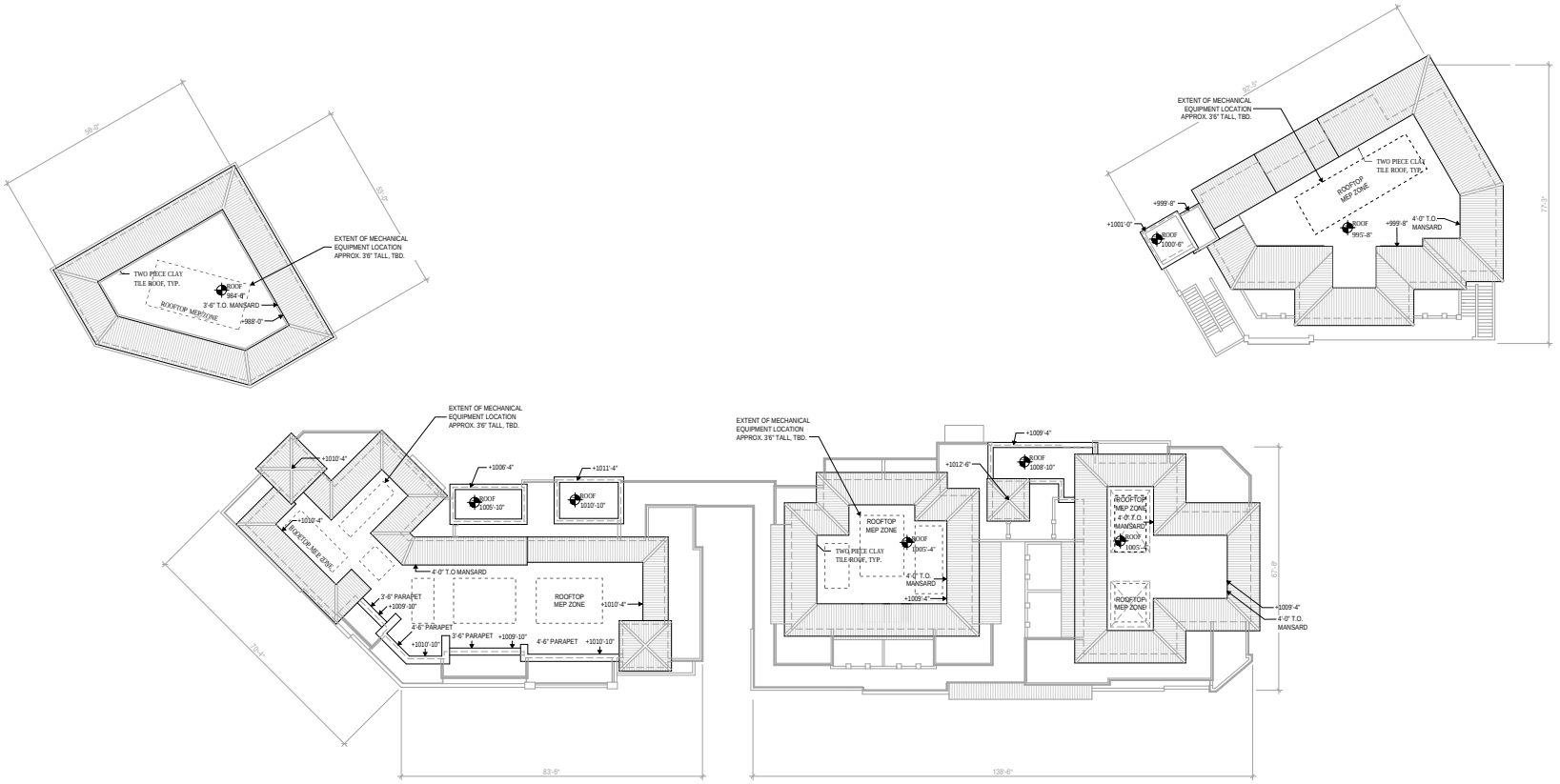
- PROPERTY LINE
- TILED ROOF
- 1 BEDROOM UNIT
- 2 BEDROOM UNIT
- 3 BEDROOM UNIT
- PATIO
- BALCONY
- (E) EXISTING
- (N) NEW
- WASTE CHUTE

Source: Steinberg Hart, August 2023.

Figure II-14
Building B-Level 2

Source: Steinberg Hart, August 2023.

Figure II-15
Building B-Level 3



PLAN LEGEND

ROOFTOP MEP ZONE

Source: Steinberg Hart, August 2023.

Figure II-16
Building B-Roof

The current project's use of different textures, colors, setbacks, materials, and distinctive architectural treatments is designed to create visual interest, avoid repetitive facades, and break up the buildings' mass. See Figures II-17 through II-26 for the Current Project's elevations and sections.

Access, Circulation, and Parking

Building A pedestrians would access the ground floor commercial space from the existing shopping center walkway and residential units from a lobby area on the west side of the building. Vehicular access to Building A would be provided via a two-way driveway from the existing shopping center parking lot. All residential automobile parking would be provided within the parking garage. Per State Density Law (Government Code Section 65915) and CMC (Chapter 17.26.040.B.2) requirements, Building A is required to provide a minimum 140 vehicular parking spaces for the residential units. Building A proposes to provide 225 total parking spaces for the residential units, which far exceeds the legal minimum.

Parking for Buildings A and B's new commercial areas would be provided within the existing Commons Shopping Center surface parking area, which currently has 1,059 surface parking spaces and would be shared[4] with existing commercial uses. It is estimated that 896 parking spaces would be required to meet the peak parking demand for the new and existing commercial uses with the entire Commons Shopping Center.[5] This shared parking demand peak accounts for the expected travel modes and carpooling, captive parking demands associated with both the commercial and residential components, and the temporal/user-related parking demand variations associated with each individual commercial land-use component. The Current Project would remove 139 of the existing surface parking spaces. However, additional site improvements, including landscaping, grading, and restriping of the existing surface parking area would recapture 11 surface parking spaces, for a net new total of 931 commercial parking spaces for Commons Shopping Center.[6]

Consistent with the CMC (17.28.040 Table 3-11), Building A would provide 112 bicycle parking spaces for residents, and one bicycle parking space for the commercial uses, for a total of 113 bicycle parking spaces for Building A. Bicycle parking would be provided interior to the building on the 1st and 2nd floor parking levels. Building B would provide 20 bicycle parking spaces for residents, and four bicycle parking spaces for the commercial uses, for a total of 24 bicycle parking spaces for Building B. Bicycle parking would be provided interior to the building on the 1st floor parking level.

Lighting and Signage

New signage would be used for building identification, wayfinding, and security. Exterior lights would be wall- or ground-mounted and shielded away from adjacent properties. Building security lighting would be

---

[4] *As part of the Current Project, pursuant to Development Code Section 17.28.050.B, a Shared Parking approval for the existing and proposed commercial uses would be requested.*

[5] *Steinberg Hart, April 2023.*

[6] *KOA, Technical Memorandum, The Commons at Calabasas – Future Commercial Development Parking Assessment, April 25, 2023.*

used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties.

Site Operation and Security

Given the residential uses on the Current Project Site, the Current Project would operate 24 hours a day, seven days a week. On-site residential amenities, as described above, would be available only to residents and their guests and would not be open to the public. The hours of ground floor commercial space would depend on the commercial tenants' use and services. The Current Project would provide security features including, but not limited to, controlled access to residential areas and video surveillance.

Sustainability Features

The Current Project would be compliant with the current California Energy Code/Title 24 requirements, the California Green Building Standards Code (CALGreen), and CMC Chapter 17.34. CMC Chapter 17.34 requires that new non-residential structures greater than 5,000 square feet achieve the equivalent of a LEED silver rating. The proposed landscaping plan provides a mix of ground cover and trees to complement the architecture. Plant material has been selected for temperature hardiness and low water requirements. Overall water consumption would be minimized with the inclusion of water efficient appliances and fixtures throughout the development. The Current Project landscape plans are shown in Figures II-24 through II-27**.**

As also required by the City Building Code, the proposed buildings would provide space to accommodate future rooftop solar panels and conduit for on-site electric automobile charging stalls, which would be provided in the parking garage.

Anticipated Construction Schedule

The Current Project would be constructed over approximately 24 months; however, construction would be managed so as to minimize disruption to existing operations. Construction activities would include the demolition of the existing structures and pavement, grading, and building construction. Demolition activities are anticipated to start in the first quarter of 2025, and construction completion and occupancy is anticipated in the fourth quarter of 2026. The anticipated haul route would be an inbound route from Ventura Freeway (US-101) south on Parkway Calabasas and then east on Calabasas Road and an outbound route going west on Calabasas Road, and then north Parkway Calabasas to access Ventura Freeway (US-101) (either southbound or northbound, depending on the final destination).

Source: Steinberg Hart, August 2023.

Figure II-17
Building A-North-West, East, and South Exterior Elevations

1 North-East Elevation
1" = 20'-0"

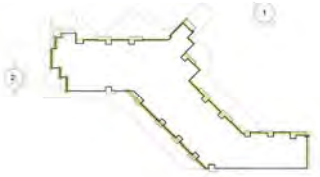
2 West Elevation
1" = 20'-0"

NOTE

1. A WAIVER OF THE DEVELOPMENT STANDARDS IS REQUESTED IN ORDER TO PERMIT MAXIMUM 85' HEIGHT FOR BUILDING A
2. PER CALABASAS MUNICIPAL CODE 17.20.140 MAXIMUM ALLOWABLE HEIGHT SHALL BE MEASURED AS THE VERTICAL DISTANCE FROM THE NATURAL OR FINISHED GRADE, WHICHEVER IS LOWER. FOR OUR PROJECT, THE LOWER GRADE IS THE GRADE AT THE EXISTING THEATER ON THE NORTH SIDE OF BUILDING A AND THE HIGHER GRADE AT THE SERVICE ROAD BEHIND THE BUILDING, ON THE SOUTH SIDE. TO AN IMAGINARY PLANE 85 FEET ABOVE AND PARALLEL TO THE NATURAL OR FINISHED GRADE.

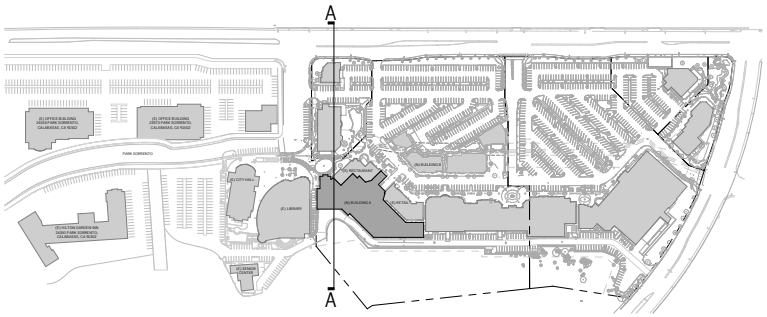
MATERIAL LEGEND

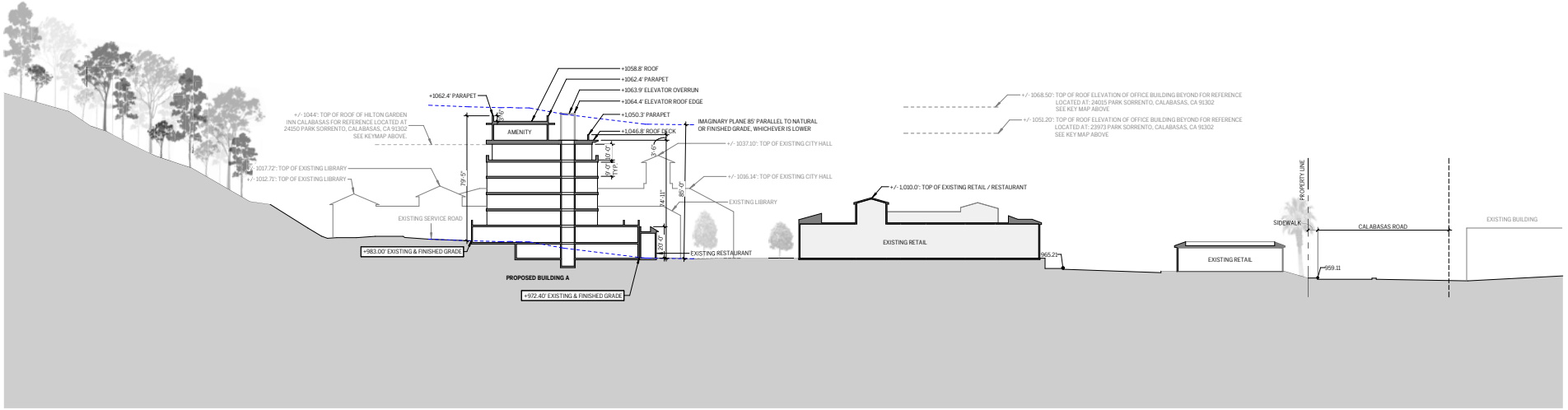
[1]	SMOOTH PLASTER COLOR 1	[6]	WINDOW GLAZING - TYPICAL
[2]	SMOOTH PLASTER COLOR 2	[7]	WINDOW GLAZING - SPANDREL
[3]	WINDOW FRAMES	[8]	GLASS RAILING - TYP 1
[4]	MAIN ROOF CANOPY	[9]	GLASS RAILING - TYP 2
[5]	LIMESTONE CLADDING	[10]	CABLE RAIL



Source: Steinberg Hart, August 2023.

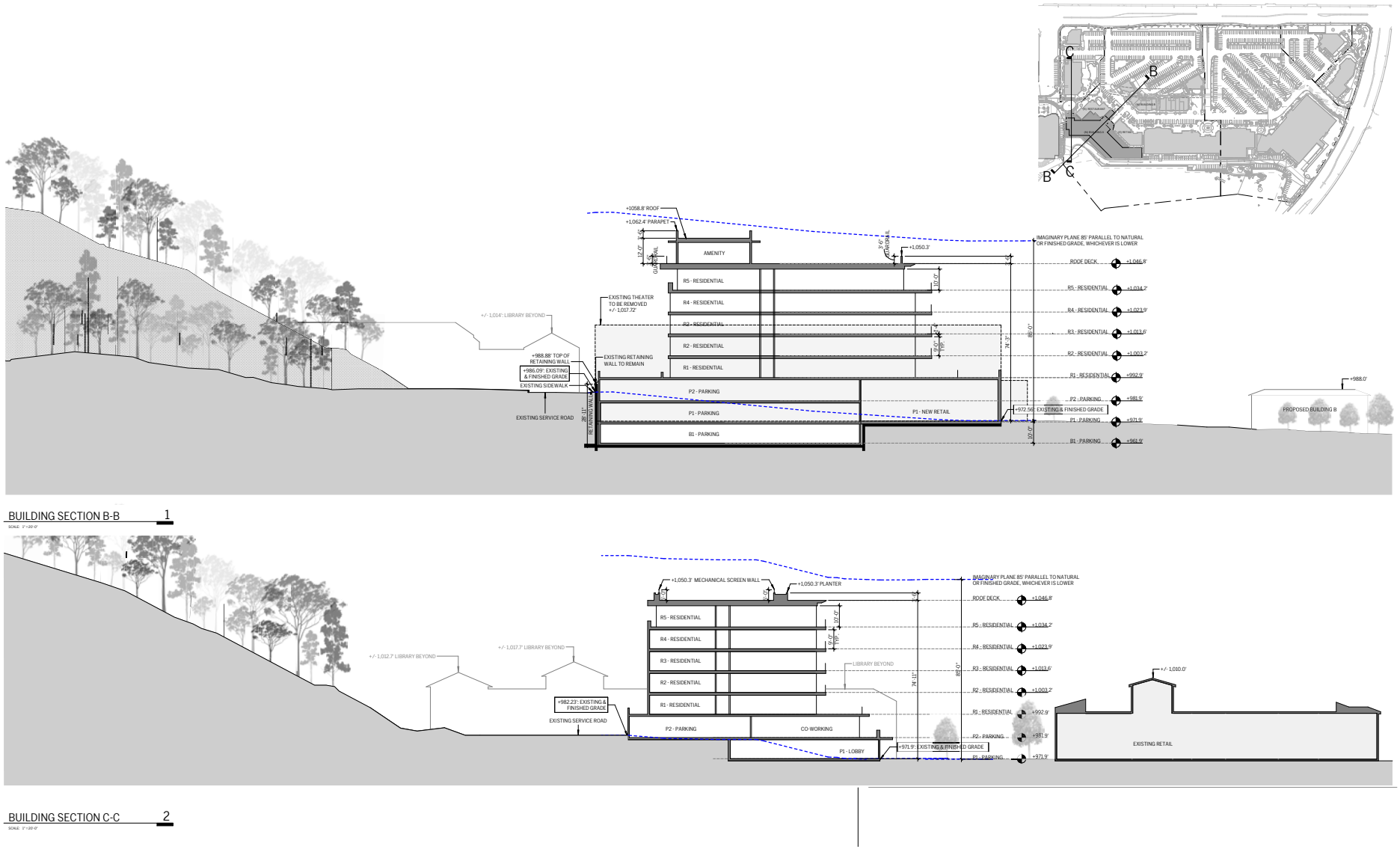
Figure II-18
Building A-North-East and West Exterior Elevations





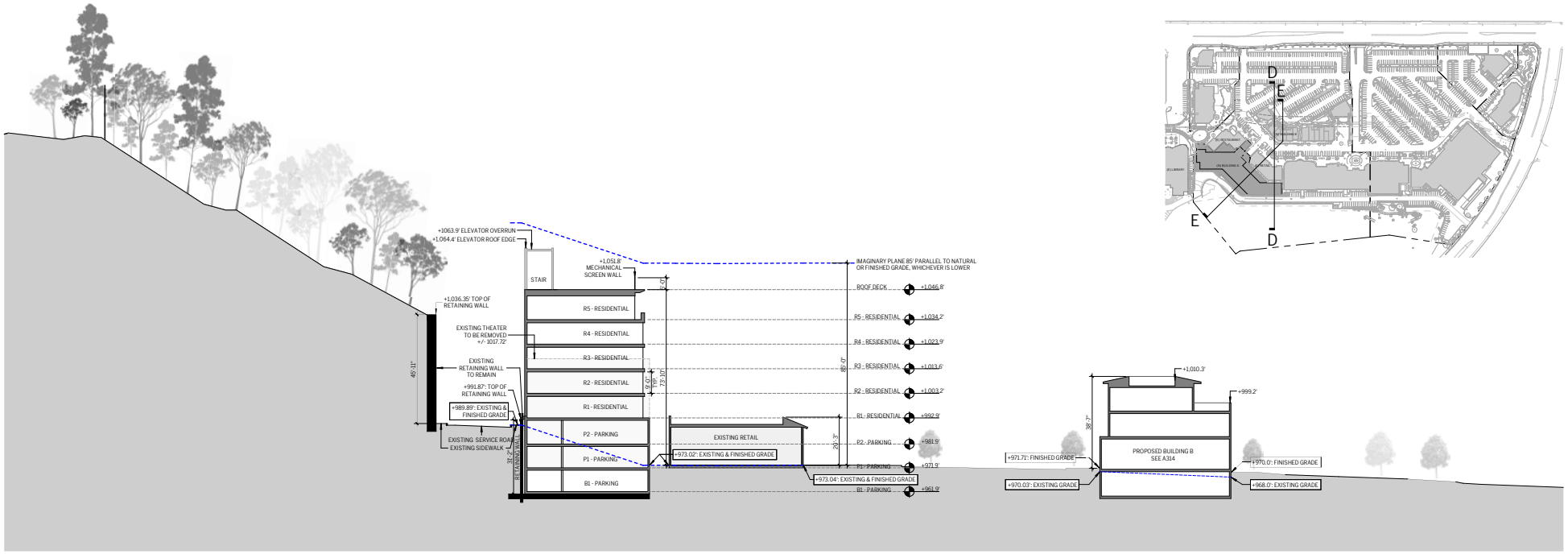
Source: Steinberg Hart, August 2023.

Figure II-19
Building A-Building Sections

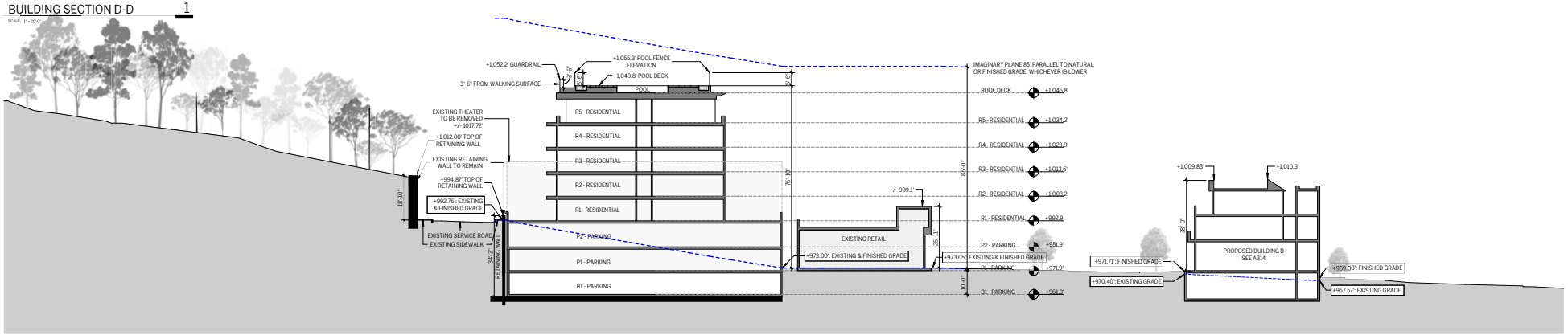


Source: Steinberg Hart, August 2023.

Figure II-20
Building A-Building Sections



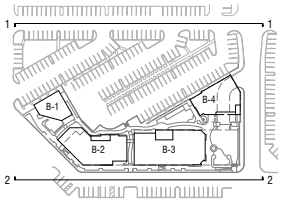
BUILDING SECTION D-D 1



BUILDING SECTION E_E 2

Source: Steinberg Hart, August 2023.

Figure II-21
Building A-Building Sections

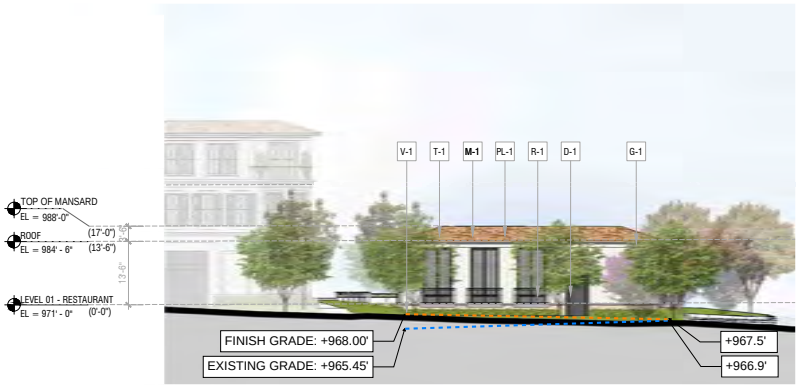


2 **Building B Overall South Elevation**
SCALE: 1/16" = 1'-0"

1 **Building B Overall North Elevation**
SCALE: 1/16" = 1'-0"

Source: Steinberg Hart, August 2023.

Figure II-22
Building B-South and North Exterior Elevations

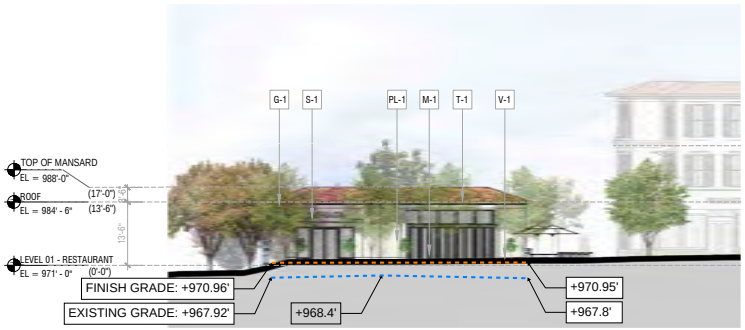


3 **Building B-1 North-East Elevation**

SCALE: 1/16"=1'-0"

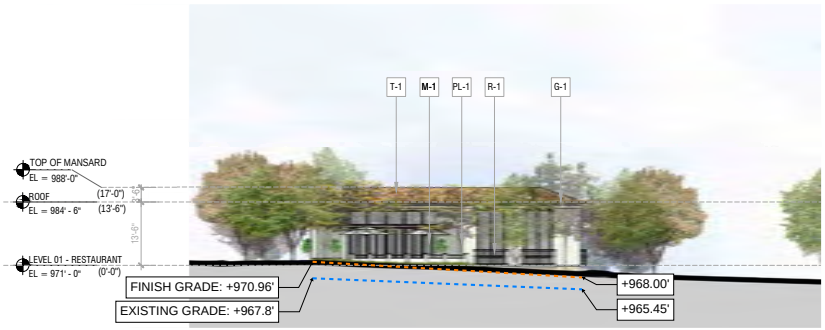
4 **Building B-1 North-West Elevation**

SCALE: 1/16"=1'-0"



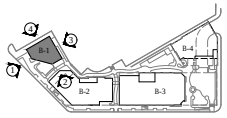
1 **Building B-1 South-West Elevation**

SCALE: 1/16"=1'-0"



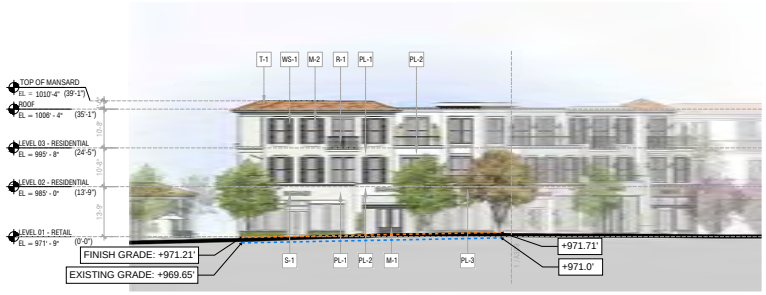
2 **Building B-1 South-East Elevation**

SCALE: 1/16"=1'-0"



Source: Steinberg Hart, August 2023.

Figure II-23
Building B-Building Elevations



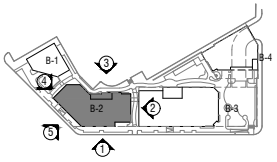
5 **Building B-2 South-West Elevation**
SCALE: 1/16"=1'-0"

3 **Building B-2 North Elevation**
SCALE: 1/16"=1'-0"

4 **Building B-2 North-West Elevation**
SCALE: 1/16"=1'-0"

1 **Building B-2 South Elevation**
SCALE: 1/16"=1'-0"

2 **Building B-2 East Elevation**
SCALE: 1/16"=1'-0"



Source: Steinberg Hart, August 2023.

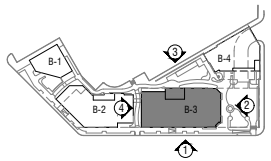
Figure II-24
Building B-Building Elevations

3 **Building B-3 North Elevation**
SCALE: 1/16"=1'-0"

4 **Building B-3 West Elevation**
SCALE: 1/16"=1'-0"

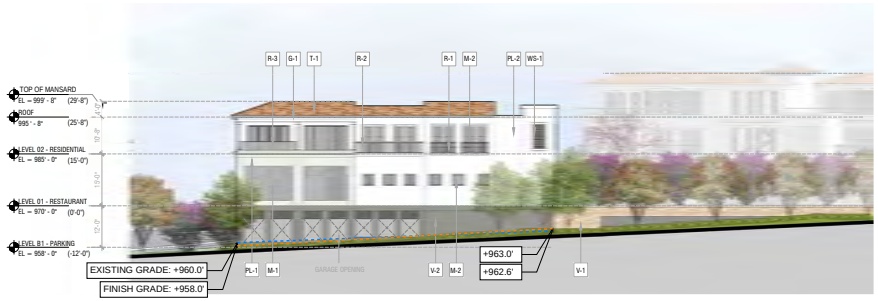
1 **Building B-3 South Elevation**
SCALE: 1/16"=1'-0"

2 **Building B-3 East Elevation**
SCALE: 1/16"=1'-0"

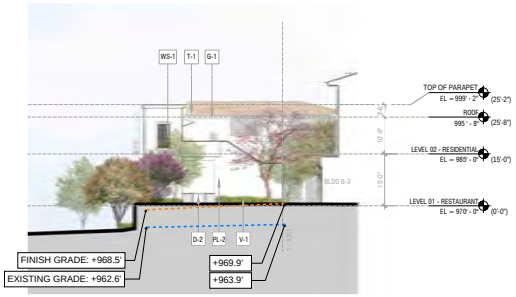


Source: Steinberg Hart, August 2023.

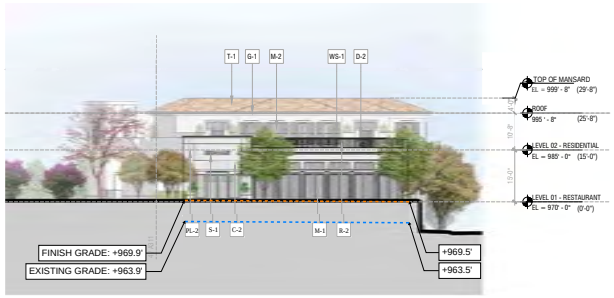
Figure II-25
Building B-Building Elevations



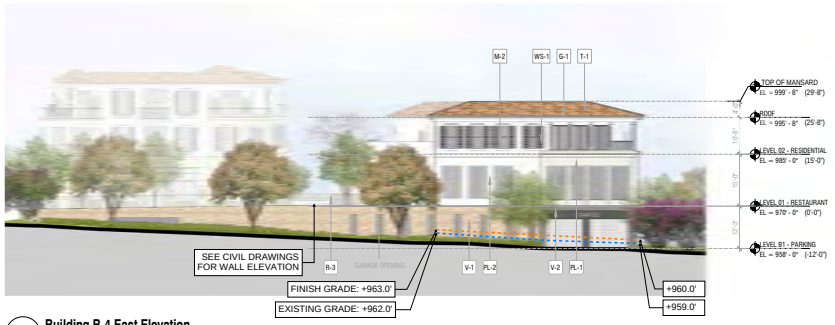
3 **Building B-4 North-West Elevation**
SCALE: 1/16"=1'-0"



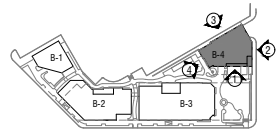
4 **Building B-4 West Elevation**
SCALE: 1/16"=1'-0"



1 **Building B-4 South Elevation**
SCALE: 1/16"=1'-0"

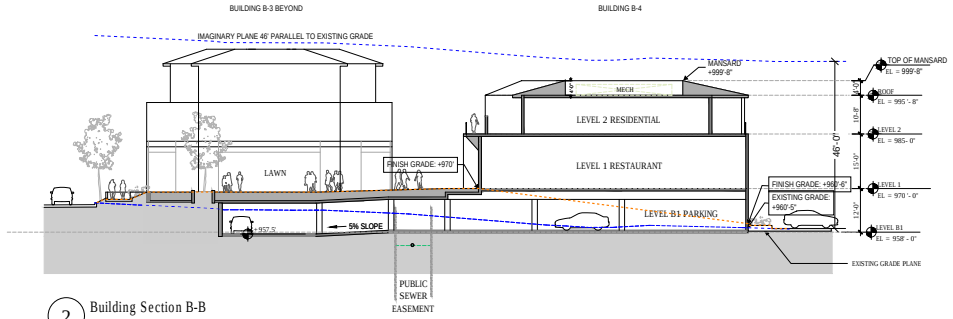


2 **Building B-4 East Elevation**
SCALE: 1/16"=1'-0"



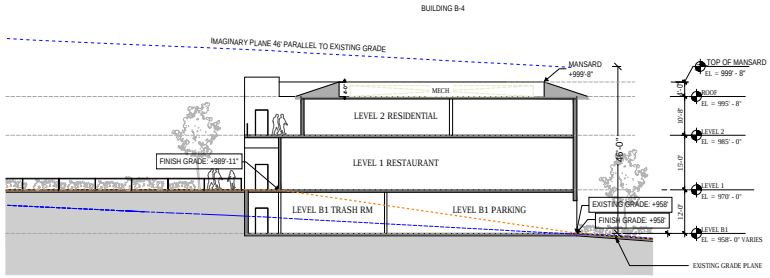
Source: Steinberg Hart, August 2023.

Figure II-26
Building B-Building Elevations



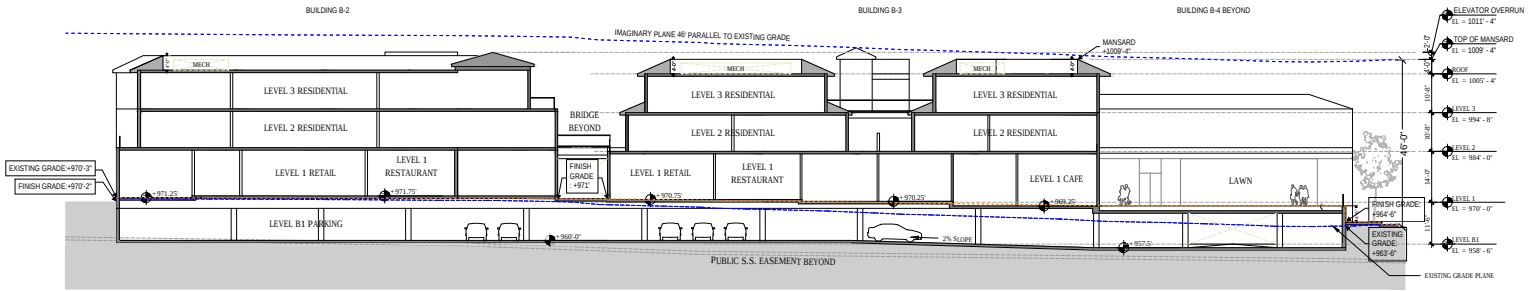
2 Building Section B-B

SCALE: 1/16" = 1'-0"



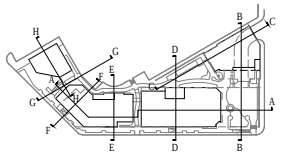
3 Building Section C-C

SCALE: 1/16" = 1'-0"



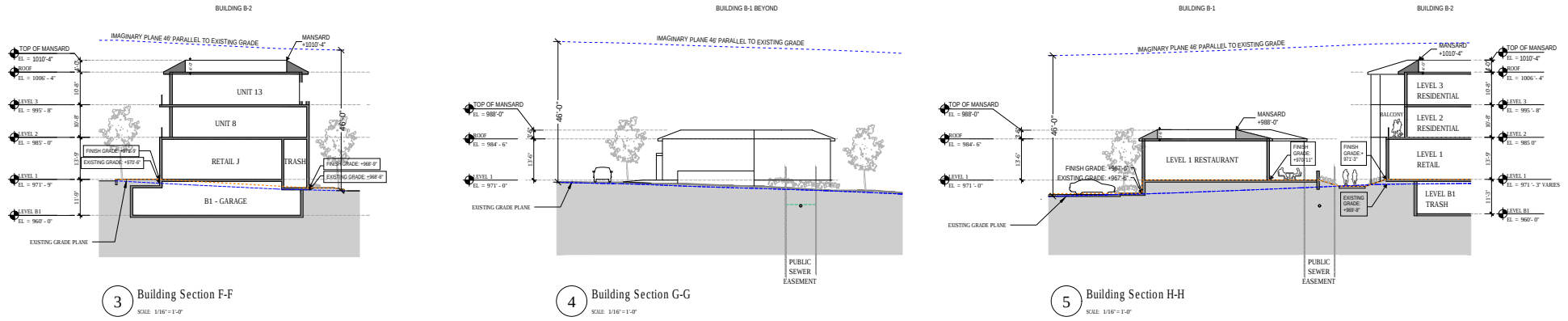
1 Building Section A-A

SCALE: 1/16" = 1'-0"



Source: Steinberg Hart, August 2023.

Figure II-27
Building B-Building Sections



Source: Steinberg Hart, August 2023.

Figure II-28
Building B-Building Sections

D. REQUESTED PERMITS AND APPROVALS

The discretionary entitlements, reviews, permits, and approvals required to implement the Current Project include, but are not necessarily limited to, the following:

1. Pursuant to Development Code Section 17.62.060, an **Amendment to the 1997 Master Plan Conditional Use Permit**, specific to The Commons Project Site only, to include the following, but not limited to::
    a. Replace all the Conditions of Approval in the 1997 Master Conditional Use Permit that are applicable to the Commons Site with Project-specific conditions in the Implementing Conditional Use Permit. However, such conditions would be unmodified and in full force and effect with respect to other properties subject to the 1997 Master Conditional Use Permit.
    b. Permit additional square footage on the Commons Site to permit up to 119 residential dwelling units and 396,077 square feet of existing commercial and proposed new residential and commercial development;
    c. Include the proposed residential use in the list of uses consistent with the underlying CMU zone and the City's Housing Element;
    d. Provide that, with respect to the Commons Site only, (i) the Calabasas Park Center Project Development and Design Guidelines are not applicable, and (b) if there are any conflicts or inconsistencies between the 1997 Master Conditional Use Permit and the new Implementing Conditional Use Permit for the Commons Site, the new implementing Conditional Use Permit shall control.
    e. Provide that all existing buildings, structures, and uses on the Commons Site shall be deemed legally conforming.
2. Pursuant to Development Code Section 17.62.060, an **Implementing Conditional Use Permit** to include the following, but not limited to:
    a. Permit up to 119 residential dwelling units and 396,077 square feet of existing commercial and proposed new residential and commercial development;
    b. Permit a mixed-use development with residential uses in the CMU zone;
    c. Permit the sale and consumption of a full line of alcoholic beverages within the proposed five restaurant and/or retail spaces; and
    d. Permit restaurant space exceeding ten (10) percent of the gross leasable floor area within a shopping center.
3. Pursuant to Development Code Section 17.22.020 and Government Code Section 65915 (State Density Bonus Law), the following **Density Bonus Incentive and Waiver of Development Standard**:
    a. Incentive from CMC Section 17.28.070 and Table 3-12 to provide a residential parking stall dimension of 8.5 feet by 18 feet in lieu of 9 feet by 20 feet, and 9 feet by 18 feet in lieu of 11 feet by 20 feet for the spaces located next to columns, walls, or other obstructions..
    b. Waiver of Development Standard to permit a maximum 85 foot building height for Building A and a maximum 46-foot building height for Building B in lieu of in lieu of 35 feet permitted in the CMU zone per CMC Section 17.14.020 and Table 2-6.
4. Pursuant to Development Code Section 17.28.050.B, **Shared Parking** approval for the existing and proposed commercial uses based on a parking demand study.
5. Pursuant to Development Code Section 17.41, a **Vesting Tentative Tract Map** for the resubdivision of Parcel B into one master ground floor and six airspace lots.

6. Pursuant to Development Code Section 17.62.020, **Site Plan Review** for the proposed commercial and residential development and associated improvements, including landscaping and building identification and tenant signage.
7. Pursuant to Development Code Section 17.62.050, a **Scenic Corridor Permit** to review consistency with the City's Scenic Corridor Development Guidelines.

TREE LEGEND

	BOTANICAL NAME	COMMON NAME	WATER USE	SIZE
	Arbutus marina	Marina Arbutus	L	48"
	Lagerstroemia Indica	Crepe Myrtle	M	48"
	Laurus Nobilis	Bay Laurel	M	48"
	Ligustrum species (Hedge)	Wax Leaf Privet	M	24"
	Michelia champaca	Champak	M	48"
	Olea europaea	Fruitless Olive	L	60"
	Pyrus calleryana 'Aristocrat'	Calleryana Pear	M	60"
	Pyrus kawakami	Evergreen Pear	M	60"
	Tristania conferta	Brisbane Box	M	60"
	Existing Tree			

Source: Steinberg Hart, August 2023.

Figure II-29
Ground Level Planting Plan

TREE LEGEND

	BOTANICAL NAME	COMMON NAME	WATER USE	SIZE
●	Ligustrum species (Hedge)	Wax Leaf Privet	M	24"

Source: Steinberg Hart, August 2023.

Figure II-30
Second Level Planting Plan

TREE LEGEND

	BOTANICAL NAME	COMMON NAME	WATER USE	SIZE
	Laurus nobilis	Bay Laurel	M	48"
	Olea europaea	Fruitless Olive	L	60"
	Rhaphiolepis 'majestic beauty'	Indian Hawthorn	L	36"
	Tristania conferta	Brisbane Box	M	60"

Source: Steinberg Hart, August 2023.

Figure II-31
Roof Planting Plan

III. ENVIRONMENTAL IMPACT ANALYSIS
A. AESTHETICS

Threshold 1: Would the General Plan Update have a substantial adverse effect on a scenic vista?

EIR Project

The General Plan Update PEIR determined that impacts on scenic vistas would be less than significant as new development would occur as infill development adjacent to existing development. Additionally, policies proposed in the General Plan Update, along with design guidelines in Title 17 of the Calabasas Municipal Code requirements and development standards, include standards that apply across zoning districts, including the provision of landscaping, protection of existing vegetation, clustered development to prevent urban sprawl into open spaces, and design guidelines that address size, height, bulk, and location of buildings. Buildings located within one of the City's five designated Scenic Corridors buffer areas would be required to comply with the Scenic Corridor Design Guidelines.

Current Project

The Current Project would develop Site 11, which is within an existing shopping center and parking lot. Site 11 is south of Highway 101 and would be infill development on a previously developed site. The General Plan identifies Scenic Corridors in Calabasas and aims to protect public views of important scenic resources such as significant ridgelines identified in the Open Space Element.[1] Highway 101 is designated as a Scenic Corridor which is described in the General Plan as a heavily traveled, high-density corridor that encompasses much of Old Town Calabasas, Calabasas Road, and the Calabasas Grade. Although Site 11 is within the Highway 101 Scenic Corridor, views of the project site from Highway 101 are largely limited and obscured due to existing trees and buildings. As discussed in the General Plan PEIR, most development that could occur along US-101 would be infill redevelopment where existing development is already adjacent. The visual character of the area on north and south sides of US-101 would be expected to improve generally as the 2030 General Plan design policies and the various development standards are implemented. The Current Project is an infill project on an already developed site and is designed to comply with the Scenic Corridor Design Guidelines as may be applicable to Site 11. The Current Project is designed and situated to minimize available views of the project, as the proposed buildings are setback approximately 650 feet from the Highway 101 Scenic Corridor allowing them blend into the ascending hillside to the south. The buildings will be further screened by the existing development on site, including a surface parking lot, and existing and proposed landscaping. The Current Project would also be required to comply with 2030 General Plan policies and design guidelines in Title 17 of the Calabasas Municipal Code. Furthermore, as discussed in the General Plan Update PEIR, none of the housing sites (including Site 11) are in areas with designated scenic vistas and no scenic vistas are visible from or through Site 11. As such, impacts to scenic vistas visible from scenic corridors, as designated by the City of Calabasas General

[1] *City of Calabasas, 2030 General Plan, October 2021, website: https://www.cityofcalabasas.com/home/showpublisheddocument/2689/637775783982970000, accessed July 13, 2023.*

Plan, would be less than significant and similar to those of the EIR Project. Accordingly, no new significant impacts or substantially more severe impacts on a scenic vista have been identified for the Current Project.

Threshold 2: Would the General Plan Update substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

EIR Project

The General Plan Update PEIR determined that there are no officially designated state scenic highways in the areas where housing sites are proposed under the General Plan Update. Therefore, impacts to state scenic highways would be less than significant.

Current Project

While Highway 101 is not an officially designated state scenic highway, development within the viewshed of an eligible state scenic highway must be done in consideration of its eligibility status; if a highway is listed as eligible for official designation, it is part of the State Scenic Highway Program and care must be taken to preserve its eligibility status (Caltrans 2021). Views of the project site from Highway 101 are largely limited and obscured due to existing trees and buildings. In alignment with the analysis in the PEIR, the Current Project would consist of infill redevelopment adjacent to existing development. The project would be consistent with the 2030 General Plan design policies, the City's development standards, and the Scenic Corridor Design Guidelines as may be applicable to Site 11. The Current Project is designed and situated to minimize views as the proposed buildings are setback approximately 650 feet from the Highway 101 Scenic Corridor, allowing them blend into the ascending hillside to the south. The Current Project would not change the proposed location of development analyzed for Site 11 in the General Plan Update PEIR. Therefore, the Current Project would not be located near an officially designated State scenic highway, and construction near an eligible scenic highway would be subject to local design standards and guidelines. Therefore, impacts would be the same as for the EIR Project and less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to the damage to scenic resources within a state scenic highway have been identified for the Current Project.

Threshold 3: In non-urbanized areas, would the General Plan Update substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

EIR Project

The General Plan Update PEIR found that impacts to existing visual character or quality of public views would be less than significant from new development as the sites are currently developed or in areas adjacent to developed areas and new development would replace aging structures with those that more clearly meet the City's design standards and Development Code, including increased landscaping.

The General Plan Update PEIR determined that much of the intensification and reuse that would be facilitated under implementation of the General Plan Update would also generally be expected to enhance the visual character of the community as the City's plans and ordinances work together to protect Calabasas aesthetic resources. Impacts would be less than significant with implementation of applicable policies and regulations.

Current Project

The Current Project would demolish a part of the southwestern portion of the Commons Shopping Center, which is developed with a 33,091 square-foot movie theater and 139 surface parking spaces. The Current Project would construct two mixed-use buildings (Building A and Building B), which would include approximately 24,163 square feet of ground-floor commercial space and 119 multi-family residential units. Additional site improvements include landscaping, grading, and restriping of the existing surface parking area.

The Current Project design is intended to create a stronger "town center" environment accomplished through close attention to planning, scale, and architectural details. Building B was inspired by the desire to create more of a "main street" experience in The Commons, and includes four distinct above-ground buildings separated to create an intimate village feel. Locating Building A across from the proposed Building B creates an active, pedestrian scale street, lined with shops and restaurants. A significantly sized open space plaza complements the new "village" area providing a distinct sense of place. This open space area may be programmed for temporary community events and used organically throughout the year.

Building A has been designed to complement the existing Commons buildings by introducing a contemporary aesthetic that incorporates soft earth tones typical of Calabasas and The Commons architecture, which allows the structure to blend into the surrounding topography. Landscaping along the façades also will help to conceal and soften edges so the building further blends into the hillside to the south. As noted, the upper residential levels of Building A are setback from the retail ground floor façade below so that the residential apartments will not be visible from the sidewalk near the retail spaces (new and existing) within Building A. In addition to the building setback at the upper levels, the massing of Building A will be softened by incorporating landscaping, articulation, and step backs in the façade at the upper levels and penthouse. Deep balconies, shadow lines, and recessed windows will provide additional architectural details to increase articulation, visual interest, and necessary private open space. The color and materials palette will be similar to the existing architecture in The Commons. Parking will be located behind the existing and proposed retail stores, entirely within the existing theater footprint, and screened from public view. Additionally, the rooftop deck and mechanical screens will be coordinated and will include landscaping to blur the designations between resident-occupied and mechanical areas.

Whereas Building A has intentionally been designed with a distinct yet complementary contemporary architectural aesthetic, Building B has been designed to mirror The Commons existing architecture in terms of both materiality and style. Retail storefronts, doors, and patio furnishings will be influenced and customized by future tenants to add to the visual interest and authenticity while trees, paving, curbs, accessories, and lighting will match the existing pedestrian sidewalks. Additionally, Building B serves as a transitional zone as viewed from Calabasas Road, by terracing the height southwards to Building A in the rear portion of the Current Project Site.

Similar to the EIR Project, the Current Project would be required to comply with design guidelines in Title 17 of the Calabasas Municipal Code and the Park Centre Development and Design Standards, as proposed to be amended. Therefore, impacts would be less than significant with implementation of applicable policies and regulations and similar to those of the EIR Project. Accordingly, no new significant impacts or substantially more severe impacts related to visual character have been identified for the Current Project.

Threshold 4: Would the General Plan Update create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

EIR Project

The General Plan Update PEIR found that impacts from light and glare would be less than significant as the City's Land Use and Development Code, which regulates lighting by its "Dark Skies Ordinance," or Section 17.27.020 et seq., would minimize artificial light effects on the night sky and on wildlife, while maintaining appropriate lighting levels in developed areas to ensure safety. Glare impacts would be less than significant as building siting, orientation, and design would follow standards that decrease glare, including shielding west-facing windows, using non-reflective exterior materials, and orienting structures so they do not receive unshielded, direct sunlight during the hottest parts of the day. Lastly, increased landscaping required under the Development Code (CMC Section 17.26.050(8)) would ensure that landscaping associated with development under the General Plan Update would alleviate glare that could be generated by parked cars, reflections from windows, and other sources.

Current Project

Similar to the EIR Project, the Current Project would be required to comply with the City's Land Use and Development Code, which regulates lighting by its "Dark Skies Ordinance," or Section 17.27.020 et seq. The Current Project would comply with lighting ordinance requirements that limit light trespass onto adjacent properties and limit glare by shielding and directing light fixtures to achieve these limitations. Similar to the EIR Project, the applicant would submit evidence during the building permit process showing the Current Project's compliance with the regulatory requirements (City of Calabasas, Development Code Section 17.27.040). Therefore, impacts would be less than significant and similar to the EIR Project. Accordingly, no new significant impacts or substantially more severe impacts related to light or glare have been identified for the Current Project.

Cumulative Impacts

EIR Project

As described in the General Plan Update PEIR, potential aesthetic impacts of future housing development on the candidate housing sites facilitated by the EIR Project would be site-specific and would require evaluation on a case-by-case basis at the project level in accordance with each project. Each cumulative development project (except by-right projects pursuant to State Housing law) would require separate discretionary approval and evaluation under CEQA, which would address potential impacts to visual resources and identify necessary mitigation measures, where appropriate. Consequently, future housing development facilitated by the General Plan Update would not result in significant cumulative environmental impacts in conflict with aesthetics requirements for preserving visual character, public views, scenic vistas and resources, or requirements for minimizing and controlling potential light and glare. Therefore, the General Plan Update would not cause a cumulatively considerable impact on aesthetics, and no mitigation is required.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. As discussed in the General Plan Update PEIR, the Current Project would undergo site plan review by the City for compliance with design guidelines in Title 17 of the Calabasas Municipal Code requirements and development standards. The closest known project that could combine with the Current Project to result in cumulative impacts is identified in the General Plan Update PEIR as the Cruzan Parking Lot project (Site

3), which is located west of the Calabasas Library and City Hall. The Calabasas Library and City Hall block ground-level views from Site 11 westward. As such, the Current Project and the Site 3 project are not within the same viewshed. Therefore, it is anticipated that the cumulative impact on views from the Current Project and the development of Site 3 would be less than significant.

Additionally, the Current Project, as well as all development in the City, would be required to comply with the City's Land Use and Development Code, which regulates lighting by its "Dark Skies Ordinance," or Section 17.27.020 et seq. No other development is expected to occur close enough to Site 11 to combine with the Current Project to significantly affect aesthetic resources. Therefore, the Current Project would not contribute to a cumulatively considerable impact.

III. ENVIRONMENTAL IMPACT ANALYSIS
B. AIR QUALITY

Threshold 1: Would the General Plan Update conflict with or obstruct implementation of the applicable air quality plan?

EIR Project

The General Plan Update PEIR determined that the General Plan Update would be consistent with the 2016 Air Quality Management Plan (AQMP). The General Plan Update would bring the forecasts for the City's General Plan and the AQMP into consistency because the new population forecast based on the City's General Plan Update would be incorporated into South Coast Air Quality Management District's (SCAQMD) 2022 AQMP and because the General Plan Update would be consistent with applicable AQMP control measures. Therefore, impacts would be less than significant, and no mitigation measures are required.

Current Project

In accordance with the procedures established in the SCAQMD's CEQA Air Quality Handbook, the following criteria are required to be addressed in order to determine the Project's consistency with applicable SCAQMD and SCAG policies:

- Criterion 1: Would the project result in any of the following:
    - An increase in the frequency or severity of existing air quality violations; or
    - Cause or contribute to new air quality violations; or
    - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Would the project exceed the assumptions utilized in preparing the AQMP?
    - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
    - Does the Project include air quality mitigation measures; or
    - To what extent is Project development consistent with the AQMP land use policies?

The Current Project's potential impacts with respect to these criteria are discussed below in order to assess the consistency with the SCAQMD's 2022 AQMP and applicable City General Plan Air Quality Element plans and policies. Both of these criteria are evaluated in the following sections.

Criterion 1 – Increase in the Frequency or Severity of Violations

As shown in Table III.B-1 below, emissions resulting from short-term construction impacts will not exceed the SCAQMD regional and local thresholds of significance, which were developed to determine the emission levels at which significant contributions to air quality violations could occur. As shown in Table III.B-2 below, emissions resulting from long-term operations impacts will also not exceed the regional thresholds of significance.

Therefore, as Current Project emissions would not exceed the SCAQMD thresholds, the Project would not contribute to the exceedance of any air pollutant concentration standards, cause or contribute to new air

quality violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. Therefore, the Current Project would be consistent with the AQMP for the first criterion**.**

Criterion 2 – Exceed Assumptions in the AQMP?

The Current Project would develop Site 11 with fewer residential units (119 versus 201) and less commercial space (24,163 square feet versus 44,393 square feet) than analyzed in the General Plan Update PEIR and would remain within the population forecast incorporated into the 2022 AQMP. Similar to the EIR Project, the Current Project would not conflict with the 2022 AQMP and with goals, objectives, and policies set forth in SCAG's RTP/SCS and, as such, would not jeopardize attainment of State and national ambient air quality standards in the area under the jurisdiction of the SCAQMD. Therefore, impacts related to conflicts with air quality plans would be similar to those of the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to a conflict or obstruction of an applicable air quality plan have been identified for the Current Project.

Threshold 2: Would the General Plan Update result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

EIR Project

The General Plan Update PEIR identified the criteria pollutants in the area, which include ozone, carbon monoxide, nitrogen dioxide, PM_{10}, $PM_{2.5}$, sulfur dioxide, and lead. The SCAB is a non-attainment area for the federal standards for ozone and $PM_{2.5}$ and the state standards for ozone, PM_{10}, and $PM_{2.5}$. The Los Angeles County portion of the SCAB is also designated non-attainment for lead. The SCAB is designated unclassifiable or in attainment for all other federal and State standards.

Construction activities facilitated by the General Plan Update would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment and construction vehicles in addition to VOC emissions that would be released during the paving phase and the drying phase of architectural coatings. However, construction activities would occur at the 12 housing sites identified in the PEIR would be subject to compliance with applicable SCAQMD rules, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coatings).

Compliance with SCAQMD rules and 2030 General Plan Policy IV-17 (regarding air quality impacts during construction activities) would reduce the overall level of air quality impacts associated with construction activities under the General Plan Update. Furthermore, reasonably foreseeable development facilitated by the General Plan Update would be required to implement additional mitigation if project-specific analysis identifies the potential to exceed the SCAQMD's regional thresholds and Localized Significance Thresholds (LSTs) for construction activities. Therefore, impacts would be less than significant, and no mitigation measures are required.

Current Project

Emissions were estimated using the California Emissions Estimating Model (CalEEMod) software, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory,

etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California and is recommended by the SCAQMD.

Construction

Regional construction emissions associated with the Current Project were calculated using CalEEMod Version 2022.1. Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs in the shortest feasible time to capture the highest peak daily emissions) and applying the mobile source and fugitive dust emissions factors from CalEEMod. Thresholds of significance are provided by SCAQMD. As shown in Table III.B-1, Estimated Peak Daily Construction Emissions – Site 11, similar to the EIR Project, the Current Project would not result in a significant emissions impact during the Demolition Phase, Grading Phase, or Building Construction Phase.

Table III.B-1
Estimated Peak Daily Construction Emissions – Site 11

Emissions Source[a]	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition Phase	***2.6***	***24.58***	***24.07***	***0.04***	***2.29***	***1.14***
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Grading Phase	***0.59***	***12.88***	***8.42***	***0.06***	***2.46***	***0.83***
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Building Construction Phase	***20.13***	***31.41***	***44.49***	***0.06***	***2.94***	***1.57***
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Building construction emissions include architectural coatings and paving. Model assumptions and calculations worksheets are provided in Appendix A to this Addendum.

[a] No overlap in phases would occur. Construction schedule and equipment assumptions provided by project applicant's construction team.

Source: MD Acoustics, 2023.

Operations

Regional operational emissions associated with the Current Project were calculated using CalEEMod Version 2022.1. As shown in Table III.B-2, Estimated Daily Operational Emissions – Site 11, similar to the EIR Project, operational emissions generated by the Current Project would not exceed regional thresholds of significance set by the SCAQMD.

Table III.B-2
Estimated Daily Operational Emissions - Site 11

Emissions Source[a]	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Total Net Project Emissions	**5.92**	**2.46**	**25.4**	**0.05**	**1.66**	**0.38**
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	No	No	No	No	No	No

[a] Mobile source emissions provided in project traffic study (Appendix I to this Addendum). Model assumptions and calculation worksheets are provided in Appendix A to this Addendum.
Source: MD Acoustics, 2023.

Therefore, impacts would be less than significant, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to a cumulatively considerable net increase of any criteria pollutant have been identified for the Current Project.

Threshold 3: Would the General Plan Update expose sensitive receptors to substantial pollutant concentrations?

EIR Project

CO Hotspots

Based on the low background level of carbon monoxide in the project area, ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the low level of operational carbon monoxide emissions anticipated for reasonably foreseeable development facilitated by the General Plan Update, the General Plan Update would not create new hotspots or contribute substantially to existing hotspots. In addition, updates to the Circulation Element to remove level of service standards and incorporate VMT reduction policies would serve to reduce VMT and associated air pollutant emissions in the Plan Area, which would improve local air quality conditions as they relate to carbon monoxide hotspots. Therefore, no impact related to the exposure of sensitive receptors to substantial concentrations of carbon monoxide would occur, and no mitigation measures are required.

Toxic Air Contaminants (TACs)

Construction-related activities would result in temporary project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by the California Air Resources Board (CARB) in 1998.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of housing units facilitated by the General Plan Update would occur over timeframes ranging generally from one to five years. According to the California Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of proposed construction activities (i.e., one to five years) is approximately 3 to 17 percent of the total exposure period used for 30-year health risk calculations.

The maximum PM_{10} and $PM_{2.5}$ emissions would occur during demolition, site preparation and grading activities, which would only occur for a portion of the overall estimated timeframe of one to five years for construction of housing units facilitated by the General Plan Update. These activities would typically last for approximately two weeks to two years, depending on the extent of grading and excavation required (e.g., projects with subterranean parking structures or geological constraints require additional grading as compared to those without). PM emissions would decrease for the remaining construction period because construction activities such as building construction and architectural coating would require less intensive construction equipment. While the maximum DPM emissions associated with demolition, site preparation, and grading activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period. This would represent between 0.1 to 7 percent of the total 30-year exposure period for health risk calculation. Additionally, SCAQMD CEQA guidance does not require preparation of a health risk assessment for short-term construction emissions.

Furthermore, reasonably foreseeably development facilitated by the General Plan Update would be required to implement additional mitigation if project-specific analysis identifies the potential for construction-related TAC emissions to exceed the SCAQMD's thresholds for TACs. Therefore, construction-related impacts associated with TAC emissions would be less than significant, and no mitigation measures are required.

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005). Together, CARB and SCAQMD guidelines recommend siting distances both for the development of sensitive land uses in proximity to TAC sources and for the addition of new TAC sources in proximity to existing sensitive land uses. Residential land uses are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed residential land uses would be below thresholds warranting further study under the California Accidental Release Program. Because the General Plan Update would not include substantial TAC sources and is consistent with CARB and SCAQMD guidelines, it would not result in the exposure of off-site sensitive receptors to significant amounts of carcinogenic or toxic air contaminants. Impacts would be less than significant, and no mitigation measures are required.

Valley Fever

Construction activities, including site preparation and grading, associated with reasonably foreseeable development under the General Plan Update would have the potential to release *Coccidioides immitis* spores. Reasonably foreseeable development of the housing sites included in the General Plan Update would occur primarily as redevelopment of currently urbanized sites with development of undisturbed, vacant land only proposed for two sites – the 0.96-acre Old Town Vacant Site (housing site #4) and a 3.83-acre portion of Craftsman's Corner (housing site #12). However, construction activities at these two sites would be required to comply with the fugitive dust control standards of SCAQMD Rule 403. Furthermore, due to the relatively small size of these two potential housing projects, it is anticipated that construction workers would be from the local or regional area and would therefore have previous exposure to and immunity from Valley Fever. The population of the Plan Area also has been and will continue to be exposed to Valley Fever from agricultural and construction activities occurring throughout the region. Therefore, construction activities associated with the General Plan Update would not result in a

substantial increase in entrained fungal spores that cause Valley Fever above existing background levels, and construction impacts related to Valley Fever would be less than significant.

Upon completion of construction, reasonably foreseeable development under the General Plan Update would not require substantial ground disturbance on undisturbed land in close proximity to sensitive receptors that could mobilize *Coccidioides immitis* spores. Therefore, no impacts related to Valley Fever would occur during operation. Therefore, impacts would be less than significant, and no mitigation measures are required.

Current Project

Similar to the EIR Project, the Current Project would not expose sensitive receptor to substantial pollutant concentrations (see Table III.B-3, Localized On-Site Peak Daily Construction Emissions – Site 11).

Table III.B-3
Localized On-Site Peak Daily Construction Emissions - Site 11

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Demolition Emissions	**23.6**	**22.7**	**1.86**	**1.03**
SCAQMD Localized Thresholds	*143*	*903*	*17*	*5*
Potentially Significant Impact?	No	No	No	No
Grading/Excavation/Foundation Preparation Emissions	**3.89**	**4.68**	**0.42**	**0.20**
SCAQMD Localized Thresholds	*143*	*903*	*17*	*5*
Potentially Significant Impact?	No	No	No	No
Building Construction Emissions	**29.89**	**35.27**	**1.2**	**1.1**
SCAQMD Localized Thresholds	*143*	*903*	*17*	*5*
Potentially Significant Impact?	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Building construction emissions include architectural coatings and paving.

[a] The distance from the construction site to the nearest sensitive receptor (senior center) is approximately 286 feet (87 meters). Consistent with SCAQMD recommendations, the localized thresholds for Site 11 are based on a two-acre disturbance area with a receptor distance of 50 meters (164 feet) in SCAQMD's SRA 6. No overlap in phases would occur. Construction schedule and equipment assumptions provided by project applicant's construction team.

[b] The localized thresholds listed for NOx in this table takes into consideration the gradual conversion of NOx to NO2, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NOx emissions is focused on NO2 levels as they are associated with adverse health effects.

Source: MD Acoustics, 2023.

CO Hotspots

The Current Project would comprise 119 residential dwelling units and 24,163 square feet of ground-floor commercial space. The Current Project would develop fewer residential units and less commercial square footage on Site 11 as compared to the 201 units and 44,393 square feet analyzed in the General Plan

Update PEIR and would, therefore, generate less air pollutants than the EIR Project. As discussed above, the EIR Project would not create new hotspots or contribute substantially to existing hotspots. In addition, updates to the Circulation Element to remove level of service standards and incorporate VMT reduction policies would serve to reduce VMT and associated air pollutant emissions in the Plan Area, which would improve local air quality conditions as they relate to carbon monoxide hotspots.

TACs

As discussed above with respect to the EIR Project, construction activities could result in temporary emissions of DPM, $PM_{2.5}$, and PM_{10}. The SCAQMD also does not recommend analysis of TACs from short-term construction activities. According to SCAQMD methodology, health effects from DPM are based on continuous exposure over a 70-year lifetime. Given the short-term construction schedule of 24 months, Current Project construction would not result in a long-term source of TAC emissions.

The primary sources of potential air toxics associated with Current Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Current Project (residential and commercial), are not considered to be land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines.

With respect to $PM_{2.5}$ and PM_{10}, as shown in Table III.B-3, these emissions as well as NO_x and CO would not exceed SCAQMD localized thresholds during construction.

Valley Fever

The risk associated with the release of *Coccidioides immitis* spores, which can cause Valley Fever, is typically associated with grading on undeveloped land. The Current Project is located on a site that has been previously developed and would not include grading or construction on a previously undeveloped site. As such, the risk of release of *Coccidioides immitis* spores is considered to be low, and impacts would be less than significant.

Conclusion

Therefore, impacts due to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to exposing sensitive receptors to substantial pollutant concentrations have been identified for the Current Project.

Threshold 4: Would the General Plan Update result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

EIR Project

The construction of housing units facilitated by the General Plan Update would generate oil and diesel fuel odors during construction from equipment use as well as odors related to asphalt paving. The odors would be limited to the construction period for each housing site and would be intermittent and temporary. Furthermore, these odors would dissipate rapidly with distance from in-use construction equipment, and the proposed housing sites are spread throughout the Plan Area such that the minor number of people affected by construction-related odors generated at one housing site would not be affected by construction-related odors generated at another housing site should construction activities occur simultaneously. With respect to operation, the SCAQMD's CEQA Air Quality Handbook (1993)

identifies land uses associated with odor complaints to be agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Residential uses are not identified on this list. In addition, individual projects would be required to comply with SCAQMD Rule 402 during both construction and operation, which prohibits the discharge of air contaminants that would cause injury, detriment, nuisance, or annoyance to the public. Therefore, the General Plan Update would not generate other emissions, such as those leading to odors, adversely affecting a substantial number of people, and impacts would be less than significant. No mitigation measures are required.

Current Project

Similar to the EIR Project, the Current Project would generate oil and diesel fuel odors during construction from equipment use as well as odors related to asphalt paving. The odors would be limited to the construction period for Buildings A and B and would be intermittent and temporary. With respect to operation, the SCAQMD's CEQA Air Quality Handbook identifies land uses associated with odor complaints to be agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. The residential and commercial uses proposed under the Current Project are not identified on this list. Therefore, impacts would be less than significant, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people have been identified for the Current Project.

Cumulative Impacts

EIR Project

As described in the General Plan Update PEIR, the General Plan Update would be consistent with the AQMP, and long-term operational emissions would not result in significant air quality impacts. As further discussed, construction-related emissions would not result in significant air quality impacts. Localized emissions of carbon monoxide and TACs would not result in significant air quality impacts. Therefore, in accordance with SCAQMD guidance on determining cumulative impacts, the General Plan Update's contribution to cumulative regional long-term air quality impacts would not be cumulatively considerable.

The General Plan Update is not located in close proximity to existing or planned projects that would generate odorous emissions affecting a substantial number of people. In addition, SCAQMD Rule 402, which prohibits the discharge of air contaminants that would cause injury, detriment, nuisance, or annoyance to the public, would minimize the potential for nuisance odors. Therefore, no cumulative odor impact would occur.

Current Project

The Current Project and related projects would be consistent with the AQMP and long-term operational emissions would not result in significant cumulative impacts with respect to AQMP consistency. As discussed above, the Current Project's construction-related emissions would not result in significant air quality impacts, and the Current Project's localized emissions of carbon monoxide and TACs would not result in significant air quality impacts. In addition, it is unlikely that the Current Project would release *Coccidioides immitis* spores, which can cause Valley Fever, because the Current Project is located on previously developed land. Therefore, in accordance with SCAQMD guidance on determining cumulative impacts, the Current Project's contribution to cumulative regional long-term air quality impacts would not be cumulatively considerable.

Similar to the EIR Project, the Current Project would not result in a cumulatively considerable impact related to air quality. Accordingly, no new significant impacts or substantially more severe impacts related to cumulative air quality have been identified for the Current Project.

III. ENVIRONMENTAL IMPACT ANALYSIS
C. BIOLOGICAL RESOURCES

Threshold 1: Would the General Plan Update have a substantial adverse effect, either directly or indirectly, or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

EIR Project

The General Plan Update PEIR determined that impacts on candidate, sensitive, or special status species created either directly or indirectly, or through habitat modification would be less than significant with the incorporation of mitigation measures that require pre-construction surveys, avoidance, monitoring, and restoration on-site. Additionally, General Plan policies and Municipal Code ordinances would reduce impacts during construction. With implementation of Mitigation Measures BIO-1 through BIO-5, this impact would be reduced to less than significant.

> *For any projects that require vegetation removal, ground disturbance of unpaved areas, parking or staging of equipment or material on unpaved areas, access routes on unpaved areas, or any rehabilitation or construction staging within 300 feet of unpaved areas (except for landscaped developed areas) that contain or have the potential to support special-status species, sensitive natural communities, or suitable habitat to support special-status species, the following measure shall apply:*
>
> *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 man-made 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 pre-construction 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 pre-construction 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 project area. This training will include information about the special-status species with potential to occur in the project 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.

Current Project

As the Current Project would develop Site 11 within an existing shopping center and parking lot, there would be no ground disturbance of currently unpaved areas. Vegetation removal would be limited to existing ornamental landscaping associated with the shopping center. Similar to the EIR Project, it is possible that the existing landscaping could contain nesting bird or bat habitat. Therefore, Mitigation Measures MM BIO-2 and BIO-3, which apply to the EIR Project, would be implemented as they are applicable to the Current Project. However, as Site 11 is developed with an existing shopping center and is not completely vacant and a majority of the site is not vacant/undeveloped, Mitigation Measures MM BIO-1, BIO-4, and BIO-5 do not apply.

Similar to the EIR Project, the impact of the Current Project on candidate, sensitive, or special status species created either directly or indirectly, or through habitat modification would be less than significant with the incorporation of Mitigation Measures MM BIO-2 and BIO-3. Accordingly, no new significant impacts or substantially more severe impacts to any species identified as a candidate, sensitive, or special status species have been identified for the Current Project.

Threshold 2: Would the General Plan Update have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Threshold 3: Would the General Plan Update have a substantial adverse effect on State or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

EIR Project

The General Plan Update PEIR found that impacts to riparian habitat and federally protected wetlands would be less than significant with the incorporation of mitigation measures that require pre-construction surveys, monitoring, and restoration on-site. Development would not directly modify wetlands or jurisdictional waters given the prioritization of infill sites for the project. Additionally, proposed development in areas identified as jurisdictional waters and/or wetlands, streambed/banks, or riparian vegetation would be subject to the permit requirements of the USACE, RWQCB, and CDFW, pursuant to Section 404 of CWA and the Porter-Cologne Water Quality Control Act, in addition to City General Plan policies and grading requirements.

Current Project

As the Current Project would develop Site 11 within an existing shopping center and parking lot, there would be no ground disturbance of currently unpaved areas. Vegetation removal would be limited to existing ornamental landscaping associated with the shopping center. There is no riparian habitat, sensitive natural community, or wetlands on Site 11. Therefore, the Current Project's impacts to habitat, sensitive natural community, and wetlands natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service would be similar to the EIR Project and also less than significant, and no mitigation measures are required.

As there are no State or federally protected wetlands on Site 11 the impact of the Current Project on State or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means would be similar to the EIR Project and also less than significant. No mitigation is required.

Accordingly, no new significant impacts or substantially more severe impacts to riparian habitat or other sensitive natural community, including wetlands, have been identified for the Current Project.

Threshold 4: Would the General Plan Update interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

EIR Project

The General Plan Update PEIR states that development activities have the potential to directly (e.g., cutting of trees or other vegetation, or removal of man-made structures containing an active bird nest or denning wildlife) or indirectly (e.g., if activities sufficiently harassed birds to cause nest abandonment) and has the potential to interfere substantially with the movement of native resident wildlife species or with established native resident or migratory wildlife. However, development facilitated by the 2030 General Plan would largely avoid impacts to wildlife movement corridors by emphasizing intensification/reuse of existing urbanized areas. General Plan policies require preservation of wildlife corridors and support acquisition of additional lands near wildlife corridors for open space.

The General Plan Update PEIR determined that reasonably foreseeable development under the General Plan Update would result in potentially significant impacts to wildlife movement or nursery sites; however, impacts would be less than significant with the incorporation of mitigation measures that require pre-construction surveys, avoidance, monitoring, and restoration on-site.

Current Project

As the Current Project would develop Site 11 within an existing shopping center and parking lot, there would be no ground disturbance of currently unpaved areas. Vegetation removal would be limited to existing landscaping associated with the shopping center. As Site 11 is currently developed, it is unlikely that native resident or migratory fish or wildlife species, corridors, or native wildlife nursery sites exist on the site. Nonetheless, Mitigation Measures MM BIO-2 and BIO-3, which apply to the EIR Project, would apply to the Current Project. However, as Site 11 is developed with an existing shopping center and is not completely vacant and a majority of the site is not vacant/undeveloped, Mitigation Measures MM BIO-1, BIO-4, and BIO-5 do not apply. As such, with implementation of Mitigation Measures MM BIO-2 and BIO-3, the impact would be similar to the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts to any native resident or migratory fish or wildlife species or with an established native resident or migratory wildlife corridors or native wildlife nursery sites have been identified for the Current Project.

Threshold 5: Would the General Plan Update conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Threshold 6: Would the General Plan Update conflict with the provision of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans?

EIR Project

The General Plan Update PEIR states that future development under the Housing Element Update would aim to comply with existing policies under the Conservation Element to maintain green space, and develop and implement procedures to protect sensitive species from potential direct and indirect impacts associated with foreseeable development. Nothing in the Housing Element Update would affect the

existing Protected Tree Ordinance or other adopted plans and policies governing biological resource. Native oak tree species would be protected in accordance with the City's Oak Tree Ordinance and Oak Tree Preservation and Protection Guidelines. The General Plan Update PEIR found that there would be no conflict with the City of Calabasas Oak Tree Ordinance and Oak Tree Preservation and Protection Guidelines. This impact would be less than significant, and no mitigation measures are required.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. Vegetation removal would be limited to existing ornamental landscaping associated with the shopping center. No protected tree species or protected biological habitat currently exist within the area to be developed with the Current Project. Site 11 is not within the Santa Monica Mountains Significant Ecological area. As such, the Current Project would not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. In addition, the Current Project would not conflict with the provision of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans because these plans would not be applicable as Site 11 is already developed. Similar to the EIR Project, the impact with the Current Project would be less than significant, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts regarding conflicts with local policies or ordinances protecting biological resources, including an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans, have been identified for the Current Project.

Cumulative Impacts

EIR Project

In the General Plan Update PEIR, the geographic area to analyze cumulatively considerable biological resource impacts includes the Santa Monica Mountains SEA, which is an ecological system that encompasses portions of the following cities: Malibu, Los Angeles, Calabasas, Agoura Hills, Hidden Hills, and Westlake Village, illustrated in Figure 4.3 2 in the General Plan Update PEIR. The General Plan Update would be implemented over eight years; therefore, the cumulative impact analyses for the various biological resources are limited to the identification of the types of impacts that may occur. Most future development and redevelopment under the General Plan Update would be infill in existing urban areas; however, ADUs may be located in rural areas.

<u>Special-Status Species, Sensitive Habitats, and Wetlands</u>

The General Plan Update's contribution to cumulative impacts to special-status species and sensitive habitats is considered cumulatively considerable without mitigation. As development occurs in the lesser or undeveloped portions of the City, habitat for biological resources will continue to be converted to urban development. It is understood that mobile species (e.g., most reptiles, mammals, and birds) may survive this development by moving to other areas, but less mobile species (i.e., species reliant on a certain type of habitat) would not. Conversion of natural habitat could reduce the availability of habitat for special-status species and the natural areas remaining could become isolated and not support biological resources beyond their carrying capacity. Buildout of the General Plan Update may result in the increase of urban buildout and contribute to the loss of habitat for special-status species, as well as common species. However, implementation of Mitigation Measures BIO-1 through BIO-5 would reduce direct and indirect impacts to wildlife and sensitive vegetation and habitat to less than significant.

If a future project under the General Plan Update would result in removal of sensitive vegetation, then compensatory mitigation may be required depending on the amount of vegetation impacted, which would ensure no net loss of habitat following implementation of the project. As described in Impact BIO-3, impacts to sensitive habitats (i.e., jurisdictional wetlands, riparian vegetation, and aquatic habitat) under the General Plan Update would be cumulatively considerable without mitigation. Implementation of Mitigation Measure BIO-5, however, would reduce these cumulative impacts through identification, avoidance, and project-specific permitting requirements through appropriate regulatory agencies (e.g., Section 404 permit, Section 401 certification, CFGC Section 1602 authorization). Mitigation for wetlands would be coordinated with the appropriate regulatory agencies on a project-by-project basis to ensure no net loss of functions and values, and the General Plan Update would not result in a cumulatively considerable impact to sensitive habitats and wetlands.

As discussed in Impact BIO-1, the Migratory Bird Treaty Act (MBTA) protects migratory avian species, including sensitive species. Individual project compliance of any project in the Santa Monica Mountains SEA would be required to comply with the MBTA and CFGC, which would ensure that cumulative impacts to migratory birds would not be significant.

City Protected Trees

The City's Oak Tree Ordinance and Oak Tree Preservation and Protection Guidelines (Municipal Code Title 17, Article III, Chapter 17.32) provides protection for oak tree species citywide, as previously discussed. All reasonably foreseeable development in the City, including development under the General Plan, would be subject to these existing ordinances and regulations. Compliance with the Oak Tree Ordinance and Oak Tree Preservation and Protection Guidelines would ensure that there would be no net loss of protected trees citywide. In addition, the City's goal is to preserve existing tree canopy and reasonably foreseeable development under the General Plan Update would be required to avoid and mitigate for impacts to tree canopy. Based on this information, the incremental effect of reasonably foreseeable development under the General Plan Update would not be cumulatively considerable, and cumulative impacts related to the Oak Tree Ordinance and Oak Tree Preservation and Protection Guidelines would be less than significant.

Wildlife Movement

Development under the General Plan Update could affect wildlife movement and nursery sites, and the General Plan Update contribution to impacts to wildlife corridors and nursery sites may be cumulatively considerable. However, implementation of Mitigation Measures MM BIO-1 through MM BIO-5 would reduce direct and indirect cumulative impacts to wildlife movement and nursery to less than significant.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. Vegetation removal would be limited to existing ornamental landscaping associated with the shopping center. There is no riparian habitat, sensitive natural community, or wetlands on Site 11. No protected tree species or protected biological habitat currently exist within the area to be developed with the Current Project. Site 11 is not within the Santa Monica Mountains Significant Ecological area. Moreover, the Current Project would comply with applicable regulatory requirements and implement applicable mitigation measures. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in a cumulatively considerable impact to biological resources.

III. ENVIRONMENTAL IMPACT ANALYSIS
D. CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

Threshold 1: Would the General Plan Update cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

EIR Project

The General Plan Update PEIR determined that impacts to archaeological resources would be less than significant with the incorporation of mitigation measures that require cultural resource records searches, cultural resource surveys, construction training and monitoring, and requirements to stop work in the event potential resources are discovered during construction.

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.

Current Project

As the Current Project would develop Site 11 within an existing shopping center and parking lot, there would be no ground disturbance in previously undisturbed areas. The development of the Current Project would include demolition, grading, building construction, landscaping, and utility upgrades. Since the Current Project would be within a previously developed location, the shallower depths of the ground disturbance would occur within fill and previously disturbed soils, but deeper disturbances could occur within previously undisturbed soils. Similar to the EIR Project and given the archaeological sensitivity of the general area within which the Current Project exists, it is possible that during development of Site 11 unidentified cultural resources could be encountered during grading and excavation activities. Similar to the EIR Project, because the Current Project would involve grading and excavation in areas of cultural resource sensitivity, the impact to archaeological resources is considered potentially significant. Furthermore, a records search results summary prepared by the South Central Coastal Information Center (SCCIC) did not reveal any prior evaluations of Site 11 (see Appendix B to this Addendum). The SCCIC records search revealed that there have been two recorded archaeological resources within half-mile radius of the of the Site 11 and none within the Current Project site boundaries.[1] Regardless, the same mitigation measures that apply to the EIR Project, Mitigation Measures MM CUL-1(a) through MM CUL-1(e), would be implemented as they are applicable to the Current Project.

Similar to the EIR Project, the impact of the Current Project on an archaeological resource would be less than significant with the incorporation of mitigation measures that require pre-construction surveys and monitoring on-site. Accordingly, no new significant impacts or substantially more severe impacts related to a substantial adverse change in the significance of an archaeological resource have been identified for the Current Project.

[1] *Letter Correspondence from Stacy St. James, South Central Coastal Information Center, December 22, 2022. Refer to Appendix B to this Addendum. As shown therein, two reports/studies were found in the project area.*

Threshold 2: Would the General Plan Update cause a substantial adverse change in significance of a historical resource as defined in CEQA Guidelines § 15064.5?

EIR Project

As discussed in the General Plan Update PEIR, sites identified as "Older than 50 Years Old," "Undeveloped," or in, or adjacent to, areas of known cultural resource sensitivity may contain previously unidentified cultural resources. Six General Plan Update properties identified as "Greater than 50 Years Old" may contain previously unidentified historic-period resources. The General Plan Update PEIR determined that impacts to historic period resources would be less than significant with the incorporation of mitigation measures that require cultural resource records searches, historic period resources evaluations, rehabilitation or relocation of historical resources, and Historic American Buildings Survey documentation. With implementation of Mitigation Measure CUL-1(a), CUL-2 (b), and CUL-2(c), this impact would be reduced to less than significant.

MM CUL-2(a) Historic-Period Resources Evaluation

As a condition of approval and prior to issuance of construction permits, a historical resources evaluation shall be prepared and submitted to the City by the project applicant for future projects involving a property which includes buildings, structures, objects, sites, landscape/site plans, or other features that are 45 years of age or older. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify any potential historical resources within the project sites. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report will be submitted to City for review and approval prior to project approval.

MM CUL-2(b) Rehabilitation or Relocation of Historical Resources

If historical resources are identified within the project area of a proposed development, efforts shall be made to the greatest extent possible to ensure that the relocation, rehabilitation, or alteration of the resource is consistent with the Standards. In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR § 15126.4(b)(1)). Application of the Standards shall be overseen by a qualified architectural historian or historic architect meeting the PQS. In conjunction with any development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City for review and concurrence prior to mitigation implementation.

MM CUL-2(c) Historic American Buildings Survey Documentation

If significant historical resources are identified on a development site and compliance with the Standards and or avoidance is not possible, the resource shall be documented in the form of a Historic American Buildings Survey (HABS)-Like report. The report shall generally follow the Secretary of the Interior's Standards for Architectural and Engineering Documentation, HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the PQS and submitted to the City prior to issuance of any permits for demolition or alteration of the historical resource.

Current Project

No previously known historic-period resource, building, and/or structure would be impacted by the Current Project. The Current Project would involve the demolition of the southwestern portion of the Commons Shopping Center, which is developed with an existing 33,091 square-foot movie theater that is not designated as "Older than 50 Years Old" in the General Plan Update PEIR and is of utilitarian design. Therefore, similar to the EIR Project, the impact of the Current Project on a cultural resource would be less than significant, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to a substantial adverse change in the significance of an historical resource have been identified for the Current Project.

Threshold 3: Would the General Plan Update disturb any human remains, including those interred outside of formal cemeteries?

EIR Project

The General Plan Update PEIR found that in the event of discover of unknown human remains, impacts to humans remains would be less than significant with compliance with California Health and Safety Code (Sections 7050.5, 7051, and 7054) and, if necessary, consultation with the tribe determined to be the Most Likely Descendant (MLD) by the Native American Heritage Commission. With implementation of Mitigation Measures CUL-1(a) through CUL-1(e), this impact would be reduced to less than significant.

Current Project

As the Current Project would develop Site 11 within an existing shopping center and parking lot, there would be no ground disturbance in previously undisturbed areas. The development of the Current Project would include demolition, grading, building construction, landscaping, and utility upgrades. Since the Current Project would be within a previously developed location, the shallower depths of the ground disturbance would occur within fill and previously disturbed soils, but deeper disturbances could occur within previously undisturbed soils. Similar to the EIR Project, it is possible that grading and excavation during construction of the Current Project could have the potential to disturb human burials outside of formal cemeteries, which include Native American burial sites. As discussed in the General Plan Update PEIR, although it is unlikely that human remains are present, all properties have at least the possibility of containing previously unidentified human remains.

Similar to the EIR Project, the Current Project must comply with applicable laws when human remains are encountered during grading and construction to ensure that no significant impacts to tribal cultural resources, including human remains. In the event that human remains are discovered, construction activities must be halted or diverted until the provisions of Section 7050.5 of the Health and Safety Code and Section 5097.98 of the Public Resources Code have been implemented. Furthermore, implementation of Mitigation Measures CUL-1(a) through CUL-1(e) would ensure that impacts to unknown human remains would be less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to the disturbance of any human remains have been identified for the Current Project.

Threshold 4: Would the General Plan Update cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

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

EIR Project

During the preparation of the General Plan Update PEIR and as part of the Tribal cultural resource identification process under AB 52, the City of Calabasas sent letters via certified mail to 15 Native American Tribes that requested to be informed through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with these tribes. The City received a reply from the Fernandeño Tataviam Band of Mission Indians.

Ground-disturbing activities on any site associated with General Plan Update could expose previously unidentified subsurface tribal cultural resources. Furthermore, any undeveloped site or site located in or adjacent to an area of known cultural resource sensitivity in the General Plan Update inventory may possess previously unidentified tribal cultural resources. Given the highly developed nature of most sites associated with the General Plan Update, the likelihood of encountering intact tribal cultural resources is low to moderate. However, the General Plan Update PEIR found that impacts to tribal cultural resources would be less than significant with the incorporation of mitigation measures that require cultural resource records searches, cultural resource surveys, construction training and monitoring, and requirements to stop work in the event potential resources are discovered during construction.

Current Project

As the Current Project would develop Site 11 within an existing shopping center and parking lot, there would be no ground disturbance in previously undisturbed areas. The development of the Current Project would include demolition, grading, building construction, landscaping, and utility upgrades. Since the Current Project would be within a previously developed location, the shallower depths of the ground disturbance would occur within fill and previously disturbed soils, but deeper disturbances could occur within previously undisturbed soils. Similar to the EIR Project, it is possible that grading and excavation during construction of the Current Project could have the potential to possess previously unidentified tribal cultural resources. Given the highly developed nature of Site 11, the likelihood of encountering intact tribal cultural resources is low to moderate, which would be similar to the EIR Project.

The Current Project would implement the same mitigation measures that apply to the EIR Project, Mitigation Measures MM CUL-1(a) through MM CUL-1(e). These mitigation measures include a Native American monitor and stop work orders, if needed. Therefore, similar to the EIR Project, the impact of the Current Project on tribal cultural resources would be less than significant with the incorporation of mitigation measures that require pre-construction surveys and monitoring on-site. Accordingly, no new

significant impacts or substantially more severe impacts related to a tribal cultural resource have been identified for the Current Project.

Cumulative Impacts

EIR Project

The cumulative setting for cultural and tribal cultural resource impacts is the General Plan Update area (Plan Area). Cumulative development under the General Plan Update could possibly disturb areas that may contain prehistoric and historic-period cultural resources and tribal cultural resources. While there is the potential for significant cumulative impacts to prehistoric and historic-period cultural resources and tribal cultural resources, it is anticipated that potential impacts associated with individual development projects would be subject to City policies and local and State regulations regarding the protection of such resources. With compliance to existing policies and regulations, mitigation measures, future development under the General Plan Update would be required to avoid or mitigate the loss of these resources. The impacts of the General Plan Update would be reduced to a level of less than significant with the standard conditions of approval and Mitigation Measures MM CUL-1(a), MM CUL-1(b), MM CUL-1(c), MM CUL-1(d), MM CUL-1(e), MM CUL-2(a), MM CUL-2(b), and MM CUL-2(c) described above. Therefore, significant cumulative cultural resources and tribal cultural resources impacts would not occur.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. The boundaries of Site 11 have not been modified compared to the EIR Project. In addition, the Current Project would comply with applicable laws regarding human remains and implement Mitigation Measures MM CUL-1(a), MM CUL-1(b), MM CUL-1(c), MM CUL-1(d), MM CUL-1(c), MM CUL-2(a), MM CUL-2(b), and MM CUL-2(c) described above. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in a cumulatively considerable impact to cultural resources and tribal cultural resources.

III. ENVIRONMENTAL IMPACT ANALYSIS
E. GEOLOGY AND SOILS

Threshold 1a: Would the General Plan Update directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Threshold 1b: Would the General Plan Update directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Threshold 1c: Would the General Plan Update directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Threshold 1d: Would the General Plan Update directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

EIR Project

The General Plan Update PEIR determined that impacts related to seismic risks including rupture of an earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, strong seismic ground shaking, seismic-related ground failure or liquefaction, or landslides would be less than significant as there are no active faults in the Plan Area and all projects would be required to comply with 2030 General Plan policies, the City's Municipal Code, and State regulations, which would minimize seismic impacts.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. As discussed in the General Plan PEIR, there are no active faults in the General Plan Update Area, which includes Site 11. The potential for surface rupture is low, and the development of Site 11 would not exacerbate the potential for surface rupture (see Appendix D to this Addendum). Therefore, like the EIR Project, the Current Project's impacts with respect to surface rupture would be less than significant, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to rupture of a known earthquake fault have been identified for the Current Project.

Similarly, with respect to seismic ground shaking, proper engineering, including compliance with the California Building Code with City of Calabasas amendments, the City of Calabasas Municipal Code, and the policies in the General Plan Safety Element, would minimize the risk to life and property. Therefore, like the EIR Project, the Current Project's impacts with respect to seismic shaking would be less than significant, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to seismic ground shaking have been identified for the Current Project.

Site 11 is not located within a liquefaction zone[1] (see Figure 4.5-2, Seismic Hazards, in the General Plan Update PEIR). As discussed above, the redevelopment of Site 11 would comply with the California Building Code with City of Calabasas amendments, the City of Calabasas Municipal Code, and the policies in the General Plan Safety Element. Therefore, like the EIR Project, the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction, under the Current Project would be less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to seismic-related ground failure have been identified for the Current Project.

Site 11 is party located within an earthquake-induced landslide zone[2] (see Figure 4.5-2, Seismic Hazards, in the General Plan Update PEIR). Earthquake-induced landslide zones are identified as areas where previous occurrence of landslide movement, or local topographic, geological, or geotechnical and subsurface water conditions indicate a potential for permanent ground displacements.

As discussed in Appendix D to this Addendum, the seismic hazard zone map, which was published in 1998 and near the time site grading was completed, includes the slope that ascends to the south of the project area.[3] The portion of the site within the mapped landslide zone was cut up to approximately 45 feet and the ascending slope is currently retained by the soldier pile with tieback anchor wall. The soldier pile with tie back anchor wall was designed by others to support the ascending slope and mitigate the potential for slope instability. Adverse slope conditions that would need to be addressed during conceptual design were not observed during the site reconnaissance on August 9, 2023 by GPI's Geotechnical Engineer and Engineering Geologist.

Site grading for the proposed buildings is anticipated to include cuts up to approximately 15 feet and fills up to 10 feet. Significant new permanent cut or fill slopes are not planned. Based on prior and planned site grading, construction of the soldier pile with tieback anchor wall, as well as the presence of near-surface bedrock materials, the potential for seismic-related ground failure due to landsliding for the project is considered to be less than significant.

Furthermore, the redevelopment of Site 11 would comply with the California Building Code with City of Calabasas amendments, the City of Calabasas Municipal Code, and the policies in the General Plan Safety Element. Therefore, the risk of loss, injury, or death involving landslides would be less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to the risk or loss, injury, or death involving landslides have been identified for the Current Project.

Threshold 2: Would the General Plan Update result in substantial soil erosion or the loss of topsoil?

EIR Project

The General Plan Update PEIR found that impacts from soil erosion or the loss of topsoil during construction would be less than significant with compliance with SWRCB's General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ), the project Stormwater Pollution Prevention Plan (SWPPP), and the City's process for best

[1] *California Geological Survey, Earthquake Zones of Required Investigation Calabasas Quadrangle, Official Map Released February 1998.*

[2] *Ibid.*

[3] *Ibid.*

management practice (BMP) selection which includes requires for sediment control, erosion control, site management, and materials and waste management.

Current Project

Construction of Site 11 would require ground-disturbing activities, such as grading and excavation, which could result in erosion and loss of topsoil, particularly if soils are exposed to wind or stormwater during construction. However, development of Site 11 would be required to comply with the SWRCB's General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). Additionally, development of Site 11 would require a SWPPP. The SWPPP would include site-specific BMPs that would be implemented to prevent erosion and loss of topsoil and would include applicable monitoring programs to be implemented as necessary.

During operation, the Current Project would continue to comply with the City's LID ordinance as outlined in Calabasas Municipal Code Chapter 8.28.160 and maintain BMPs (Chapter 8.28.120). Compliance with the City's LID ordinance and continuation of BMPs would prevent soil erosion and the loss of topsoil. Furthermore, there would be no additional soil erosion and/or loss of topsoil during operation because Site 11 would be fully developed with structures, impervious surfaces, and landscaping.

Compliance with existing regulations would reduce the risk of soil erosion from construction and operation activities such that there would be minimal change in risk compared to current conditions with existing development, and impacts would be less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to substantial soil erosion or the loss of topsoil have been identified for the Current Project.

Threshold 3: Would the General Plan Update be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Threshold 4: Would the General Plan Update be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

EIR Project

The General Plan Update PEIR determined that the EIR Project's impacts from liquefaction and lateral spreading would be less than significant with compliance with CBC building standards and General Plan policies.

With respect to landslides, the General Plan Update PEIR states that development located in landslide areas with landslide or liquefaction potential would be subject to standard building procedures to review potential development at the project-specific level. The City's review process would ensure that appropriate recommendations and mitigation measures are implemented.

With respect to subsidence, the General Plan Update PEIR states that there are no known areas of subsidence are in the Plan Area.

With respect to expansive soils, the General Plan Update PEIR states that moderate to highly expansive soils are encountered throughout Calabasas. According to the City of Calabasas Geotechnical Guidelines, the following areas in the City are considered potentially hazardous for expansive soils: Calabasas

Highlands, Old Topanga Canyon, Northwest Las Virgenes Road, South Las Virgenes Road, and Calabasas Road.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. Site 11 is not located within a liquefaction zone (see Figure 4.5-2, Seismic Hazards, in the General Plan Update PEIR, and Appendix D to this Addendum). Furthermore, the Site 11 is underlain by bedrock and, as such, the potential for subsidence and/or collapse is remote. As discussed above, the redevelopment of Site 11 would comply with the California Building Code with City of Calabasas amendments, the City of Calabasas Municipal Code, and the policies in the General Plan Safety Element.

As discussed in the Geotechnical Evaluation Report for the Current Project (see Appendix D), near surface soils are anticipated to have a low to moderate expansion potential when subject to changes in moisture content. In addition, the bedrock materials at the site contain at least two percent pyrite (iron sulfide), which can result in bedrock heave if the pyrite is exposed and oxidizes to create gypsum crystals within bedrock fractures. As such, the potential for expansive soils and bedrock to adversely affect the Current Project is considered to be high. Therefore, the recommended project design features contained in the Geotechnical Investigations dated December 22, 2022 and December 23, 2022 (see Appendix D to this Addendum) shall be incorporated into the Current Project, as appropriate. The potential impact of expansive soils and bedrock on the proposed project can be reduced by design and construction in conformance with current building codes and engineering practices. The project will be designed in accordance with the California Building Code.

Compliance with the project design feature, regulations, and policies would assure that the impact due to geologic unit and/or soil stability would be less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to geologic or soil instability or expansive soil have been identified for the Current Project.

Threshold 5: Would the General Plan Update have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

EIR Project

The General Plan Update PEIR found that the EIR Project would not use septic systems or alternative wastewater systems; therefore, impacts to soils from septic systems would be less than significant.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. The existing shopping center does not use a septic system, and the Current Project does not include a septic system. The Current Project would connect to the exiting sewer system. Therefore, the impact related to septic tanks or alternative wastewater systems would be less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to septic tanks or alternative wastewater disposal systems have been identified for the Current Project.

Threshold 6: Would the General Plan Update directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

EIR Project

The General Plan Update PEIR found that impacts related to paleontological resources or sites or unique geologic feature would be less than significant with incorporation of mitigation measures that require review of project site plans by a qualified paleontologist for projects in areas of high paleontological sensitivity or with excavations exceeding five below ground level. When appropriate, a qualified paleontologist would prepare and implement a Worker Environmental Awareness Program (WEAP) training to be delivered at a preconstruction meeting for all on-site construction personnel.

Furthermore, the General Plan Update PEIR explained that development would be prioritized on infill sites and in areas that have previously been developed and disturbed, which are less likely to contain paleontological resources than undisturbed areas that have not previously been excavated or disturbed below the ground surface. In addition, where suitable geologic units are present, paleontological resources are most likely to occur in the first five feet below the ground surface. As such, while development under the General Plan Update would most often occur on previously disturbed areas, paleontological resources could be impacted if a previous site development did not include excavation of the first five feet of the ground surface and a proposed development would. Similarly, if a proposed development would occur on a previously disturbed site, but would require deeper excavations than were previously conducted, paleontological resources may be impacted. Projects under the General Plan Update would adhere to Policy XI-2 in the 2030 General Plan. These policies include: Policy XI-2 Preserve significant archeological and paleontological resources in-situ, when feasible. When avoidance of impacts is not possible, require data recovery mitigation for all significant resources.

Therefore, the General Plan Update PEIR included the following mitigation measure to reduce impacts to less than significant:

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.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. As explained in the General Plan Update PEIR, it is unlikely that Site 11 contains paleontological resources because the ground surface has been previously disturbed. The paleontological records search (see Appendix C to this Addendum) found no paleontological resources on the Project Site. However, excavation to below a level previously disturbed could occur with the construction of the Current Project, which could disturb previously unknown paleontological resources. Therefore, as with the EIR Project, Mitigation Measure MM GEO-1 would be implemented for the Current Project to reduce this impact to a less-than-significant level. Accordingly, no new significant impacts or substantially more severe impacts related to the destruction of paleontological resources have been identified for the Current Project.

Cumulative Impacts

EIR Project

The General Plan Update PEIR found that cumulative impacts, both geological and paleontological resources, are site-specific, such that cumulative impacts would only occur if other projects in the cumulative scenario would occur on the same site and/or affect the same paleontological resource(s) as a project under the General Plan Update. Other development that would occur in the Plan Area during the 2021-2029 timeframe would be subject to applicable State and City regulations regarding seismic and geological hazards. Thus, the General Plan Update would not contribute to a cumulatively considerable significant impact regarding seismic and geological hazards.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. As discussed in the General Plan Update PEIR, geological and paleontological resources are site-specific, such that cumulative impacts would only occur if other projects in the cumulative scenario would occur on the same site and/or affect the same paleontological resource(s) as a project under the General Plan Update. No other development is expected to occur on or adjacent to the Current Project, which could combine with the Current Project to significantly impact geologic or paleontologic resources. Furthermore, other projects would, similar to the Current Project, be required to retain a Qualified Paleontologist (see Mitigation Measure MM GEO-1). Therefore, like the EIR Project, the Current Project would not contribute to a cumulatively considerable impact.

III. ENVIRONMENTAL IMPACT ANALYSIS
F. GREENHOUSE GAS EMISSIONS

Threshold 1: Would the General Plan Update generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Threshold 2: Would the General Plan Update conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

EIR Project

Consistency with Applicable Plans, Policies, and Regulations

The General Plan Update PEIR determined that construction and operation of reasonably foreseeable development associated with the General Plan Update would generate temporary and long-term increases in GHG emissions that would not result in a significant impact on the environment related to climate change. In addition, the General Plan Update would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Impacts would be less than significant.

Several plans and policies have been adopted to reduce GHG emissions in the southern California region, including the State's 2017 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and local policies contained in the City's General Plan. The General Plan Update's consistency with these plans is discussed in the following subsections. As discussed therein, the General Plan Update would not conflict with plans and policies aimed at reducing GHG emissions. No impact would occur, and no mitigation measures are required.

Quantitative GHG Emissions Assessment

Construction activities facilitated by the General Plan Update would generate temporary GHG emissions primarily as a result of operation of construction equipment on-site as well as from vehicles transporting construction workers to and from the project sites and heavy trucks to transport demolition debris, building materials, and soil export. Construction of reasonably foreseeable development under the General Plan Update would generate an estimated total of 9,108 MT of CO2e over the planning horizon. Amortized over a 30-year period per SCAQMD guidance, construction of reasonably foreseeable development under the General Plan Update would generate an estimated 304 MT of CO2e per year.

Operation of the reasonably foreseeable development facilitated by the General Plan Update would generate GHG emissions associated with area sources (e.g., fireplaces, landscape maintenance), energy and water usage, vehicle trips, and wastewater and solid waste generation. Annual operational emissions generated by the General Plan Update combined with amortized construction emissions would total approximately 8,270 MT of CO2e per year.

The General Plan Update PEIR developed a project-specific operational emission efficiency threshold from the statewide GHG emissions inventory and statewide population data. This locally-appropriate, project-specific emissions threshold was determined to be 3.3 MT of CO_2e per service population per year. The locally-applicable, project-specific threshold was determined based on the GHG reduction target contained in SB 32, which is more stringent than the GHG reduction target contained in AB 32. The General Plan Update PEIR identified that residential development that would be permitted under the General Plan Update would generate approximately 2.3 MT of CO2e per service person per year, which would not exceed the locally applicable, project-specific threshold of 3.3 MT of CO2e per year.

Therefore, the General Plan Update would not generate GHG emissions that may have a significant impact on the environment; impacts would be less than significant, and no mitigation measures are required.

Current Project

The Current Project would develop Site 11 with fewer residential units (119 versus 201) and less commercial space (24,163 square feet versus 44,393 square feet) than analyzed in the General Plan Update PEIR.

Consistency with Applicable Plans, Policies, and Regulations

City Of Calabasas General Plan

The City of Calabasas 2030 General Plan includes two policies related to reducing GHG emissions. New housing units included in the Current Project are required to comply with the California Building Energy Efficiency Standards and CALGreen, which would reduce energy consumption. Furthermore, the Current Project housing units would be opted by default into the Clean Power Alliance, which would supply electricity from 100 percent clean, renewable energy. In addition, the Current Project would be required to comply with the City's recycling and green waste requirements for multi-family residential land uses set forth in Calabasas Municipal Code (CMC) Chapters 8.16.500(C), 8.16.500(D) and 8.16.500(G), which would maximize the recycling and solid waste diversion. These factors would minimize GHG emissions associated with electricity and natural gas consumption as well as solid waste disposal (General Plan Policy IV-18). Furthermore, as discussed below, per capita GHG emissions associated with the Current Project would not exceed the locally-applicable, project-specific threshold that was determined based on the GHG reduction target contained in SB 32, which is more stringent than the GHG reduction target contained in AB 32.

As discussed in the Transportation Impact Analysis (Appendix I to this Addendum), the EIR Project VMT Analysis accounted for up to 200 housing units to be developed on the Project Site. The EIR Project VMT Analysis estimated a Home-Based VMT per capita of 15.0 Home-Based VMT per Capita for the Project Site, which is below the City's threshold of 17.5 Home-Based VMT per Capita. Therefore, the Current Project would not conflict with the City's policy to reduce per capita GHG emissions by at least 25 percent below 2005 levels consistent with AB 32 (Policy IV-19). As a result, the Current Project would be consistent with the GHG reduction policies of the City's 2030 General Plan.

2020-2045 SCAG RTP/SCS

On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (titled Connect SoCal). The SCAG 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by 8 percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. The 2020-2045 RTP/SCS includes ten goals with corresponding implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The consistency of the Current Project with the 2020-2045 RTP/SCS is discussed in III.F-1. As shown therein, the Current Project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table III.F-1
Project Consistency with Applicable SCAG 2020-2045 RTP/SCS Strategies

Reduction Strategy	Project Consistency
Focus Growth Near Destinations & Mobility Options • Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations. • Focus on regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center -focused main streets. • Plan for growth near transit investments and support implementation of first/last mile strategies. • Promote the redevelopment of underperforming retail development and other outmoded residential uses. • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods. • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and operating close to existing destinations). • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. Shared parking or smart parking).	**No Conflict**. The Current Project would be constructed on an underutilized site near transportation corridors and within biking and walking distance of existing residential and commercial development. Furthermore, the Current Project housing site – Site 11 (Commons Shopping Center) - would be located within 0.25 mile of bus stops for LA Metro Line 161, which provides service to Canoga Park, Woodland Hills, Hidden Hills, and Agoura Hills. Therefore, the Current Project updates would emphasize a land use pattern that facilitates multimodal access to work, educational, and other destinations, planned growth near existing transit corridors, infill and redevelopment of underutilized land to accommodate new growth and increase connectivity in existing neighborhoods, and design and transportation options to reduce reliance on single occupancy passenger automobiles. In addition, the incorporation of VMT reduction policies would serve to encourage less reliance on single-occupancy passenger automobiles and reduce GHG, including a policy to facilitate transportation demand management programs.
Promote Diverse Housing Choices • Preserve and rehabilitate affordable housing and prevent displacement. • Identify funding opportunities for new workforce and affordable housing development. • Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply. • Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of GHGs.	**No Conflict**. The Current Project is consistent with the General Plan Update, which proposes sites along major transportation corridors and in proximity to existing residential and commercial development. The Current Project would construct 119 apartment units, including affordable units, on Site 11 of the General Plan Update, which would minimize GHG emissions associated with vehicle trips. Therefore, the Current Project would promote diverse housing choices that support the reduction of GHGs.
Leverage Technology Innovations • Promote low emission technologies such as neighborhood electric vehicles, shared rides	**No Conflict.** The Current Project would comply with State and local regulations, including the California Building Energy Efficiency Standards and CALGreen, related to the provision of electric vehicle supply equipment for parking

Table III.F-1
Project Consistency with Applicable SCAG 2020-2045 RTP/SCS Strategies

Reduction Strategy	Project Consistency
hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space. • Improve access to services through technology – such as telework and telemedicine as well as other incentives such as a "mobility wallet", an app-based system for storing transit and other multi-modal payments. • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	spaces and incorporation of solar power generation and storage equipment into new buildings. Therefore, the Current Project would leverage technology innovations.
Support Implementation of Sustainability Policies • Pursue funding opportunities to support local sustainable development projects that reduce GHG emissions. • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations. • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space. • Work with local jurisdictions/communities and assess barriers to implement sustainability strategies. • Enhance partnerships with other planning organizations to promote resources and best practices and best practices in the SCAG region. • Continue to support long range planning efforts by local jurisdictions. • Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.	**No Conflict.** The Current Project would be consistent with the GHG reduction policies of the City's current General Plan (discussed above) and would be constructed in accordance with the California Building Energy Efficiency Standards and CALGreen. Therefore, the Current Project would support implementation of sustainability policies.

Table III.F-1
Project Consistency with Applicable SCAG 2020-2045 RTP/SCS Strategies

Reduction Strategy	Project Consistency
Promote a Green Region • Support local development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards. • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration. • Integrate local food production into the regional landscape. • Promote more resource efficient development focused on conservation, recycling and reclamation. • Preserve, enhance and restore regional wildlife connectivity. • Reduce consumption of resources areas, including agricultural land. • Identify ways to improve access to public park space.	**No Conflict**. The Current Project would be constructed on an infill development site identified in the General Plan Update. Furthermore, as discussed in Section III.P, *Effects Found Not to Be Significant*, of this Addendum, the Current Project would not result in the conversion of agricultural land. The Current Project would be constructed on an already developed site and will provide additional and enhanced landscaping (i.e., greening) in areas that are presently occupied by buildings and parking lot area. Therefore, the Current Project would support development of a green region.
Source: Southern California Association of Governments, Connect SoCal - The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, adopted for federal transportation conformity purposes only on May 7, 2020; EcoTierra Consulting, 2023.	

2022 Scoping Plan

On December 15, 2022, the California Air Resources Board (CARB) approved the 2022 Scoping Plan for Achieving Carbon Neutrality (the "2022 Scoping Plan"). The 2022 Scoping Plan provides a detailed sector-by-sector roadmap to guide California away from its current dependance on petroleum and fossil gas to clean and renewable energy resources and zero-emission vehicles. Appendix D of the 2022 Scoping Plan includes recommendations that are intended to guide local government actions to align with the State's climate goals, with a focus on local GHG reduction strategies and approval of land use development projects. Appendix D of the 2022 Scoping Plan provides a list of GHG reduction strategies that can be implemented by local governments. The list focuses on three priority areas that local jurisdictions should focus on:

1. Transportation electrification
2. VMT reduction
3. Building decarbonization

Table III.F-2, Priority GHG Reduction Strategies, demonstrates how the Current Project would further the strategies to support the priority areas recommended by CARB for local agencies to evaluate. Similar to the EIR Project, the Current Project is designed in accordance with policies and state, regional and local strategies for reducing GHG emissions. Similar GHG reduction measures would apply to the EIR Project as the Current Project.

Table III.F-2
Priority GHG Reduction Strategies

Priority Areas	Priority GHG Reduction Strategies	Current Project Consistency
Transportation Electrification	Convert local government fleets to ZEVs and provide EV charging at public sites.	**No Conflict.** The Current Project includes installation of Electric Vehicle (EV) chargers and EV ready spaces to serve the residential and commercial uses. Chargers/EV spaces provided to serve commercial uses would be available for use by the public.
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans).	**No Conflict.** The strategy refers to City-wide policies and programs implemented through the General Plan and City-wide ordinances. The Current Project would not conflict with these policies and programs and would be consistent with existing General Plan and zoning designations. In addition, the Current Project would include EV chargers and EV ready spaces.
VMT Reduction	Reduce or eliminate minimum parking standards.	**No Conflict.** While this strategy is directed at the City, the Current Project would maintain an efficient supply of parking to support the function of the uses parking serves. The Current Project would provide parking for residents and guests within Buildings A and B. Parking for the commercial component of the Project would continue to be provided within the Project Site's existing surface parking area through a shared parking approval.
	Implement Complete Streets policies and investments, consistent with general plan circulation element requirements.	**No Conflict.** Development of the Current Project would not require system efficiency enhancements or improvements to the public right-of-way. The Current Project would not alter the existing bicycle and pedestrian circulation systems and would not preclude the City from future improvements to these systems.
	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.	**No Conflict.** The Current Project Site is served by local and regional transit lines, including Metro Local Line 161, Calabasas Shuttle Lines 1 and 3, and LADOT Commuter Express Line 423. Stops for the aforementioned transit lines are within convenient walking distance

Table III.F-2
Priority GHG Reduction Strategies

Priority Areas	Priority GHG Reduction Strategies	Current Project Consistency
		to the Current Project Site along Park Granada, Calabasas Road, and Parkway Calabasas. The Current Project would comply with any City-imposed funding requirements related to transit facilities. The Current Project is located near existing employment centers, thereby providing an opportunity for employees to live and work in the same area, providing an opportunity to reduce the number and length of vehicle trips. Additionally, the Project is located near existing local-serving commercial uses and would add 24,163 square feet of neighborhood-serving commercial uses. The presence of nearby commercial uses allows Project residents to walk to retail and restaurant uses within the Project Site and the surrounding area. The new commercial uses proposed as part of the Project would provide nearby residents and employees with additional dining and shopping opportunities.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.	**No Conflict.** The immediate Project vicinity is served by existing Class II Bicycle Lanes on Calabasas Road and Park Granada. The Project would not alter the existing bicycle infrastructure, nor would the Project preclude the City from installing future bicycle infrastructure within the public right-of-way. The Project would provide bicycle parking in compliance with the City's Development Code. The provision of EV spaces and chargers to serve residential uses would facilitate the use of EVs by future residents, while EV spaces and chargers provided to serve commercial uses would facilitate the use of EVs by commercial patrons.

Table III.F-2
Priority GHG Reduction Strategies

Priority Areas	Priority GHG Reduction Strategies	Current Project Consistency
		The Project Site is within walking distance of public transit stops. Development of the Project would not preclude the City from expanding transit service and improving transit facilities throughout the City. The Project would comply with the City's transportation demand management ordinance.
	Implement parking pricing or transportation demand management pricing strategies.	**No Conflict.** The Current Project would maintain an efficient supply of parking to support the function of the uses parking serves. The Current Project would provide parking for residents and guests within Buildings A and B. Parking for the commercial component of the Project would continue to be provided within the Project Site's existing surface parking area through a shared parking approval.
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood).	**No Conflict.** Although this strategy refers to City-wide policy implemented through the zoning code, the Current Project would seek an amendment to the CUP to enable mixed-use. It would provide direct pedestrian connections from public sidewalks to the Current Project Site from the two driveways along the south side of Calabasas Road, the driveway along the west side of Park Granada (opposite Park Sorrento), and a pedestrian path located at the northeasterly portion of the Current Project Site at the southwest corner of the Park Granada / Calabasas Road intersection. Additionally, a pedestrian connection from the adjacent Calabasas Civic Center is provided at the westerly edge of the Current Project site. In addition, the Current Project has been designed to enhance the pedestrian-oriented nature of the existing Project Site. The existing pedestrian pathway fronting the

Table III.F-2
Priority GHG Reduction Strategies

Priority Areas	Priority GHG Reduction Strategies	Current Project Consistency
		movie theater would be maintained with the construction of Building A. Building B would face the existing commercial uses and is located across the drive aisle from proposed Building A to create a new pedestrian-oriented "main street" within The Commons lined with small-scale shops and restaurants in a mixed-use format creating a distinct sense of place. Pedestrian pathways flanked by landscaping would be provided at the front and rear of each of Building B's buildings and between each Building B building to create a pedestrian oriented environment.
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).	**No Conflict.** The Current Project would be constructed on the site of an existing retail center and does not involve greenfield or undeveloped lands.
Building Decarbonization	Adopt all-electric new construction reach codes for residential and commercial uses.	**No Conflict.** The strategy refers to City-wide policies and programs implemented through the City's building code. At present, City's Zoning Code and Building Code do not require all-electric buildings. However, the Building Code requires that all new units and/or habitable structures be 100% electric ready, which means that the electrical power amperage, transformers, panels, breakers, wiring, etc. must be installed as though the new housing units / building would be 100% electric, and/or can over time be converted to all-electric. The Current Project is not presently designed to be all-electric from the outset, but will be 100% electric ready per the Building Code so it could be converted to all electric in the future. The Current Project would comply with all City building codes related to electric systems and appliances and would not preclude the adoption of additional requirements by the City.

Table III.F-2
Priority GHG Reduction Strategies

Priority Areas	Priority GHG Reduction Strategies	Current Project Consistency
	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers).	**No Conflict.** The Current Project involves new construction and does not involve retrofitting of existing buildings. However, the Current Project would comply with the energy efficiency requirements of the Green Building Code.
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances.	**No Conflict.** The Current Project involves new construction and does not involve retrofitting of existing buildings.
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing).	**No Conflict.** The Current Project would comply with City building code requirements and would not preclude the installation of renewable energy generation and storage facilities within the Project.
	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings).	**No Conflict.** The Current Project does not include public projects or facilities.

Source: EcoTierra Consulting, 2023; and California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D, approved December 15, 2022.

Because the Current Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions, the Current Project would not result in a significant impact with respect to GHG emissions. As such, like the EIR Project, the Current Project's GHG impacts would be less than significant.

Quantitative GHG Emissions Assessment

The Current Project would involve similar, but less construction than the EIR Project, and would result in less new floor area than the EIR Project. Similar to the EIR Project, the Current Project would increase the service population, but to a lesser degree than the EIR Project. Also similar to the EIR Project, the Current Project would generate GHG emissions due to construction and operational activities (see Table III.F-3, Current Project Construction-Related GHG Emissions, and Table III.F-4, Current Project GHG Emissions).

Table III.F-3
Current Project Construction-Related GHG Emissions

Year	CO_2e Emissions (Metric Tons per Year, unmitigated)
2025	681
2026	460
Total Current Project Construction GHG Emissions	**1,141**
Source: MD Acoustics, 2023. Calculations are in Appendix A to this Addendum.	

Table III.F-4
Current Project GHG Emissions (CO_2e, Metric Tons Per Year)

Land Use	Mobile	Energy		Area	Water	Waste	Refrigerant	Total (rounded)
		Electrical	Gas					
Residential	713[b]	111	103	-	13.3	27.5	0.15	968[b]
Retail	-	29	3.89	-	2.72	4	0.01	40
Restaurant	-	100.3	73.3	-	10.92	43.9	3.1	232
Parking	-	34.3	-	-	-	-	-	34
Landscape Equipment	-	-	-	2.55	-	-	-	3
Total Operational Emissions (rounded)	713	275	180	3	27	76	3	1,277
Construction Emissions [a]								38
							Project Total	***1,315***

[a] In accordance with SCAQMD guidance, total construction GHG emissions were amortized over 30 years and added to the Project operational emissions.
[b] CalEEMod does not calculate trips for individual land uses. Therefore, the total shown includes all Project land uses, including retail and restaurant uses. Use of this total to calculate per capita GHG emissions associated with the Current Project is conservative in that the total emissions shown includes GHG emissions from retail and restaurant uses as well as residential.
Source: MD Acoustics, 2023. Calculations are in Appendix A to this Addendum.

As noted above, the General Plan Update PEIR demonstrated that residential development associated with the General Plan Update would not generate emissions that would exceed the locally-applicable, project-specific threshold of 3.3 MT of CO_2e per service population per year and impacts would be less than significant. As shown in Table III.F-3, total GHG emissions associated with the Current Project would be approximately 1,315 MT of CO_2e per year. Dividing this total by the total service population consisting of 323 residents projected to be generated under the Current Project (based on household size of 2.71 persons per unit, see Section III.K, Population and Housing of this EIR Addendum) and 95 employees for

retail, restaurant and project operations/management uses[1], the GHG emissions of the Current Project would represent emissions of approximately 3.15 MT of CO_2e per service population per year, which would be below the locally-applicable, project-specific threshold of 3.3 MT of CO_2e per service population per year, and impacts would be less than significant.

As discussed above, the Current Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions and would therefore not result in a significant impact with respect to GHG emissions.

Accordingly, no new significant impacts or substantially more severe impacts regarding GHG emissions have been identified for the Current Project.

Cumulative Impacts

EIR Project

As described in the General Plan Update PEIR, the geographic scope for related projects considered in the cumulative impact analysis for GHG emissions is global because the impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources. Therefore, GHG emissions and climate change are, by definition, cumulative impacts. The potential adverse environmental impacts of cumulative GHG emissions, including sea level rise, increased average temperatures, more drought years, and more large forest fires, are already occurring. As a result, cumulative impacts related to GHG emissions are significant. Thus, the issue of climate change involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. As discussed above, the EIR Project would be consistent with the GHG emission reduction policies of the City's General Plan, the SCAG 2020-2045 RTP/SCS, and the CARB 2017 Scoping Plan. Therefore, the contribution of the EIR Project to the cumulative impact of climate change would not be cumulatively considerable and no mitigation is required.

Current Project

As discussed above, the Current Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions and would generate GHG emissions at a rate that would be below the locally-applicable, project-specific threshold of 3.3 MT of CO_2e per service population per year. The Current Project would therefore not result in a significant impact with respect to GHG

[1] *Employment associated with the Current Project was estimated as follows:*

a. *Employment rates for retail and restaurant uses at the existing shopping center were calculated based on actual tenant and employee counts. Rates were calculated to be 1.2 employees per 1,000 square feet for retail and 4.7 employees per 1,000 square feet for restaurant (see Appendix E).*
b. *The Current Project would include 24,163 square feet of retail and restaurant uses (12,205 sq.ft. retail and 11,958 sq.ft. restaurant). Applying the existing shopping center employment factors results in a projected 15 retail and 57 restaurant employees.*
c. *An estimated 23 employees, including a residential property manager, residential coordinator, leasing agent, engineers, concierge, housekeeping and public safety/security, would be required to operate the Current Project (based on Applicant-provided data).*

emissions. Similar to the EIR Project, the Current Project would not result in a cumulatively considerable impact related to GHG emissions.

Accordingly, no new significant impacts or substantially more severe impacts regarding cumulative GHG emissions have been identified for the Current Project.

III. ENVIRONMENTAL IMPACT ANALYSIS
G. HAZARDS AND HAZARDOUS MATERIALS

The analysis of risk of exposure to wildland fires resulting from implementation of the General Plan Update was contained in Section 4.15, *Wildfire*, of the General Plan Update PEIR. Therefore, potential hazards associated with wildland fires are addressed in Section III.O, *Wildfire*, of this General Plan Update PEIR Addendum.

Threshold 1: Would the General Plan Update create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Threshold 2: Would the General Plan Update create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

EIR Project

The General Plan Update PEIR determined that impacts from hazards through the routine transport, use or disposal of hazardous materials, or from accidental release or exposure to these materials would be less than significant with compliance with existing applicable regulations and programs and implementation of General Plan Update policies that minimize risks from routine transport, use, and disposal of hazardous materials, including potential hazards from the accidental release of hazardous materials. Additionally, oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials during operation would minimize the risk of the public's potential exposure to these materials.

The General Plan Update PEIR found that the General Plan Update would facilitate residential and mixed-use development, which typically do not emit hazardous materials or substances. Therefore, impacts would be less than significant.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. Similar to the General Plan Update PEIR, the Current Project development would comply with existing applicable regulations and programs and implementation of General Plan Update policies that minimize risks from routine transport, use, and disposal of hazardous materials, including potential hazards from the accidental release of hazardous materials. Additionally, oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials during operation would minimize the risk of the public's potential exposure to these materials. Therefore, the Current Project's impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant and similar to the EIR Project. Accordingly, no new significant impacts or substantially more severe impacts related to the routine transport, use, or disposal of hazardous materials have been identified for the Current Project.

As discussed in the Phase I Environmental Site Assessment (see Appendix F to this Addendum), there are no recognized environmental conditions associated with the Current Project site. The Phase I Environmental Site Assessment identified the potential for residual pesticides due to former agricultural use on the project site (identified as a business environmental risk); however, the Phase I Environmental

Site Assessment noted that it was unlikely that elevated concentrations of pesticides remain at the site due to prior site grading. Despite the unlikely presence of elevated concentrations of pesticides in the site soils, the Phase I report recommended that near-surface soils be sampled prior to being removed from the project site during future construction activities. If soil is removed from the project site for off-site disposal, the waste soil will need to be classified in accordance with Title 40 Code of Federal Regulations Parts 260-279 and California Code of Regulations, Division 4.5, Title 22 Section 66261. Such characterization could include soil sampling. Based on the unlikely presence of elevated concentrations of residual pesticides and compliance with hazardous waste law, the impacts associated with foreseeable upset and accident conditions and with the routine transport and disposal of hazardous materials would be less than significant.

Threshold 3: Would the General Plan Update emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

EIR Project

Hazardous materials and waste generated from future development would not pose a health risk to nearby schools because businesses that handle or have on-site storage of hazardous materials would be required to comply with the provisions of the California Fire Code and the HHMD CUPA requirements set forth in the California Health and Safety Code, Division 20, Chapter 6.95, Articles 1 and 2. Therefore, impacts were less than significant.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. Site 11 is not located within one-quarter mile of an existing school (see Figure 4.7-1 in the General Plan Update PEIR). Furthermore, as discussed above, the residential and mixed-use development associated with the Current Project typically would not emit or handle hazardous or acutely hazardous materials, substances, or waste. Therefore, this impact would be less than significant and similar the EIR Project. Accordingly, no new significant impacts or substantially more severe impacts related to emitting hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school have been identified for the Current Project.

Threshold 4: Would development facilitated by the General Plan Update be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

EIR Project

The General Plan Update PEIR determined that impacts from development on hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant as development on any documented sites would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board or DTSC before construction activities could begin. Additionally, any unknown underground storage tanks (USTs) in use prior to permitting and record keeping requirements would be removed under permit by the Emergency Operations Section of the Los Angeles County Fire Department's Health Hazardous Materials Division (HHMD) and in compliance

Division 20, Chapters 6.7 and 6.75 (Underground Storage Tank Program) of the California Health and Safety Code.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. The only site identified in the General Plan Update PEIR as being located on a site included on a list of hazardous materials sites is located at 24003 Ventura Boulevard, which is approximately three-quarters mile northeast of Site 11. Site 11 is not located close enough to 24003 Ventura Boulevard to create a significant hazard to the public or the environment.

The General Plan Update PEIR also addressed unidentified Underground Storage Tanks (USTs). However, Site 11 has been previously developed, and it is unlikely that there are any unidentified USTs on the site. Nonetheless, any unknown underground storage tanks (USTs) in use prior to permitting and record keeping requirements would be removed under permit by the Emergency Operations Section of the Los Angeles County Fire Department's Health Hazardous Materials Division (HHMD) and in compliance Division 20, Chapters 6.7 and 6.75 (Underground Storage Tank Program) of the California Health and Safety Code. Therefore, this impact would be less than significant and similar to the EIR Project. Accordingly, no new significant impacts or substantially more severe impacts related to a listed hazardous materials site that could create a hazard to the public or the environment have been identified for the Current Project.

Threshold 5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the General Plan Update result in a safety hazard or excessive noise for people residing or working in the project area?

EIR Project

The General Plan Update PEIR found that there would be no impact from safety hazards or excessive noise from public airports within two miles of the project sites as the Plan Area is located entirely outside of the area of influence for the closest public airport, Van Nuys Airport, which is 10 miles northeast of the City.

Current Project

Similar to the EIR Project, the Current Project is not located within two miles of a public airport or public use airport or within an airport land use plan. Therefore, like the EIR Project, the Current Project would have no impact related to excessive noise hazards within airport land use plan areas or in proximity to airports. Accordingly, no new significant impacts or substantially more severe impacts related to a safety hazard or excessive noise from an airport have been identified for the Current Project.

Threshold 6: Would the General Plan Update impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

EIR Project

The General Plan Update PEIR found that impacts to adopted emergency response plans or emergency evacuation plans would be less than significant as citywide evacuation access would be adequate. Additionally, the City has prepared an Emergency Operations Plan (2012) that describes how the City will effectively prepare for, respond to, and recover from natural disasters, technological incidents, and

national security emergencies, in addition to City emergency planning and local programs such as the Multi-Jurisdictional Hazard Mitigation Plan; therefore, impacts would be less than significant related to implementation of adopted emergency response and evacuation plans.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. The General Plan Update PEIR future population growth projections assumed that Site 11 would be developed with more dwelling units and commercial square forage than proposed under the Current Project. Implementation of the General Plan Update policies and implementation programs associated with emergency planning and response, in addition to City emergency planning and local programs, such as the Multi-Jurisdictional Hazard Mitigation Plan, would ensure that there would be less-than-significant impacts relating to implementation of adopted emergency response and evacuation plans. Impacts would be similar to the EIR Project. Accordingly, no new significant impacts or substantially more severe impacts related to implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan have been identified for the Current Project.

Cumulative Impacts

EIR Project

The geographic scope for hazards and hazardous materials cumulative impacts included the General Plan Update Area. Implementation of the Safety Element policies contained in the General Plan Update and compliance with existing laws and regulations would reduce cumulative hazards and hazardous materials impacts and they would not be cumulatively considerable.

Current Project

Similar to the EIR Project, the Current Project and other future development projects would comply with the Safety Element policies and comply with existing laws and regulations, which would reduce cumulative hazards and hazardous materials, and would ultimately reduce cumulative impacts. Therefore, cumulative impacts would be less than significant.

III. ENVIRONMENTAL IMPACT ANALYSIS
H. HYDROLOGY AND WATER QUALITY

Threshold 1: Would the General Plan Update violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

EIR Project

The General Plan Update PEIR determined that impacts to water quality standards and waste discharge requirements would be less than significant during construction and operation. Construction activities would be required to comply with State and local water quality regulations designed to control erosion and protect water quality during construction, including the installation of silt fences to trap sediments, slope stabilization, and regular sweeping of construction sites to control dust. Post-construction stormwater performance standards are also required to specifically address water quality and channel protection events and adhere to all requirements under the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit and the City's low-impact development (LID) techniques and stormwater control measures as outlined under Chapter 8.28.160 of the Calabasas Municipal Code.

Current Project

Similar to the EIR Project, the Current Project would be required to comply with State and local water quality regulations designed to control erosion and protect water quality during construction. This includes compliance with the requirements of the State Water Resources Board (SWRCB) Construction General Permit, which requires preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for projects that disturb one acre or more of land. The Current Project would be subject to the SWRCB Construction General Permit and would be required to develop a SWPPP. The SWPPP must include erosion and sediment control Best Management Practices (BMPs) that would meet or exceed measures required by the Construction General Permit. Implementation of the required SWPPP would reduce the potential for eroded soil and any contaminants attached to that soil to contaminate a waterbody following a storm event. Impacts to surface and groundwater quality during construction of the Current Project would be less than significant and similar to the EIR Project.

Similar to the EIR Project, development of the Current Project would be required to adhere to all requirements under the Los Angeles County MS4 permit for stormwater management. During operation, the Current Project would employ LID techniques and stormwater control measures as outlined under Chapter 8.28.160 of the Calabasas Municipal Code. Furthermore, the Current Project would be required to comply with Chapter 15.11.080 Storm Drainage and Runoff, Chapter 15.11.090 Dust Prevention and Control, and Chapter 15.11.100 Erosion and Sediment Control of the Calabasas Municipal Code. Compliance with the regulations, permit requirements, and BMPs would prevent or minimize impacts related to water quality and ensure that construction and operation of the Current Project would not cause or contribute to the degradation of water quality in receiving waters. With adherence to these drainage control requirements, construction and operation of the Current Project would not violate any water quality standards or waste discharge requirements (WDRs) or otherwise substantially degrade water quality, and water quality impacts would be less than significant and similar to the EIR Project.

Accordingly, no new significant impacts or substantially more severe impacts related to water quality standards or waste discharge requirements or otherwise substantially degrading surface or ground water quality have been identified for the Current Project.

Threshold 2: Would the General Plan Update substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the General Plan Update may impede sustainable groundwater management of the basin?

EIR Project

The General Plan Update PEIR found that the General Plan Update would not substantially decrease groundwater supplies nor interfere substantially with groundwater recharge, and impacts would be less than significant. The City does not use groundwater for potable uses. The City does use groundwater from the Thousand Oaks Basin, mixed with recycled water, for landscape and golf course irrigation, with a minor quantity used for various commercial uses during peak demand in the summer. Groundwater would only be used during construction activities, and construction water demand would account for approximately 4.6 acre-feet (AF) over the approximately eight-year buildout period, or approximately 0.6 AF per year (AFY), which would represent approximately 0.002 percent of Las Virgenes Municipal Water District's (LVWMD) annual potable water supply as of 2020 and would not result in a long-term demand on water supplies. Development facilitated by the General Plan Update would incrementally increase the amount of impervious surface in the Plan Area, which could incrementally reduce the potential for groundwater recharge from infiltration of precipitation. However, this development would primarily be infill development in previously disturbed areas and increase in impervious surface area would be marginal and less than significant.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot and, as such, would not increase impervious surface area. The existing storage volume of the underground detention basin is 5,530 cubic feet, which is more than the Current Project requirement of 4,560 cubic feet. Furthermore, runoff from the Current Project Site would be reduced, as the site would have approximately 3,900 square feet less impervious area than the existing site condition. The Current Project runoff would connect to the existing storm drain system and would not change the preexisting condition of entering the existing underground detention system (see Appendix G to this Addendum).

In addition, the City requires new construction and redevelopment to use LID techniques such as bioswales and permeable pavement. The impact of the Current Project on groundwater management would be less than significant similar to the EIR Project. Accordingly, no new significant impacts or substantially more severe impacts related to decreasing groundwater supplies or interfering with groundwater recharge have been identified for the Current Project.

Threshold 3a: Would the General Plan Update substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Threshold 3b: Would the General Plan Update substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Threshold 3c: Would the General Plan Update substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

EIR Project

The General Plan Update PEIR found that impacts from changes to drainage, including erosion, siltation, and flooding would be less than significant as projects would comply with State and local water quality regulations designed to control erosion and protect water quality during construction, including the installation of silt fences to trap sediments, slope stabilization, and regular sweeping of construction sites to control dust. Development facilitated by the General Plan Update would adhere to existing regulatory requirements that instruct stormwater management, including management of rainfall at the source by infiltrating stormwater as close to the source as practicable. Per National Pollutant Discharge Elimination System (NPDES) requirements, post-construction peak runoff must be maintained at or below pre-project levels.

Current Project

The Current Project Site generally drains northeasterly to various drain inlets and is further conveyed to the onsite underground storm water detention basin. The existing storage volume of the underground detention basin is 5,530 cubic feet, which is more than the Current Project requirement of 4,560 cubic feet. The Current Project runoff would connect to the existing storm drain system and would not change the preexisting condition of entering the existing underground detention system located in the northeast corner of the site. The Current Project would develop Site 11 within an existing shopping center and parking lot and, therefore, would not alter an existing drainage pattern (see Appendix G to this Addendum).[1]

Similar to the EIR Project, the Current Project would comply with State and local water quality regulations designed to control erosion and protect water quality during construction, including the installation of silt fences to trap sediments, slope stabilization, and regular sweeping of construction sites to control dust. Development of Site 11 would adhere to existing regulatory requirements that instruct stormwater management, including management of rainfall at the source by infiltrating stormwater as close to the source as practicable. Per NPDES requirements, post-construction peak runoff must be maintained at or below pre-project levels. Compliance with local standards and regulations, including, but not limited to, the standards for development in the Los Angeles County Hydrology Manual and the City of Calabasas Municipal Code, would require the Current Project to similarly maintain or reduce post-construction peak runoff.

The landscaping that would be developed with the Current Project would decrease the amount of impervious surface compared to what currently exists on Site 11. Runoff from the Current Project Site would have approximately 3,900 square feet less impervious area than the existing site condition. Therefore, the impact of the Current Project on drainage patterns and the associated erosion, siltation, flooding, and polluted runoff would be less than significant and similar to the EIR Project. Accordingly, no

[1] *Commons at Calabasas Memorandum, Flowers & Associates, Inc., April 17, 2023. See Appendix G to this Addendum.*

new significant impacts or substantially more severe impacts related to the altering of an existing drainage pattern have been identified for the Current Project.

Threshold 3d: Would the General Plan Update substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Threshold 4a: In flood hazard, tsunami, or seiche zones, would the General Plan Update risk release of pollutants due to inundation?

EIR Project

The General Plan Update PEIR determined that impacts to alteration of drainage pattern, including altering the course of a stream or river or the addition of impervious surfaces would be less than significant as development on this site would be required to comply with Chapter 15.16, *Flood Hazard Prevention* of the Calabasas Municipal Code. Chapter 15.16, *Flood Hazard Prevention*, sets forth design requirements in flood-prone areas such as elevating all residential structures at least two feet above the base flood elevation and constructed with materials that can resist strong hydrostatic and hydrodynamic loads. Additionally, all specific project development under the General Plan Update would be required to comply with all regulations and requirements set forth by the Federal Emergency Management Agency (FEMA) and the City's Municipal Code.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot and, as such, would not alter an existing drainage pattern nor increase impervious surfaces (see Appendix G to this Addendum).[2] The Current Project Site generally drains northeasterly to various drain inlets and is further conveyed to the onsite underground storm water detention basin. The Current Project runoff would connect to the existing storm drain system and would not change the preexisting condition of entering the existing underground detention system located in the northeast corner of the site.

Site 11 is not located in a flood hazard zone (see Figure 4.8-2 in the General Plan Update PEIR). Furthermore, similar to the EIR Project, the Current Project would comply with Chapter 15.16, *Flood Hazard Prevention,* of the Calabasas Municipal Code and all regulations and requirements set forth by FEMA. Therefore, the Current Project would not alter an existing drainage pattern, and the impact would be less than significant and similar to the EIR Project. Accordingly, no new significant impacts or substantially more severe impacts related to altering an existing drainage pattern or the course of a stream or river have been identified for the Current Project.

As discussed in the General Plan Update PEIR (page 4.5-6), tsunamis and seiches are associated with ocean surges and inland water bodies, respectively, neither of which are located in close enough proximity to Site 11 to affect the Project site. Furthermore, Site 11 is not located in a flood hazard zone (see Figure 4.8-2 in the General Plan Update PEIR). Therefore, the Current Project would not risk the release of pollutants due to inundation by the flood, tsunami, or seiche. The impact would be less than significant and similar to the EIR Project. Accordingly, no new significant impacts or substantially more severe impacts related to a flood hazard, tsunami, or seiche have been identified for the Current Project.

[2] *Commons at Calabasas Memorandum, Flowers & Associates, Inc., April 17, 2023. See Appendix G to this Addendum.*

Threshold 5: Would the General Plan Update conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

EIR Project

The General Plan Update PEIR determined that the General Plan Update would not conflict or obstruct a water quality control plan or sustainable groundwater management plan as development would not substantially impede recharge in the basin, could be served by LVMWD's existing and planned potable water supplies, and would comply with relevant water quality regulations, BMPs, and policies to reduce the risk of water degradation from soil erosion and other pollutants related to construction and operational activities of development. Therefore, this impact would be less than significant.

Current Project

Similar to the EIR Project, the Current Project would not conflict or obstruct a water quality control plan or sustainable groundwater management plan. Development of Site 11 would not substantially impede recharge in the basin, could be served by LVMWD's existing and planned potable water supplies, and would comply with relevant water quality regulations, BMPs, and policies to reduce the risk of water degradation from soil erosion and other pollutants related to construction and operational activities. Therefore, this impact would be less than significant and similar to the EIR Project. Accordingly, no new significant impacts or substantially more severe impacts related to conflicts with or obstructing the implementation of a water quality control plan or sustainable groundwater management plan have been identified for the Current Project.

Cumulative Impacts

EIR Project

The General Plan Update PEIR found the geographic scope for cumulative impacts for hydrology and water quality is the western portions of the Upper Los Angeles River watershed and eastern portions of the Malibu Creek Watershed. All cumulative development would be required to adhere to all applicable State and local regulations designed to control erosion and protect water quality, including the Calabasas Municipal Code, NPDES Construction General Permit, and LARWQCB Basin Plan. Each development proposal would be required to reduce the on-site post-development peak discharges at or below pre-development peak discharge rates by implementing on-site LID features and other groundwater recharge design elements. Compliance with mandatory Clean Water Act (NPDES Construction General Permit and MS4 General Permit) and Calabasas Municipal Code requirements would further reduce the potential for water quality degradation and violations of water quality standards as a result of cumulative development. Therefore, construction and operation of all cumulative development would be required to comply with the City's LID ordinance as outlined in Chapter 8.28.160, which aims to specifically reduce the amount of surface runoff and aid in groundwater recharge through techniques such as infiltration, evapotranspiration, bioretention and/or rainfall harvest. Therefore, the General Plan Update would not result in a significant cumulative impact.

Portions of the City are located within a 100-year flood hazard area. Cumulative development in other areas in the Upper Los Angeles River and Malibu Creek watersheds that are subject to inundation may have localized impacts. However, projects would be analyzed and mitigated on a case-by-case basis and would be designed to avoid or mitigate potential impacts related to flooding in compliance with the Municipal Code. Cumulative impacts related to flooding, seiche, and tsunami would, therefore, be less

than significant. The General Plan Update would not impede or redirect flood flows or risk release of pollutants due to inundation. Impacts from implementation of the General Plan Update related to flood flows and inundation would be less than significant. Flooding is localized and site specific, therefore, the General Plan Update would not have a cumulatively considerable contribution to a significant cumulative impact related to flood hazard or inundation risks.

Current Project

Similar to the EIR Project, the Current Project would comply with all applicable State and local regulations designed to control erosion and protect water quality, including the Calabasas Municipal Code, NPDES Construction General Permit, and LARWQCB Basin Plan. In addition, Site 11 is not located in a flood hazard zone (see Figure 4.8-2 in the General Plan Update PEIR). Runoff would connect to the existing storm drain system and would not change the preexisting condition of entering the existing underground detention system located in the northeast corner of the site. Runoff would have approximately 3,900 square feet less impervious area than the existing site condition. The Current Project would be required to reduce the on-site post-development peak discharges at or below pre-development peak discharge rates by implementing on-site LID features and other groundwater recharge design elements.

Compliance with mandatory Clean Water Act (NPDES Construction General Permit and MS4 General Permit) and Calabasas Municipal Code requirements would further reduce the potential for water quality degradation and violations of water quality standards as a result of cumulative development, including the Current Project. Construction and operation of all cumulative development, including the Current Project, would be required to comply with the City's LID ordinance as outlined in Chapter 8.28.160. Therefore, the Current Project would not result in a significant cumulative impact.

III. ENVIRONMENTAL IMPACT ANALYSIS
I. LAND USE AND PLANNING

Threshold 1: Would the General Plan Update physically divide an established community?

EIR Project

The General Plan Update PEIR found that the General Plan Update would increase the potential number of dwelling units in the Plan Area and intensify development in existing urban areas, but would not create structures, such as roadways, that could physically divide an established community; therefore, there would be no impact.

Current Project

The Current Project includes the demolition of a part of the southwestern portion of the Commons Shopping Center, which is developed with an existing 33,091 square-foot movie theater, retail and restaurant land uses, and 139 surface parking spaces and the construction of two mixed-use buildings (Building A and Building B), including approximately 24,163 square feet of ground-floor commercial space and 119 multi-family residential units, incorporating at least 10 percent (or 12 dwelling units) set aside as Affordable Units. The Current Project would develop fewer residential units and less commercial square footage on Site 11 as compared to the 201 units and 44,393 square feet analyzed in the PEIR. The Current Project would not create structures, such as roadways, that could physically divide an established community. Therefore, no impacts would occur, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to the physical division of an established community have been identified for the Current Project.

Threshold 2: Would the General Plan Update cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

EIR Project

The General Plan Update PEIR determined that the General Plan Update would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect as programs and policies in the Housing Element update would facilitate the development of housing at densities appropriate for respective income levels, consistent with the RHNA under State law. Despite accommodating growth beyond that anticipated in the current RTP/SCS and 2030 General Plan, housing growth under the General Plan Update would not be substantial or unplanned, and therefore consistent with State regulations. The General Plan Update would incorporate the new state housing requirements. The RTP/SCS would be brought into consistency with the General Plan at the next RTP/SCS cycle to reflect new forecasts for each city in the region; therefore, the planned growth under the General Plan Update would not conflict with the SCAG RTP/SCS. In addition, the City adopted an addendum to the General Plan Update PEIR in April 2023 that includes updates to the Circulation and Safety Elements. The Circulation Element update includes updated language regarding vehicle miles traveled, emergency evacuation, complete streets, and circulation enhancements on critical intersections; it also includes the addition of Agoura Road as a freeway segment affected by freeway diversion. The Safety Element update includes language and terminology regarding fire hazards, climate change vulnerability, and emergency

evacuation. The Safety Element updates also include 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. The General Plan Update, including recent updates to the Circulation and Safety Elements, would be consistent with the existing General Plan policies promoting infill development and with land use development objectives of the SCAG 2020 RTP/SCS. Therefore, the General Plan Update would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

Current Project

The Current Project's approximately 24,163 square feet of ground-floor commercial space and 119 multi-family residential units would be consistent with the General Plan, which designates the site for Mixed Use (MU) 0.95. The MU designation accommodates a broad range of office, retail, visitor-serving uses, and commercial services, as well as higher density residential uses. Pursuant to the General Plan, this designation is intended to provide for innovative site design and the creation of relatively high intensity, pedestrian-oriented environments with an integrated mix of uses. The project site is zoned CMU for Commercial, Mixed Use. As the Current Project proposes a mixed-use development, including commercial and residential uses, the Current Project would be consistent with both the General Plan designation and site zoning.

The Current Project would not conflict with any General Plan policies or measures that are intended for environmental protection. Moreover, infill development in existing urban areas, as would be developed with the Current Project, (as opposed to development in vacant spaces) is designed to fulfill State housing requirements in such as a way as to avoid biologically and culturally sensitive areas; reduce development in areas that exacerbate risk of geological and wildfire hazards; reduce per capita VMT and air quality, GHG, and energy impacts; reduce the need for additional utility infrastructure; and minimize potential impacts to scenic resources, such as ridgelines. Like the EIR Project, the Current Project would be consistent with the existing General Plan policies promoting infill development and with land use development objectives of the SCAG 2020 RTP/SCS. As discussed in the General Plan Update PEIR, the General Plan Update would be consistent with the following policies of the 2030 General Plan that promote infill development to reduce potential environmental impacts:

- Policy II-8: Emphasize retention of Calabasas natural environmental setting, neighborhood character, and scenic features as a priority over the expansion of urban areas.
- Policy IX-44: Preserve large areas of natural hillsides and other dominant natural environmental features visible from the Ventura Freeway.

Therefore, the Current Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect have been identified for the Current Project.

Cumulative Impacts

EIR Project

The cumulative setting for land use and planning impacts is the General Plan Update area. Cumulative land use and planning impacts, such as the potential for conflicts with adjacent land uses and consistency with adopted plans and regulations, are typically site- and project-specific. However, because the exact size, nature, and location of future developments and associated infrastructure improvements are not known at this time, the General Plan Update PEIR found that would be speculative to predict when impacts may occur.

Current Project

The Current Project would not include any features that would physically divide an established community and, as such, would not contribute to cumulative impacts. Specifically, the Current Project site is surrounded by and consistent with similar land uses that are compatible.

The Current Project is an infill project in an existing center developed with commercial and governmental uses. To the north of the Current Project Site, across Calabasas Road, is a two-story office use and associated parking. The eastern portion of the Commons Shopping Center, comprising retail shops and associated parking, is adjacent to the Current Project Site to the east. To the south of the Current Project Site is a landscaped hillside and Park Granada, a roadway. West of the Current Project Site is Calabasas City Hall and Calabasas Library. Other uses in the Current Project area include hotel uses, and other commercial retail stores, restaurants, and services. Therefore, the Current Project would not contribute to a cumulative environmental impact related to potential conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

III. ENVIRONMENTAL IMPACT ANALYSIS
J. NOISE

Threshold 1: Would the General Plan Update result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

EIR Project

Construction

The General Plan Update PEIR identifies noise-sensitive land uses as residences, schools, parks, hotels, hospitals, libraries,[1] hotels/motels, places of worship, and auditoriums**.** Residences and other noise-sensitive land uses adjacent to the proposed housing sites would be the most affected by construction noise associated with reasonably foreseeable development facilitated by the General Plan Update. Since there are no specific plans or time scales for reasonably foreseeable development, it is not possible to determine exact noise levels, locations, or time periods for construction. However, for purposes of analyzing potential impacts from the construction of reasonably foreseeable development facilitated by the General Plan Update, the PEIR used criteria from the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual.* The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction. For residential uses, the daytime noise threshold is 80 dBA L_{eq} for an 8-hour period.

Based on this threshold, the General Plan Update PEIR determined that construction activities facilitated by the General Plan Update would have the potential to temporarily exceed the threshold of 80 dBA L_{eq} (8-hour) at sensitive receptors in the vicinity of future development projects. Therefore, implementation of Mitigation Measure MM N-1 would be required which would reduce impacts to a less-than-significant level.

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.

[1] *Calabasas Library is specifically called out as a sensitive receptor in the General Plan Update PEIR.*

- 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.

Operation

The General Plan Update PEIR determined that operation of future development projects facilitated by the General Plan Update would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the project sites. The General Plan Update would primarily facilitate new residential development at 12 identified housing sites. Noise sources typically associated with residential land uses include mechanical equipment (e.g., heating, ventilation, and air conditioning equipment), conversations, landscaping equipment, recreational activities, parking, and social gatherings. The City has adopted specific standards for noise associated with projects in CMC Chapter 17.20.160 and CMC Chapter 9.28.010. Furthermore, the General Plan Noise Element includes policies that serve to minimize operational noise associated with new development projects.

With respect to traffic noise, increased traffic noise generated by future development projects facilitated by the General Plan Update would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of these project sites. Buildout under the proposed General Plan Update would have significant traffic noise impacts if it would increase noise levels at sensitive receivers by more than 3 dBA. Traffic volumes associated with reasonably foreseeable development would not double existing traffic volumes along any affected roadways and, therefore, would not result in more than a 3 dBA increase in traffic noise levels at sensitive receivers for any of the 12 sites.

Therefore, operational noise impacts would be less than significant, and no mitigation measures are required.

Current Project

Construction

The Current Project would develop Site 11 with fewer residential units (119 versus 201) and less commercial space (24,163 square feet versus 44,393 square feet) than analyzed in the General Plan Update PEIR. Sensitive receptors in the vicinity of the Current Project site are shown in Figure III.J-1, (Sensitive Receptors) and listed in Table III.J-1, (Estimated Exterior Construction Noise at Sensitive

Source: GoogleEarth, March 2020.

Figure III-J.1
Sensitive Receptors

Receptors). Similar to the EIR Project, the Current Project would increase noise levels during construction at sensitive receptors. Under the Current Project, as shown in Table III.J-1, the impact of construction noise to sensitive receptors would be below the 80 dBA L_{eq} (8-hour) threshold and less than significant before mitigation at four of the five sensitive receptors located in the vicinity of the Current Project construction site. Construction activities associated with the Current Project would potentially generate noise levels that temporarily exceed the 80 dBA L_{eq} (8-hour) threshold at Sensitive Receptor 1 (Calabasas Library). The highest levels shown in Table III.J-1 would only occur when all pieces of construction equipment are operating simultaneously at the edge of the construction site located nearest the library. This infrequent occurrence would represent the most conservative effect of the construction activity associated with the Current Project. Similar to the EIR Project, the Current Project would implement Mitigation Measure MM N-1. Consistent with, and in furtherance of, MM N-1, the Current Project would include a temporary sound barrier capable of achieving at least 15 dBA reduction at the edge of the construction site located nearest the Calabasas Library. The barrier shall be at least 15 feet in height and shall be of sufficient length to block the line of sight from the construction site to the library. As shown in Table III.J-1, the highest construction noise level that could be experienced at the library is 94.1 dBA L_{eq} (8-hour). With the inclusion of a sound barrier with minimum 15 dBA reduction, the maximum level at the library would be 79.1 dBA L_{eq} (8-hour), which would be below the significance threshold of 80 dBA L_{eq} (8-hour).

Table III.J-1
Estimated Exterior Construction Noise at Sensitive Receptors

Sensitive Land Uses	Distance to Construction Site (feet)	Monitored Daytime Ambient Noise Levels (dBA L_{eq})[a]	Estimated Peak Construction Noise Levels (dBA L_{eq})(8-hour)[b]	Peak Noise Levels at Receptor (Ambient plus Peak Construction (dBA L_{eq})(8 hour)	Threshold (dBA L_{eq}) (8 hour)	Potentially Significant Impact?
1. Calabasas Library	25	44.9	94.1	94.1	80	Yes
2. Calabasas Senior Center	286	44.9	73.3	73.3	80	No
3. Park Granada Residential	776	67.6	64.6	69.4	80	No
4. Calabasas Avanti Residential	1,234	64.3	60.6	65.8	80	No
5. Parkway Calabasas Residential	1,288	69,9	58.6	70.2	80	No

a Monitoring worksheets are in Appendix H to this Addendum.

b Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2018. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period. Calculations are in Appendix H to this Addendum.

Source: MD Acoustics, 2023.

Moreover, the City's Noise Ordinance, Calabasas Municipal Code (CMC) Chapter 17.20.160(C)(4) (Exceptions to Noise Standards) exempts construction noise from the standards of CMC Chapter 17.20.160(D), (Exterior Noise Level Standards), provided that construction activities are restricted to between 7:00 a.m. and 6:00 p.m. on weekdays and between 8:00 a.m. and 5:00 p.m. on Saturdays. No

construction is allowed on Sundays or federal holidays. With the inclusion of MM N-1, construction noise impacts of the Current Project would be less than significant after mitigation and would not represent a new significant impact or increase in the severity of a previously identified impact would occur. No additional mitigation measures are required.

Operation

The Current Project would have similar traffic generation, parking design, and operating equipment to the EIR Project. Traffic noise levels with the Current Project are presented in Table III.J-2, Offsite Roadway Noise Levels. A significant impact on noise levels from project operations would occur if the project causes the ambient noise level at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase in CNEL. As shown in Table III.J-2, the Current Project would not generate sufficient traffic to cause an audible increase (i.e., 3 dBA or greater) in noise levels during operation. Parking lot noise would be contained within a structure and would not exceed ambient levels.

The Current Project would include stationary mechanical equipment typical of residential development, such as air conditioning and HVAC equipment. The City has adopted specific standards for noise associated with projects in CMC Chapter 17.20.160, including limitations on exterior and interior noise levels and limitations on noise generated within known wildlife nesting or migration areas and natural open space. In addition, CMC Chapter 9.28.010 prohibits the creation of nuisance noise. Compliance with the requirements of the City's Noise Ordinance would ensure that impacts from stationary equipment would be less than significant.

In addition to traffic and HVAC noise sources, the Current Project could include a rooftop pool deck on Building A that could accommodate events involving gatherings of residents and guests and speaker noise. The Project's various outdoor amenities on the rooftop could include a swimming pool and spa, fitness room and workroom/meeting area for residents.

The City of Calabasas Noise ordinance regulates noise levels from such sources at sensitive receptors. CMC Section 17.20.160.D (Exterior Noise Level Standards) provides exterior noise level standards. The most stringent of these are as follows:

- Residential Zones: Hourly L_{eq} not to exceed 50 dBA from 10 p.m. to 7 a.m. and 65 dBA from 7 a.m. to 10 p.m. on Monday through Friday; nor to exceed 50 dBA from 10 p.m. to 8 a.m. and 60 dBA from 8 a.m. to 10 p.m . on Saturday and Sunday.
- Commercial Zones: Hourly L_{eq} not to exceed 65 dBA from 10 p.m. to 7 a.m. and 70 dBA from 7 a.m. to 10 p.m. (+5 dB for mixed use).
- Open Space: CNEL not to exceed CNEL 60 dBA.

Table III.J-2
Offsite Roadway Noise Levels

Roadway	Roadway Segment[a]	dBA CNEL					
		Existing [1]	Existing + Project [2]	*Net Increase [2]-[1]*	Opening Year (2027)[a]	Opening Year + Project [3]	*Net Increase [3]-[1]*
Ventura Blvd.	Pkwy Calabasas to US 101 off ramp	66.0	66.1	***0.1***	66.5	66.6	***0.6***
	East of US 101 off ramp	60.5	60.5	***0.0***	60.6	60.6	***0.1***
Calabasas Rd.	West of US 101 ramps	70.0	70.1	***0.1***	71.1	71.1	***1.0***
	US 101 ramps to Pkwy Calabasas	72.2	72.3	***0.1***	72.9	72.9	***0.7***
	Pkwy Calabasas to Park Granada	72.2	72.2	***0.0***	72.5	72.6	***0.4***
	Park Granada to El Canon Ave	70.1	70.1	***0.0***	70.4	70.4	***0.3***
Park Sorrento	East of Park Granada	66.7	66.8	***0.1***	67.1	67.1	***0.4***
Park Granada	Pkwy Calabasas Rd to Park Sorrento	70.0	70.1	***0.1***	70.3	70.3	***0.3***
	Park Sorrento to Calabasas Rd	70.3	70.4	***0.1***	70.6	70.7	***0.4***
US 101 off ramp EB	US 101 to Calabasas Rd	66.7	66.7	***0.0***	67.3	67.4	***0.7***
US 101 on ramp EB	Calabasas Rd to US 101	66.7	66.7	***0.0***	67.3	67.4	***0.7***
Parkway Calabasas	US 101 to Calabasas Rd	73.8	73.9	***0.1***	74.3	74.3	***0.5***
	Calabasas Rd to Park Granada	72.4	72.4	***0.0***	72.7	72.7	***0.3***
	South of Park Granada	71.5	71.6	***0.1***	71.8	71.8	***0.3***
US 101 off ramp WB	Ventura Blvd to US 101	63.4	63.5	***0.1***	64.0	64.1	***0.7***

[a] Traffic levels based on related projects and ambient growth factor of 1% per year.

Note: A significant impact on noise levels from project operations would occur if the project causes the ambient noise level at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (see Table 4.10-6, Community Noise Exposure (CNEL)).

[a] TRANSPORTATION IMPACT ANALYSIS, THE COMMONS LANE, City of Calabasas, California, May 2, 2023, Linscott, Law & Greenspan, Engineers. See Appendix I to this Addendum.

Source: MD Acoustics, 2023. Calculations are in Appendix H to this Addendum.

Sound generated from the rooftop facilities would be associated with two primary sources: 1) people talking; and 2) sound system speakers. The average decibel level of human speech is estimated between 55 and 65 decibels. For this operational noise analysis, reference noise levels of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used for analyzing potential noise impacts from people gathering at the outdoor spaces.[2] In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. The normal attendance at a gathering is estimated to be approximately 75 persons. In addition, the hours of operation for use of the outdoor spaces were assumed to be unlimited[3].

An additional potential noise source associated with outdoor uses would include the use of outdoor sound systems (e.g., ambient music broadcast through an outdoor mounted speaker system). The sound from outdoor sound systems, if used, would potentially be heard by people in the immediate vicinity of the outdoor areas. As part of the Current Project, the sound system used in the outdoor areas would be designed so as not to exceed noise level of 80 dBA L_{eq}[4] at a distance of 25 feet (approximately 89 dBA L_{eq} at 10 feet) in order to remain within the allowable maximum noise level for residential areas of 50 dBA. This level of sound emanating from an amplified system would generally be louder than and mask any noise associated with people talking. As such, these sources would represent a combined source level no greater than 81 dBA L_{eq} at 25 feet. As shown in Table III.J-3 (Estimated Exterior Noise at Sensitive Receptors from Outdoor Rooftop Activity), distances from the center of the rooftop to nearby sensitive receptors would range from approximately 260 feet to the nearest receptor (Calabasas Library [Sensitive Receptor 1]) and approximately 1,450 feet to the most distant receptor (Parkway Calabasas Residential area [Sensitive Receptor 5]). As shown in Table III.J-3, levels that would be experienced at the sensitive receptors from outdoor activity at the Current Project would be below the applicable City Exterior Noise Level Standards. Accordingly, impacts of potential activity on the rooftop deck of the Current Project would be less than significant and no mitigation measures are required.

Accordingly, no new significant impacts or substantially more severe impacts due to a substantial temporary or permanent increase in ambient noise levels have been identified for the Current Project.

---

[2] *Harris, Cyril M., Handbook of Acoustical Measurements and Noise Control, Third Edition, 1991, Table 16.1.*

[3] *While unlimited hours are assumed for analysis purposes, expected hours for typical activities on the rooftop deck would be 7 a.m. to 10 p.m.*

[4] *Represents the maximum source level for the sound system for analysis purposes; typical events would reflect ambient levels (i.e., 65-75 dBA) for sound systems.*

Table III.J-3
Estimated Exterior Noise at Sensitive Receptors from Outdoor Rooftop Activity

Sensitive Land Uses	Distance to Pool Area (feet)	Estimated Noise Level (dBA L_{eq})[a]	Threshold (dBA L_{eq})	Potentially Significant Impact?
1. Calabasas Library	260	60	70[b]	No
2. Calabasas Senior Center	560	54	70[b]	No
3. Park Granada Residential	880	50[d]	50[c]	No
4. Calabasas Avanti Residential	1,430	46	50[c]	No
5. Parkway Calabasas Residential	1,450	46	50[c]	No

a Based on attenuation of 6 dBA for each doubling of distance. Calculated using the formula SPL2 = SPL1−20 log (R1/R2) where SPL1 = Sound pressure level at point 1; SPL2 = Sound pressure level at point 2; R1 = Distance from the sound source to point 1; and R2 = Distance from the sound source to point 2. https://www.omnicalculator.com/physics/distance-attenuation

b Commercial zone daytime (7.a.m. to 10 p.m.) limit per CMC Section 17.20.160.D (Exterior Noise Level Standards) to correspond with operating hours of library and senior center.

c Residential zone nighttime (10 p.m. to 7 a.m. Mon-Fri; 10 p.m. to 8 a.m. Sat-Sun) limit per CMC Section 17.20.160.D (Exterior Noise Level Standards). While unlimited hours are assumed for analysis purposes, expected hours for typical activities on the rooftop deck would be 7 a.m. to 10 p.m.

d Conservative estimate since attenuation of 6 dBA for doubling of distance assumed whereas the area between the source and receptor in this case is comprised of undeveloped hillside area where estimated attenuation is 7.5 dBA per doubling of distance.

Source: EcoTierra Consulting, 2023.

Threshold 2: Would the General Plan Update result in generation of excessive groundborne vibration or groundborne noise levels?

EIR Project

Construction

The General Plan Update PEIR determined that construction activities and the operation of future development projects facilitated by the General Plan Update would not result in the generation of excessive groundborne vibration or groundborne noise levels. The General Plan Update would facilitate the construction of housing units in the Plan Area. Certain types of construction equipment that could be utilized during construction activities facilitated by the proposed General Plan Update, such as vibratory rollers, bulldozers, jackhammers, and loaded trucks can generate high levels of groundborne vibration. Vibration-generating construction equipment would occasionally pass-by off-site structures within 25 to 50 feet. Vibration levels from individual pieces of construction equipment would not exceed the human annoyance or structural damage thresholds for construction activities at distances of 25 and 50 feet based on the significance thresholds shown in Table III.J-4, Vibration Thresholds. As a result, impacts would be less than significant, and no mitigation measures are required.

Table III.J-4
Vibration Thresholds

Type of Impact	Thresholds for Construction Activities (in/sec PPV)	Thresholds for Operational Activities (in/sec PPV)
Human Annoyance	0.25	0.04
Damage to Historic and Some Old Buildings	0.5	0.25
Damage to Older Residential Structures	0.5	0.3
Damage to Newer Residential Buildings	1.0	0.5

in/sec = inches per second; PPV = peak particle velocity.
Source: Calabasas General Plan Update Program EIR, Tables 4.10-2 and 4.10-3, based on Transportation and Construction Vibration Guidance Manual, Caltrans, 2020.

Operation

The General Plan Update PEIR determined that the proposed residential land uses would not include significant stationary sources of vibration, such as manufacturing or heavy equipment operations. No operation-related vibration impact would occur, and no mitigation measures are required.

Current Project

The Current Project would involve similar construction and would use similar construction equipment as the EIR Project. Similar to the EIR Project, the Current Project would generate groundborne vibration levels during construction that would not be perceptible at nearby sensitive receptors (see Table III.J-5, Estimated Vibration Levels at Nearest Sensitive Receptors). This impact would be less than significant, and no mitigation measures are required.

The Current Project proposed residential land uses would not include significant stationary sources of vibration, such as manufacturing or heavy equipment operations. No operation-related vibration impact would occur, and no mitigation measures are required.

Table III.J-5
Estimated Vibration Levels at Nearest Sensitive Receptors

Sensitive Land Uses	Distance to Construction Site (feet)	Estimated Vibration Levels in PPV (in/sec)	Threshold - Building Damage in PPV (in/sec)	Significant Impact?	Threshold – Human Annoyance in PPV (in/sec)	Significant Impact?
1. Calabasas Library	25	0.085	0.5	No	0.25	No
2. Calabasas Senior Center	286	0.006	0.5	No	0.25	No
3. Park Granada Residential	776	0.002	0.5	No	0.25	No
4. Calabasas Avanti Residential	1,234	0.001	0.5	No	0.25	No
5. Parkway Calabasas Residential	1,288	0.001	0.5	No	0.25	No

Note: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2018. Transit Noise and Vibration Impact Assessment, Final Report, May 2006. These vibration levels are estimates.
Source: MD Acoustics, 2022. Calculations are in Appendix H to this Addendum.

Accordingly, no new significant impacts or substantially more severe impacts related to excessive groundborne vibration or groundborne noise levels have been identified for the Current Project.

Threshold 3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the General Plan Update expose people residing or working in the project area to excessive noise levels?

EIR Project

The General Plan Update PEIR determined that projects facilitated by the General Plan Update would be located outside the planning area for the Van Nuys Airport. In addition, the Plan Area is not located within two miles of private airstrips. Therefore, the General Plan Update would not expose people residing in the plan area to excessive noise levels. No impacts would occur, and no mitigation measures are required.

Current Project

The Current Project would be located outside the planning area for the Van Nuys Airport. Therefore, the Current Project would not expose people residing in the plan area to excessive noise levels. No impacts would occur, and no mitigation measures are required.

Accordingly, no new significant impacts or substantially more severe impacts related to the exposure of people to excessive noise levels from an airport have been identified for the Current Project.

Land Use Compatibility

EIR Project

The ruling for *California Building Industry Association v. Bay Area Air Quality Management District* (*CBIA v. BAAQMD*) determined that under CEQA, except for a few specified and limited instances, environmental impacts on residents of a proposed project are not required to be analyzed, except when the project would exacerbate environmental hazards or conditions that already exist (i.e., CEQA requires the analysis of the impacts of a project on the environment and not analysis of the environment's impacts on a project). As discussed in the General Plan Update PEIR, additional traffic associated with the proposed General Plan Update would not significantly exacerbate existing ambient noise conditions; therefore, an evaluation of how future residents of the Plan Area would be affected by exacerbated conditions is not required. Accordingly, the following noise/land use compatibility discussion is provided for informational purposes only.

The General Plan Update would facilitate the construction of multi-family housing on several sites throughout the Plan Area. The City's General Plan Noise Element considers ambient exterior noise levels up to 65 CNEL to be normally acceptable and ambient noise levels up to 70 CNEL to be conditionally acceptable for multi-family land uses. Noise levels near U.S. 101 and arterial roadways in the Plan Area are estimated to reach 65 to over 75 CNEL at a distance of 50 feet, depending on the roadway and associated traffic volumes, under maximum buildout of the 2030 General Plan.

Ambient noise levels at housing sites in close proximity to US-101, such as housing sites 1, 2, 3, 4, 7, 9, 11, and 12 are estimated to fall within 70 to 75 CNEL, which is the "normally unacceptable" range for new multi-family residential land uses. According to the City's General Plan Noise Element, if ambient noise levels fall within the "normally unacceptable" range, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design if new development proceeds. Ambient noise levels at the remaining housing sites (i.e., sites 6, 7, and 9) are estimated to fall within 65 to 70 CNEL, which is the "conditionally acceptable" range for multi-family residential land uses. Ambient noise levels at these sites would be lower due to their distance from U.S. 101 and lower traffic volumes on arterial roadways such as Las Virgenes Road and Lost Hills Road. According to the City's General Plan Noise Element, if ambient noise levels fall within the "conditionally acceptable" range, new development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.

Current Project

The Current Project would comply with the requirements of CMC Section 17.20.16(E) (Interior Noise Level Standards for Residential Uses) which sets a standard of 45 dBA L_{eq} during daytime hours (7 a.m. to 10 p.m.) and 40 dBA L_{eq} during nighttime hours (10 p.m. to 7 a.m.). The Current Project would be reviewed for its noise/land use compatibility and require the inclusion of design features to reduce exterior and interior noise exposure in areas where existing ambient noise levels exceed "normally acceptable" levels through the provision of interior insulation and glazing adequate to achieve these levels, as enforced through the City's building code. Therefore, compliance with the policies of the City's General Plan and Noise Ordinance would ensure that impacts related to noise/land use compatibility would be less than significant.

Cumulative Impacts

EIR Project

The geographic scope for cumulative noise impacts is generally limited to areas within 0.5 mile of the proposed housing sites. Construction activities associated with the General Plan Update may overlap with construction activities for other cumulative development projects within and near the Plan Area. Construction noise is localized and rapidly attenuates within an urban environment. Construction activities for cumulative development projects would be subject to compliance with local ordinances and General Plan policies, including CMC Chapter 17.20.160(C)(4), which establishes the allowed hours of construction, and General Plan Policy VIII-8, which requires the review of construction noise for proposed development projects in the Plan Area. Nonetheless, combined noise levels associated with simultaneous construction activities at sites in close proximity to each other may result in a significant temporary increase in ambient noise levels at noise-sensitive uses, such as residences and schools, in excess of the threshold of 80 dBA L_{eq} (8-hour) depending on the proximity of noise sensitive receivers to the proposed housing sites. Therefore, cumulative construction noise impacts would be significant. Depending on the proximity of simultaneous construction activities, the contribution of reasonably foreseeable development facilitated by the General Plan Update may comprise the majority of these combined construction noise levels. As a result, the General Plan Update's contribution to the cumulative construction noise impact would be cumulatively considerable. Mitigation Measure MM N-1 requires project applicants to coordinate with other project applicants and/or construction contractors located within 500 feet of the project site to minimize the magnitude and duration of combined construction noise levels. In addition, the requirement for each construction project to provide a non-automated telephone number for local residents to call to submit complaints associated with construction noise during all phases of construction would provide a mechanism for addressing specific instances of high construction noise levels during overlapping construction activities. Implementation of this mitigation measure would reduce the project's contribution to cumulative construction noise impacts such that it would not be cumulatively considerable.

Cumulative operational noise would consist of the combined operational noise of residential projects facilitated by the General Plan Update in conjunction with existing and future development in the vicinity of the proposed housing sites, which would increase noise associated with operational sources, such as mechanical equipment (e.g., heating, ventilation, and air conditioning equipment), conversations, landscaping equipment, recreational activities, parking, and social gatherings. However, operational noise generated by existing and future land uses would be subject to the restrictions of CMC Chapters 9.28.010 and 17.20.160, and future development projects would also be subject to the noise-related policies of the City's General Plan Noise Element. Therefore, no cumulative operational noise impact would occur.

Cumulative plus project traffic volumes would not double existing traffic volumes along affected roadways and, therefore, would not result in more than a 3 dBA increase in traffic noise levels at sensitive receivers. Therefore, no cumulative traffic noise impact would occur.

Vibration generated by human activities, such as construction, is localized and rapidly attenuates with distance. It is possible that construction activities facilitated by the General Plan Update would occur at the same time as other development projects in and near the Plan Area. However, it is unlikely that vibration-generating equipment used for construction of other development projects would operate close enough to the proposed housing sites and the nearest sensitive receivers such that cumulative vibration impacts at the same receivers or structures would occur. Therefore, no cumulative impact related to construction vibration would occur.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. The proposed development on Site 3 is located southwest of the Current Project Site, to the west of City Hall. If construction of that project happens to overlap with the construction on Site 11, potentially significant cumulative construction noise increases could occur. As noted above, the Current Project would have a less than significant impact after mitigation on the nearest sensitive receptor (Calabasas Library). Because of the proximity of the proposed development on Site 3 to the library, construction noise from the Current Project and the proposed development on Site 3 would have the potential to result in a significant cumulative impact. However, the proposed development on Site 3 is located on the opposite side of the library from the Current Project, at a greater distance than the Current Project, and is shielded from the library building by the City Hall building (see Figure III.J-1). Shielding provided from this building would be particularly effective at reducing noise at the northern edge of the proposed development on Site 3, which is the closest point from this site to the library building. Further, any overlap of the construction activities of both projects at the respective closest points to the library building would be infrequent and temporary. Moreover, Mitigation Measure MM N-1 would apply to the proposed development on Site 3, which would work to reduce the magnitude of combined construction noise levels. Accordingly, potential cumulative construction noise impacts at the Calabasas Library would not be cumulatively considerable.

Similarly, potential cumulative impacts on the Senior Center could result if construction of the proposed development on Site 3 would overlap with construction of the Current Project. In this case, the primary source of construction noise that would affect the Senior Center would be generated by the proposed development on Site 3 because of its proximate location to the Senior Center. As shown in Table III.J-1, the Current Project would have a less than significant impact on the Senior Center before mitigation. The contribution of the Project to any significant cumulative construction noise impact would be reduced or eliminated by the greater distance of the Current Project from the Senior Center. In addition, the Current Project would install a noise barrier at the southern edge of the construction site which would further reduce any contribution of the Current Project to a cumulative construction noise impact at the Senior Center. Accordingly, potential cumulative impacts at the Senior Center would not be cumulatively considerable.

As shown in Table III.J-3, cumulative plus project traffic volumes would not result in more than a 3 dBA audible increase in traffic noise levels. Therefore, no cumulative traffic noise impact would occur. Operational noise generated by existing and future land uses would be subject to the restrictions of CMC Chapters 9.28.010 and 17.20.160, and future development projects would also be subject to the noise-related policies of the City's General Plan Noise Element. Therefore, no cumulative operational noise impact would occur.

It is possible that construction activities associated with the proposed development on Site 3 would occur at the same time as the Current Project. However, vibration-generating equipment used for construction of the Current Project would be substantially below the significance thresholds for building damage and human annoyance and the vibration impacts on the Calabasas Library from the proposed development on Site 3 would be lower than the Current Project since it would be located at a greater distance from the library and would have lower vibration impacts on the library during construction. Therefore, no cumulative impact related to construction vibration would occur.

Similar to the EIR Project, the Current Project would not result in a cumulatively considerable impact related to noise or vibration.

III. ENVIRONMENTAL IMPACT ANALYSIS
K. POPULATION AND HOUSING

Threshold 1: Would the General Plan Update induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

EIR Project

The General Plan Update PEIR found that the General Plan Update would facilitate development beyond what is forecast in both the 2030 General Plan and SCAG's 2020 RTP/SCS; however, the rezoning of select parcels is needed to meet the City's final RHNA allocation for the 2021 to 2029 planning period. The increase in development capacity would be reflected in the City's General Plan and then carried through into the RTP/SCS since the RTP/SCS will be updated to reflect new forecasts for each city in the region. This impact would be less than significant.

Current Project

The Current Project would be comprised of the construction of two mixed-use buildings (Building A and Building B), including approximately 24,163 square feet of ground-floor commercial space and up to 119 residential dwelling units, incorporating at least 10 percent (or 12 dwelling units), set aside as Affordable Units. The Current Project would develop fewer residential units and less commercial square footage on Site 11 as compared to the 201 units and 44,393 square feet analyzed in the PEIR. The reduction of 83 residential dwelling units would reduce the total number of dwelling units to 1,222 residential dwelling units compared to the overall EIR Project development potential to accommodate changes to the land use designations for 1,305 residential dwelling units plus up to 148,853 square feet of new or redeveloped commercial space.

As a result, the total population estimated for the Plan Area would be reduced to 3,312 residents (1,222 housing units x 2.71 persons per household), compared to 3,537 residents estimated for the 1,305 residential dwelling units (1,305 housing units x 2.71 persons per household) analyzed in the PEIR. In addition, the potential employment generated within the Plan Area would also be reduced based on the reduction of 44,393 square feet to 24,163 square feet for Site 11, resulting in a maximum of 128,623 square feet for Plan Area, compared to 148,853 square feet analyzed in the PEIR. The total number of jobs estimated for the Plan Area would also be reduced proportionally as a result of the reduction in the commercial floor area currently proposed. Similar to the General Plan PEIR, it is assumed that employment associated with commercial development would likely be filled by existing residents in the Plan Area or neighboring jurisdictions and would not result in substantial population growth.

Therefore, overall population and housing impacts would be less than significant, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to substantial unplanned population growth have been identified for the Current Project.

Threshold 2: Would the General Plan Update displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

EIR Project

The General Plan Update PEIR determined that impacts from displacement of people or housing would be less than significant, as the General Plan Update would accommodate new development and redevelopment projects in the City through rezoning and increasing residential density. Only one site in the City (referred to as the Plan Area in the General Plan Update PEIR) includes existing residential uses, but residential uses would be augmented, not removed or displaced.

Current Project

A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site currently consists of a 33,091 square-foot movie theater, other restaurant and retail uses, and 139 surface parking spaces. The Current Project would not displace existing people or housing, as no residences currently exist on the Project Site (Site 11). Therefore, no impacts would occur, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to displacement of people or housing have been identified for the Current Project.

Cumulative Impacts

EIR Project

The geographic scope for cumulative residential and nonresidential development and growth is the Plan Area. The General Plan Update would accommodate all projected citywide population and housing growth through 2029. Employment growth associated with commercial development on mixed-use sites would mostly be filled by the existing workforce and would not induce substantial population growth. Therefore, cumulative impacts relating to population and housing would be the same as project impacts under Impact 4.11-1 and would be less than significant. The General Plan Update incorporates regional growth anticipated by SCAG's RHNA projections and thus considers cumulative growth.

The General Plan Update would result in an overall net increase of housing units in the City, including affordable housing, and would not result in the any cumulative displacement of people or housing.

Current Project

As discussed above, implementation of the Current Project would result in a reduction in the total number of dwelling units (83 units) and residents (225 residents) within the Site 11 property when compared to the impact analysis of the PEIR. Furthermore, the total number of jobs estimated for the Plan Area would also be reduced as a result of the reduction in the commercial floor area currently proposed. Similar to the EIR Project, it is assumed that employment associated with commercial development would likely be filled by existing residents in the Plan Area or neighboring jurisdictions and would not result in substantial population growth. Further, the Current Project would not displace existing people or housing, as no residences currently exist on the Project Site (Site 11). As such, the Current Project would not change any of the conclusions in the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in a cumulatively considerable impact to population and housing.

III. ENVIRONMENTAL IMPACT ANALYSIS
L. PUBLIC SERVICES AND RECREATION

Threshold 1a: Would the General Plan Update result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Background

The Los Angeles County Fire Department (LACFD) provides fire protection and emergency medical service to Calabasas. The City is served by both Station 68, located at 24130 Calabasas Road, and Station 125, located at 5215 Las Virgenes Road. Additionally, LACFD operates Station 67, located at 25801 Piuma Road, approximately 2.5 miles south of the Plan Area, and Station 69, located at 401 South Topanga Canyon Boulevard, approximately 2.9 miles southeast of the Plan Area. The City of Calabasas is further protected against fire hazards by the Mountains Recreation and Conservation Authority (MRCA) Fire Division. MRCA services more than 75,000 acres of parkland that is owned by the Santa Monica Mountains Conservancy, which are located in and near the Plan Area.

EIR Project

The General Plan Update PEIR found that development outlined in the General Plan Update would increase the Los Angeles County Fire Department (LACFD) service population by approximately 3,537 people. However, population growth accommodated under the General Plan Update would be minor compared to the existing service population of the LACFD (less than one percent of the existing service population). As discussed in the General Plan Update PEIR, new units in existing urban areas would not necessarily impact LACFD's staffing, because the number of firefighters required is dictated by call response times. These response times are calculated based on several factors, but primarily the distance from the station to the residences in their station jurisdiction. The density/number of residents and number of calls per day come into play when determining the size of a station's jurisdiction. Further, additional property taxes would be collected from the new residential projects in the Plan Area that would be used to support the City's budget for fire protection services. Additionally, all new development that would occur under the General Plan Update would be required to comply with all applicable federal, State, and local regulations governing the provision of fire protection services, including adequate fire access, fire flows, and number of hydrants, such as the 2016 California Fire Code and 2019 California Building Code. Therefore, impacts would be less than significant.

Current Project

The Current Project would develop Site 11 with 119 residential dwelling units, compared to 202 units analyzed for Site 11 in the PEIR. As a result, the total population estimated for the General Plan Update Area would be reduced from 3,537 residents in the PEIR to 3,312 residents (1,222 housing units x 2.71 persons per household). Therefore, compared to the EIR Project, the Current Project's impact would be reduced. Similar to the EIR Project, additional property taxes would be collected from the Current Project that would be used to support the City's budget for fire protection services. Additionally, the Current Project would be required to comply with all applicable federal, State, and local regulations governing the

provision of fire protection services, including adequate fire access, fire flows, and number of hydrants, such as the current California Fire Code and California Building Code.

Therefore, the Current Project's on fire protection facilities would be less than under the EIR Project and also less significant. Accordingly, no new significant impacts or substantially more severe impacts related to fire protection facilities have been identified for the Current Project.

Threshold 1b: Would the General Plan Update result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

EIR Project

The General Plan Update PEIR found that the General Plan Update would facilitate development of approximately 1,305 housing units and development and redevelopment of commercial space in the Plan Area. The additional housing units would result in approximately 3,537 additional persons to the Plan Area and to the Los Angeles County Sheriff Department (LACSD) district. As discussed in the General Plan Update PEIR, according to LACSD, the Malibu/Lost Hills Service Station is currently understaffed, and additional personnel to the Station to meet an acceptable service ratio would exacerbate the current shortage of space and supporting equipment. However, the population growth accommodated under the General Plan Update would be minor compared to the existing service population of the LACSD (approximately four percent of the existing service population for the Malibu/Lost Hills Sheriff's Station) and would not require the construction of new or expanded police protection facilities. Additionally, this incremental increase in demand for LACSD protection services from implementation of the General Plan Update would be offset by payment of additional property taxes and sales taxes to the City by developers and the addition of new residents. This impact would be less than significant.

Current Project

As discussed above, the Current Project would result in fewer dwelling units and a smaller population increase than analyzed in the PEIR. Therefore, impacts to police services would be less than under than under the EIR Project and also less than significant. Similar to the EIR Project, the Current Project would result in the payment of additional property taxes and sales taxes to the City that would be used to support the City's budget for police protection services. Additionally, local policies, including Calabasas General Plan Objective VII.F in Impact PS-1 and Policy XII-10, would continue and improve disaster preparedness efforts, community safety, and coordination between agencies.

Therefore, overall impacts on police protection facilities under the Current Project would be less than under the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to police protection facilities have been identified for the Current Project.

Threshold 1c: Would the General Plan Update result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

EIR Project

The General Plan Update PEIR determined that impacts to enrollment capacity of the Las Virgenes Unified School District (LVUSD) would be less than significant. Residents of new housing construction would be required to pay State-mandated school impact fees under the Leroy F. Greene School Facilities Act of 1998. Any project associated with expanding school facilities, whether related to the construction of new facilities or modernization of existing facilities, would be subject to project-specific environmental review and mitigation pursuant to CEQA.

Current Project

As discussed above, the Current Project would result in fewer dwelling units and a smaller population increase than analyzed in the PEIR. Therefore, the Current Project would result in fewer students than the EIR Project. Similar to the EIR Project, the Current Project would pay school impact fees under the Leroy F. Greene School Facilities Act of 1998.

Therefore, impacts under the Current Project would be less than under the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to school facilities have been identified for the Current Project.

Threshold 1d: Would the General Plan Update result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Threshold 2: Would the General Plan Update increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Threshold 3: Does the General Plan Update include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

EIR Project

The General Plan Update PEIR determined that impacts to parkland and the City's parkland to population ratio would be less than significant as development fees for parks or donation of parkland (pursuant to the Quimby Act) would be required as part of the individual projects. Additionally, the General Plan Update would not preclude implementation or expansion of any parkland, trails, or recreation facility.

Current Project

As discussed above, the Current Project would result in fewer dwelling units and a smaller population increase than analyzed in the PEIR. In addition, like the EIR Project, the Current Project would also pay applicable park development fees. Similar to the EIR Project, the Current Project would not preclude implementation or expansion of any parkland, trails, or recreation facility.

Therefore, overall impacts on parkland and parkland facilities under the Current Project would be less than under the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to parkland and parkland facilities have been identified for the Current Project.

Threshold 1e: Would the General Plan Update result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

EIR Project

The General Plan Update PEIR found that impacts to libraries from increased demand would be less than significant as impacts from development would be offset by payment of property taxes and sales taxes to the City. Additionally, any project associated with new or expanding library facilities would be subject to project-specific environmental review and mitigation pursuant to CEQA. It is anticipated that the City's review processes would adequately mitigate potential environmental impacts relating to the development of new or redeveloped library facilities.

Current Project

As discussed above, the Current Project would result in fewer dwelling units and a smaller population increase than analyzed in the PEIR. Similar to the EIR Project, the Current Project would result in the payment of additional property taxes and sales taxes to the City that would be used to support the Calabasas Library's operations and capital needs. Additionally, local policies, including Calabasas General Plan Policies XII-11 and XII-12, would promote the expansion of library facilities and acquisition of library materials to serve the needs of Calabasas residents.

Therefore, overall impacts on library facilities under the Current Project would be less under the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to library facilities have been identified for the Current Project.

Cumulative Impacts

EIR Project

The geographic area to analyze cumulatively considerable impacts to facilities related to public services is the service area of each agency, respectively: LACFD, LACSD, LVUSD, and the Calabasas Library. The geographic area to analyze cumulatively considerable impacts to facilities related to parkland and recreation facilities is the Plan Area.

Fire and Police Protection Facilities

Similar to the project-specific impact to fire and police protection facilities, cumulative impacts to LACFD and LACSD service demand would be less than significant as any increase in demand would be offset by payment of additional property taxes and sales taxes resulting from the new development.

Schools, Libraries, and Parks

Similar to the project-specific impact to schools, libraries, and parks cumulative impacts to LVUSD, Calabasas Library, and City parks would be less than significant as any increase in demand would be offset

by payment of school and park fees and property taxes and sales taxes by developers and the addition of new residents.

Current Project

Fire Protection Facilities

Implementation of the Current Project would result in a reduction in the total number of dwelling units and residents on Site 11 when compared to the impact analysis of the PEIR. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in cumulatively considerable significant environmental impacts associated with the need for the provision of new or physically altered fire protection facilities.

Police Protection Facilities

Implementation of the Current Project would result in a reduction in the total number of dwelling units and residents on Site 11 when compared to the impact analysis of the EIR Project. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in cumulatively considerable significant environmental impacts associated with the need for the provision of new or physically altered police protection facilities.

School Facilities

Implementation of the Current Project would result in a reduction in the total number of dwelling units and residents within the Site 11 property when compared to the impact analysis of the EIR Project. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in a cumulatively considerable significant environmental impacts associated with the need for the provision of new or physically altered school facilities.

Public Facilities

Implementation of the Current Project would result in a reduction in the total number of dwelling units and residents within the Site 11 property when compared to the impact analysis of the EIR Project. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, Current Project would not result in a cumulatively considerable significant environmental impacts associated with the need for the provision of new or physically altered public facilities.

Parks and Recreation

Implementation of the Current Project would result in a reduction in the total number of dwelling units and residents within the Site 11 property when compared to the impact analysis of the EIR Project. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, Current Project would not result in a cumulatively considerable significant environmental impacts associated with the need for the provision of new or physically altered recreation facilities.

III. ENVIRONMENTAL IMPACT ANALYSIS
M. TRANSPORTATION

Threshold 1: Would the General Plan Update conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

EIR Project

The General Plan Update PEIR found that construction activities may temporarily alter the movement of vehicles, public transit, bicycles, and/or pedestrians within the Plan Area due to slow vehicle speeds and possible temporary lane closures. However, due to the temporary nature of construction traffic, the existing high volumes of traffic on US-101 and arterial roadways in the General Plan Update Plan Area, and required coordination with the City for possible temporary lane closures, construction traffic associated with reasonably foreseeable development would not have the potential to interfere with or obstruct the implementation of plans related to the circulation network, such as the SCAG 2020-2045 RTP/SCS, the LA Metro First Last Mile Strategic Plan, the City of Calabasas General Plan, and the Calabasas Bicycle Master Plan. Impacts during construction would be less than significant, and no mitigation measures are required.

With respect to traffic during operation, the General Plan Update PEIR found that reasonably foreseeable development would not include design features that would interfere with or obstruct existing plans to improve the circulation network, including transit, roadway, bicycle, and pedestrian facilities. In addition, reasonably foreseeable development would be required to implement necessary circulation system improvements based on the results of individual traffic studies prepared for each project, which would serve to enhance the circulation network. Furthermore, reasonably foreseeable development would be required to comply with the standards contained in CMC Chapter 17.20.020 related to medians, intersection improvements, on-street parking, sidewalks, and bicycle facilities. In addition, associated circulation improvements (if necessary) for reasonably foreseeable development would be required to undergo review by the City's Community Development Department and Public Works Department for consistency with the policies of the City's General Plan and the standards of the CMC prior to project construction. Individual projects would also be subject to review by the City's Traffic and Transportation Commission where warranted. These review processes would minimize the potential for conflicts with the circulation system. Therefore, operational traffic of reasonably foreseeable development would not have the potential to interfere with or obstruct the implementation of plans related to the circulation network, such as the SCAG 2020-2045 RTP/SCS, the LA Metro First Last Mile Strategic Plan, the City of Calabasas General Plan, and the Calabasas Pedestrian and Bicycle Plan. Impacts during operation would be less than significant and no mitigation measures are required.

Current Project

A Transportation Impact Analysis (TIA) was prepared for the Current Project and is included in Appendix I to this Addendum. As discussed in the TIA and Appendix D to the TIA, the Current Project would not conflict with the relevant programs, plans, ordinances, and policies that address the circulation system, and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. The Current Project is located near existing transit services and would not preclude the City of Calabasas or Metro from implementing transit-related improvements

within the vicinity. The Current Project would not conflict with any of the policies set forth in the Circulation and Safety Elements of the City's 2030 General Plan, including the policies recommended within the Safety Element Emergency Evacuation Traffic Assessment, nor would the Current Project preclude the City from completing any of the future bicycle infrastructure projects set forth in the City's Bicycle Master Plan. Therefore, the Current Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities; the impact would be less than significant and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to consistency with programs, plans, ordinances, or policies addressing the circulation system have been identified for the Current Project.

Threshold 2: Would the General Plan Update conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

EIR Project

The City has prepared Local Transportation Study Guidelines regarding vehicle miles traveled (VMT) impact analysis but has not yet formally adopted its own VMT impact threshold for determining whether proposed projects would have a VMT impact. However, the City's Local Transportation Study Guidelines recommend that projects with VMT that exceeds a level of 15 percent below the baseline VMT be considered to have a significant VMT impact.

Given that the primary change in land use with the Housing Element Update is the addition of new housing units in the City, the VMT analysis in the General Plan Update PEIR focused on the residential home-based VMT per capita for each opportunity site. Of the 12 housing opportunity sites, nine of the sites are located in a low VMT area, which is defined as an area with residential home-based VMT per capita that is 15 percent or more below the City baseline. These nine housing sites include 86 percent of the total number of housing units, which means 86 percent of housing units in the General Plan Update are in a low VMT area. The housing sites proposed in the General Plan Update are expected to generate 16.8 home-based VMT per capita, which is approximately 18 percent below the citywide baseline of 20.6 home-based VMT per capita. Therefore, reasonably foreseeable development under the General Plan Update would collectively generate home-based VMT per capita that is more than 15 percent below the City baseline. Therefore, impacts related to VMT would be less than significant, and no mitigation measures are required.

Current Project

Following guidance from the State, the City has developed three VMT screening criteria for land use projects: Project Size and Type; Low VMT Area; and Transit Priority Area (TPA).[1] A project only needs to satisfy one of the three screening criteria to be exempt from requiring further VMT analysis. If a project is mixed-use and satisfies one of the screening criteria that applies to a specific land use, only that component of the project is exempt from requiring further VMT analysis and the remaining land uses should complete a VMT analysis. The Current Project would not result in a significant VMT impact for the following reasons:

1 *City of Calabasas, Local Transportation Study Guidelines, July 2021. See Appendix J to this Addendum.*

- The Current Project would replace the existing 33,091 square-foot movie theater with Buildings A and B, providing up to 119 residential units, including 12 low-income affordable units, and 24,163 square feet of neighborhood-serving commercial uses.
- Per the LTS Guidelines, the Current Project's commercial component, which totals 24,163 square feet of neighborhood-serving commercial uses, is considered local-serving. As the Current Project's commercial component would not add any new commercial use greater than 50,000 square feet, the commercial component is screened from further VMT analysis and is presumed to have a less-than-significant VMT impact.
- The Current Project Site is located in a low VMT generating area for residential projects. Therefore, the Current Project's residential component is screened from further VMT analysis and is presumed to have a less than significant VMT impact.

Based on the above analyses, the Current Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, this impact would be less than significant, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to CEQA Guidelines Section 15064.3(b) have been identified for the Current Project.

Threshold 3: Would the General Plan Update substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

EIR Project

The General Plan Update PEIR states that the General Plan Update would facilitate the development of additional residential units in the Plan Area. The types of vehicle traffic generated by residential land uses would be compatible with that generated by existing residential and commercial development in the Plan Area. In addition, reasonably foreseeable development would be required to comply with the standards contained in CMC Chapters 17.20.020 and 17.28.080 related to the number and location of driveway access points, the width and length of driveways, medians, access grades, sight distance, driveway clearance from appurtenances, intersection improvements, on-street parking, sidewalks, and bicycle facilities. Furthermore, future site plans and associated circulation improvements (if necessary) would be required to undergo review for safety by the City's Community Development Department and Public Works Department, and by the Los Angeles County Fire Department prior to project construction. Individual projects would also be subject to review by the City's Traffic and Transportation Commission where warranted. These review processes would evaluate future projects' geometric design features, if any, and minimize the potential for the creation of safety hazards. Therefore, given the nature of the General Plan Update and required compliance with existing standards and review processes, the General Plan Update would not substantially increase hazards due to a geometric design feature or incompatible use(s). Therefore, the impact would be less than significant, and no mitigation measures are required.

Current Project

The Current Project would not change the current vehicular access points to the Current Project Site from the public right-of-way, nor would the Current Project add new vehicular access points from the public right-of-way. The existing driveways have been designed in accordance with City design standards and are well-maintained. The existing driveways provide excellent line-of-sight for all users as the potential for vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts would be reduced. Direct pedestrian connections from public sidewalks to the Current Project Site are provided from the two driveways along the south side of Calabasas Road, the driveway along the west side of Park Granada (opposite Park

Sorrento), and a pedestrian path located at the northwesterly portion of the Current Project Site at the southwest corner of the Park Granada/Calabasas Road intersection. Additionally, a pedestrian connection from the adjacent Calabasas Civic Center is provided at the westerly edge of the Current Project Site. These direct connections limit the need for pedestrians to cross into vehicular travel paths when accessing the Current Project Site from the sidewalk. Finally, the amount of traffic volumes forecast to be added by the Current Project to the roadways adjacent to the Current Project Site are not expected to materially change vehicle queuing at any of the site access points, particularly at left-turn movements into the Current Project Site. However, if vehicle queuing were to increase beyond the striped turn pockets on either Calabasas Road or Park Granada, the City has the ability to adjust current traffic signal timing to allow for additional green time on approaches where queuing may be increased. No physical modifications to the intersections would be required.

With respect to internal circulation, traffic calming measures and safety improvements will be installed along Commons Lane to create a pedestrian-first, multi-modal complete street. All existing and new sidewalks will be a minimum of 15 feet in width to provide a safe, comfortable pedestrian experience. The existing striped crosswalks will be improved with special paving to alert motorists of the crosswalk. Crosswalks and intersections along Commons Lane will be raised to reinforce to motorists that they are approaching a crosswalk. Stop signs will be installed at all approaches along Commons Lane to reinforce the pedestrian-first nature of the street. At the intersection of Commons Way and Commons Lane, corner extensions will be installed (pending Fire Department approval) to reduce the speed at which motorists can make right-turn movements at pedestrian crossings. At the mid-block crossing between Buildings A and B, as well as the Building A vehicular access point, the mid-block narrowing features will be installed (pending Fire Department approval) to reduce the speed of vehicular traffic.

At the Building A vehicular access point, in addition to the parking control arms and audio and/or visual alerting systems, bollards will be installed to warn pedestrians and bicyclists of oncoming vehicular traffic. No pedestrian crossings are provided at the Building B vehicular access point. However, parking control arms and audio and/or visual alerting systems will be installed to alert motorists, bicyclists, and pedestrians of exiting vehicles.

Therefore, the Current Project would not substantially increase hazards due to a geometric design feature or incompatible use, resulting in a less than significant impact, and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to hazards due to a geometric design feature or incompatible uses have been identified for the Current Project.

Threshold 4: Would the General Plan Update result in inadequate emergency access?

EIR Project

The General Plan Update PEIR states that the development of additional residential units in the Plan Area would not result in inadequate emergency access. The on-site circulation systems and parking for reasonably foreseeable development would connect to the City's existing circulation network and would not include construction of features that would impede emergency access. In addition, reasonably foreseeable development would be required to comply with the standards contained in CMC Chapters 17.20.020 and 17.28.080 related to the number and location of driveway access points, the width and length of driveways, medians, access grades, sight distance, driveway clearance from appurtenances, intersection improvements, and on-street parking. Furthermore, future site plans and associated

circulation improvements (if necessary) would be required to undergo review for safety by the City's Community Development Department and Public Works Department, and by the Los Angeles County Fire Department prior to project construction. Individual projects would also be subject to review by the City's Traffic and Transportation Commission where warranted. These review processes would evaluate the design of future projects' emergency access schematics, which would minimize the potential for the creation of inadequate emergency access.

Furthermore, an Emergency Evacuation Assessment[2] was prepared for the Housing Element Update in July 2021 (the Emergency Evacuation Assessment), which is included in the General Plan Update PEIR. The evaluation assessed capacity during an emergency evacuation event, assuming complete evacuation of Calabasas, which may occur during a wildfire. The Emergency Evacuation Assessment concluded that traffic from buildout of the General Plan Update would be minor compared to existing conditions in the Plan Area. As a result, additional traffic volumes associated with the General Plan Update would not have a significant impact on the transportation system that would result in inadequate emergency access during an evacuation event.

Therefore, given the nature of the General Plan Update, the results of the Emergency Evacuation Assessment, Safety Element Update policies, and required compliance with existing standards and review processes, the General Plan Update would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures are required.

Current Project

The Emergency Evacuation Assessment included the analysis of 1,209 housing units and 148,853 square feet of new or redeveloped commercial floor area across 12 different sites, including the Project Site. For the Project Site, the Emergency Evacuation Assessment assumed the development of 200 residential units and 44,393 square feet of new commercial uses. The Current Project would remove the existing 33,091 square-foot movie theater to accommodate the development of two new mixed-use buildings providing a total of 119 residential units and 24,163 square feet of neighborhood-serving commercial uses (a net reduction of 8,928 square feet of commercial floor area). As such, the analysis in the emergency evacuation assessment is conservative, as it overstates conditions upon completion of the Current Project. Therefore, the impact of the Current Project would be less than significant with regard to emergency evacuation and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to emergency access have been identified for the Current Project.

Cumulative Impacts

EIR Project

The General Plan Update PEIR identifies the geographic scope of cumulative transportation impacts as the Plan Area and surrounding region. This geographic scope is appropriate for evaluating transportation impacts because it includes the regional and local transportation network that would primarily be impacted by reasonably foreseeable development associated with the General Plan Update.

Similar to reasonably foreseeable development facilitated by the General Plan Update, cumulative development would be required to implement necessary circulation system improvements based on the

2 *Calabasas Housing Element Update Emergency Evacuation Assessment, Fehr & Peers, July 28, 2021.*

results of individual traffic studies prepared for each project, which include evaluations of cumulative traffic impacts. In addition, cumulative development would be required to comply with the standards contained in CMC Chapter 17.20.020, and associated circulation system improvements (if needed) would be required to undergo review by the City's Public Works Department for consistency with the policies of the City's General Plan and the standards of the CMC prior to project construction, and individual projects would also be subject to review by the City's Traffic and Transportation Commission where warranted. These review processes would minimize the potential for the conflict with the circulation system. Therefore, no cumulative impacts to the circulation system would occur.

The General Plan Update would facilitate new housing units and induce changes in commercial and employment uses in the City (with an emphasis on mixed commercial and residential developments as well as housing site placements in close proximity to existing shopping and employment centers and transit points of access). The cumulative VMT analysis estimates the change in total VMT resulting from these land use changes and is represented through the metric of total VMT per service population. The cumulative VMT estimates also reflect the potential development of 96 ADUs in the City under the General Plan Update. The total VMT per service population in 2029 with the Housing Element Update decreases in comparison to the City baseline (2021) and decreases in comparison to the future year (2029) without the General Plan Update. Given that the total VMT per service population is forecasted to decrease with the Housing Element Update, the additional housing units and changes in land uses would help the City to decrease VMT generated on a per capita basis over time.

According to OPR guidance, a project that is below the VMT impact thresholds and, therefore, does not have a VMT impact under baseline conditions would also not have a cumulative impact as long as it is aligned with long-term State environmental goals, such as reducing greenhouse gas emissions, and relevant plans, such as the SCAG RTP/SCS. Therefore, since the General Plan Update would generate home-based VMT per capita that is more than 15 percent below the City's baseline, reduce total VMT per service population in the City under future (2029) conditions, and provide the housing required to meet State and regional needs, the General Plan Update would not result in a cumulative VMT impact.

Current Project

Based on the analysis presented in the TIA, there is no cumulative inconsistency with the local programs, plans, ordinances, or policies and, therefore, the cumulative impacts of the Current Project would be less than significant. Furthermore, since the Current Project does not include any features that would preclude the City from complying with these guiding documents and policy objectives, there is no cumulative inconsistency.

Based on the OPR *Technical Advisory* (page 6), the thresholds of significance recommended therein for VMT metrics are considered as "efficiency-based" thresholds. Further, the OPR *Technical Advisory* states "A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less than significant project impact would imply a less than significant cumulative impact, and vice versa." Therefore, as the Current Project is expected to result in a less than significant transportation impact based on the use of the VMT metrics, there would be a less than significant cumulative transportation impact for the Current Project.

The proposed development on Site 3 is located southwest of the Current Project Site, to the west of City Hall. The proposed development on Site 3 is the only known project close enough to the Current Project

that could potentially combine with the Current Project to create a cumulative hazards or emergency evacuation impact. If the development on Site 3 proposes the modification of existing vehicular access points from the site to the public right-of-way or the addition of new vehicular access points from the public right-of-way, these modifications would need to be designed in accordance with City standards and would be thoroughly reviewed by City staff with respect to hazards and emergency evacuation. Therefore, there would be no cumulative impacts that could increase hazards or inhibit emergency evacuation.

As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in a cumulatively considerable impact to transportation.

III. ENVIRONMENTAL IMPACT ANALYSIS
N. UTILITIES AND SERVICE SYSTEMS

Threshold 1: Would the General Plan Update require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

EIR Project

The General Plan Update PEIR determined that impacts from the need for relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities would be less than significant.

Water

Reasonably foreseeable development facilitated by the General Plan Update may require installation of additional water mains, and connections within the Plan Area but facilities would be installed during individual project construction and within the disturbance area of such projects or the rights-of-way of previously disturbed roadways. Reasonably foreseeable development facilitated by the General Plan Update would be served by existing and planned Las Virgenes Municipal Water District (LVMWD) supplies, and is not anticipated to require major LVMWD treatment or distribution facility improvements.

Wastewater

Wastewater generated by future development would be treated at the LVMWD Tapia Water Reclamation Facility (TWRF) in Calabasas, which has a dry weather capacity of 12 mgd. Based on a wastewater generation rate of 280 gallons per residential unit per day (Joint Powers Authority of LVMWD and Triunfo Sanitation District (TSD) 2014), reasonably foreseeable development under the General Plan Update would generate a net increase of approximately 365,400 gallons per day (gpd), or 0.37 million gallons per day (mgd), of wastewater per day (280 gpd per residential unit x 1,305 units).[1] The General Plan Update's net increase in residential wastewater generation would comprise approximately 14.8 percent of the TWRF's existing available wastewater treatment capacity, and the TWRF would have adequate capacity to serve reasonably foreseeable development under the General Plan Update.

With respect to commercial wastewater, the General Plan Update PEIR does not present calculations for commercial wastewater generation due to its narrowed scope, compared to the General Plan PEIR. The General Plan PEIR indicates that the General Plan would generate a net increase of approximately 62,465 gallons per day, or 0.062 mgd, of wastewater per day for new retail development (73,918 gpd new retail – 11,453 gpd retail to be removed).[2] Similar to the General Plan Update PEIR, the General Plan PEIR concluded that the net increase in wastewater generation would be within the TWRF's existing available

[1] *The Joint Powers Authority of LVMWD and TSD's Sanitation Master Plan 2014 Update indicates that approximately 2,644 new dwelling units would generate approximately 0.74 mgd, which is equivalent to 280 gallons per dwelling unit per day (Joint Powers Authority of LVMWD and TSD 2014).*

[2] *Table 4.14-6, Projected Wastewater Generation at Maximum General Plan Buildout, 2030 General Plan Final Environmental Impact Report, City of Calabasas, December 2008.*

wastewater treatment capacity, and the TWRF would have adequate capacity to serve reasonably foreseeable development under the General Plan.

Stormwater Drainage

Reasonably foreseeable development under the General Plan Update would be required to adhere to existing regulations that instruct stormwater management, including management of rainfall at the source by infiltrating stormwater as close to the source as practicable. Per NPDES requirements, post-construction peak runoff must be maintained at or below pre-project levels.

Electric Power, Natural Gas, and Telecommunications

Specific development under the General Plan Update would primarily consist of infill development and development near transportation nodes; therefore, major upgrades to electrical, gas, or telecommunications facilities and transmission lines is not anticipated.

Current Project

Water

As discussed in the General Plan Update PEIR, reasonably foreseeable development facilitated by the EIR Project, which includes Site 11, may require installation of additional water main lines, lateral connections, and hydrants within the Plan Area. Such facilities for the Current Project would be installed during project construction and within the disturbance area of Site 11; therefore, the construction of infrastructure improvements for the Current Project would not substantially increase the EIR Project's disturbance area or otherwise cause significant environmental effects. Similar to the EIR Project, the Current Project would be served by existing and planned LVMWD supplies and is not anticipated to require major LVMWD treatment or distribution facility improvements.[3] Furthermore, the water demand for the Current Project would be lower than the EIR Project due to the reduction in development intensity. Additionally, local policies, including Calabasas General Plan Policies XII-20 and XII-21, would continue the provision of adequate water services and facilities to new development. As a result, similar to the EIR Project, the Current Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effect.

Therefore, overall impacts on water facilities under the Current Project would be similar to those under the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to water facilities have been identified for the Current Project.

Wastewater

As discussed in the General Plan Update PEIR, reasonably foreseeable development facilitated by the EIR Project, which includes Site 11, may require installation of additional sewer lines and lateral connections within the Plan Area. Such facilities for the Current Project would be installed during project construction and within the disturbance area of Site 11; therefore, the construction of infrastructure improvements for

[3] *Planned potable water capital improvements for the LVMWD service area (including Calabasas, Agoura Hills, Hidden Hills, Westlake Village, and portions of unincorporated Los Angeles County) include approximately 9.2 miles of distribution pipelines, 6.3 million gallons of storage, and additional standby pumping facilities (Joint Powers Authority of LVMWD and TSD 2014).*

the Current Project would not substantially increase the EIR Project's disturbance area or otherwise cause significant environmental effect.

The Current Project would comprise 119 residential dwelling units and 24,163 square feet of ground-floor commercial space. The Current Project would develop fewer residential units and less commercial square footage on Site 11 as compared to the 201 units and 44,393 square feet analyzed in the General Plan Update PEIR and would, therefore, generate less wastewater than the EIR Project. Similar to the EIR Project, wastewater generated by the Current Project would be treated at the LVMWD TWRF, which has a dry weather capacity of 12 mgd. As the General Plan Update PEIR found that the TWRF would have adequate capacity for the EIR Project, it would also have adequate capacity for the Current Project.

Similar to the EIR Project, the Current Project would be responsible for constructing on-site wastewater treatment conveyance systems and paying standard sewer connection fees, as necessary. Additionally, local policies, including Calabasas General Plan Policies XII-25 and XII-26, would continue the provision of adequate wastewater services and facilities to new development. As a result, similar to the EIR Project, the Current Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effect.

Therefore, overall impacts on wastewater facilities would be less than the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to wastewater facilities have been identified for the Current Project.

Stormwater Drainage

As discussed in the General Plan Update PEIR, reasonably foreseeable development facilitated by the EIR Project, which includes Site 11, may require new or modified stormwater drainage facilities. Such facilities for the Current Project would be installed during project construction and within the disturbance area of Site 11; therefore, the construction of infrastructure improvements for the Current Project would not substantially increase the EIR Project's disturbance area or otherwise cause significant environmental effect. Furthermore, similar to the EIR Project development, the Current Project, which is located on a completely developed site, would not have a substantial effect on stormwater runoff volumes due to the relatively minor change in impervious surface area.

Similar to the EIR Project, the Current Project would be required to incorporate Low Impact Development (LID) techniques and stormwater control measures as outlined under Calabasas Municipal Code (CMC) Chapter 8.28.16 0(D-F), including stormwater retention and treatment features. The LID control measures would include storm drain system stenciling and signage, divert roof runoff to vegetated areas before discharge unless the diversion would result in slope instability, and direct surface flow to vegetated areas before discharge unless the diversion would result in slope instability. Furthermore, similar to the EIR Project, the Current Project would be required to adhere to existing regulations that instruct stormwater management, including management of rainfall at the source by infiltrating stormwater as close to the source as practicable. Per NPDES requirements, post-construction peak runoff must be maintained at or below pre-project levels and the CMC requires implementation of Best Management Practices (BMPs) to control the volume, rate, and potential pollutant load of stormwater runoff from project sites as a requirement of the MS4 General Permit. The CMC also sets forth requirements and BMPs pertaining to the mitigation of erosion, sediment control and runoff as outlined in Chapter 15.11.100 and Chapter 15.11.08. Furthermore, the City's LID ordinance outlined in Chapter 8.28.160 aims to specifically reduce

the amount of surface runoff and aid in groundwater recharge through techniques such as infiltration, evapotranspiration, bioretention and/or rainfall harvest and additional uses in accordance with the requirements set forth in the MS4 permit and the LID standards manual. As a result, similar to the EIR Project, the Current Project would not require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effect.

Therefore, overall impacts on stormwater drainage facilities would be less than significant and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to stormwater drainage facilities have been identified for the Current Project.

Electric Power, Natural Gas, and Telecommunications

As discussed in the General Plan Update PEIR, reasonably foreseeable development facilitated by the EIR Project, which includes Site 11, may require installation of additional electrical and natural gas connections, and minor telecommunications improvements, such as undergrounding or extensions of telephone lines within the Plan Area. Such facilities for the Current Project would be installed during project construction and within the disturbance area of Site 11; therefore, the construction of infrastructure improvements for the Current Project would not substantially increase the EIR Project's disturbance area or otherwise cause significant environmental effect. Furthermore, Site 11, would consist of infill development; therefore, major upgrades to transmission lines and other facilities is not anticipated. Additionally, local policies, including Calabasas General Plan Policies XII-37 and XII-39, would continue the provision of adequate telecommunications facilities to new development. As a result, similar to the EIR Project, the Current Project would not require or result in the relocation or construction of new or expanded electrical, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effect.

Therefore, overall impacts on electrical, natural gas, or telecommunication facilities would be similar to those of the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to electrical, natural gas, or telecommunication facilities have been identified for the Current Project.

Threshold 2: Would the General Plan Update have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

EIR Project

The General Plan Update PEIR found that the increase in demand for water supply would be less than significant as construction water demand would account for approximately 4.6 acre feet (AF) over the approximately eight-year buildout period, or approximately 0.6 acre feet per year (AFY), which would represent approximately 0.002 percent of LVWMD's annual potable water supply as of 2020 and supplies would be adequate. Reasonably foreseeable development would generate a water demand of approximately 333,217 gpd (186,359 gpd for indoor water use and 146,858 gpd for outdoor water use), or 373 AFY. Based on the Tier 1 limits described in Metropolitan's 2015 UWMP, the LVMWD would have an annual average Tier 1 maximum amount of 24,358 AFY available from Metropolitan, which represents an additional 7,212 AFY available to serve reasonably foreseeable development during normal, single-dry, and multiple-dry year scenarios. Metropolitan anticipates sufficient supplies to meet expected demand under normal, single-dry, and multiple-dry year conditions through 2040 and this excess amount of 7,212

AFY would be sufficient to accommodate the estimated increase in water demand of 373 AFY associated with the General Plan Update.

Current Project

Construction Demand

Similar to the EIR Project, the Current Project would require water for temporary construction activities, including dust suppression, grading and grubbing, compaction, construction equipment wheel washing, and concrete mixing and casting. Water consumption by construction workers and cleaning of portable toilets would also account for a small portion of overall construction water demand.

Similar to the EIR Project, pursuant to the requirements of SCAQMD Rule 403, all disturbed unpaved roads and disturbed areas under the Current Project would be watered to reduce fugitive dust generation from construction activities. A 2017 analysis prepared by SCAQMD estimated water demand associated with Rule 403 dust suppression requirements for construction sites in SCAQMD jurisdiction at approximately 1,000 gallons per acre per day (SCAQMD 2017). The overall Current Project site boundaries have remained unchanged, when compared to the EIR Project. Therefore, similar to the EIR Project, the Current Project construction water demand would account for approximately 0.002 percent of LVWMD's annual potable water supply as of 2020. Furthermore, similar to the EIR Project, the Current Project construction water demand would be temporary and, therefore, would not result in a long-term demand on water supplies. Additionally, LVMWD provides non-potable water for use as dust suppression during construction activities in the Plan Area; therefore, the actual demand on potable water supplies would be even lower than estimated.

Therefore, overall impacts on construction water demand would be less than significant and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to construction water demand have been identified for the Current Project.

Operational Demand

As discussed in the General Plan Update PEIR, reasonably foreseeable development facilitated by the EIR Project, which includes Site 11, would result in increased demand for potable water supplies for drinking; use by appliances and fixtures including toilets, showers, bathtubs, sinks, washing machines, and dishwashers; and landscape irrigation.

The Current Project buildout of Site 11 would be comprised of 119 residential dwelling units and 24,163 square feet of ground-floor commercial space. The Current Project would develop fewer residential units and less commercial square footage on Site 11 as compared to the 201 units and 44,393 square feet analyzed in the PEIR and would therefore have a lower water demand than the EIR Project.

Site 11 would be served by imported water from the LVMWD. The LVMWD has estimated water supply availability for normal, single-dry, and multiple-dry year scenarios from 2025 through 2045 in its 2020 Urban Water Management Plan (UWMP). For all years and all scenarios, the LVMWD anticipates meeting forecast demand, but does not anticipate any excess supply. Therefore, similar to the EIR Project, the Current Project analysis of water supply availability focuses on whether or not it is consistent with the water demand projections contained in the LVMWD's 2020 UWMP, which does not fully account for water demands associated with reasonably foreseeable development under the EIR Project, which includes Site 11. Based on the Tier 1 limits described in LVMWD's 2015 UWMP, the LVMWD would have an annual

average Tier 1 maximum amount of 24,358 AFY, which represents an additional 7,212 AFY available to serve reasonably foreseeable development during normal, single-dry, and multiple-dry year scenarios. As discussed in the General Plan Update PEIR, this excess amount of 7,212 AFY would be sufficient to accommodate the estimated increase in water demand associated with the EIR Project. The buildout of Site 11 would be comprised of 119 residential dwelling units, compared to 202 residential dwelling units currently approved for the same site. Therefore, as there would be an overall dwelling unit reduction under the Current Project, when compared to the EIR Project, the excess 7,212 AFY would be sufficient to accommodate the increase in water usage under the Current Project.

Additionally, local policies, including Calabasas General Plan Policies IV-21, IV-22, IV-23, IV-24, XII-23, and XII-24, would continue development review with the LVMWD to ensure the availability of water supplies, minimizing domestic water use, encouraging the use of drought-tolerant plants and efficient landscape irrigation design, promoting the use of non-potable water for landscape irrigation and other uses, and minimizing the need for new water sources through water conservation. As a result, similar to the EIR Project, the Current Project would not result in insufficient water supplies of which could cause significant environmental effect.

Therefore, the Current Project's overall impacts on operational water demand would be less than the EIR Project's and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to operational water demand have been identified for the Current Project.

Threshold 3: *Would the General Plan Update result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

EIR Project

The General Plan Update PEIR determined that impacts to wastewater treatment would be less than significant as wastewater generated by the reasonably foreseeable development under the General Plan Update would account for approximately 14.8 percent of the remaining available capacity at the plant, which has approximately 2.5 MGD of excess treatment capacity.

Current Project

As discussed under Threshold 2, the Current Project would result in fewer dwelling units and less commercial square footage than analyzed in the PEIR and would therefore generate less wastewater. Similar to the EIR Project, wastewater generated by the Current Project would be treated at the LVMWD TWRF, which has a dry weather capacity of 12 mgd. As the PEIR found that the TWRF would have adequate capacity for the EIR Project, it would also have adequate capacity for the Current Project.

Therefore, overall impacts on wastewater treatment under the Current Project would be less than under the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to wastewater treatment providers have been identified for the Current Project.

Threshold 4: Would the General Plan Update generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Threshold 5: Would the General Plan Update comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

EIR Project

The General Plan Update PEIR found that impacts to solid waste disposal capacity and compliance with federal, state, and local management and reduction statutes and regulations related to solid waste would be less than significant. Approximately 209,415 square feet of existing building area would be demolished and replaced over the course of buildout of the General Plan Update. Demolition would generate approximately 9,633 tons of debris for off-site disposal, or approximately 321 tons per day when spread over the estimated 30 days of demolition activities anticipated across all construction phases. Consequently, demolition debris would account for approximately 5.8 percent of the permitted daily throughput at the Calabasas Sanitary Landfill during the 30 days of demolition activities and the facility would have adequate capacity to serve this phase of construction for reasonably foreseeable development under the General Plan Update. The General Plan Update would generate a net increase of approximately 600 tons of solid waste annually, or approximately 1.6 tons per day. Based on this information, the solid waste generation of reasonably foreseeable development would account for approximately 0.1 percent of the Calabasas Sanitary Landfill's average daily surplus throughput of 1,876 tons per day. Given this small proportion of permitted throughput, the solid waste generated by operation of reasonably foreseeable development under the General Plan Update would be adequately accommodated by existing landfills. Reasonably foreseeable development under the General Plan Update would be required to comply with federal, State, and local statutes and regulations related to solid waste, including AB 939; the City's General Plan Policies IV-41, IV-43, IV-44, and IV-45, the City's Resolution No. 2008-1111, and CMC Chapters 8.16.500(C-D, G) and impacts would be less than significant.

Current Project

Construction

Similar to the EIR Project, the Current Project, would involve the demolition of the southwestern portion of the Commons Shopping Center, which is developed with an existing 33,091 square-foot movie theater and 139 surface parking spaces and, therefore, would result in the generation of construction/demolition debris that would need to be disposed of at the Calabasas Sanitary Landfill. Furthermore, similar to the EIR Project, because the Current Project consists of an infill site with existing structures that would be redeveloped, soil from the grading on Site 11 would be reused onsite where needed. Any soil that is not used onsite would be exported either to another construction site or to a landfill for use as daily cover. Use of soil as landfill daily cover is not anticipated to affect landfill disposal capacity because daily cover operations are already factored into remaining landfill disposal capacity. Demolition under the Current Project would be similar to the EIR Project as it would developed on a similar footprint. Consequently, as with the EIR Project there would be sufficient capacity at the Calabasas Sanitary Landfill.

Similar to the EIR Project, handling of all debris and waste generated during construction of the Current Project would be subject to CalGreen requirements and the California Integrated Waste Management Act of 1989 (AB 939) requirements for salvaging, recycling, and reuse of materials from construction activity.

Therefore, Current Project's overall impacts associated with construction solid waste would be similar to the EIR Project's and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to construction solid waste have been identified for the Current Project.

Operation

As set forth above, the Current Project would result in fewer dwelling units and less commercial square footage than analyzed in the PEIR and would, therefore, generate less solid waste when compared to the EIR Project. The General Plan Update PEIR concluded that there would be available landfill capacity in the Calabasas Sanitary Landfill to accommodate the anticipated solid waste stream generated by implementation of the EIR Project and, therefore, would be able to accommodate the Current Project.

Similar to the EIR Project, the Current Project would be required to comply with federal, State, and local statutes and regulations related to solid waste, including AB 939, Calabasas General Plan Policies IV-41, IV-43, IV-44, and IV-45, the City's Resolution No. 2008-1111, and CMC Chapters 8.16.500(C-D, G). As a result, similar to the EIR Project, the Current Project would be served by landfills with sufficient capacity and would comply with applicable regulations related to solid waste.

Therefore, the Current Project's overall impacts associated with operational solid waste would be less than the EIR Project's and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to operational solid waste have been identified for the Current Project.

Cumulative Impacts

EIR Project

Impacts related to the extension of water supply, wastewater, electric power, natural gas, and telecommunications facilities to reasonably foreseeable development are typically generated in the immediate vicinity of a project. Therefore, cumulative impacts related to extensions of water supply, wastewater, stormwater, electric power, natural gas, and telecommunications facilities to individual projects sites would be installed within the disturbance area of such projects or the rights-of-way of previously disturbed roadways and impacts would be less than significant.

Water

The project-level impact analysis is cumulative in nature because it addresses the significance of water demand associated with reasonably foreseeable development under the project in terms of whether this demand is accounted for in the LVMWD's 2020 UWMP, which is a plan that addresses cumulative impacts to water supply and are less than significant.

Wastewater

Accounting for cumulative development in the LVMWD and TSD service areas, the 2014 Sanitation Master Plan estimated future cumulative demand of 12.59 mgd by 2035, which would exceed the 12 mgd treatment capacity of the TWRF. The General Plan Update would increase this cumulative exceedance of treatment capacity by 0.37 mgd because it would facilitate construction of 1,305 additional residential units. New and expanded wastewater treatment facilities may result in environmental effects; however, because the location or scale of such future facilities cannot be known at this time, the evaluation of such facilities would be speculative. New or expanded facilities that may result from cumulative growth would

require their own environmental analysis pursuant to the requirements of CEQA. At that time, any associated environmental effects would be disclosed and evaluated, and any required mitigation to reduce identified effects would be required through that process. Therefore, cumulative impacts related to wastewater treatment would be less than significant.

Electricity

Although reasonably foreseeable development under the General Plan Update would be constructed in accordance with the latest iteration of CalGreen, it would increase electricity demand in comparison to existing conditions and would contribute to the cumulative regional increase in electricity demand. New and expanded electric power facilities and infrastructure may result in environmental effects; however, since the location or scale of such future facilities cannot be known at this time, the evaluation of such facilities would be speculative. New or expanded facilities that may result from cumulative development would require their own environmental analysis pursuant to the requirements of CEQA. At that time, any associated environmental effects would be disclosed and evaluated, and any required mitigation to reduce identified effects would be required through that process. Therefore, cumulative impacts related to electric power would be less than significant.

Natural Gas

Natural gas demand in the SoCalGas service area is projected to decline at a rate of one percent per year between 2020 and 2035 primarily due to increasing energy efficiency, modest economic growth, increasing building decarbonization, and statewide efforts to reduce greenhouse gas emissions from the electricity generation sector, even when accounting for moderate growth in the adoption of natural gas vehicles. Given that cumulative demand for natural gas is anticipated to decline, new or expanded natural gas facilities would not be required, and no cumulative impact related to natural gas would occur.

Solid Waste

Cumulative development in the wasteshed would have to more than double existing development in order for solid waste generation to exceed the current average daily surplus. Given the current built-out nature of the wasteshed and topographical and open space restrictions on much of the remaining vacant land, it is unlikely that cumulative development would double existing development such that the average daily surplus in maximum permitted daily throughput would be exceeded. Therefore, there would be no cumulative impact related to the maximum permitted daily throughput at the Calabasas Sanitary Landfill.

Current Project

Similar to the EIR Project, impacts related to the extension of water supply, wastewater, electric power, natural gas, and telecommunications facilities for the Current Project would be generated in the immediate vicinity of the sites. Therefore, cumulative impacts related to extensions of water supply, wastewater, stormwater, electric power, natural gas, and telecommunications facilities would be installed within the disturbance area of such projects or the rights-of-way of previously disturbed roadways and impacts would be less than significant.

Water

Implementation of the Current Project would result in a reduction in the total number of dwelling units, residents, and commercial square footage within the Site 11 property when compared to the EIR Project. As such, the Current Project would not change any of the cumulative impact analysis presented in the

General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in a cumulatively considerable significant environmental impact associated with water usage.

Wastewater

Implementation of the Current Project would result in a reduction in the total number of dwelling units, residents, and commercial square footage within the Site 11 property when compared to the EIR Project. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in a cumulatively considerable significant environmental impacts associated with wastewater treatment.

Electricity

Implementation of the Current Project would result in a reduction in the total number of dwelling units, residents and commercial square footage within the Site 11 property when compared to the EIR Project. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in a cumulatively considerable significant environmental impact associated with electric power.

Natural Gas

Implementation of the Current Project would result in a reduction in the total number of dwelling units, residents, and commercial square footage within the Site 11 property when compared to the EIR Project. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in a cumulatively considerable significant environmental impacts associated with natural gas.

Solid Waste

Implementation of the Current Project would result in a reduction in the total number of dwelling units, residents, and commercial square footage within the Site 11 property when compared to the EIR Project. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not result in a cumulatively considerable significant environmental impact associated with landfill capacity.

III. ENVIRONMENTAL IMPACT ANALYSIS
O. WILDFIRE

The project site is located in a Very High Fire Hazard Severity Zone (FHSZ) within the Local Responsibility Area within the City of Calabasas.[1] Figure 4.15-1 of the General Plan Update PEIR illustrates the entirety of Calabasas is designated as a Very High FHSZ.[2] The areas surrounding Calabasas are within a High and Very High FHSZ within a State Responsibility Area (SRA), as well as Cheseboro and Palo Comado Canyon being within an Federal Responsibility Area (FRA).[3]

Threshold 1: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the General Plan Update substantially impair an adopted emergency response plan or emergency evacuation plan?

EIR Project

Construction

The General Plan Update PEIR determined that construction impacts related to emergency response/evacuation plan consistency would be less than significant as evacuation routes would not be blocked during construction as staging areas are required to be situated in such a way that they avoid designated evacuation zones, temporary alternative access/egress routes would be established and maintained throughout construction, and construction-related vehicular traffic would also use designated routes. Therefore, with adherence to the General Plan Update and existing policies, impacts related to conflicting with emergency response plans or evacuation plans during project construction would be less than significant.

Operation

An Emergency Evaluation Assessment (Fehr and Peers 2021) was prepared for the General Plan Update PEIR, which evaluates road capacity during an emergency evacuation of the entire City and considers the General Plan Update compared to existing conditions. The analysis found that the General Plan Update would not have a significant effect on the transportation system during an evacuation or when needed for emergency use, and traffic from buildout of the General Plan Update would be minor compared to existing conditions in the Plan Area. It should be noted that all proposed housing sites would be located within a mile of major arterials that could be used for evacuation. The PEIR determined that in the event of the most dangerous type of wildfires, one occurring from prevailing south winds and approaching the City over the heavily wooded landscapes at the southern edges of the Plan Area, none of the proposed housing sites would be cut off from using the defined evacuation routes and US-101 evacuation system. If all sites were to be evacuated in a single event, instead of phased evacuation to avoid congestion, the

---

1 *California Department of Forestry and Fire Protection (CAL FIRE), 2007, Fact Sheet: California's Fire Hazard Severity Zones, May 2007, website: https://www.sccgov.org/sites/dpd/DocsForms/Documents/Fire_Hazard_Zone_Fact_Sheet.pdf (accessed April 2021).*

2 *City of Calabasas, 2015, 2030 General Plan, website: https://www.cityofcalabasas.com/home/showpublisheddocument?id=2689 (accessed April 2021).*

3 *California Department of Forestry and Fire Protection (CAL FIRE), 2020, California Fire Hazard Severity Zone Viewer, website: https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414 (accessed April 2021).*

traffic from development under the General Plan update and traffic from buildout of the General Plan Update would be minor compared to existing conditions. Additionally, the Safety Element of the General Plan Update includes objectives and policies that address emergency access, response, and preparedness to maintain existing evacuation and emergency response plans. Buildout associated with the General Plan Update would not substantially alter or otherwise interfere with public rights-of-way and individual projects would provide adequate and multiple internal ingress and egress for necessary emergency response vehicles. In addition, projects facilitated by the General Plan Update would comply with applicable California Fire Code (Title 24, California Code of Regulations, Section 9) requirements, that include stringent building standards including fire suppression systems, materials, and design.

Buildout associated with the General Plan Update would be guided by existing and future planning strategies, including those concerning public safety. Given the full breadth of the hazard and evacuation plans available, and the robust design/review process currently in place, development under the General Plan Update would not produce direct or indirect effects that would substantially impair an adopted emergency response plan or emergency evacuation plan. With adherence to General Plan Update objectives and policies, as well as compliance with the California Fire Code, impacts related to emergency response/evacuation plan consistency would be less than significant.

Current Project

Construction

The Current Project would develop Site 11 within an existing shopping center and parking lot, which is developed with an existing 33,091 square-foot movie theater and 139 surface parking spaces. The Current Project would consist of construction of two mixed-use buildings (Building A and Building B), including approximately 24,163 square feet of ground-floor commercial space and 119 multi-family residential units. Similar to the General Plan Update PEIR, evacuation routes would not be blocked during construction as staging areas are required to be situated in such a way that they avoid designated evacuation zones, temporary alternative access/egress routes would be established and maintained throughout construction, and construction-related vehicular traffic would also use designated routes. Therefore, with adherence to General Plan Update and existing policies, project construction would not conflict with an emergency response plan or evacuation plan/routes and no new significant impacts or substantially more severe impacts would occur.

Operation

The Current Project would develop fewer residential units and less commercial square footage on Site 11 as compared to the 201 units and 44,393 square feet analyzed in the PEIR. Accordingly, the total number of new residents in the Plan Area under the Current Project would be 3,312, which is less than the 3,537 analyzed in the PEIR. Therefore, in an emergency situation, the Current Project would result in the potential evacuation of fewer residents than analyzed in the PEIR, and impacts would be less severe than those analyzed in the PEIR.

Calabasas disaster preparedness and evacuation planning defines two evacuation routes for the City. The first is the Freeway Disaster Route that includes the Ventura Freeway (US-101). The second is the disaster route on City thoroughfares that includes Las Virgenes Road, Mulholland Highway, and Old Topanga Canyon Road. Site 11 is located approximately 2,534 feet from the closest major arterial road for evacuation (Ventura Freeway), as determined by the General Plan Update PEIR. The Current Project would not change the proposed location of development analyzed for Site 11 in the General Plan Update PEIR,

and would not increase development density compared to what was analyzed in the General Plan Update PEIR.

Therefore, operational impacts related to conflicting with an adopted emergency response plan or emergency evacuation plan under the Current Project would be less than those under the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to an adopted emergency response plan or emergency evacuation plan have been identified for the Current Project.

Threshold 2: If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the General Plan Update due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Threshold 5: If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the General Plan Update expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

EIR Project

The General Plan Update concentrates the forecasted development in urban areas and corridors of the Plan Area where the risk of wildfire is less than in more rural areas where fuels are more abundant. The General Plan Update PEIR determined that none of the proposed housing sites are associated with topographic positions, regional slope tendencies, on-site slopes, or areas of immediately adjacent high slopes, such that there would be an expected, unreasonable vulnerability to wildfire ignition or spread. The Plan Area is subject to Santa Ana winds, which influence wildfire behavior, and prevailing winds in the Plan Area from west to east, and east to northeast could push a potential wildfire and wildfire smoke into the developed portions of the City. The proposed housing sites are not located on slopes that exceed eight percent. Four of the proposed housing sites are located near terrain with slopes ranging from 30 to 40 percent: Cruzan Parking Lot, Commons Shopping Center (the Current Project site), Las Virgenes Shopping Center, and Rancho Pet Kennels. However, these four sites are located at positions lower than the adjacent terrain, thus lessening the wildfire risk associated with topographic positioning of the project sites (fire spread rates, under constant wind conditions, are faster moving uphill, and conversely slower going downhill). It is not reasonably expected that any of the 12 proposed housing sites would experience increased wildfire risk levels attributable to topographic influences, prevailing winds, or other factors. In addition, development on these sites would be constructed in accordance with LACFD and City of Calabasas building standards designed to reduce wildfire risk including vegetation management, pre-fire management and planning, fuel modification, and brush clearance. Development under the General Plan Update would also be required to adhere to state and federal regulations related to wildfire, including the California Fire Code, Chapter 7A, which applies to construction in wildfire hazard areas and includes safety measures that minimize the threat of fire, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system and sealing any gaps around doors, windows, eaves and vents to prevent intrusion by flame or embers. Although risks from wildfire are inherent to the City and cannot be fully avoided, impacts would be less than significant because the General Plan Update would not exacerbate wildfire risks, increase exposure of occupants to pollutant concentrations from a wildfire, uncontrolled spread of wildfire, or exposure of significant risk of loss, injury or death involving wildland fire.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. The Current Project would not change the proposed location of development analyzed for Site 11 in the General Plan Update PEIR, and would decrease the development density compared to what was analyzed in the General Plan Update PEIR. The Current Project does not propose any changes to topography that would change the conclusions of the General Plan Update PEIR. Similar to the EIR Project, the Current Project would be constructed in accordance with LACFD and City building standards designed to reduce wildfire risk including vegetation management, pre-fire management and planning, fuel modification, and brush clearance. Development under the General Plan Update would also be required to adhere to state and federal regulations related to wildfire, including the California Fire Code, Chapter 7A, which includes safety measures that minimize the threat of fire, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system and sealing any gaps around doors, windows, eaves and vents to prevent intrusion by flame or embers. Further, the PEIR evaluated the wildfire risk index for each proposed housing site, and determined that the Commons Shopping Center (the Current Project site) has a wildfire risk index of 36. The average wildfire risk index amongst all proposed housing sites is 43.6. As such, the wildfire risk index for the Current Project is lower than average across all housing sites analyzed in the PEIR. The Current Project would not exacerbate wildfire hazards and would involve fewer residential units and a lower intensity of development than analyzed in the PEIR.

Therefore, with adherence to state and local requirements, overall impacts related to exacerbating wildfire risk, exposure of occupants to pollutant concentrations from a wildfire, uncontrolled spread of wildfire, or exposure of significant risk of loss, injury or death involving wildland fire would be less than significant and no mitigation measures are required. Accordingly, no new significant impacts or substantially more severe impacts related to exposure of occupants to pollutant concentrations from a wildfire, uncontrolled spread of wildfire, or exposure of significant risk of loss, injury or death involving wildland fire have been identified for the Current Project.

Threshold 3: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the General Plan Update require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

EIR Project

The General Plan Update PEIR found that proposed growth would occur primarily as infill and redevelopment within the vacant and urbanized areas of the City, and the majority of roads and utility infrastructure required for growth would be existing or would occur in currently developed areas, resulting in negligible temporary or ongoing environmental impacts. Structures would also be required to use building materials that reduce overall flammability and lower vulnerability to ember source ignitions per Title 24, Part 2, Chapter 7A. New electrical power lines would be installed underground and would not contribute to increased fire risk. General Plan Safety Element Policy VII-45 would ensure new development, including associated infrastructure, is designed to facilitate access by firefighting equipment. Policy VII-49 would require adequate water pressure for reliable fire flows for new development and Policy VII-52 would prioritize undergrounding of all utilities for designated routes to make them more reliable. Therefore, impacts would be less than significant.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. The Current Project would not change the proposed location of development analyzed for Site 11 in the General Plan Update PEIR, and would decrease development density compared to what was analyzed in the General Plan Update PEIR. The Current Project would not require the installation or maintenance of associated infrastructure beyond which was analyzed in the PEIR. No new roads are proposed and the project would connect to existing utility systems. Similar to the General Plan Update PEIR, the Current Project would be required to use building materials that reduce overall flammability and lower vulnerability to ember source ignitions per Title 24, Part 2, Chapter 7A. New electrical power lines would be installed underground and would not contribute to increased fire risk. The Current Project would be required to facilitate access by firefighting equipment. As analyzed by the General Plan Update PEIR, Policy VII-49 would require adequate water pressure for reliable fire flows for new development and Policy VII-52 would prioritize undergrounding of all utilities for designated routes to make them more reliable.

Therefore, Current Project impacts associated with the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment would be less than under the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to exacerbated fire risk have been identified for the Current Project.

Threshold 4: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the General Plan Update expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

EIR Project

The General Plan Update PEIR found that none of the proposed housing sites are near areas that have historically experienced landslides and severely sloped terrain does not occur adjacent to the proposed housing sites. Observations at several of the subject sites showed slope stabilization and retention actions and there were no indications that adjacent sites would be at risk of a landslide. Therefore, development under General Plan Update would not expose people or structures to landslides or post-fire instability and this impact is less than significant.

Seven of the proposed housing sites are not associated with a defined drainage or wet area. Therefore, development under General Plan Update would not expose people or structures to flooding or drainage changes following a wildfire and this impact would be less than significant.

In addition, Objective VII.C and associated policies in the Safety Element of the General Plan Update are intended to reduce the risk of wildfire throughout the Plan Area as it relates to both landslides and flooding following a wildfire event. Compliance with proposed polices would reduce the risk of landslides and flooding following a wildfire for developments implemented by the General Plan Update. Adherence to these policies would address critical issues, such as slope instability, following a wildfire and require wildfire risk reduction measures, such as healthy hillside management. Additionally, proposed housing sites are not located in areas associated with landslides and flooding. Development under the General Plan Update would not expose people or structures to landslides or flooding following a wildfire and impacts would be less than significant.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. The Current Project would not change the proposed location of development analyzed for Site 11 in the General Plan Update PEIR. As identified in the General Plan Update PEIR, Site 11 is not located adjacent to Calabasas Creek or Las Virgenes Creek. Therefore, the Current Project's impacts related to exposure of people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would be similar to the EIR Project and also less than significant. Accordingly, no new significant impacts or substantially more severe impacts related to exposure of people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes have been identified for the Current Project.

Cumulative Impacts

EIR Project

Wildfire Hazards

The geographic scope for potential cumulative wildfire impacts associated with the EIR Project is Los Angeles County. However, this cumulative analysis focuses on development on and proximate to Calabasas. With respect to the location of cumulative development, most land surrounding Calabasas to the north and east is suburban use and open space areas south and west of the City are classified as Very High Fire Hazard Severity Zone. Potential cumulative wildfire hazard impacts could be significant if cumulative development would occur in undeveloped rural or high fire hazard areas that could exacerbate risks due to location on steep slopes, in high-wind areas, or areas of historical wildfire burn areas. Cumulative development in Calabasas in conjunction with future potential development in Agoura Hills, Hidden Hills, Woodland Hills, and unincorporated Los Angeles County would increase the density of development in urban areas compared to outlying areas, which would help reduce wildfire risk. Specifically, the General Plan Update would accommodate a net increase of approximately 1,305 new residential units in Calabasas, all of which would be located in developed areas within high fire hazard zones. Cumulative development and infrastructure would be subject to Statewide standards for fire safety in the California Fire Code. Compliance with state, regional, and local codes, regulations, and proposed polices would reduce the risk of loss, injury, or death from wildfire by making structures more resilient to wildfire. By replacing existing structures with new structures built to more stringent fire codes, build out of the General Plan Update would help to reduce wildfire risk in these areas.

With respect to the amount (and density) of cumulative new development, cumulative development and infrastructure would be subject to statewide standards for fire safety in the California Fire Code. However, existing codes and regulations cannot fully prevent wildfires from resulting in damage to structures or populations. Additionally, while fire hazard would be greatly reduced, codes and regulations cannot guarantee that fires would not be ignited onsite or offsite by project occupants. Mitigation is not available for such cumulative impacts, as it is not possible to completely prevent a risk of wildfires and/or fully protect people and structures associated with cumulative development from the risks of wildfires within high fire hazard zones in Los Angeles County. Since the amount of cumulative development would increase under the General Plan Update in conjunction with other development in Calabasas and surrounding areas, there would be a significant and unavoidable cumulative impact. However, since cumulative development is concentrated in urban areas, and would require compliance with state, regional, and local

codes, regulations, and proposed policies, all of which reduce the risks associated with wildfires, cumulative impacts related to exposure of occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire, or exposure of significant risk of loss, injury or death involving wildland fire are considered less-than-significant

Wildfire-Related Emergency/Evacuation Response

Cumulative development in Agoura Hills, Hidden Hills, Woodland Hills, and unincorporated Los Angeles County, including development under the General Plan Update, would comply with local emergency response plans, which coordinate efforts among agencies and local entities in the event of a wildfire. Specifically, Calabasas is part of the Las Virgenes-Malibu Multi-Jurisdictional Hazard Mitigation Plan that includes the cities of Agoura Hills, Hidden Hills, Westlake, and Malibu. This plan ensures coordinating evacuation procedures for residents and businesses in the region. In addition, the Los Angeles County Fire Department provides fire services to these jurisdictions, which would result in coordinated efforts for emergency access and evacuation response. With adherence to local plans and procedures, the cumulative impact related to emergency and evacuation response relative to wildfire events would be less than significant.

Current Project

Wildfire Hazards

As noted, wildfire hazards can increase due to the location of new development (such as within currently undeveloped areas) and/or the amount (and density) of new development. With respect to the location of Site 11, the Current Project does not propose any changes to the location of new development or the topography that would increase the potential for wildfire occurrence or change the conclusions of the General Plan Update PEIR. Compliance with state, regional, and local codes, regulations, and proposed polices would reduce the risk of loss, injury, or death from wildfire by making structures more resilient to wildfire. Therefore, development of the Current Project, in conjunction with future development envisioned under the General Plan Update and with other potential development in the City of Calabasas and surrounding areas, would not exacerbate wildfire risk or result in more significant cumulative impacts related to exposure of occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire.

With respect to the amount (and density) of new development, the Current Project would result in a reduction in the total number of dwelling units within the Site 11 property when compared to the EIR Project. Thus, the Current Project would reduce the overall number of dwelling units in the Plan Area as compared to the EIR Project and would reduce the number of dwelling units proposed in high fire hazard zones. The Current Project and cumulative development and infrastructure would be subject to statewide standards for fire safety in the California Fire Code. However, as discussed in the General Plan Update PEIR, existing codes and regulations cannot fully prevent wildfires from damaging structures or populations. Mitigation is not available for such cumulative impacts, as it is not possible to completely prevent risk of wildfires or fully protect people and structures associated with cumulative development from the risks of wildfires within Los Angeles County. Although the Current Project would develop fewer residential units than the EIR Project and impacts would be less than the EIR Project, the Current Project, in conjunction with cumulative development, would increase the amount of development that could potentially be damaged by wildfire and therefore would have a significant and unavoidable cumulative impact related to the amount of damage to cumulative development that could potentially result from

wildfires. Although the cumulative impact is significant and unavoidable, the Current Project would not exacerbate this impact or result in more significant cumulative impacts related to wildfire, and thus, like the EIR Project, cumulative impacts related to wildfire remain a less-than-significant impact.

Wildfire-Related Emergency/Evacuation Response

As set forth above, the Current Project would decrease not increase development density compared to what was analyzed in the General Plan Update PEIR. In addition, the Current Project does not propose changes to any local emergency response plans, including the Las Virgenes-Malibu Multi-Jurisdictional Hazard Mitigation Plan. Similar to the EIR Project, the Current Project would adhere to local plans and procedures; the cumulative impact related to emergency and evacuation response relative to wildfire events would be less than significant. As such, the Current Project would not change any of the cumulative impact analysis presented in the General Plan Update PEIR related to emergency and evacuation response relative to wildfire events, and such impacts would remain less than significant.

III. ENVIRONMENTAL IMPACT ANALYSIS

P. EFFECTS FOUND NOT SIGNIFICANT

1. INTRODUCTION

Section 15128 of the CEQA Guidelines requires an EIR to briefly describe any possible effects that were determined not to be significant and were, therefore, not discussed in detail. This section addresses the potential environmental effects of the General Plan Update that were determined not to be significant.

2. AGRICULTURAL AND FORESTRY RESOURCES

Threshold 1: Would the General Plan Update convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Threshold 2: Would the General Plan Update conflict with existing zoning for agricultural use or a Williamson Act contract?

Threshold 3: Would the General Plan Update conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Threshold 4: Would the General Plan Update result in the loss of forest land or conversion of forest land to non-forest use?

Threshold 5: Would the General Plan Update involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

EIR Project

The General Plan Update PEIR determined that there would be no impacts on agricultural and forestry resources as the Plan Area has no portions of land that are classified as forestland. Furthermore, housing under the General Plan Update would primarily be located in infill areas that are previously developed. Therefore, implementation of the General Plan Update would not lead to the loss or conversion of farmland, forest land, or timberland, and would not produce changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. The Current Project would not change the proposed location of development analyzed for Site 11 in the General Plan Update PEIR. Similar to the EIR Project, the Current Project would not lead to the loss or conversion of farmland, forest land, or timberland, and would not produce changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. Accordingly, no new significant impacts or substantially more severe impacts related to agricultural or forestry resources have been identified for the Current Project.

3. ENERGY

Threshold 1: Would the General Plan Update result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

Threshold 2: Would the General Plan Update conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

EIR Project

The General Plan Update PEIR found that reasonably foreseeable development under the General Plan Update would require site preparation and grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping. During construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site.

The General Plan Update PEIR found that energy use during construction would be temporary in nature and construction equipment used would be typical of similar-sized construction projects in the region. Therefore, reasonably foreseeable development under the General Plan Update would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and construction-phase impacts related to energy consumption would be less than significant.

The General Plan Update PEIR determined that operation of reasonably foreseeable development under the General Plan Update would contribute to regional energy demand by consuming electricity, natural gas, and gasoline and diesel fuels. Natural gas and electricity would be used for heating and cooling systems, lighting, and appliances among other purposes. Gasoline and diesel consumption would be associated with vehicle trips generated by customers and employees. However, all new development under the General Plan Update would be required to comply with all standards set in the latest iteration of the California Building Standards Code (California Code of Regulations Title 24), which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the built environment during operation and would not result in wasteful, inefficient, or unnecessary consumption of energy.

Furthermore, the proposed land use changes under the General Plan Update would increase housing density and encourage mixed-use development in close proximity to existing commercial uses and existing transit stops, which would facilitate the use of transit and alternative transportation modes such as walking and biking. Therefore, implementation of the General Plan Update would not result in the wasteful, inefficient, or unnecessary consumption of vehicle fuels. Therefore, operation would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Therefore, the General Plan Update would result in no impact related to an inconsistency with adopted energy conservation plans.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. Similar to the General Plan Update PEIR, the Current Project would require energy use during construction, which would be temporary in nature. Construction equipment used would be typical of similar-sized construction projects in the region. Therefore, similar to the EIR Project reasonably foreseeable development under the General Plan Update would not involve the inefficient, wasteful, and unnecessary

use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Similar to the EIR Project, operation of the Current Project would contribute to regional energy demand by consuming electricity, natural gas, and gasoline and diesel fuels. However, the Current Project would be required to comply with all standards set in the latest iteration of the California Building Standards Code (California Code of Regulations Title 24), which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the built environment during operation and would not result in wasteful, inefficient, or unnecessary consumption of energy.

Lastly, the Current Project would be located within an existing shopping center and would increase housing density and mixed-use development near existing commercial uses. Therefore, operation of the Current Project would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Similar to the EIR Project, the Current Project would not result in an impact related to an inconsistency with adopted energy conservation plans.

Accordingly, no new significant impacts or substantially more severe impacts related to energy have been identified for the Current Project.

4. MINERAL RESOURCES

Threshold 1: Would the General Plan Update result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Threshold 2: Would the General Plan Update result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

EIR Project

According to the Department of Conservation (DOC) California Geological Survey, the Plan Area contains areas identified as MRZ-3, which are areas that contain mineral deposits for which the significance cannot be evaluated (DOC 2021). However, the Plan Area is a primarily residential developed community; therefore, resource extraction would not be compatible with existing and planned land uses. Proposed development under the General Plan Update would not consist of any uses that would require mineral extraction. Therefore, no impacts relating to mineral resource extraction would occur.

Current Project

The Current Project would develop Site 11 within an existing shopping center and parking lot. There are no known mineral resources on or under Site 11, and the Current Project would not involve mineral extraction. Therefore, similar to the EIR Project, no impacts relating to mineral resource extraction would occur. Accordingly, no new significant impacts or substantially more severe impacts related to mineral resources have been identified for the Current Project.

IV. SUMMARY AND CONCLUSION

A. SUMMARY OF IMPACTS

Table IV-1, Summary of Impacts, provides a summary and comparison of the impacts of the EIR Project and the Current Project.

Table IV-1

Summary of Impacts

Impact Category	EIR Project Impacts	Current Project Impacts
Aesthetics	Less Than Significant	Same
Agricultural Resources	No Impact	Same
Air Quality – Construction	Less Than Significant	Less Than Significant
Air Quality – Operation	Less Than Significant	Less Than Significant
Biological Resources	Less Than Significant with Mitigation	Lower and Less Than Significant with Mitigation
Cultural Resources – Historic Resources	Less Than Significant with Mitigation	Same
Cultural Resources – Archaeological, Human Remains, and Tribal Cultural Resources	Less Than Significant with Mitigation	Same
Energy	Less Than Significant	Same
Geology and Soils	Less Than Significant	Same
Geology – Paleontological Resources	Less Than Significant with Mitigation	Same
Greenhouse Gas Emissions		
Hazards and Hazardous Materials	Less Than Significant	Same
Hydrology and Water Quality	Less Than Significant	Same
Land Use and Planning	Less Than Significant	Same
Mineral Resources	No Impact	Same
Noise – Construction	Less Than Significant with Mitigation	Lower and Less Than Significant with Mitigation
Noise – Operation	Less Than Significant	Less Than Significant
Population and Housing	Less Than Significant	Same
Public Services	Less Than Significant	Lower and Less Than Significant
Transportation	Less Than Significant	Less Than Significant
Utilities and Service Systems	Less Than Significant	Lower and Less than Significant
Wildfire	Less Than Significant	Lower and Less than Significant
Source: EcoTierra Consulting, April 2023.		

B. ADDENDUM CONCLUSION

As demonstrated by the discussion above, impacts associated with the Current Project would be similar to or less than the impacts addressed in the General Plan Update PEIR. No substantial changes would occur with respect to the circumstances under which the Current Project is undertaken that will require major revisions of the General Plan Update PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, no new information of substantial importance has become available relative to any of the environmental topic categories that would result in new or more severe significant environmental impacts. In addition, the applicable mitigation measures included as part of the General Plan Update PEIR would continue to be implemented under the Current Project. As all of the impacts of the Current Project would be within the envelope of impacts analyzed in the General Plan Update PEIR, none of the conditions described in PRC Section 21166 and CEQA Guidelines Sections 15162 and 15163 requiring a Supplemental or Subsequent EIR would occur. Additionally, there are no known mitigation measures or project alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment identified in the General Plan Update PEIR. Therefore, the Current Project would not create any potential adverse impacts beyond those evaluated in the General Plan Update PEIR. As such, the preparation of an addendum that amends the project description in the General Plan Update PEIR to include the Current Project is appropriate and fully complies with the requirements of PRC Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164.

Appendices:
A https://www.cityofcalabasas.com/home/showdocument?id=29167&t=638368524557400234
B https://www.cityofcalabasas.com/home/showdocument?id=29169&t=638368524561618978
C https://www.cityofcalabasas.com/home/showdocument?id=29171&t=638368524567244047
D https://www.cityofcalabasas.com/home/showdocument?id=29173&t=638368524585212889
E https://www.cityofcalabasas.com/home/showdocument?id=29175&t=638368524589431712
F https://www.cityofcalabasas.com/home/showdocument?id=29177&t=638368524636463489
G https://www.cityofcalabasas.com/home/showdocument?id=29179&t=638368524640994789
H https://www.cityofcalabasas.com/home/showdocument?id=29181&t=638368524691307971
I https://www.cityofcalabasas.com/home/showdocument?id=29183&t=638368524721152037
J https://www.cityofcalabasas.com/home/showdocument?id=29185&t=638368524728652078