



# CITY OF ROLLING HILLS

## FINAL NEGATIVE DECLARATION FOR THE CITY OF ROLLING HILLS SAFETY ELEMENT UPDATE

***Prepared for:***

**CITY OF ROLLING HILLS**  
No. 2 Portuguese Bend Road  
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**March 2022**

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## SECTION 1.0 – INTRODUCTION

### 1.1 DRAFT INITIAL STUDY / NEGATIVE DECLARATION

An Initial Study Negative Declaration (IS/ND) was prepared for both the Housing Element Update and Safety Element Update for the City of Rolling Hills. On January 13, 2022, the City of Rolling Hills circulated a Draft IS/ND to public agencies and the general public. In accordance with the California Environmental Quality Act (CEQA) Section 21091 and State CEQA Guidelines Section 15073, a 30-day public review period for the Draft IS/ND was provided from January 13, 2022 to February 12, 2022.

The City has not yet received comments back from the California Department of Housing and Community Development (HCD) on the Housing Element Update, and does not wish to approve the Housing Element Update without such comments. The City has removed the Housing Element Update from the Project (and associated IS/ND). The changes to the IS/ND do not affect the overall conclusions of the environmental document; the analysis of the Safety Element Update is wholly bounded by the analysis and findings in the previously circulated Draft IS/ND. An errata has been prepared to clarify and modify the Project.

### 1.2 AVAILABILITY OF THE NOI AND IS/ND

The Notice of Intent (NOI) and the IS/ND were available for review at the following locations:

- City of Rolling Hills City Hall  
Planning and Community Services Department  
No. 2 Portuguese Bend Road  
Rolling Hills, CA 90274
- The city's website at:  
[https://www.rolling-hills.org/21330%20-%20Rolling%20Hills%20IS\\_011022.pdf](https://www.rolling-hills.org/21330%20-%20Rolling%20Hills%20IS_011022.pdf)

Additionally the NOI was posted in the *Daily Breeze* on January 13, 2022. Agencies and members of the public were invited to reach out to the City's Director of Planning and Community Services, John F. Signo, AICP, with any comments or questions regarding the Project.

## **SECTION 2.0 – PROJECT DESCRIPTION AND SETTING**

### **2.1 INTRODUCTION**

The City of Rolling Hills (City) is a rural, equestrian residential community, consisting entirely of large lot residential parcels of one acre or more. The community encompasses 2.99 square miles of land (approximately 1,910 acres) on the Palos Verdes Peninsula in the County of Los Angeles (Figure 2.2-1: Project Location). The City's General Plan was drafted and adopted in 1990. The City is proposing updates to the Safety Element of the General Plan, one of the six elements.

The Safety Element Update (SEU), (available on the City's website) provides the City's goals, policies, and actions to minimize the hazards to safety in and around the City. The SEU evaluates natural and human-caused safety hazards that affect existing and future development and provides guidelines for protecting the community from harm. The SEU describes existing and potential future conditions and sets policies for improved public safety. The goal of the SEU is to reduce the risk of injury, death, property loss, and other hardships to acceptable levels. A detailed description of the update is provided below.

### **2.2 SAFETY ELEMENT UPDATE**

#### **2.2.1 Background**

Throughout its history as a city, the City has dealt with various natural hazards, including earthquakes, wildfires, droughts, and land movement. Developments in high landslide areas have occurred, and the City has been identified as being located in a Very High Fire Hazard Severity Zone (VHFHSZ). As a result, the City has amended its building and safety codes to include special requirements such as fire-rated materials for new construction and a requirement for geotechnical studies in active fault zones.

#### **2.2.2 Safety Element Overview**

The City's SEU addresses hazards of concern relevant to the City and provides goals, policies, and implementation measures to minimize these hazards. Figures 2 through 6 of the SEU show exact locations of these hazards, which are described in the following paragraphs.

##### **Landslide Hazards**

Much of the existing development in the City is located on hilly terrain and has a greater potential to experience landslide hazards. Many of the canyons in the City exhibit steep slopes with little vegetation coverage, leaving them susceptible to slope failure.

##### **Seismic Hazards**

The City is in a seismically active region of southern California. The last major earthquake in the Los Angeles area was the 5.1 magnitude La Habra earthquake in 2014. The City is within 50 miles of the Whittier fault, Newport-Inglewood fault, Palos Verdes fault, Malibu Coast fault, Cabrillo fault, Santa Monica fault, and Redondo Canyon fault. Analysis of seismic data from the region indicates that the Whittier and Newport-Inglewood faults may generate a maximum credible earthquake of magnitude 7.2 and 7.4, respectively. The earthquake shaking potential for the City is moderate. A number of seismically active faults are present in the City and region; however, none are active faults with the potential for

ground rupture, defined by the Alquist-Priolo Earthquake Fault Zoning Act and delineated by California Geological Survey. The City has a low potential for liquefaction, as the subsurface soils generally lack saturated alluvial deposits and thick, granular soils.

### **Flooding**

The City is not in any immediate risk from flooding caused by overflowing water bodies or heavy rains. However, runoff and minor flooding pose a risk if drainage systems fail along canyon bottoms, where natural drainage leads. Due to dam locations and the topography of the area, the inundation areas do not enter or affect any portion of the City.

### **Wildland and Urban Fires**

The entire City is designated a Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE 2011). The terrain in the City is composed of several large and steep canyons that limit and challenge vegetation management and present conditions where a fire can quickly travels up and downslope to nearby homes. Due to the rural nature and large residential lots, many homes are surrounded by more substantial vegetation and dense brush than in more suburban settings.

### **Hazardous Materials**

According to the Department of Substances Control (DTSC 2021), no hazardous waste sites or facilities are present in the City. The City and surrounding area do not contain heavy industrial uses that would create a hazardous material risk in the event of a spill, release, or natural disaster.

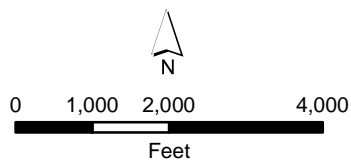
#### **2.2.3      Goals and Policies**

The SEU is a policy document; no actual development or rezoning of parcels is included as part of the approval. In addition to goals and policies, the SEU includes implementation measures for action items for the City. The goals, policies, and implementation for hazard mitigation, community communication, and climate change adaptation and resilience are listed at the end of the SEU.





Project Location



**Figure 2.1-1**  
City of Rolling Hills  
Safety Element Update  
Project Location

### **SECTION 3.0 – FINDINGS**

An IS / ND was prepared to assess the proposed Project's potential impacts on the environment and the significance of those impacts. Based on this IS / ND, it was determined that the proposed Project would not have any significant impacts on the environment. This conclusion is supported by the following findings:

- No potential was found for adverse impacts on Aesthetics, Agriculture, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gases, Hazards and Hazardous Materials, Hydrology, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, Tribal Cultural Resources, and Wildfire associated with the Proposed Project.
- The proposed Project will not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory with the implementation of the recommended mitigation.
- The proposed Project will not have impacts that are individually limited but cumulatively considerable.
- The proposed Project will not have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly



## SECTION 4.0 – CIRCULATION

On January 13, 2022, the City of Rolling Hills circulated a NOI to Adopt an IS / ND to public agencies. In accordance with the California Environmental Quality Act (CEQA) Section 21091 and State CEQA Guidelines Section 15073, a 30-day public review period for the Draft IS/ND was provided from January 13, 2022, to February 12, 2022. Copies of the IS / ND and supporting materials were made available for review at the City of Rolling Hills City Hall No. 2 Portuguese Bend Road, Rolling Hills, CA 90274 and online at [https://www.rolling-hills.org/government/planning\\_and\\_community\\_services/index.php](https://www.rolling-hills.org/government/planning_and_community_services/index.php).

During the 30-day comment period, the following comments were received from the following agencies.

**Table 4-1: Comments from Agencies on the Draft Negative Declaration**

Comment Letter No.	Commenting Agency	Date of Comment
1	California Department of Transportation	January 27, 2022
2	California Department of Fish and Wildlife	February 4, 2022
3	Los Angeles County Sanitation District	February 7, 2022
4	County of Los Angeles Fire Department	February 8, 2022

## **SECTION 5.0 – RESPONSE TO COMMENTS**

CEQA Guidelines Section 15204 (b) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of negative declarations should be, “on the proposed finding that the project will not have a significant effect on the environment. If persons and public agencies believe that the project may have a significant effect, they should: (1) Identify the specific effect; (2) Explain why they believe the effect would occur, and; (3) Explain why they believe the effect would be significant.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with Public Resources Code 21092.5 (b) of the CEQA Guidelines, the lead agency shall notify any public agency which comments on a negative declaration of the public hearing or hearings, if any, on the project for which the negative declaration was prepared. If notice to the commenting public agency is provided pursuant to Section 21092, the notice shall satisfy the requirement of this subdivision.

### **5.1 COMMENTS AND RESPONSES TO COMMENTS**

Written comments on the Draft IS / ND are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the letters are coded using numbers (e.g., Comment Letter 1) and each issue raised in the comment letter is assigned a number that correlates with the letter (e.g., 1-1, 1-2, 1-3, etc.).

Comment-initiated text revisions to the Draft ND and minor staff-initiated changes are compiled in their entirety and are demarcated with revision marks in Section 6.0, Revisions to the Draft Negative Declaration, of this Final IS/ ND.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7  
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*Making Conservation  
a California Way of Life*

January 27, 2022

John F. Signo, Director  
Planning and Community Services  
City of Rolling Hills  
No. 2 Portuguese Bend Road  
Rolling Hills, CA 90274

RE: City of Rolling Hills 2021-2029 Housing  
Element Update and Safety Element  
Update  
SCH # 2022010176  
Vic. LA-01, LA-213, Citywide  
GTS # LA-2022-03823-ND

Dear John F. Signo:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The Project is the Sixth Cycle, 2021-2029 Housing Element Update of the City of Rolling Hills General Plan and an update to the City's Safety Element to address various natural and human-caused hazards, including earthquakes, wildfires, droughts, and land movement. The City's Housing Element serves as an integrated part of the General Plan and is subject to detailed statutory requirements, including a requirement to be updated every eight years and mandatory review by the California Department of Housing and Community Development. The City's Safety Element addresses hazards of concern relevant to the City and provides goals, policies, and implementation measures to minimize these hazards. The Housing Element Update and Safety Element Update are policy updates only, and no specific development is proposed at this time.

The 2020 Census indicates a citywide population of 1,739 residents, making the City the fifth smallest of the 88 cities in Los Angeles County. For the City, the Regional Housing Needs Allocation (RHNA) for 2021-2029 is 45 units (SCAG 2020). This includes 20 very low income units, 9 low income units, 11 moderate income units, and 5 above moderate income units. The 2021-2029 Housing Element demonstrates that the City has the capacity to accommodate this assignment.

Comment  
1-1

"Provide a safe and reliable transportation network that serves all people and respects the environment"

John F. Signo, Director  
January 27, 2022  
Page 2 of 3

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

For future specific projects, we encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

Comment  
1-2

Comment  
1-3

*"Provide a safe and reliable transportation network that serves all people and respects the environment"*



John F. Signo, Director  
January 27, 2022  
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<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Rolling Hills has no public roads or streets; thus, the City's circulation infrastructure is not conducive to uses generating high trip volumes (City 2014). Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, no circulation-related impacts would result from the Project.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2022-03823-ND.

Sincerely,

*Miya Edmonson*

MIYA EDMONSON  
IGR/CEQA Branch Chief

email: State Clearinghouse

↑  
Comment  
1-3 cont.  
|  
Comment  
1-4  
|  
Comment  
1-5

*"Provide a safe and reliable transportation network that serves all people and respects the environment"*



## **RESPONSE TO COMMENT LETTER 1**

**Commenter: Miya Edmonson, IGR/CEQA Branch Chief, California Department of Transportation**

**Date of Letter: January 27, 2022**

**Response to Comment 1-1:** The commenter acknowledges receipt of the environmental document and discusses the Project components. However, it should be noted that clarifications and insignificant modifications to the negative declaration have been made to remove the Housing Element Update part of the Project. The comment also provides population and housing information regarding the City of Rolling Hills. No response is required.

**Response to Comment 1-2:** The commenter discusses the shift in transportation analysis as a result of Senate Bill 743 which utilizes vehicle miles traveled (VMT) as the analysis metric as required for CEQA projects and notes the challenges that the region faces in identifying viable solutions to alleviating congestion on state and local facilities. The commenter suggests use of road diets, complete streets, and use of pedestrian safety measures to increase road safety and notes the environmental report should ensure all modes are served well by planning and development activities. This comment is noted, and no further response is required.

**Response to Comment 1-3:** The commenter encourages the lead agency to use Transportation Demand Management strategies for future specific projects to support transit and pedestrian services, while providing reference manuals for these strategies. This comment is noted, and no further response is required.

**Response to Comment 1-4:** The commenter acknowledges the lack of public roads or streets in the City and notes the City's circulation infrastructure does not support high volume trips. The commenter also notes impacts associated with future development would require project-specific mitigation measures. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City.

**Response to Comment 1-5:** The commenter concludes the letter and provides contact information for questions related to the letter. This comment is noted, and no further response is required.

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State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

Feb 04 2022

STATE CLEARING HOUSE

Via Electronic Mail Only

February 4, 2022

Victoria Boyd  
Chambers Group  
5 Hutton Centre Suite 750  
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[VBoyd@chambersgroupinc.com](mailto:VBoyd@chambersgroupinc.com)

**Subject: Negative Declaration for the City of Rolling Hills 2021-2029 Housing Element Update and Safety Element Update, SCH #2022010176, City of Rolling Hills, Los Angeles County**

Dear Ms. Boyd:

The California Department of Fish and Wildlife (CDFW) has reviewed a Negative Declaration (ND) from the City of Rolling Hills (City) for the City of Rolling Hills 2021-2029 Housing Element Update and Safety Element Update (Project). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

#### CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Comment  
2-1

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Victoria Boyd  
Chambers Group  
February 4, 2022  
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### Project Description and Summary

**Objective:** The Project proposes to update both the Housing Element and Safety Element of the City's General Plan.

**Housing Element Update:** State housing element law requires housing elements to be updated regularly to reflect a community's changing housing needs. A critical measure of compliance is the ability of a jurisdiction to accommodate its share of the regional housing needs based on a Regional Housing Needs Allocation (RHNA). The RHNA is prepared by California Department of Housing and Community Development for each Council of Governments. The City's RHNA for the 6<sup>th</sup> Cycle 2021-2029 Housing Element Update is 45 units. This includes 20 very low-income units, 9 low-income units, 11 moderate income units, and 5 above moderate income units. The Housing Element Update will consist of the following major components:

- A review of the prior housing element and goals that were accomplished (Section 2, Evaluation of Prior Housing Element);
- An assessment of housing needs including profile and analysis of the City's demographics, housing characteristics, and existing and future housing needs (Section 3, Housing Needs Assessment);
- An assessment of resources available to meet the City's objectives regarding housing production and preservation. Resources include land available for new construction and redevelopment, as well as financial and administrative resources available (Section 4, Housing Sites);
- A review of the constraints to housing production and preservation. Constraints include potential market, governmental policy, and environmental limitations to meeting the City's identified housing needs (Section 5, Constraints to Housing Production); and,
- A statement of the housing plan to address the City's identified housing needs, including housing goals, policies, and programs (Section 6, Housing Goals, Policies, Objectives, and Programs).

Comment  
2-2

**Safety Element Update:** The Safety Element Update addresses hazards of concern relevant to the City. Hazards within the City include landslides, seismic activity, flooding, wildland and urban fires, and hazardous materials. The Safety Element Update provides goals, policies, and implementation measures to minimize these hazards.

**Location:** The Project would apply to the entire City. The City is a rural, equestrian residential community, consisting entirely of large lot residential parcels of one acre or more. The City encompasses 2.99 square miles (approximately 1,910 acres) on the Palos Verdes Peninsula in Los Angeles County.

### Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions are also included to improve the environmental document. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

Comment  
2-3



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Chambers Group  
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## Specific Comments

### Comment #1: Impacts on Biological Resources

**Issue:** Development facilitated by the Project could impact biological resources.

**Specific impacts:** The City has identified 20 developable vacant sites to meet the City's RHNA of above moderate-income units (Attachment B). Development of any those 20 vacant sites could impact biological resources. Development of all 20 sites could result in approximately 75 acres of habitat loss. Biological resources that could be impacted by development facilitated by the Project includes, but is not limited to, the following (Table 1; Attachment B):

**Table 1.** Biological resources that could be impacted by development facilitated by the Project. This is not an exhaustive list of biological resources that could be impacted nor all plants, wildlife, and natural communities that occur/could occur in the City.

<b>Wildlife</b>		
Common name	Scientific Name	Status
coastal California gnatcatcher	<i>Polioptila californica californica</i>	FT, SSC
coastal cactus wren	<i>Campylorhynchus brunneicapillus couesi</i>	SSC
El Segundo blue butterfly	<i>Euphilotes battoides allyni</i>	FE
Palos Verdes blue butterfly	<i>Glaucopsyche lygdamus palosverdesensis</i>	FE
<b>Plants</b>		
Common name	Scientific Name	Status
aphanisma	<i>Aphanisma bitoides</i>	CRPR 1B.2
south coast saltscale	<i>Atriplex pacifica</i>	CRPR 1B.2
Catalina crossosoma	<i>Crossosoma californicum</i>	CRPR 1B.2
Island green dudleya	<i>Dudleya virens</i> ssp. <i>insularis</i>	CRPR 1B.2
Santa Catalina Island desert-thorn	<i>Lycium brevipes</i> var. <i>hasseli</i>	CRPR 3.1
woolly seablife	<i>Suaeda taxifolia</i>	CRPR 4.2
<b>Natural communities</b>		
woodlands (oak and California walnut)	<i>Quercus</i> genus Woodland Alliance, <i>Juglans californica</i> Woodland Alliance	S4, S3.2
coastal sage scrub	<i>Artemisia californica</i> - <i>Salvia mellifera</i> Shrubland Alliance, <i>Encelia californica</i> Shrubland Alliance, <i>Salvia apiana</i> Shrubland Alliance	S3, S4
riparian scrub	<i>Salix</i> genus Shrubland Alliance	S3, S4
southern coastal bluff scrub		
coast prickly pear scrub	<i>Opuntia littoralis</i> Shrubland Alliance	S3
<b>grasslands</b>		

FE: Federally endangered

FT: Federally threatened

SSC: California Species of Special Concern

CRPR: California Rare Plant Rank (CNPS 2022a)

CRPR 1B: rare throughout their range, endemic to California; declined significantly over the last century

CRPR 3: lacking the necessary information to assign one of the other ranks or to reject them

CRPR 4: limited distribution or infrequent throughout a broader area in California

S: State Rank (Sawyer et al. 2008)

S3: 21-100 viable occurrences worldwide/statewide

S4: greater than 100 viable occurrences worldwide/statewide

0.2: threatened

Comment  
2-3 Cont.

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**Why impacts would occur:** The 20 vacant sites identified by the City would accommodate single-family units. These vacant sites currently are open space/natural areas. Future housing development facilitated by the Project would require open space/natural areas to be substantially graded and disturbed. This could result in removal of vegetation, trees, and habitat supporting plants and wildlife. Furthermore, development could impact biological resources within Significant Ecological Areas (Attachment B). Impacts on biological resources could extend beyond the immediate development footprint because development of a site could likely require fuel modification and grading to mitigate the effects of fire and landslide hazards.

**Evidence impact would be significant:** The Project would result in direct physical changes to the environment and substantially degrade the quality of the environment. Development facilitated by the Project would occur on vacant sites that are open space and natural areas. Development resulting in habitat degradation could impact biological resources, including plant and/or wildlife species that is listed under the Endangered Species Act (ESA), a SSC, or a rare species (Table 1).

- **ESA-listed species:** Impacts on ESA-listed species requires a mandatory finding of significance under CEQA (CEQA Guidelines, § 15065). Take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting.
- **SSC:** A [California Species of Special Concern](#) meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, impacts on SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). An SSC is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:
  - is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
  - is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
  - is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
  - has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2022a).
- **Rare Plants:** Plants with a CRPR of 1B meet the definition of endangered, rare, or threatened species (CNPS 2022a). Plants with a CRPR of 4 may meet the definition of endangered, rare, or threatened species. Therefore, impacts on rare plants could require a mandatory finding of significance.
- **Sensitive Natural Communities:** CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2022b). Impacts on sensitive natural communities could require a mandatory finding of significance.

Comment  
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The Project's potential impacts on biological resources, especially rare, sensitive, or special status species, as well as sensitive natural communities, requires a mandatory finding of significance. However, the Project's ND concludes that there will be no impacts. Development facilitated by the Project could substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species [CEQA Guidelines, § 150565(a)(1)]. For example, the Palos Verdes blue butterfly is restricted to open coastal sage scrub habitat on the Palos Verdes Peninsula. The Project resulting in the development and loss of open coastal sage scrub habitat could therefore have a significant effect on biological resources in accordance with CEQA Guidelines section 150565(a)(1). Furthermore, the Project has possible environmental effects that are individual limited but cumulatively considerable [CEQA Guidelines, § 150565(a)(3)].

The ND does not provide measures to mitigate for the Project's potentially significant impacts on rare, sensitive, or special status species, as well as sensitive natural communities. Accordingly, the Project has a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species, or a Sensitive Natural Community, in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS).

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** Applicants of future development projects should be required to prepare a Biological Resources Assessment (BRA). The BRA should be prepared by a qualified biologist. A qualified biologist should conduct field surveys of the project site and focused plant and wildlife surveys. Focused species-specific surveys should be required if suitable habitat is present and performed according to established [Survey and Monitoring Protocols and Guidelines](#) (CDFW 2021c). The BRA should characterize the biological resources on site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The BRA should provide the following information:

- 1) A complete, recent, assessment of rare, threatened, and endangered species, regionally and locally unique species, and sensitive habitats at the project site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of land around the project site should also be addressed. A nine-quadrangle search of CDFW's [California Natural Diversity Database](#) (CNDDDB) should be conducted to obtain current information on any previously reported sensitive species and habitat (CDFW 2022d);
- 2) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where project construction and activities could lead to direct or indirect impacts off site;
- 3) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the area of potential effect. The [Manual of California Vegetation](#) (MCV), second edition, should be used to inform this mapping and assessment (Sawyer et al. 2009);

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- 4) A rare plant assessment using online databases for rare, threatened, and endangered plants, including the California Native Plant Society (CNPS) [Online Inventory of Rare and Endangered Plants of California](#) (CNPS 2022b) as well as the Calflora's [Information on Wild California Plants](#) database (Calflora 2022);
- 5) A discussion regarding project-related indirect impacts on biological resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]; and,
- 6) Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the project site.

**Mitigation Measure #2:** Development projects that would impact species listed under CESA and/or ESA should be required to obtain appropriate take authorization from CDFW and/or USFWS prior to the City's issuance of a grading permit.

**Mitigation Measure #3:** If a rare plant species or a Sensitive Natural Community is detected, the project applicant should fully avoided impacts. The project applicant should retain a qualified biologist to develop an avoidance plan. An avoidance plan should be submitted to the City prior to any grading or vegetation removal.

If the project cannot feasibly avoid impacts to rare plants and habitat, or sensitive natural communities, either during project activities or over the life of the project, the project applicant should provide compensatory mitigation for the loss of individual plants and habitat acres, which should include impacts due to fuel modification and landslide remediation. Impacts on vegetation due hazard mitigation should also be mitigated as these impacts would result in permanent loss and perpetual impacts on habitat function and quality. The project applicant should provide compensatory so that there is no net loss of rare plants and habitat, or sensitive natural communities. Compensatory mitigation should be appropriate for the extent of permanently disturbed habitat. Compensatory mitigation should be higher for impacts on CRPR 1 species, S1 or S2 Sensitive Natural Community, and Sensitive Natural Community with an additional rank of 0.1 or 0.2. Compensatory mitigation should be implemented by a qualified restoration ecologist. A Restoration Plan, at a minimum, should include success criteria and performance standards for measuring the establishment of rare plants and habitat, responsible parties, maintenance techniques and schedule, 5-year monitoring and reporting schedule, adaptive management strategies, and contingencies. A Restoration Plan should be submitted to the City prior to any grading or vegetation removal.

**Recommendation #1:** CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species that results from a project is prohibited, except as authorized by State law (Fish & G. Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Consequently, if a project, project construction, or any project-related activity for the duration of the project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends the project applicant seek appropriate take authorization under CESA prior to implementing/continuing the project. Appropriate authorization from CDFW may include an Incidental Take Permit or a Consistency Determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may

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require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

**Recommendation #2:** The City's [Open Space and Conservation Element](#) sets forth goals to conserve and enhance the City's natural resources. The City's Open Space and Conservation Element states that conversion of land use often endangers sensitive resources and open space lands, and the City is committed to maintaining a balance of preservation and development. Yet, the City's current [Zoning Map](#) shows the entire City zoned for residential development (City of Rolling Hills 1990). CDFW recommends the City consider conserving sites 6 through 14 and 31 through 34 as large continuous open space for preservation of natural resources, habitats, natural vistas, canyons, and corridors benefiting local and transient wildlife populations (Attachment B). CDFW recommends the City protect from development sites that overlap with critical habitat, Significance Ecological Areas, and streams (Attachment B). Finally, CDFW recommends the City consider focusing development the northern part of the City where impacts on biological resources would be minimized and focus development where it already exists.

Comment  
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#### **Comment #2: Impacts on Coastal California Gnatcatcher**

**Issue:** Development facilitated by the Project could impact coastal California gnatcatcher.

**Specific impacts:** Housing development during the coastal California gnatcatcher breeding and nesting season could result in the incidental loss of fertile eggs or nestlings. In addition, development facilitated by the Project could result in permanent loss of coastal California gnatcatcher habitat.

**Why impacts would occur:** Fourteen of 20 developable vacant sites identified by the City overlap with critical habitat for the coastal California gnatcatcher (Attachment B; USFWS 2021a). Where a development project would occur within or adjacent to suitable habitat, the project could impact coastal California gnatcatcher. Construction would create elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. These activities occurring near potential nests could cause birds to abandon their nests and a decrease in feeding frequency, both resulting in the loss of fertile eggs or nestlings. Accordingly, the Project would have an impact on coastal California gnatcatcher. In addition, a development project would require grading and vegetation removal in the project site and adjacent areas for fuel modification and/or landslide remediation. Accordingly, development may result in permanent loss of coastal California gnatcatcher habitat. The quality and function of nesting habitat in areas adjacent to a project site could also be permanently impacted by project-facilitated edge effects such as ambient nighttime lighting and spread of invasive, non-native species.

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**Evidence impact would be significant:** The Project could result in impacts on coastal California gnatcatcher. Impacts on ESA-listed species and SSC requires a mandatory finding of significance under CEQA (CEQA Guidelines, § 15065). The Project's ND does not provide measures to mitigate for potentially significant impacts on coastal California gnatcatcher. Accordingly, the Project has a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or

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special-status species in local or regional plans, policies, or regulations, or by CDFW and USFWS.

In addition, nests of all birds and raptors are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5. Fish and Game Code section 3503 states, "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird." Fish and Game code section 3503.5 prohibits the take, possession, or destruction of birds-of-prey and their nests or eggs. Also, take or possession of migratory nongame birds designated in the Federal Migratory Bird Treaty Act of 1918 is prohibited under Fish and Game Code section 3513. As such, impacts on nesting birds and raptors, either directly or indirectly through nest abandonment, reproductive suppression, or loss of occupied nesting habitat, would be a significant impact under CEQA.

**Recommended Potentially Feasible Mitigation Measure(s):** In addition to Mitigation Measure #2, #9, and #10 in this letter, CDFW recommends the mitigation measures below:

**Mitigation Measure #4:** Where a project site and areas adjacent to the project has suitable habitat for coastal California gnatcatcher, applicants of future development projects should be required to retain a qualified permitted biologist to survey for coastal California gnatcatcher and prepare an impact assessment. The qualified biologist should survey the project site and adjacent areas to determine presence/absence of coastal California gnatcatcher. The qualified biologist should conduct surveys according to USFWS [Coastal California Gnatcatcher \(Polioptila californica californica\) Presence/Absence Survey Guidelines](#) (USFWS 1997). The protocol should be followed for all surveys unless otherwise authorized by the USFWS in writing (USFWS 1997). Survey results should be provided to USFWS per protocol guidance. Survey results, including negative findings, and an impact assessment should be conducted prior to the City's issuance of a grading permits.

**Mitigation Measure #5:** Applicants of future development projects should be required to provide compensatory mitigation for impacts to coastal California gnatcatcher habitat in addition to mitigation required by USFWS to prevent temporal or permanent habitat loss.

### **Comment #3: Impacts on Streams and Associated Natural Communities**

**Issue:** Development facilitated by the Project could impact streams and associated natural communities.

**Specific impacts:** Construction of housing may result in erosion and earth movement that could impair streams, whether ephemeral, intermittent, or perennial. Construction of housing may necessitate streams to be channelized or diverted from their natural course of flow. Construction of housing may require vegetation along streams to be removed, or may degrade vegetation through habitat modification (e.g., loss of water source, encroachment, and edge effects leading to introduction of non-native plants).

**Why impacts would occur:** The City consists of canyons of the San Pedro Hills, and within these canyons are streams, whether ephemeral, intermittent, or perennial (Attachment B, USFWS 2021b). Most of the developable sites identified by the City are located adjacent to streams. Construction of housing would result in ground-disturbing activities (e.g., excavation, pile driving, paving, grading) and vegetation removal. This includes ground-disturbing activities

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and vegetation removal potentially required for fuel modification and landslide remediation. Ground-disturbing activities and vegetation removal could result in erosion. Excess sediment transported downslope could impair streams and herbaceous vegetation. Herbaceous vegetation adjacent to streams protects the physical and ecological integrity of these water features and maintains natural sedimentation processes. Therefore, housing projects that would impact vegetation adjacent to streams, but not the stream itself, could still impact the watercourse. In addition, housing projects may require streams to be channelized or diverted from their natural course of flow.

**Evidence impacts would be significant:** CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 et seq. to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake<sup>1</sup>;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or,
- Deposit or dispose of material into any river, stream, or lake.

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when a project activity may substantially adversely affect fish and wildlife resources. The Project may result in significant impacts on streams and associated natural communities if development facilitated by the Project would be in close proximity to these resources. The Project's ND does not provide measures to mitigate for potentially significant impacts. Accordingly, the Project has a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on fish and wildlife resources, including rivers, streams, or lakes and associated natural communities identified by CDFW.

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #6:** Applicants of future development projects that are located adjacent to a river, stream, or lake should be required to prepare a jurisdictional delineation<sup>2</sup> and impact assessment provided along with the project's Biological Resources Assessment.

**Mitigation Measure #7:** If such features are present and may be impacted by the future development, then the project should be required to avoid impacts by implementing appropriate vegetative buffers and/or setbacks adjoining the stream or wetland feature to reduce impacts of the project on these resources.

**Mitigation Measure #8:** If avoidance is not feasible, the project applicant should be required to notify CDFW pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW

<sup>1</sup> "Any river, stream, or lake" includes those that are dry for periods of time (ephemeral/episodic) as well as those that flow year-round (perennial). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a water body.

<sup>2</sup> Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.

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prior to the City's issuance of a grading permit. The project applicant should comply with the mitigation measures detailed in a LSA Agreement issued by CDFW. The project applicant should also provide compensatory mitigation at no less than 1:1 for the impacted stream and habitat acreage, or at a ratio acceptable to CDFW.

Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2021b).

**Recommendation #3:** CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/project applicant for the project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, a project's CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures; avoidance of resources; protective measures for downstream resources; on- and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands in perpetuity.

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#### **Comment #4: Impacts on Nesting Birds**

**Issue:** Development facilitated by the Project could impact nesting birds and raptors directly or through habitat loss and modification.

**Specific impacts:** Construction of housing during the nesting bird season could cause nesting birds to abandon their nests and a decrease in feeding frequency. This could result in loss of fertile eggs and nestlings. In addition, development facilitated by the Project could result in loss of nesting habitat or degrade habitat quality and function in areas adjacent to a project.

**Why impacts would occur:** Vegetation found in all 20 developable sites could provide suitable nesting habitat for birds and raptors. Some of these sites may contain woodlands such as oak woodlands. Oak woodlands have higher levels of biodiversity than any other terrestrial ecosystem in California. Over 330 species of birds, mammals, reptiles, and amphibians depend on oak woodlands in California at some stage in their life cycle (CalPIF 2002). Large oak trees in oak woodland habitats are important for cover, nesting sites for cup nesting species and cavity nesting species, as well as caching sites for birds storing acorns (CalPIF 2002).

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Where a development project would occur within or adjacent to suitable habitat, the project could impact nesting birds and raptors. Construction would create elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. These activities occurring near potential nests could cause birds to abandon their nests and a decrease in feeding frequency, both resulting in the loss of fertile eggs or nestlings. Accordingly, nesting birds and raptors would be impacted. In addition, a development project would require grading and vegetation removal in the project site and adjacent areas for fuel modification and/or landslide remediation. Accordingly, development may result in permanent loss of nesting habitat. The quality and function of nesting habitat in areas adjacent to a project site could also be

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permanently impacted by project-facilitated edge effects such as ambient nighttime lighting and spread of invasive, non-native species.

**Evidence impact would be significant:** The Project could result in impacts on nesting birds, including ESA-listed species of birds and SSC (i.e., coastal California gnatcatcher and coastal cactus wren). Impacts on ESA-listed species and SSC requires a mandatory finding of significance under CEQA (CEQA Guidelines, § 15065). In addition, nests of all birds and raptors are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5. Fish and Game Code section 3503 states, "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird." Fish and Game code section 3503.5 prohibits the take, possession, or destruction of birds-of-prey and their nests or eggs. Also, take or possession of migratory nongame birds designated in the Federal Migratory Bird Treaty Act of 1918 is prohibited under Fish and Game Code section 3513.

Impacts on nesting birds and raptors, either directly or indirectly through nest abandonment, reproductive suppression, or loss of occupied nesting habitat, would be a significant impact. The Project's ND does not provide measures to mitigate for potentially significant impacts on nesting birds. Accordingly, the Project has a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species by CDFW and USFWS.

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #9:** Future development projects requiring vegetation disturbance and/or removal, and/or are adjacent to suitable nesting habitat should be required to avoid impacts on nesting birds by conducting all project-related activities between September 1 through January 31, outside of the nesting bird season.

**Mitigation Measure #10:** If construction must occur during the bird nesting season, project applicants should be required to retain a qualified biologist to survey suitable nesting habitat for nesting birds on the project site and within 100 feet from the project site to the extent allowable and accessible. A qualified biologist should conduct a nesting bird survey no more than 7 days prior to any ground and vegetation disturbing activities. If project activities are delayed or suspended for more than 7 days during the nesting bird season, a qualified biologist should repeat nesting bird surveys before the project can recommence.

No-disturbance buffers should be established to minimize impacts on any nests and nestlings. No-disturbance buffers should be maintained until the breeding season has ended or until a qualified biologist determines that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

**Mitigation Measure #11:** Future development projects removing habitat for nesting birds should be required to restore or replace habitat in-kind and on site if feasible to prevent temporal or permanent habitat loss. Projects should provide replacement habitat for both individual trees and habitat acres.

**Comment #5: Impacts on Bats**

**Issue:** Development facilitated by the Project could impact bats.

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**Specific impacts:** Construction of housing may result in direct and indirect impacts to bats. Direct impacts include removal of trees and structures occupied by roosting bats. This could result in injury or mortality to bats as well as loss of roosting habitat. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground-disturbing activities (e.g., staging, mobilizing, excavating, and grading), and vibrations caused by heavy equipment.

**Why impacts would occur:** California has the fourth highest diversity of bat species in the United States, with 25 species representing three families. Twenty-four of these species occur in the south coast ecoregion of the State, indicating the importance of the region to bat diversity (Miner and Stokes 2005). The major threat to bats in the south coast ecoregion is habitat loss (especially riparian and oak woodland habitats) due to urban expansion as well as extermination or disturbance of bat colonies.

Vegetation found in all 20 developable sites could provide suitable roosting habitat for bats. Some of these sites may contain riparian and oak woodland habitats. Where a development project would occur within or adjacent to suitable habitat, the project could impact bats and roosts. Construction would create elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. These activities as well as the reconfiguration of large objects can lead to the disturbance of roosting bats which may have a negative impact on the animals. Modifications to roost sites can have significant impacts on the bats' usability of the roost and can impact the bats' fitness and survivability (Johnston et al. 2004). Human disturbance can lead to a change in humidity, temperatures, or the approach to a roost that could force the animals to change their mode of egress and/or ingress to a roost. Although temporary, such disturbance can lead to the abandonment of a maternity roost (Johnston et al. 2004). In addition, a development project would require grading and vegetation removal in the project site and adjacent areas for fuel modification and/or landslide remediation. Accordingly, development may result in permanent habitat loss.

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**Evidence impacts would be significant:** Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Several bat species are considered SSC. Impacts on SSC could require a mandatory finding of significance under CEQA (CEQA Guidelines, § 15065). Impacts on bats, either directly or indirectly through disturbances to roosts and loss of habitat, would be a significant impact. The ND does not provide measures to mitigate for the Project's potentially significant impacts on bats. Accordingly, the Project has a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species by CDFW.

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #12: Surveys for Bats** – Future development projects in areas with suitable roosting and foraging habitat for bats should be required to retain a qualified bat biologist to conduct a survey for within the project site and within 100 feet from the project site to the extent allowable and accessible. A qualified bat specialist should identify potential daytime, nighttime, wintering, and hibernation roost sites. Surveys should be conducted prior to any ground-disturbing activities and vegetation removal.

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**Mitigation Measure #13: Tree Removal** – If a project requires tree removal and a qualified bat biologist determines that roosting bats may be present at any time of year and could roost in trees that need to be removed, during tree removal, trees should be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly and remain in place until it is inspected by a qualified bat biologist. Trees that are known to be bat roosts or could support roosting bats should not be bucked or mulched immediately. A period of at least 24 hours, and preferable 48 hours, should elapse prior to such operations to allow bats to escape.

**Mitigation Measure #14: Roosting Bats** - If bats roosts are found within the project impact area, the qualified bat biologist should identify the bats to the species level, evaluate the colony to determine its size and significance, and establish a species-specific no-disturbance buffer that should be maintained throughout the duration of the project's construction.

**Mitigation Measure #15: Maternity Roosts** – If maternity roosts are found, project-related construction and activities should be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).

If maternity roosts are found and the project must take place during the maternity roosting season, trees/structures determined to be maternity roosts should be left in place until the end of the maternity season. Project-related construction and activities should not occur within 100 feet of or directly under or adjacent to an active maternity roost. A qualified bat biologist should establish a no-disturbance buffer that should be maintained throughout the duration of the project's construction or until a qualified bat biologist determines that the roost is no longer active. Project-related construction and activities should also not occur between 30 minutes before sunset and 30 minutes after sunrise.

#### **Additional Recommendations**

**Recommendation #4: Data** - CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., CNDDDB] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDDB by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2021f). Information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and Relevé Form](#) should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2021g).

**Recommendation #5: Mitigation and Monitoring Reporting Plan** - CDFW recommends the City provide Biological Resources Mitigation Measures for the Project and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist the City in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per

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Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

#### Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City of Rolling Hills and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

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#### Conclusion

We appreciate the opportunity to comment on the Project to assist the City of Rolling Hills in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City of Rolling Hills has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist (Specialist), at [Ruby.Kwan-Davis@wildlife.ca.gov](mailto:Ruby.Kwan-Davis@wildlife.ca.gov) or (562) 619-2230.

Sincerely,

DocuSigned by:

  
5991E19EF8094C3...

Victoria Tang signing for

Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

Comment  
2-10

ec: CDFW

Erinn Wilson-Olgin, Los Alamitos – [Erinn.Wilson-Olgin@wildlife.ca.gov](mailto:Erinn.Wilson-Olgin@wildlife.ca.gov)  
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**Attachment(s):**

Attachment A: Draft Mitigation and Monitoring Reporting Plan  
Attachment B: Housing Sites

**References:**

- [CDFWa] California Department of Fish and Wildlife. 2022. Species of Special Concern. Available from: <https://wildlife.ca.gov/Conservation/SSC>
- [CDFWb] California Department of Fish and Wildlife. 2022. Natural Communities. Available from: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>.
- [CDFWc] California Department of Fish and Wildlife. 2022. Survey and Monitoring Protocols and Guidelines. Available from: <https://wildlife.ca.gov/conservation/survey-protocols>
- [CDFWd] California Department of Fish and Wildlife. 2022. California Natural Diversity Database. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data#43018408-cnddb-in-bios>
- [CDFWe] California Department of Fish and Wildlife. 2022. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/LSA>.
- [CDFWf] California Department of Fish and Wildlife. 2022. Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>
- [CDFWg] California Department of Fish and Wildlife. 2022. Natural Communities — Submitting Information. Available from: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>
- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>
- Calflora. 2022. Information on Wild California Plants. Available from: <https://www.calflora.org/>
- [CNPSa] California Native Plant Society. 2022. CNPS Rare Plant Ranks. Available from: <https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>
- [CNPSb] California Native Plant Society, Rare Plant Program. 2022. Inventory of Rare and Endangered Plants of California (online edition, v9-01 1.0). Available from: <https://www.rareplants.cnps.org>
- [CalPIF] California Partners in Flight. 2002. Version 2.0. The oak woodland bird conservation plan: a strategy for protecting and managing oak woodland habitats and associated birds in California (S. Zack, lead author). Point Reyes Bird Observatory, Stinson Beach, CA. Available from: <http://www.prbo.org/calpif/plans.html>
- City of Rolling Hills. 2019. General Plan Open Space and Conservation Element. Available from: <https://cms5.revize.com/revize/rollinghillsca/Government/Planning%20And%20Community%20Services/6%20-%20Open%20Space%20and%20Conservation%20Element.pdf>
- Johnston, D., Tatarian, G., & Pierson, E. 2004. California Bat Mitigation Techniques, Solutions, and Effectiveness. Available from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=10334>
- Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2009. A Manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.
- [USFWSa] U.S. Fish and Wildlife Service. 2021. Environmental Conservation Online System. Threatened & Endangered Species Active Critical Habitat Report. Online Mapper.

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[Accessed 2022 January 25]. Available from:  
<https://ecos.fws.gov/ecp/report/table/critical-habitat.html>  
[USFWS] United States Fish and Wildlife Service. 2021. Wetlands Mapper. [Accessed 2022  
January 25]. Available from: <https://www.fws.gov/wetlands/data/mapper.html>.  
[USFWS] United States Fish and Wildlife Service. 1997. Coastal California Gnatcatcher  
(*Poliophtila californica californica*) Presence/Absence Survey Guidelines  
February 28, 1997. Available from:  
[https://www.fws.gov/ventura/docs/species/protocols/cagn/coastal-gnatcatcher\\_survey-guidelines.pdf](https://www.fws.gov/ventura/docs/species/protocols/cagn/coastal-gnatcatcher_survey-guidelines.pdf).

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GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director

#### Attachment A: Draft Mitigation and Monitoring Reporting Plan

Biological Resources (BIO)			
	Mitigation Measure (MM) or Recommendation (REC)	Timing	Responsible Party
<b>MM-BIO-1 Impacts on Biological Resources – Biological Resources Assessment</b>	<p>Applicants of future development projects shall be required to prepare a Biological Resources Assessment (BRA). The BRA shall be prepared by a qualified biologist. A qualified biologist shall conduct field surveys of the project site and focused plant and wildlife surveys. Focused species-specific surveys shall be required if suitable habitat is present and performed according to established <a href="#">Survey and Monitoring Protocols and Guidelines</a>. The BRA shall characterize the biological resources on site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The BRA shall provide the following information:</p> <ol style="list-style-type: none"> <li>1) A complete, recent, assessment of rare, threatened, and endangered species, regionally and locally unique species, and sensitive habitats at the project site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species. Species to be addressed shall include all those which meet the CEQA definition of endangered, rare, or threatened species. Seasonal variations in use of land around the project site shall also be addressed. A nine-quadrangle search of CDFW's <a href="#">California Natural Diversity Database</a> shall be conducted to obtain current information on any previously reported sensitive species and habitat;</li> <li>2) A thorough, recent, floristic-based assessment of special status</li> </ol>	Prior to issuance of grading permit	Applicants of future development projects/City of Rolling Hills (City)



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	plants and natural communities following CDFW's <a href="#">Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</a> . Adjoining habitat areas shall be included where project construction and activities could lead to direct or indirect impacts off site; 3) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the area of potential effect. The <a href="#">Manual of California Vegetation</a> shall be used to inform this mapping and assessment; 4) A rare plant assessment using online databases for rare, threatened, and endangered plants, including the California Native Plant Society <a href="#">Online Inventory of Rare and Endangered Plants of California</a> as well as the California's <a href="#">Information on Wild California Plants</a> database; 5) A discussion regarding project-related indirect impacts on biological resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands; and, 6) Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the project site.		
<b>MM-BIO-2</b> <b>Impacts on Biological Resources – Take of Listed Species</b>	Development projects that would impact species listed under CESA and/or ESA shall be required to obtain appropriate take authorization from CDFW and/or USFWS.	Prior to issuance of grading permit	Applicants of future development projects/City
<b>MM-BIO-3</b> <b>Impacts on Biological Resources – Rare Plants &amp;</b>	If a rare plant species or a Sensitive Natural Community is detected, the project applicant shall fully avoided impacts. The project applicant shall retain a qualified biologist to develop an avoidance plan. An avoidance plan shall be submitted to the City prior to any grading or vegetation removal.	An avoidance plan shall be submitted to the City prior to any grading	Applicants of future development projects/City

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<p><b>Sensitive Natural Communities</b></p>	<p>If the project cannot feasibly avoid impacts to rare plants and habitat, or sensitive natural communities, either during project activities or over the life of the project, the project shall provide compensatory mitigation for the loss of individual plants and habitat acres, which shall include impacts due to fuel modification and landslide remediation.</p> <p>The project applicant shall provide compensatory so that there is no net loss of rare plants and habitat, or sensitive natural communities. Compensatory mitigation shall be appropriate for the extent of permanently disturbed habitat. Compensatory mitigation shall be higher for impacts on CRPR 1 species, S1 or S2 Sensitive Natural Community, and Sensitive Natural Community with an additional rank of 0.1 or 0.2. Compensatory mitigation shall be implemented by a qualified restoration ecologist.</p> <p>A Restoration Plan, at a minimum, shall include success criteria and performance standards for measuring the establishment of rare plants and habitat, responsible parties, maintenance techniques and schedule, 5-year monitoring and reporting schedule, adaptive management strategies, and contingencies. A Restoration Plan shall be submitted to the City prior to any grading or vegetation removal.</p>	<p>or vegetation removal</p> <p>A Restoration Plan shall be submitted to the City prior to any grading or vegetation removal</p>	
<p><b>MM-BIO-4 Impacts on Coastal California Gnatcatcher – Gnatcatcher Surveys</b></p>	<p>Where a project site and areas adjacent to the project has suitable habitat for coastal California gnatcatcher, applicants of future development projects shall be required to retain a qualified permitted biologist to survey for coastal California gnatcatcher and prepare an impact assessment. The qualified biologist shall survey the project site and adjacent areas to determine presence/absence of coastal California gnatcatcher. The qualified biologist shall conduct surveys according to <a href="#">USFWS Coastal California Gnatcatcher (Polioptila californica californica) Presence/Absence Survey Guidelines</a>. The protocol shall be followed for all surveys unless otherwise authorized by the USFWS in writing. Survey results shall be provided to USFWS per protocol guidance. Survey</p>	<p>Prior to the City's issuance of a grading permits</p>	<p>Applicants of future development projects/City</p>



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	results, including negative findings, and an impact assessment shall be conducted prior to the City's issuance of a grading permits.		
<b>MM-BIO-5</b> Impacts on Coastal California Gnatcatcher – Replacement Habitat	Applicants of future development projects shall be required to provide compensatory mitigation for impacts to coastal California gnatcatcher habitat in addition to mitigation required by USFWS to prevent temporal or permanent habitat loss.	Prior to any grading and vegetation removal	Applicants of future development projects
<b>MM-BIO-6</b> Impacts on Streams and Associated Natural Communities – Jurisdictional Delineation	Applicants of future development projects that are located adjacent to a river, stream, or lake shall be required to prepare a jurisdictional delineation and impact assessment provided along with the project's Biological Resources Assessment.	Prior to issuance of grading permit	Applicants of future development projects/City
<b>MM-BIO-7</b> Impacts on Streams and Associated Natural Communities – Buffers & Setbacks	If such features are present and may be impacted by the future development, then the project shall be required to avoid impacts by implementing appropriate vegetative buffers and/or setbacks adjoining the stream or wetland feature to reduce impacts of the project on these resources.	Prior to any grading and vegetation removal Project design	Applicants of future development projects
<b>MM-BIO-8</b> Impacts on Streams and Associated Natural Communities – Fish & Game Code 1602	If avoidance is not feasible, the project applicant shall be required to notify CDFW pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW prior to the City's issuance of a grading permit. The project applicant shall comply with the mitigation measures detailed in a LSA Agreement issued by CDFW. The project applicant shall also provide compensatory mitigation at no less than 1:1 for the impacted stream and habitat acreage, or at a ratio acceptable to CDFW.	Prior to issuance of grading permit	Applicants of future development projects/City

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<b>MM-BIO-9 Impacts on Nesting Birds – Avoiding Impacts</b>	Future development projects requiring vegetation disturbance and/or removal, and/or are adjacent to suitable nesting habitat shall be required to avoid impacts on nesting birds by conducting all project-related activities between September 1 through January 31, outside of the nesting bird season.	Prior to any grading and vegetation removal	Applicants of future development projects
<b>MM-BIO-10 Impacts on Nesting Birds – Surveys &amp; No- Disturbance Buffers</b>	<p>If construction must occur during the bird nesting season, project applicants shall be required to retain a qualified biologist to survey suitable nesting habitat for nesting birds on the project site and within 100 feet from the project site to the extent allowable and accessible. A qualified biologist shall conduct a nesting bird survey no more than 7 days prior to the beginning of any ground and vegetation disturbing activities. If project activities are delayed or suspended for more than 7 days during the nesting bird season, a qualified biologist shall repeat nesting bird surveys before the project can recommence.</p> <p>No-disturbance buffers shall be established to minimize impacts on any nests and nestlings. No-disturbance buffers shall be maintained until the breeding season has ended or until a qualified biologist determines that the birds have fledged and are no longer reliant upon the nest or parental care for survival.</p>	<p>No more than 7 days prior to any ground and vegetation disturbing activities</p> <p>Repeat surveys if project activities are delayed or suspended for more than 7 days during the nesting bird season,</p>	Applicants of future development projects
<b>MM-BIO-11 Impacts on Nesting Birds – Replacement Habitat</b>	Future development projects removing habitat for nesting birds shall be required to restore or replace habitat in-kind and on site if feasible to prevent temporal or permanent habitat loss. Projects shall provide replacement habitat for both individual trees and habitat acres.	<p>Prior to any grading and vegetation removal</p> <p>During project construction</p>	Applicants of future development projects
<b>MM-BIO-12 Impacts on Bats – Surveys for Bats</b>	Future development projects in areas with suitable roosting and foraging habitat for bats shall be required to retain a qualified bat biologist to conduct a survey for within the project site and within 100 feet from the project site to the extent allowable and	Prior to any ground-disturbing activities and	Applicants of future development projects

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	accessible. A qualified bat specialist shall identify potential daytime, nighttime, wintering, and hibernation roost sites. Surveys shall be conducted prior to any ground-disturbing activities and vegetation removal.	vegetation removal	
<b>MM-BIO-13 Impacts on Bats – Tree Removal</b>	If a project requires tree removal and a qualified bat biologist determines that roosting bats may be present at any time of year and could roost in trees that need to be removed, during tree removal, trees shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a qualified bat biologist. Trees that are known to be bat roosts or could support roosting bats shall not be bucked or mulched immediately. A period of at least 24 hours, and preferable 48 hours, shall elapse prior to such operations to allow bats to escape.	During tree removal	Applicants of future development projects
<b>MM-BIO-14 Impacts on Bats – Roosting Bats</b>	If bats roosts are found within the project impact area, the qualified bat biologist shall identify the bats to the species level, evaluate the colony to determine its size and significance, and establish a species-specific no-disturbance buffer that shall be maintained throughout the duration of the project's construction.	Prior to any ground-disturbing activities and vegetation removal	Applicants of future development projects
<b>MM-BIO-15 Impacts on Bats – Maternity Roosts</b>	If maternity roosts are found, project-related construction and activities shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).  If maternity roosts are found and the project must take place during the maternity roosting season, trees/structures determined to be maternity roosts shall be left in place until the end of the maternity season. Project-related construction and activities shall not occur	Prior to any ground-disturbing activities and vegetation removal  During project construction	Applicants of future development projects



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	within 100 feet of or directly under or adjacent to an active maternity roost. A qualified bat biologist shall establish a no-disturbance buffer that shall be maintained throughout the duration of the project's construction or until a qualified bat biologist determines that the roost is no longer active. Project-related construction and activities shall also not occur between 30 minutes before sunset and 30 minutes after sunrise.		
<b>REC-1-CESA ITP</b>	If a project, project construction, or any project-related activity for the duration of the project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the project applicant should seek appropriate take authorization under CESA prior to implementing/continuing the project. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.	Prior to implementing/continuing the project	Applicants of future development projects
<b>REC-2-Housing Sites</b>	The City should consider conserving sites 6 through 14 and 31 through 34 as large continuous open space for preservation of natural resources, habitats, natural vistas, canyons, and corridors benefiting local and transient wildlife populations. Removing sites 31 through 34 would still allow the City to meet its 6 <sup>th</sup> Cycle RHNA for above moderate income units. The City should protect from development sites that overlap with critical habitat, Significance Ecological Areas, and streams. Finally, the City should consider focusing development the northern part of the City where impacts on biological resources would be minimized such as sites 22, 23,	Prior to finalizing the Project's CEQA document	City

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	and 24, and prioritize development where development already exists.		
<b>REC-3-Lake and Streambed Alteration Agreement</b>	CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/project applicant for the project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, a project's CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., CNDDB] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDB by completing and submitting <a href="#">CNDDB Field Survey Forms</a> . Information on special status native plant populations and sensitive natural communities, the <a href="#">Combined Rapid Assessment and Relevé Form</a> should be completed and submitted to CDFW's Vegetation Classification and Mapping Program.	Prior to finalizing future project-level CEQA documents	Applicants of future development projects
<b>REC-4-Submitting Data for Sensitive and Special Status Species and Natural Communities</b>		Prior to finalizing future project-level CEQA documents	Applicants of future development projects
<b>REC-5-Mitigation and Monitoring Reporting Plan</b>	The City should provide Biological Resources Mitigation Measures for the Project and condition the environmental document to include mitigation measures recommended in this letter.	Prior to finalizing the Project's CEQA document	City



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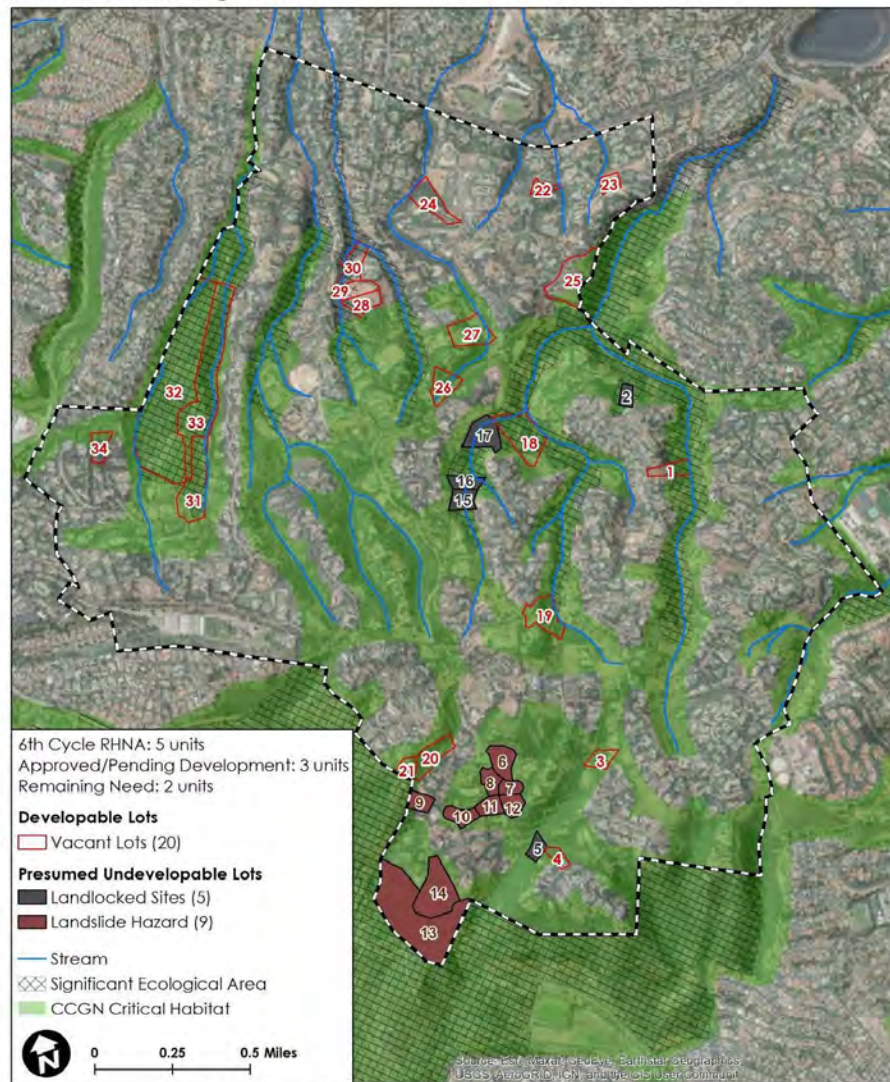


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GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



### Attachment B: Housing Sites



City of Rolling Hills 6th Cycle 2021-2029 Housing Element Update  
Housing Sites for Single Family Homes  
Above Moderate Income Units

Map by: CDFW 2022



## RESPONSE TO COMMENT LETTER 2

**Commenter:** Erinn Wilson-Olgin, Environmental Program Manager I, South Coast Region, California Department of Fish and Wildlife

**Date of Letter:** February 4, 2022

**Response to Comment 2-1:** The commenter notes that California Department of Fish and Wildlife (CDFW) has reviewed the proposed Project and Negative Declaration. The commenter accurately notes that they are a Trustee Agency per CEQA Guidelines Section 15386 subdivision (a). The commenter also notes that they are submitting comments as a Responsible Agency; however, per CEQA Guidelines Section 15381, a responsible agency is a public agency with discretionary approval authority over a portion of a CEQA project (e.g., required permits). The commenter also notes that CDFW's regulatory authority is derived from the potential need for a lake and streambed alteration agreement or take permit; however, neither will be required for the Project. As the proposed Project requires no permits, there are no responsible agencies. However, it should be noted that clarifications and insignificant modifications to the negative declaration have been made to remove the Housing Element Update part of the Project. None of the clarifications and modifications are considered "substantial revisions" because they do not show that the Project has a new, avoidable significant effect and the City has determined that project revisions are not required to reduce potential effects to less than significant. None of the clarifications and modifications substantially modify the analysis or conclusions of the IS/ND, but they instead merely remove discussion of the Housing Element Update. As noted above, the clarified and modified Project would continue to result in no impacts without any need for mitigation.

**Response to Comment 2-2:** The commenter provides a description of the Project. However, it should be noted that clarifications and insignificant modifications to the negative declaration have been made to remove the Housing Element Update part of the Project. No response is required.

**Response to Comment 2-3:** The commenter introduces their comments and provides recommendations regarding perceived impacts tied to future development. The commenter also proposes potential mitigation measures for protection of biological resources including wildlife and plant species that exist within the City.

The City is proposing an updates to the Safety Element of the General Plan, one of the six General Plan elements that cover long-range planning for the community's growth and development.

CEQA Guidelines Section 15126.4 notes that mitigation measures are not required for effects, which are not found to be significant. Since the Project is the adoption of a policy document and not an application for development of any particular parcel or site in the City or change in zoning, no impacts to biological resources were identified and no mitigation is required. However, it should be noted that clarifications and insignificant modifications to the negative declaration have been made to remove the Housing Element Update part of the Project. None of the clarifications and modifications are considered "substantial revisions" because they do not show that the Project has a new, avoidable significant effect and the City has determined that project revisions are not required to reduce potential effects to less than significant. None of the clarifications and modifications substantially modify the analysis or conclusions of the IS/ND, but they instead merely remove discussion of the Housing Element Update. As noted above, the clarified and modified Project would continue to result in no impacts without any need for mitigation.

**Response to Comment 2-4:** The commenter raised concern regarding potential impacts to the coastal California Gnatcatcher and noted that 14 of the 20 identified sites overlap with habitat for the species. The commenter also provided suggested mitigation measures to reduce perceived impacts.

All future projects would be treated as individual projects and may be subject to specific environmental analysis including potential impacts to the coastal California gnatcatcher. All future projects, especially the 14 sites identified with habitat for the species, would be required to address any potential impacts to the species. As necessary, future projects will analyze direct, indirect, and cumulative biological impacts and will include specific mitigation or avoidance measures as suggested to offset impacts. Additionally, CEQA Guidelines Section 15126.4 notes that mitigation measures are not required for effects, which are not found to be significant. Since the Project is the adoption of a policy document and not an application for development of any particular parcel or site in the City or change in zoning, no impacts to the coastal California gnatcatcher were identified and no mitigation is required. However, it should be noted that clarifications and insignificant modifications to the negative declaration have been made to remove the Housing Element Update part of the Project. None of the clarifications and modifications are considered “substantial revisions” because they do not show that the Project has a new, avoidable significant effect and the City has determined that project revisions are not required to reduce potential effects to less than significant. None of the clarifications and modifications substantially modify the analysis or conclusions of the IS/ND, but they instead merely remove discussion of the Housing Element Update. As noted above, the clarified and modified Project would continue to result in no impacts without any need for mitigation.

**Response to Comment 2-5:** Comments were provided regarding impacts on streams and associated natural communities. The commenter notes that the City consists of canyons of the San Pedro Hills; and within these canyons are streams, whether ephemeral, intermittent, or perennial. The commenter also provides suggested mitigation measures and recommendations regarding perceived impacts to these noted streams.

All future projects would be treated as individual projects and may be subject to specific environmental analysis including potential impacts on streams. All future projects, especially those in areas with streams (ephemeral, intermittent, or perennial) would be required to prepare hydrology reports and / or obtain appropriate permits in order to evaluate potential impacts on these watercourses and permit any potential impacts. As necessary, future projects will analyze direct, indirect, and cumulative biological impacts and will include specific mitigation or avoidance measures as suggested to offset impacts. Additionally, CEQA Guidelines Section 15126.4 notes that mitigation measures are not required for effects, which are not found to be significant. Since the Project is the adoption of a policy document and not an application for development of any particular parcel or site in the City or change in zoning, no impacts to streams were identified and no mitigation is required. However, it should be noted that clarifications and insignificant modifications to the negative declaration have been made to remove the Housing Element Update part of the Project. None of the clarifications and modifications are considered “substantial revisions” because they do not show that the Project has a new, avoidable significant effect and the City has determined that project revisions are not required to reduce potential effects to less than significant. None of the clarifications and modifications substantially modify the analysis or conclusions of the IS/ND, but they instead merely remove discussion of the Housing Element Update. As noted above, the clarified and modified Project would continue to result in no impacts without any need for mitigation.

**Response to Comment 2-6:** The commenter raises concerns regarding potential impacts to nesting birds and noted that all 20 of the sites identified for potential development contain vegetation suitable as habitat for nesting birds and raptors. The commenter also provided suggested mitigation measures for perceived impacts to nesting birds.

All future projects would be treated as individual projects and may be subject to specific environmental analysis, including potential impacts to nesting birds and / or raptors. All future projects, especially those removing potential habitat for bird and raptor species, would be required to address any potential impacts. As necessary, future projects will analyze direct, indirect, and cumulative biological impacts and will include specific mitigation or avoidance measures as suggested to offset impacts. Additionally, CEQA Guidelines Section 15126.4, notes that mitigation measures are not required for effects, which are not found to be significant. Since the Project is the adoption of a policy document and not an application for development of any particular parcel or site in the City or change in zoning, no impacts to birds were identified and no mitigation is required. However, it should be noted that clarifications and insignificant modifications to the negative declaration have been made to remove the Housing Element Update part of the Project. None of the clarifications and modifications are considered “substantial revisions” because they do not show that the Project has a new, avoidable significant effect and the City has determined that project revisions are not required to reduce potential effects to less than significant. None of the clarifications and modifications substantially modify the analysis or conclusions of the IS/ND, but they instead merely remove discussion of the Housing Element Update. As noted above, the clarified and modified Project would continue to result in no impacts without any need for mitigation.

**Response to Comment 2-7:** The commenter raises concern regarding potential impacts to bats and noted that all 20 of the sites identified for potential development contain vegetation suitable roosting habitat for bats. The commenter also provided suggested mitigation measures for perceived impacts to bat species.

All future projects would be treated as individual projects and may be subject to specific environmental analysis, including potential impacts to bats. All future projects, especially those removing potential roosting habitat for bats, would be required to address any potential impacts to the species. As necessary, future projects will analyze direct, indirect, and cumulative biological impacts and will include specific mitigation or avoidance measures as suggested to offset impacts. Additionally, CEQA Guidelines Section 15126.4 notes that mitigation measures are not required for effects, which are not found to be significant. Since the Project is the adoption of a policy document and not an application for development of any particular parcel or site in the City or change in zoning, no impacts to bats were identified and no mitigation is required. However, it should be noted that clarifications and insignificant modifications to the negative declaration have been made to remove the Housing Element Update part of the Project. None of the clarifications and modifications are considered “substantial revisions” because they do not show that the Project has a new, avoidable significant effect and the City has determined that project revisions are not required to reduce potential effects to less than significant. None of the clarifications and modifications substantially modify the analysis or conclusions of the IS/ND, but they instead merely remove discussion of the Housing Element Update. As noted above, the clarified and modified Project would continue to result in no impacts without any need for mitigation.

**Response to Comment 2-8:** The commenter provides further recommendations that information developed in CEQA documents be included in databases (i.e., California Natural Diversity Database) for use in future CEQA documents. Additionally, the commenter recommends that the City include the



mitigation measures mentioned in the comment letter and provide a Mitigation Monitoring and Reporting Program (MMRP).

Any future development would provide information to appropriate databases as necessary. Additionally, any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. As previously noted, CEQA Guidelines Section 15126.4 notes that mitigation measures are not required for effects, which are not found to be significant. Since the Project is the adoption of a policy document and not an application for development of any particular parcel or site in the City or change in zoning, no impacts were identified and no mitigation is required. However, it should be noted that clarifications and insignificant modifications to the negative declaration have been made to remove the Housing Element Update part of the Project. None of the clarifications and modifications are considered “substantial revisions” because they do not show that the Project has a new, avoidable significant effect and the City has determined that project revisions are not required to reduce potential effects to less than significant. None of the clarifications and modifications substantially modify the analysis or conclusions of the IS/ND, but they instead merely remove discussion of the Housing Element Update. As noted above, the clarified and modified Project would continue to result in no impacts without any need for mitigation.

**Response to Comment 2-9:** The commenter notes that the proposed Project is required to pay the CDFW filing fees. No development projects are proposed at this time or with implementation of the Project. The Project is the adoption of the Safety Element Update. The SEU is a policy document and does not include any changes to land use designations, zoning, building heights and intensities, or residential densities. Therefore, the Project is the adoption of a policy document and not an application for development of any particular parcel or site in the City. Nevertheless, as directed by the CDFW, filing fees will be submitted at the time the Notice of Determination is filed.

**Response to Comment 2-10:** The commenter concludes the comment letter and provides references and attachments associated with the comment letter. The attachments have been reviewed as part of the responses to comments as above, and no further response is required.



**LOS ANGELES COUNTY  
SANITATION DISTRICTS**  
*Converting Waste Into Resources*

**Robert C. Ferrante**  
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
(562) 699-7411 • [www.lacsd.org](http://www.lacsd.org)

February 7, 2022

Ref. DOC 6431859

Mr. John F. Signo, AICP  
Planning Director  
City of Rolling Hills  
Planning and Community services Department  
2 Portuguese Bend Road  
Rolling Hills, CA 90274

Dear Mr. Signo:

**NOI Response to 2021 – 2029 Housing Element Update and Safety Element Update**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent (NOI) to Adopt a Negative Declaration (ND) for the subject project on January 14, 2022. The City of Rolling Hills (City) is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:

1. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.
2. The Districts should review individual developments within the City to determine whether sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.
3. The wastewater generated by the City will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 249.8 mgd.
4. In order to estimate the volume of wastewater the project will generate, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the [Table 1. Loadings for Each Class of Land Use](#) link for a copy of the Districts' average wastewater generation factors.
5. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the

Comment  
3-1

Comment  
3-2

Comment  
3-3

DOC 6455657.D05

Mr. John F. Signo

2

February 7, 2022

connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

Comment  
3-3 Cont.

6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

Comment  
3-4

7. Portions of the City where sewage disposal will be achieved by on-site septic systems will have no effect on Districts' facilities.

Comment  
3-5

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or [mandyhuffman@lacsdc.org](mailto:mandyhuffman@lacsdc.org).

Very truly yours,

*Mandy Huffman*

Mandy Huffman  
Environmental Planner  
Facilities Planning Department

MNH:mnh

DOC 6455657.D05



### **RESPONSE TO COMMENT LETTER 3**

**Commenter: Mandy Huffman, Environmental Planner, Facilities Planning Department, Los Angeles County Sanitation Districts**

**Date of Letter: February 7, 2022**

**Response to Comment 3-1:** The commenter acknowledges receipt of the environmental document and provides details regarding the wastewater conveyance system in the area. However, the commenter notes that since local collectors and/or lateral sewer lines are the responsibility of the jurisdiction, the Districts cannot provide information on deficiencies in the area. This comment is noted, and no response is required.

**Response to Comment 3-2:** The commenter states that the Districts should review projects within the City to ensure sufficient capacity. Future Projects will be evaluated as necessary to determine available sewer capacity. This comment is noted, and no further response is required.

**Response to Comment 3-3:** The commenter provides the full and average available capacity of the Joint Water Pollution Control Plant, with information on how to estimate wastewater produced by a project. The commenter also notes that future projects will be required to pay any necessary connection fees. This comment is noted, and no further response is required.

**Response to Comment 3-4:** The commenter discusses compliance with the Clean Air Act and notes that facility capacities are based on SCAG growth forecasts. The commenter notes that this letter does not constitute a guarantee of wastewater service but provides advice for future developers. This comment is noted, and no further response is required.

**Response to Comment 3-5:** The commenter states that use of septic systems would have no effect on wastewater facilities and provides contact information for questions related to the letter. This comment is noted, and no further response is required.



DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

**COUNTY OF LOS ANGELES  
FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2401  
[www.fire.lacounty.gov](http://www.fire.lacounty.gov)

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City of Rolling Hills

February 8, 2022

John Signo, Planning Director  
City of Rolling Hills  
Planning and Community Services Department  
2 Portuguese Bend  
Road Rolling Hills, CA 90274

Dear Mr. Signo:

**NOTICE OF INTENT TO ADOPT AN INITIAL STUDY AND NEGATIVE DECLARATION,  
"2021-2029 HOUSING ELEMENT UPDATE AND SAFETY ELEMENT UPDATE," THE  
PROJECT IS THE 6TH CYCLE, 2021-2029 HOUSING ELEMENT UPDATE OF THE CITY  
OF ROLLING HILLS GENERAL PLAN, ROLLING HILLS, FFER 2022000820**

The Notice of Intent to Adopt an Initial Study and Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

**PLANNING DIVISION:**

We have no comments.

For any questions regarding this response, please contact Kien Chin, Planning Analyst, at (323) 881-2404 or [Kien.Chin@fire.lacounty.gov](mailto:Kien.Chin@fire.lacounty.gov).

**LAND DEVELOPMENT UNIT:**

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows, and fire hydrants.

Comment  
2-1

Comment  
4-2

Comment  
1-3

**SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:**

AGOURA HILLS  
ARTESIA  
AZUSA  
BALDWIN PARK  
BELL  
BELL GARDENS  
BELLFLOWER  
BRADBURY  
CALABASAS

CARSON  
CERRITOS  
CLAREMONT  
COMMERCE  
COVINA  
CUDAHY  
DIAMOND BAR  
DUARTE

EL MONTE  
GARDENA  
GLENDORA  
HAWAIIAN GARDENS  
HAYTHORNE  
HERMOSA BEACH  
HIDDEN HILLS  
HUNTINGTON PARK  
INDUSTRY

INGLEWOOD  
IRVINDALE  
LA CANADA-FLINTRIDGE  
LA HABRA  
LA MIRADA  
LA PUENTE  
LAKESWOOD  
LANDASTER

LAWDALE  
LOMITA  
LYNWOOD  
MALIBU  
MAYWOOD  
MORRIS  
PALMDALE  
PALOS VERDES ESTATES  
PARAMOUNT

PICO RIVERA  
POMONA  
RANCHO PALOS VERDES  
ROLLING HILLS  
ROLLING HILLS ESTATES  
ROSEMEAD  
SAN DIMAS  
SANTA CLARITA

SIGNAL HILL  
SOUTH EL MONTE  
SOUTH GATE  
TEMPLE CITY  
VERNON  
WALNUT  
WEST HOLLYWOOD  
WESTLAKE VILLAGE  
WHITTIER

John Signo, Planning Director  
February 8, 2022  
Page 2

This project does not propose construction of structures or any other improvements at this time, therefore until actual construction is proposed the project will not have a significant impact to the Fire Department, Land Development Unit.

Comment  
4.3 Cont.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Comment  
4.4

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Nicholas Alegria at (818) 890-5719.

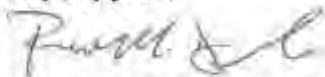
**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Comment  
4.5

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or [Perla.garcia@fire.lacounty.gov](mailto:Perla.garcia@fire.lacounty.gov) if you have any questions.

Very truly yours,



RONALD M. DURBIN, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

RMD:jl



## **RESPONSE TO COMMENT LETTER 4**

**Commenter: Ronald M. Durbin, Chief – Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department**

**Date of Letter: February 8, 2022**

**Response to Comment 4-1:** The commenter acknowledges receipt of the environmental document and lists the departments that reviewed the document and provided comments. This comment is noted, and no further response is required.

**Response to Comment 4-2:** The comment from the Planning Division states that the Planning Division has no comments. This comment is noted, and no further response is required.

**Response to Comment 4-3:** The comment from the Land Development Unit states that in the event any structures or improvements are conducted, they must comply with applicable codes and ordinances. Any future development would comply with all applicable codes and ordinances. No further response is required.

**Response to Comment 4-4:** The comment from the Forestry Division – Other Environmental Concerns discusses compliance with the Forestry Division, including erosion control, watershed management, rare and endangered species, vegetation and fuel, archeological and cultural resources, and the County Oak Tree Ordinance. The comment also includes detail regarding the County Oak Tree Ordinance and when an Oak tree permit is required. The Project does not include cutting, destroying, removing, or relocating of any Oak trees. If any future projects require such actions, a permit will be obtained. No further response is required.

**Response to Comment 4-5:** The commenter states that the Health Hazardous Materials Division has no comments. This comment is noted, and no further response is required.

## SECTION 6.0 – ERRATA TO THE DRAFT NEGATIVE DECLARATION

An errata was prepared for the Draft IS/ND and is included as Appendix A of this document. The changes to the IS/ND do not affect the overall conclusions of the environmental document; the analysis of the environmental impacts of the Safety Element Update are fully covered in the previously circulated Draft IS/ND. The changes that have been made to the Draft IS/ND in the errata do not constitute a “substantial revision” to the IS/ND because the revisions (1) do not identify a new, avoidable significant effect and mitigation measure or project revisions that must be added in order to reduce the effect to insignificance; or (2) do not result in a change to any mitigation measures that were previously disclosed (none were). (State CEQA Guidelines, section 15073.5.) Because the project revisions do not result in any new avoidable significant effects, recirculation is not required. (*Ibid.*) The errata was prepared to clarify and modify the Project.

## SECTION 7.0 – NEGATIVE DECLARATION

This document, along with the Draft Initial Study/Negative Declaration, and errata to the Draft Initial Study/Negative Declaration constitute the Final Negative Declaration for the City of Rolling Hills Safety Element Update Project in the City of Rolling Hills.

Pursuant to Section 21082.1 of the California Environmental Quality Act, the City of Rolling Hills has independently reviewed and analyzed the Initial Study and Negative Declaration for the proposed Project and finds that these documents reflect the independent judgment of the City of Rolling Hills.

  
\_\_\_\_\_  
Signature

March 28, 2022  
\_\_\_\_\_  
Date

John F. Signo, AICP  
\_\_\_\_\_  
Printed Name

Director of Planning & Community Services  
\_\_\_\_\_  
Title



## SECTION 8.0 – REFERENCES

California Department of Forestry and Fire Protection (CAL FIRE)

- 2011 Very High Fire Hazard Severity Zones in LRA: Rolling Hills. Available online at: [https://osfm.fire.ca.gov/media/5840/rolling\\_hills.pdf](https://osfm.fire.ca.gov/media/5840/rolling_hills.pdf).

California Department of Toxic Substances Control (DTSC)

- 2021 EnviroStor. Accessed December 2021. Available online at: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=rolling+hills%2C+CA>.

City of Rolling Hills

- 2022 *Draft Negative Declaration for the City of Rolling Hills ~~2021-2029 Housing Element Update~~ and Safety Element Update*. Available online at: [https://www.rolling-hills.org/21330%20-%20Rolling%20Hills%20IS\\_011022.pdf](https://www.rolling-hills.org/21330%20-%20Rolling%20Hills%20IS_011022.pdf). January 2022.

Southern California Association of Governments (SCAG)

- 2020 The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association Of Governments: Connect SoCal. Available online at: [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan\\_0.pdf?1606001176](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176).

## **APPENDIX A – Errata to the Draft IS/ND**





# CITY OF ROLLING HILLS

## ERRATA FOR THE CITY OF ROLLING SAFETY ELEMENT UPDATE INITIAL STUDY AND NEGATIVE DECLARATION

***Prepared for:***

**CITY OF ROLLING HILLS**  
No. 2 Portuguese Bend Road  
Rolling Hills, CA 90274  
Contact: John F. Signo, AICP  
(310) 377-1521

***Prepared by:***

**CHAMBERS GROUP, INC.**  
600 West Broadway #250  
Glendale, CA 91204  
(213) 623-1859

**March 2022**



## **BACKGROUND**

An Initial Study Negative Declaration (IS/ND) was prepared for both the Housing Element Update and Safety Element Update for the City of Rolling Hills. On January 13, 2022, the City of Rolling Hills circulated a Draft IS/ND to public agencies and the general public. In accordance with the California Environmental Quality Act (CEQA) Section 21091 and State CEQA Guidelines Section 15073, a 30-day public review period for the Draft IS/ND was provided from January 13, 2022 to February 12, 2022.

The City has not yet received comments back from the California Department of Housing and Community Development (HCD) on the Housing Element Update, and does not wish to approve the Housing Element Update without such comments. The City has removed the Housing Element Update from the Project (and associated IS/ND). The changes to the IS/ND do not affect the overall conclusions of the environmental document; the analysis of the Safety Element Update is wholly bounded by the analysis and findings in the previously circulated Draft IS/ND. This errata has been prepared to clarify and modify the Project.

## **PURPOSE OF ERRATA**

The CEQA Guidelines Section 15073.5 requires that a lead agency recirculate a negative declaration “when the document must be substantially revised.” A “substantial revision” includes: (1) identification of a new, avoidable significant effect requiring mitigation measures or project revisions, and/or (2) determination that proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures and revisions must be required.

The CEQA Guidelines specify situations in which recirculation of a negative declaration is not required. This includes, but is not limited to, situations in which “new information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.” This errata addresses technical changes on the IS/ND. None of the clarifications and insignificant modifications are considered “substantial revisions” because they do not show that the Project has a new, avoidable significant effect and the City has determined that Project revisions are not required to reduce potential effects to less than significant. None of the clarifications and modifications substantially modify the analysis or conclusions of the IS/ND, but they instead merely remove discussion of the Housing Element Update. As noted above, the clarified and modified Project would continue to result in no impacts without any need for mitigation. The overall findings and analysis do not change. Recirculation of the negative declaration is therefore not required in accordance with CEQA Guidelines Section 15073.5.

Changes to the text are noted with underline (for added text) or ~~strikeout~~ type (for deleted text). The full modified Negative Declaration is provided below.



# CITY OF ROLLING HILLS

## DRAFT NEGATIVE DECLARATION FOR THE CITY OF ROLLING HILLS ~~2021-2029 HOUSING ELEMENT~~ ~~UPDATE AND SAFETY ELEMENT UPDATE~~

---

***Prepared for:***

**CITY OF ROLLING HILLS**  
No. 2 Portuguese Bend Road  
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Contact: John F. Signo, AICP  
(310) 377-1521

***Prepared by:***

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(213) 623-1859

~~January~~ March 2022

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## CHAPTER 1.0 – PROJECT OVERVIEW

**Project Title:** City of Rolling Hills ~~2021-2029 Housing Element Update and~~ Safety Element Update

**Project Location:** Citywide. Rolling Hills is located in Los Angeles County, on the Palos Verdes Peninsula (See Figure 2.2-1: Project Location.)

**Lead agency name and address:**

City of Rolling Hills  
No. 2 Portuguese Bend Road  
Rolling Hills, CA 90274

**Contact person and phone number:**

John F. Signo, AICP, Director of Planning and Community Services  
phone: (310) 377-1521  
email: [jsigno@cityofrh.net](mailto:jsigno@cityofrh.net)

**Project sponsor's name and address:**

City of Rolling Hills  
No. 2 Portuguese Bend Road  
Rolling Hills, CA 90274

**General Plan Description:** Citywide

**Zoning:** Citywide; No proposed zoning changes

**Approvals Required:** ~~Pursuant to State law, the California Department of Housing and Community Development (HCD) is empowered to review the housing element of each community to ensure its compliance with the provisions of the Government Code related to facilitating the improvement and development of housing in order to make adequate provisions for the housing needs of all economic segments of the community. HCD has review but not approval authority. Prior to adoption of the Safety Element, coordination and feedback from Los Angeles County Fire Department, Rolling Hills Community Association, and the Los Angeles County Sheriff's Department is required.~~

The City Council will need to adopt the Negative Declaration for the ~~Housing Element and~~ Safety Element Updates. No other approvals will be required.

**Project Description Summary:** The Project is ~~the Sixth Cycle, 2021-2029 Housing Element Update of the City of Rolling Hills General Plan and an update to the City of Rolling Hills's~~ Safety Element to address various natural and human-caused hazards the City has dealt with, including earthquakes, wildfires, droughts, and land movement. The ~~Housing Element and~~ Safety Element Updates is are a policy updates only, and no specific development is proposed at this time. See further discussion under Section 2.0, "Project Description and Setting."



## CHAPTER 2.0 – PROJECT DESCRIPTION AND SETTING

### 2.1 INTRODUCTION

The City of Rolling Hills (City) is a rural, equestrian residential community, consisting entirely of large lot residential parcels of one acre or more. The community encompasses 2.99 square miles of land (approximately 1,910 acres) on the Palos Verdes Peninsula in the County of Los Angeles (Figure 2.2-1: Project Location). The City's General Plan was drafted and adopted in 1990. The City is proposing updates to both the Housing Element and Safety Element of the General Plan, ~~two~~ one of the six elements. A description of each of the updates is provided below.

#### ~~2.1.1~~ Housing Element Update

The 2020 Census indicates a citywide population of 1,739 residents, making the City the fifth smallest of the 88 cities in Los Angeles County. The City is proposing to adopt the Housing Element for the Sixth Cycle planning period from 2021 to 2029. The proposed Housing Element Update (HEU) is attached hereto as Appendix A. The Housing Element, which is part of the City's General Plan, is a policy document designed to provide the City a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. California Government Code Section 65580 states the following regarding the importance of creating housing elements:

*~~The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.~~*

Per State law, the housing element has two main purposes:

- ~~1. To provide an assessment of both current and future housing needs and constraints in meeting these needs; and~~
- ~~2. To provide a strategy that establishes housing goals, policies, and programs.~~

#### ~~2.1.2~~ Safety Element Update

The Safety Element Update (SEU), (~~Appendix B~~ Available on the City's website) provides the City's goals, policies, and actions to minimize the hazards to safety in and around the City. The SEU evaluates natural and human-caused safety hazards that affect existing and future development and provides guidelines for protecting the community from harm. The SEU describes existing and potential future conditions and sets policies for improved public safety. The goal of the SEU is to reduce the risk of injury, death, property loss, and other hardships to acceptable levels. A detailed description of the update is provided below.

### 2.2 SAFETY ELEMENT UPDATE

#### 2.2.1 Background

Throughout its history as a city, the City has dealt with various natural hazards, including earthquakes, wildfires, droughts, and land movement. Developments in high landslide areas have occurred, and the City has been identified as being located in a Very High Fire Hazard Severity Zone (VHFHSZ). As a result,

the City has amended its building and safety codes to include special requirements such as fire-rated materials for new construction and a requirement for geotechnical studies in active fault zones.

### **2.2.2    Safety Element Overview**

The City's SEU addresses hazards of concern relevant to the City and provides goals, policies, and implementation measures to minimize these hazards. Figures 2 through 6 of the SEU show exact locations of these hazards, which are described in the following paragraphs.

#### **Landslide Hazards**

Much of the existing development in the City is located on hilly terrain and has a greater potential to experience landslide hazards. Many of the canyons in the City exhibit steep slopes with little vegetation coverage, leaving them susceptible to slope failure.

#### **Seismic Hazards**

The City is in a seismically active region of southern California. The last major earthquake in the Los Angeles area was the 5.1 magnitude La Habra earthquake in 2014. The City is within 50 miles of the Whittier fault, Newport-Inglewood fault, Palos Verdes fault, Malibu Coast fault, Cabrillo fault, Santa Monica fault, and Redondo Canyon fault. Analysis of seismic data from the region indicates that the Whittier and Newport-Inglewood faults may generate a maximum credible earthquake of magnitude 7.2 and 7.4, respectively. The earthquake shaking potential for the City is moderate. A number of seismically active faults are present in the City and region; however, none are active faults with the potential for ground rupture, defined by the Alquist-Priolo Earthquake Fault Zoning Act and delineated by California Geological Survey. The City has a low potential for liquefaction, as the subsurface soils generally lack saturated alluvial deposits and thick, granular soils.

#### **Flooding**

The City is not in any immediate risk from flooding caused by overflowing water bodies or heavy rains. However, runoff and minor flooding pose a risk if drainage systems fail along canyon bottoms, where natural drainage leads. Due to dam locations and the topography of the area, the inundation areas do not enter or affect any portion of the City.

#### **Wildland and Urban Fires**

The entire City is designated a Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE 2011). The terrain in the City is composed of several large and steep canyons that limit and challenge vegetation management and present conditions where a fire can quickly travels up and downslope to nearby homes. Due to the rural nature and large residential lots, many homes are surrounded by more substantial vegetation and dense brush than in more suburban settings.

## **Hazardous Materials**

According to the Department of Substances Control (DTSC 2021), no hazardous waste sites or facilities are present in the City. The City and surrounding area do not contain heavy industrial uses that would create a hazardous material risk in the event of a spill, release, or natural disaster.

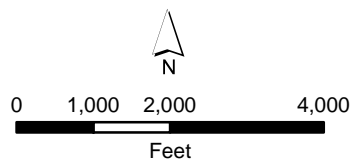
### **2.2.3 Goals and Policies**

Similar to the HEU, The SEU is a policy document; no actual development or rezoning of parcels is included as part of the approval. In addition to goals and policies, the SEU includes implementation measures for action items for the City. The goals, policies, and implementation for hazard mitigation, community communication, and climate change adaptation and resilience are listed at the end of the SEU.





Project Location



**Figure 2.1-1**  
City of Rolling Hills  
Safety Element Update  
Project Location



## **~~2.3 HOUSING ELEMENT UPDATE~~**

### **~~2.3.1 Background~~**

~~The City's Housing Element serves as an integrated part of the General Plan and is subject to detailed statutory requirements, including a requirement to be updated every eight years and mandatory review by the California Department of Housing and Community Development (HCD). This action includes the adoption of the HEU, which is a policy document; no actual development or rezoning of parcels is included as part of the HEU. The proposed HEU is an eight-year plan for the 2021-2029 period.~~

~~Pursuant to Government Code Section 65583, a housing element is required to consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. Specifically, a housing element is required to contain the following:~~

- ~~▪ An assessment of housing needs and an inventory of resources and constraints relevant to meeting those needs (Government Code Section 65583[a])~~
- ~~▪ A statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing (Government Code Section 65583[a])~~
- ~~▪ A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation of the policies and to achieve the goals and objectives of the housing element (Government Code Section 65583[c])~~

~~Southern California Association of Governments (SCAG) began the Regional Housing Needs Allocation (RHNA) process for the Sixth Cycle in Fall 2019, exploring different methodologies for allocating the regional need to individual cities and counties. As other cities began work on their Sixth Cycle Elements, the City was required to first amend its Fifth Cycle Element to accommodate both the current (Fifth) cycle and the prior (Fourth) cycle RHNA allocations due to its noncompliant status. The combined RHNA for the two cycles was 28 units. Accommodating this need meant that City was also required to amend its General Plan and zoning to create additional housing capacity.~~

~~The Fifth Cycle Housing Element was adopted June 14, 2021. The Fifth Cycle Housing Element was submitted to HCD and found to be in compliance on July 7, 2021. As a result of the compliance determination, the City does not have to carry over its prior allocation and may plan only for the 45 units identified in the Sixth Cycle RHNA.~~

### **~~2.3.2 Housing Element Overview~~**

~~The City's HEU consists of the following major components:~~

- ~~▪ A review of the prior housing element and goals that were accomplished (Section 2, Evaluation of Prior Housing Element)~~

- ~~An assessment of housing needs in the City including profile and analysis of the City's demographics, housing characteristics, and existing and future housing needs (Section 3, Housing Needs Assessment)~~
- ~~An assessment of resources available to meet the City's objectives regarding housing production and preservation. Resources include land available for new construction and redevelopment, as well as financial and administrative resources available (Section 4, Housing Sites)~~
- ~~A review of the constraints to housing production and preservation. Constraints include potential market, governmental policy, and environmental limitations to meeting the City's identified housing needs (Section 5, Constraints to Housing Production)~~
- ~~A statement of the housing plan to address the City's identified housing needs, including housing goals, policies, and programs (Section 6, Housing Goals, Policies, Objectives, and Programs)~~

### **2.3.3 Regional Housing Needs Allocation (RHNA)**

~~State housing element law requires housing elements to be updated regularly to reflect a community's changing housing needs, including preparation of a RHNA plan [Government Code Section 65584(a)]. A critical measure of compliance is the ability of a jurisdiction to accommodate its share of the regional housing needs based on a RHNA prepared by HCD for each Council of Governments in the state that identifies projected housing units needed for all economic segments based on Department of Finance population estimates. The SCAG is responsible for allocating this total to each of the six counties and 191 cities in the SCAG area. This process is known as the RHNA and occurs every eight years.~~

~~SCAG calculates each city and county's "fair share" of the regional need using a computer model that weighs factors such as existing population and employment, growth potential, proximity to transit, and social equity. For each jurisdiction, SCAG distributes the RHNA among four different income groups. This ensures that each city or county is planning for housing that meet the needs of all economic segments of the community, including lower income households.~~

~~For the City, the RHNA for 2021-2029 is 45 units (SCAG 2020). This includes 20 very low income units, 9 low income units, 11 moderate income units, and 5 above moderate income units. The 2021-2029 Housing Element demonstrates that the City has the capacity to accommodate this assignment.~~

### **2.3.4 Summary of Ability to Meet RHNA**

~~As shown in Table 2.3-1 below, the combination of recently approved housing units (expected to be occupied in 2022), future affordable units on the Rancho Del Mar site<sup>‡</sup>, and new accessory dwelling units (ADUs) can accommodate the RHNA allocation in all income categories. The table illustrates a surplus capacity of seven lower income units based on projected ADU production over the planning period.~~

---

<sup>‡</sup> ~~In March 2021, the City adopted an Affordable Housing Overlay Zone on the 31-acre Palos Verdes Peninsula Unified School District (PVPUSD) property located at 38 Crest Road (Rancho Del Mar site). Although the site is technically non-vacant, roughly three-quarters of the property (23 acres) is open space. The remaining areas are underutilized and could be repurposed. Consistent with the General Plan and Zoning amendments completed in 2021, the site is viable for 16 units of low/very low income housing.~~

**Table 2.3-1: Summary of Ability to Meet RHNA**

	Income Category				Total
	Extremely Low/ Very Low	Low	Moderate	Above Moderate	
Approved Development	-	2	3	7*	12
Vacant Residential Lots	-	-	-	20	20
Rancho Del Mar Site	8	8	-	-	16
Accessory Dwelling Units	12	6	8	14	40
<b>TOTALS</b>	<b>20</b>	<b>16</b>	<b>11</b>	<b>41</b>	<b>88</b>
RHNA	20	9	11	5	45
Surplus/Deficit	0	+7	0	+36	+43
<b>Adequate Sites?</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>

Notes: Includes 3 new homes and 4 ADU's

### **2.3.5 — 2021-2029 Goals and Policies**

As previously mentioned, based on the City's ability to meet RHNA allocation as described above, the HEU is a policy document; no actual development nor rezoning of parcels is included as part of the approval. The housing goals, policies, objectives, and programs which can be found in Chapter 6 of the HEU reflect the City's continued commitment to actively support residential development and plan for the City's fair share of regional housing needs.

## CHAPTER 3.0 – ENVIRONMENTAL DETERMINATION

### 3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

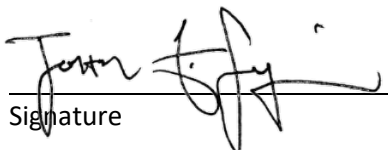
The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input type="checkbox"/> Air Quality
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input type="checkbox"/> Geology /Soils	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards & Hazardous Materials
<input type="checkbox"/> Hydrology /Water Quality	<input type="checkbox"/> Land Use / Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population / Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input type="checkbox"/> Transportation	<input type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Utilities /Service Systems	<input type="checkbox"/> Wildfire	<input type="checkbox"/> Mandatory Findings of Significance

### 3.2 DETERMINATION

On the basis of this initial evaluation:

- I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☒
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared. ☐
- I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐
- I find that the proposed project **may have a "potentially significant impact" or "potentially significant unless mitigated impact"** on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed. ☐
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

  
Signature

John F. Signo, AICP  
Name

~~January 10~~ March 28, 2022  
Date

Director of Planning and Community Services  
Title



## **CHAPTER 4.0 – EVALUATION OF ENVIRONMENTAL IMPACTS**

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if substantial evidence exists that an effect may be significant. If one or more “Potentially Significant Impact” entries are marked when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier Environmental Impact Report (EIR) or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. The explanation of each issue should identify:
  - a. the significance criteria or threshold, if any, used to evaluate each question; and
  - b. the mitigation measure identified, if any, to reduce the impact to less than significant.

## CHAPTER 5.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

### 5.1 AESTHETICS

1.	AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	In non-urbanized areas, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 5.1.1 Impact Analysis

- a) *Would the project have a substantial adverse effect on a scenic vista?*  
b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

**No Impact.** The HEU and SEU are ~~is~~ both policy documents and ~~does~~ do not include any changes to land use designations, zoning, building heights and intensities, or residential densities. Further, the ~~Housing Element and Safety Element~~ Housing Element and Safety Element includes policies intended to continue to make the City a safe and desirable place to work and live. All future development in the City would require project-specific environmental evaluation in order to determine any potential impacts to scenic vistas. Additionally, no officially designated State scenic highway is located in the City (Caltrans 2021). Potential aesthetic-related impacts are unique to a project's location and cannot be meaningfully determined until a project site has been defined. Any future development would be subject to the City's zoning requirements, and any potentially significant impacts identified would be addressed through mitigation measures specific to the impact. The Project would result in no impacts to scenic vistas or scenic resources within a State scenic highway.

- c) *Would the project, in non-urbanized areas, 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?*

**No Impact.** As previously mentioned, the Project would implement policies intended to continue to make the City a safe and desirable place to work and live including efforts such as development ~~and landscaping policies, among others.~~ The City's current Zoning Code contains standards intended to preserve the natural beauty of the City and to maintain visual orderliness, including provisions related

to building standards (height, setbacks, intensities), screening of utilities in development, and outdoor improvements. All future development in the City would be required to comply with the provisions of the City's Zoning Code and undergo project-specific environmental evaluation in order to determine any potential impacts. The Project would result in no impacts to the visual character or quality of public views or conflict with applicable zoning and other regulations governing scenic quality.

- d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

**No Impact.** Sources of light present throughout the City include residential uses of both interior and exterior lighting and vehicular traffic, while sources of glare include highly finished building materials such as glass, and roadway traffic. The Project consists of ~~two~~ a policy documents and would not directly enable construction or development. Nevertheless, all future residential development enabled by the City's General Plan is anticipated to introduce light and glare sources typical of development; and all future development in the City would be subject to the City's zoning requirements. The City's current Zoning Code contains lighting requirements intended to maintain public health, safety, and welfare from noxious or offensive illumination, glare, or similar effects. All future development in the City would be required to comply with the provisions of the City's Zoning Code and undergo project-specific environmental evaluation in order to determine any potential impacts. The Project would result in no impact to the creation of light or glare that would adversely affect views.

## 5.2 AGRICULTURE & FORESTRY RESOURCES

2.	<b>AGRICULTURE &amp; FOREST RESOURCES.</b> (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.2.1 Impact Analysis

- a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*
- c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*
- d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?*

**No Impact.** The City does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2021a). Additionally, no land within the City is under a Williamson Act contract (DOC 2017). The Project involves updates to the City's ~~Housing Element and Safety Element~~, with no proposed changes to land use designations or zoning of parcels within the City. The City is a residential community, and no provisions contained in the ~~Housing Element Update or the Safety Element Update~~ would convert Prime Farmland or any farmland of unique or Statewide importance. Further, no development is proposed on forestland or timber property zoned Timberland Production. Any future development proposals would not conflict with an existing Williamson Act contract; that would result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use or result in conversion or loss of forest land. Any future development on properties zoned agricultural would be analyzed in a future site-specific environmental document. Therefore, no impacts to agricultural or forestry resources would occur.

### 5.3 AIR QUALITY

3.	<b>AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(b)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.3.1 Impact Analysis

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

**No Impact.** The City is located within the South Coast Air Basin, which is currently designated nonattainment for ozone and fine particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) (SCAQMD 1999). The South Coast Air Quality Management District (SCAQMD) prepared an air quality management plan (AQMP) for both pollutants in 2016 and is currently working on the 2022 AQMP (SCAQMD 2021). The Project would not directly result in construction or development activity, nor would it enable development beyond that which is currently provided for in the City's General Plan. ~~The number of residential units that could be developed under the HEU is consistent with the City's current General Plan and zoning designations.~~ Potential air quality-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site is known. At such time that a development proposal is considered, that project will be subject to adopted development air quality standards; and any impacts identified with the development project will be addressed through mitigation measures specific to the impact. Short-term air quality impacts resulting from construction activities, such as dust generated by clearing and grading activities, exhaust emissions from gas- and diesel-powered construction equipment, and vehicular emissions associated with the commuting of construction workers, will be subject to SCAQMD air quality management plans identified above and all other relevant SCAQMD rules and regulations.

Thus, the Project would result in no impacts related to implementation of any applicable air quality plan, nor would it result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard.

- c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

**No Impact.** As mentioned, the ~~HEU and SEU are both~~ <sup>HEU</sup> is a policy documents and ~~does~~ <sup>do</sup> not include any changes to land use designations or zoning. Moreover, the Project does not directly enable construction or development activities. Potential air quality-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site is known. The City's General Plan and Municipal Code contain policies and measures related to maintaining air quality in residential neighborhoods, including protecting neighborhoods from air pollution-generating activities through site-specific environmental review and appropriate development buffers. At the time that a development proposal is considered, that project will be subject to the development review process, and any potentially significant impacts identified would be addressed through mitigation measures

specific to the impact. Thus, the Project would result in no impacts related to the exposure of sensitive receptors to substantial pollutant concentrations.

- d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

**No Impact.** Impacts would be considered potentially significant if the Project were to result in the creation of objectionable odors with the potential to affect substantial numbers of people, or if construction or operation of the Project would result in the creation of nuisance odors that would be noxious to a substantial number of people. The City's General Plan and Municipal Code contain policies and measures related to maintaining air quality in residential neighborhoods, including protecting neighborhoods from odor-generating activities through site-specific environmental review and appropriate development buffers.

~~Residential development, such as that described in the HEU, is not a land use typically associated with odor complaints or noxious emissions. Moreover, the SEU contains policies to prevent health threats due to air quality impacts such as those associated with wildfire. The Project would not directly enable construction or development activities upon implementation. At the time that a development proposal is considered, that project will be subject to the development review process; and any potentially significant impacts identified would be addressed through mitigation measures specific to the impact. The Project would therefore not result in impacts related to emissions adversely affecting a substantial number of people.~~

#### 5.4 BIOLOGICAL RESOURCES

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	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 U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 5.4.1 Impact Analysis

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

**No Impact.** The City's environs have the capacity to house a range of plant and wildlife species, including State and federally listed species. To protect candidate, sensitive, or special status species all future development in the City would require project-specific environmental evaluation in order to determine any potential impacts. Potential impacts related to biological resources are unique to a project's location and cannot be meaningfully determined until a project site has been defined. Any future development would be subject to federal, State, regional, and local regulatory requirements related to biological resources.

Further, the ~~HEU and SEU~~ includes policies intended to lessen impacts to biological resources, including policies to minimize housing construction in environmentally sensitive areas and policies for climate change adaptation and resiliency. Additionally, future projects would be evaluated by the City for their compliance with goals, policies, and measures contained in the City's General Plan intended to mitigate potential impacts to natural and biological resources, including those contained in the Open Space and Conservation Element. Any potentially significant environmental impacts identified from future development would be addressed through project specific mitigation measures identified at the time a specific development project is considered by the City. Therefore, the Project would have no impacts on any candidate, sensitive, or special status species.

- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- c) *Would the project have a substantial adverse effect on state or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

**No Impact.** A substantial amount of land in the City is constrained from development due to steep hillsides and canyons, many of which contain intermittently flooded riparian and wetland habitat (USFWS 2021). However, the ~~HEU and SEU~~ are both this a policy documents and would not directly enable construction or development activity. Potential impacts related to sensitive natural communities, such as riparian or wetland habitats, are unique to a project's location and cannot be



meaningfully determined until a project site has been defined. Thus, all future development in the City would require project-specific environmental evaluation. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Therefore, the Project would have no impacts on any riparian habitat, other sensitive natural communities, or on State or federally protected wetlands.

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

**No Impact.** The City is a heavily landscaped residential community interspersed with undeveloped steep hillsides and canyons (City 1990). Within these undeveloped areas, the potential exists for nesting birds and other species to occur. Nonetheless, the HEU and SEU are policy documents consistent with the City's General Plan and does not propose any land use or zoning changes. Further, future development will require site-specific environmental analysis. Potential environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Therefore, the Project would have no impacts to the movement of native resident or migratory fish or wildlife species, corridors, or nursery sites.

- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservancy Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

**No Impact.** The County of Los Angeles's Significant Ecological Area (SEA) Program was originally established as a part of the 1980 County General Plan, to help conserve the genetic and physical diversity in the County. The SEA Ordinance, which codified the SEA Program, establishes the permitting, design standards and review process for development within SEAs. The City contains portions of the Palos Verdes Peninsula and Coastline SEA; however, only areas within unincorporated Los Angeles County are subject to this ordinance. Further, policies and programs of the HEU promote infill housing including ADUs. No development would occur pursuant to the SEU. Any development that occurs pursuant to HEU or SEU policies will occur in already disturbed areas of the community and will be reviewed and processed in accordance with City planning policies. Therefore, the Project would not conflict with any local policies, ordinances, or plans protecting biological resources; and no impacts would occur.

## 5.5 CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 5.5.1 Impact Analysis

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*
- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*
- c) *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

**No Impact.** The Project involves adoption of two policy documents, the HEU and SEU, which does not directly propose any ground disturbance. Potential impacts related to cultural resources are unique to a project's location and cannot be meaningfully determined until a project site has been defined. Thus, all future development in the City would require project-specific environmental evaluation in order to determine any potential impacts. Future development would be subject to federal, State, and local regulatory requirements related to the discovery and proper handling of cultural and historic resources, including Public Resource Code (PRC) Section 211083.2, which requires avoidance and other measures in the event of discovery. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Therefore, no impacts to cultural resources would occur with implementation of the Project.

#### 5.6 ENERGY

6.	ENERGY Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 5.6.1 Impact Analysis

- a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

**No Impact.** The HEU and SEU are consistent with the City's General Plan and contain policies to conserve energy resources. However, potential impacts related to energy resources are unique to a project and cannot be meaningfully determined until a project has been defined. The HEU also seeks to conserve energy through public education on the reduction of residential energy use. Any future development would also be subject to individual review for compliance with federal, State, and local

regulatory requirements related to energy efficiency. Future development projects would incorporate site-specific infrastructure improvements, as necessary, and would be reviewed by relevant energy providers to identify necessary energy facility and service connections. Additionally, future projects would be evaluated by the City for their compliance with goals, policies, and measures contained in the City's General Plan intended to mitigate potential impacts to energy resources. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, no impacts would occur.

b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

**No Impact.** Any future development in the City would be subject to federal, State, and local regulatory requirements related to energy efficiency. Additionally, goals, policies, and programs related to reducing greenhouse gas (GHG) emissions (as discussed in Section 5.8: Greenhouse Gas Emissions) are closely related to reducing energy consumption through the use of alternative forms of energy or sustainable design features.

Future projects would be evaluated by the City for their compliance with goals, policies, and measures contained in the City's General Plan intended to mitigate potential impacts to energy resources. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Therefore, no impacts would occur.

## 5.7 GEOLOGY AND SOILS

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(d)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.7.1 Impact Analysis

- a) i) *Would the project 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? Refer to Division of Mines and Geology Special Publication 42.*
- ii) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*
- iii) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*
- iv) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

**No Impact.** Rolling Hills is in a seismically active region of southern California, with the Whittier fault, Newport-Inglewood fault, Palos Verdes fault, Malibu Coast fault, Cabrillo fault, Santa Monica fault, and Redondo Canyon fault all within 50 miles of the City. The closest active fault to the City is the Palos Verdes Fault, located within the City boundaries. While there are a number of seismically active faults in the City and region, there are no active faults with the potential for ground rupture, defined by the Alquist-Priolo Earthquake Fault Zoning Act. The closest Alquist-Priolo Fault Zone is the Newport-Inglewood Fault approximately nine miles northeast of the City (City 1990).

Regarding other geologic hazards, much of the existing development in Rolling Hills is located on hilly terrain highly susceptible to landslide risks. However, the potential for liquefaction, lateral spreading, and seismically induced dynamic settlement is low (City 1990).

The SEU addresses the protection of the existing and future population and development from both natural and man-made hazards through a number of goals, policies, implementation programs, principles, and standards. Among these is Goal 1 of the SEU, which aims for “minimization of loss of life, injury, and property damage resulting from geologic hazards”. Additionally, the Project includes implementation of ~~two~~ a policy documents and no development is proposed at this time. All future development in the City would require project-specific environmental evaluation in order to determine that any potential impacts are less than significant. Any future development would be subject to federal, State, and local regulatory requirements related to building design and



construction. Any potentially significant impacts identified would be addressed through mitigation measures specific to the impact. Therefore, the Project would result in no impacts related to the direct or indirect cause of potential substantial adverse effects, including the risk of loss, injury, or death, involving rupture of a known earthquake fault, strong seismic ground shaking, and seismic-related ground failure, including liquefaction or landslides.

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

**No Impact.** The Project consists of ~~two~~ a policy documents and would not directly enable construction or development activities. Any future development in the City would be subject to State, regional, and local requirements related to the prevention of erosion of onsite soils, as well as discharge of other construction-related pollutants, through the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and Best Management Practices (BMPs). Additionally, future projects would be evaluated by the City for their compliance with goals, policies, and measures contained in the SEU intended to protect lives and property. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Therefore, the Project would have no impacts related to soil erosion or the loss of topsoil.

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

**No Impact.** As previously discussed, much of the existing development in Rolling Hills is located on hilly terrain; and many of the City's canyons exhibit steep slopes with little vegetation coverage. These areas are highly susceptible to landslide risks. However, the City generally lacks the thick, loose, sandy soils which lead to liquefaction and ground failure hazards. Thus, the potential for liquefaction, lateral spreading, and seismically induced dynamic settlement is low (City 1990).

The ~~HEU and SEU are~~ is a policy documents; thus, the Project does not directly propose physical changes in the environment and does not, in and of itself, enable future development. To account for any potential instability, all future development projects would be evaluated on a site-specific basis and would be subject to federal, State, and local regulatory requirements related to building design and construction. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, the Project would have no impacts related to location on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse.

*d) Would the project 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?*

**No Impact.** Expansive soils are characterized as fine-grained, such as silts and clays or soils with variable amounts of expansive clay minerals that can change in volume due to changes in water content. According to the General Plan, soil types within the City consist predominantly of fertile clays with some loams and shales (City 1990). Nevertheless, the ~~HEU and SEU are~~ is a policy documents; thus, the Project does not directly propose physical changes in the environment and does not, in and

of itself, enable future development. Future development would be evaluated in separate, site-specific CEQA documents and would be subject to federal, State, and local regulatory requirements related to building design and construction. Potential environmental impacts from future development would be addressed through project-specific mitigation measures identified at the time a development project is considered by the City.

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

**No Impact.** With the exception of a Palos Verdes Unified School District site and 13 residences that have individually or collectively (through the creation of a small sewer district) connected to an adjacent jurisdiction's sewer systems, no sanitary sewer system exists in Rolling Hills. Residences are served by individual septic tanks and seepage pits. These systems are designed to serve single-family residences and are not conducive to multi-family housing; particularly given the geologic, slope, and soil constraints in Rolling Hills. However, the HEU and SEU are policy documents consistent with the City's General Plan and does not propose any land use or zoning changes. Moreover, all future development would be evaluated on a site-specific basis and subject to federal, State, and local regulatory requirements related to building design and construction. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. The Project would have no impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

**No Impact.** All future development in the City would require project-specific environmental evaluation in order to determine that any potential impacts are less than significant. Potential impacts related to paleontological and geologic resources are unique to a project and site and cannot be meaningfully determined until a project has been defined. In the event that paleontological resources are discovered during future development projects, applicants will be required to comply with regulatory standards enumerated under in PRC Section 5097.574, which sets the protocol for proper handling. Any potentially significant environmental impacts from future development would be analyzed in a separate CEQA document and addressed through project-specific mitigation measures identified at the time a development project is considered by the City. Therefore, the Project would have no impacts related to the direct or indirect destruction of a unique paleontological resource or site or unique geologic feature.

## 5.8 GREENHOUSE GAS EMISSIONS

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(b)	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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### 5.8.1 Impact Analysis

- a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

**No Impact.** The HEU and SEU are policy documents consistent with the City's General Plan. The Project does not directly propose physical changes in the environment and does not, in and of itself, enable future development. Any future development in the City would be required to comply with the latest California Building Code, including the CALGreen code, which helps reduce GHG emissions through sustainable design and renewable energy considerations. Any potentially significant environmental impacts would be analyzed in a project-specific environmental document and addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. The Project would have no impacts related to the generation of GHG emissions or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs.

### 5.9 HAZARDS AND HAZARDOUS MATERIALS

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.9.1 Impact Analysis

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

**No Impact.** The ~~HEU and SEU are~~ is a policy documents consistent with the City's General Plan. The Project does not directly propose physical changes in the environment and does not, in and of itself, enable future development. Moreover, the SEU addresses the protection of the existing and future population and development from both natural and man-made hazards through a number of goals, policies, implementation programs, principles, and standards. Among these are measures to mitigate the risk from hazardous materials.

Construction activities associated with future individual development projects would likely involve the temporary transportation, management, and use of oils, fuels and other potentially flammable substances, such as paints, solvents, and cleaners. Hazardous materials that may be present during operation of future individual projects are usually associated with landscaping and building maintenance. Nevertheless, any future development in the City would be subject to federal, State, and local regulatory requirements related to the transport, use, or disposal of hazardous materials. All potential environmental impacts resulting from future development would be analyzed in a separate environmental document and addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City.

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

**No Impact.** Residential uses enabled by the City's HEU are generally not characterized as substantial generators of hazardous materials, nor are they anticipated to result in upset or accident conditions involving the release thereof. Further, ~~the~~ SEU addresses the protection of the existing and future population and development from both natural and man-made hazards, including hazardous materials. Regardless, the Project involves ~~two~~ a policy documents and would not directly result in physical changes in the environment. Any future development would be subject to all applicable regulatory requirements concerning the proper handling, treatment, and disposal of hazardous materials. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City.

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

**No Impact.** The City only has one school in its boundary: Rancho Del Mar High School located in the western portion of the City. Potential hazardous material-related impacts are location-specific and



cannot be assessed in a meaningful way until the location of a project site is known. At such time that a development proposal is considered, that project will be subject to the development review process; and any potentially significant impacts would be addressed through mitigation measures specific to the impact. Since the current Project involves ~~two~~a policy documents and does not directly propose physical changes in the environment, no impacts related to the emission or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would occur.

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

**No Impact.** According to the Department of Toxic Substances Control (DTSC), no potential hazardous waste sites are under evaluation in Rolling Hills (DTSC 2021; SWRCB 2021). The City and surrounding area do not contain heavy industrial uses that would create a hazardous material risk in the event of a spill, release, or natural disaster. Additionally, the City is not located near any major transit routes involving transport of a substantial quantity of hazardous material through the City (City 1990).

The Project involves ~~two~~a policy documents and does not directly propose physical changes in the environment. Any future development would be subject to all applicable regulatory requirements concerning the proper handling, treatment, and disposal of hazardous materials. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. The Project would result in no impacts related to location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

**No Impact.** The ~~HEU and~~ SEU ~~is~~are policy documents that analyzes ~~housing and~~ safety needs in the City. The City is within 2 miles of the Torrance Airport, which is approximately 1.4 miles from the northern boundary of the City. However, the City is not located within the airport or airfield safety hazard zone (ALUC 2003). The Project proposes adoption of the SEU, which is a policy document that would not result in direct development or construction. Any development that occurs pursuant to Housing Element or Safety Element policies will be subject to State and local regulations regarding the transport, use, and disposal of hazardous materials and to City planning, engineering, and building requirements. No impacts relative to noise hazards are expected to occur as a result of the Project.

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

**No Impact.** The City's Community Wildfire Protection Plan (CWPP) identifies the potential evacuation routes listed below, which include options for rapid egress from areas within the City if threatened by a wildfire.

- Main Gate at Rolling Hills Road and Palos Verdes Drive North

- Crest Gate at Crest Road near Crenshaw Boulevard
- Eastfield Gate at Eastfield Drive and Palos Verdes Drive East
- Crest Road East (emergency access only)

The SEU addresses the protection of the existing and future population and development from both natural and man-made hazards through a number of goals, policies, implementation programs, principles, and standards. Among these are measures to provide and maintain an emergency response system for the City. Moreover, future development in the City would be required to comply with the provisions of the City's General Plan and Hazard Mitigation Plan during construction and operation. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, the Project would result in no impacts related to the impairment of or physical interference with an adopted emergency response plan or emergency evacuation plan.

- g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

**No Impact.** The entire City is designated as Very High Fire Hazard Severity Zone (VHFHSZ) by CAL FIRE (2011). The SEU ~~and HEU~~ addresses the protection of the existing and future population and development from both natural and man-made hazards through a number of goals, policies, implementation programs, principles, and standards. Among these are measures to mitigate the risk from the hazards of fire and ensure the protection of people and wildlife from hazardous materials in the community.

Further, future development in the City would be required to comply with the provisions of the City's General Plan and CWPP during construction and operation. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, the Project would not expose people or structures to loss, injury, or death involving wildland fires; and no impacts would result.

## 5.10 HYDROLOGY AND WATER QUALITY

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	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:				

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iii) 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; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 5.10.1 Impact Analysis

- a) *Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?*

**No Impact.** The Project involves ~~two~~ policy documents ~~which are~~ that is consistent with the City's General Plan and ~~does~~ not directly propose physical changes to the environment. Future development in the City would be required to follow State, regional, and local regulations regarding onsite stormwater retention, so that surface waters and the groundwater aquifer are not contaminated with Project-related pollutants. To comply with federal National Pollutant Discharge Elimination System (NPDES) requirements and maintain its Municipal Separate Storm Sewer System (MS4) permit, the City is required to screen and monitor its runoff to avoid compromising downstream water quality standards. It is also required to implement a number of programs, such as an Illicit Discharge Elimination Program. The City requires BMPs for construction in order to avoid erosion, pollution, sedimentation, and runoff that would degrade water quality. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, the Project would have no impact related to violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

- b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

**No Impact.** The City's water infrastructure is owned, maintained, and operated by California Water Service Palos Verdes District (District). According to the District's 2020 Urban Water Management Plan (UWMP), the current water supply for the customers of the District is purchased imported water and groundwater is not being used as a source of supply (CalWater 2021). Further, all future development in the City would require project-specific environmental evaluation in order to determine any potentially significant impacts to groundwater and required project-specific mitigation

measures. Any future development would also be subject to all applicable State, regional, and local regulatory requirements concerning the efficient use and conservation of water resources, including measures identified in the City's General Plan. Therefore, the Project would result in no impacts related to groundwater supplies or groundwater recharge.

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
- i) *result in substantial erosion or siltation on- or off-site;*
  - ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*
  - iii) *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or*
  - iv) *impede or redirect flood flows?*

**No Impact.** The Project involves ~~two~~ a policy documents which ~~are~~ is consistent with the City's General Plan and does not directly propose physical changes to the environment. The City's SEU also contains principles and standards intended to minimize risk from flooding or erosion. Nonetheless, potential impacts related to drainage are unique to a project and cannot be meaningfully determined until a project site has been defined. Future development in the City would be required to follow State, regional, and local regulations regarding drainage, erosion, and runoff. As mentioned, the City is required to screen and monitor its runoff to avoid compromising downstream water quality standards to comply with federal NPDES requirements and maintain its MS4 permit. The City also requires BMPs for construction in order to avoid erosion, pollution, sedimentation, and runoff that would degrade water quality. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, the Project would have no impacts.

- d) *Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

**No Impact.** According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) panels 06037C2026G, 06037C2027G, and 06037C1940F, the City is not located in a flood hazard area and currently has a less than 0.2 percent annual chance to be inundated by flood waters as a result of a storm event (FEMA 2021). Additionally, the City is not located within a tsunami or seiche zone (DOC 2021b; DWR 2021). Regardless, all future development in the City would require project-specific environmental evaluation in order to determine any potential impacts. Future development would be subject to all applicable federal, State, and local regulatory requirements concerning flood hazards, including measures identified in the City's General Plan intended to minimize impacts. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Therefore, the Project would result in no impact related to risking release of pollutants due to Project inundation in flood hazard, tsunami, or seiche zones.

- e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*



**No Impact.** The Project involves updating ~~two~~ a policy documents and does not propose any zoning or land use changes, or authorize any physical development. Any future development ~~that occurs pursuant to the HEU or SEU in the City~~ will be subject to State and local regulations regarding water quality, run-off, and hydrology and to City planning, engineering and building requirements. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan; thus, no impacts would occur.

## 5.11 LAND USE AND PLANNING

11.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.11.1 Impact Analysis

- a) *Would the project physically divide an established community?*  
b) *Would the project 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?*

**No Impact.** The City has prepared its HEU and SEU in accordance with ~~Section 65580 and Section 65302(g)~~ of the Government Code, respectively. The updates ~~has have~~ also been prepared consistent with the City General Plan and the community's vision of its housing and safety needs and objectives. ~~Accordingly, the HEU examines the City's housing needs as they exist today and projects future housing needs based on RHNA allocation. No change to the land use plan or zoning map is proposed as part of the HEU.~~ The SEU identifies and offers goals, policies, and actions to minimize the City's hazards which pose a risk of injury, death, property loss, and other hardships. ~~Any subsequent discretionary actions or development that occur pursuant to HEU policies will be reviewed and processed in accordance with City planning policies.~~ The HEU and SEU ~~has~~ve been prepared in full compliance with the State law, and no potential adverse impacts relative to land use would occur.

## 5.12 MINERAL RESOURCES

12.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.12.1 Impact Analysis

- a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- b) *Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

**No Impact.** The City is not designated as having any known mineral resources. Although mineral resources exist in the area, they are outside the City limits and outside the boundaries of the General Plan (City 1990). Additionally, the Project proposes implementation of the HEU and SEU, which are ~~is~~ a policy documents consistent with the General Plan. No land use or zoning changes are proposed, and the Project would not result in direct physical changes to the environment. All future development would require project-specific environmental evaluation in order to determine any potentially significant impacts and would integrate project-specific mitigation measures if needed. Therefore, the Project would have no impacts on the availability of any known resources or locally important mineral resource recovery sites.

### 5.13 NOISE

13.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	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 project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.13.1 Impact Analysis

- a) *Would the project 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?*
- b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

**No Impact.** The HEU and SEU are ~~is~~ a both policy documents and would not result in direct physical changes in the environment. Thus, implementation of the Project would not generate a temporary or substantial increase in ambient noise levels. All future development would require project-specific environmental evaluation in order to determine any potential noise impacts. Further, future development would be required to adhere to the policies, principles, standards, and mitigation as

outlined in the General Plan Noise Element and the City's Municipal Code. Therefore, the Project would result in no impacts associated with an increase in temporary or ambient noise levels or groundborne vibration/noise levels.

- c) *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 us airport, would the project expose people residing or working in the project area to excessive noise levels?*

**No Impact.** The City is within 2 miles of the Torrance Airport but is not within the airport or airfield safety hazard zone. Moreover, the HEU and SEU are policy documents; thus, future development would require project-specific environmental evaluation in order to determine any potential noise impacts. Further, future development would be required to adhere to the policies, principles, standards, and mitigation as outlined in the General Plan Noise Element and the City's Municipal Code. Therefore, the Project would have no impacts related to noise levels associated with development within 2 miles of an airport.

#### 5.14 POPULATION AND HOUSING

14.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

##### 5.14.1 Impact Analysis

- a) *Would the project 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)?*
- b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

**No Impact.** As the regional planning agency for the Los Angeles region, SCAG is responsible for preparing jurisdiction-level forecasts for each city and county in the region. The latest forecasts were adopted in September 2020 and describe conditions in a base year (2016) and forecast year (2045). SCAG forecasts indicate that City growth will be flat through 2045, with the latest published forecasts showing 700 households in 2016 and 700 households in 2045. Population in the City over the equivalent period is shown as increasing from 1,900 to 2,000, a growth rate of about 5 percent over 29 years (SCAG 2020).

~~The 2021-2029 RHNA allocation for the City is 45 units, including 20 very low income units, 9 low income units, 11 moderate income units, and 5 above moderate income units. As previously shown in~~

Table 2.3-1, the combination of recently approved housing units (expected to be occupied in 2022), future affordable units on the Rancho Del Mar site, and new ADUs, which have been made easier to develop under a series of recently passed legislation, can accommodate the RHNA allocation in all income categories. The table illustrates a surplus capacity of seven lower income units based on projected ADU production over the planning period. Any subsequent development accomplished pursuant to the HEU or SEU will be consistent with State and regional growth mandates. The Project does not include any development that would increase population directly or indirectly and The Project will not displace housing or people, but, conversely, is intended to promote affordability and increase housing supply, which can support retention of households in all income categories. No impacts relative to population or housing would occur as a result of the Project.

## 5.15 PUBLIC SERVICES

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	i) Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	ii) Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.15.1 Impact Analysis

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?*

**No Impact.** The Los Angeles County Fire Department provides fire protection services to the City. Fire Station 56, located at 12 Crest Road West, serves the City under Battalion 14. The Project, which involves the SEU and HEU, would implement policies to promote maintenance of acceptable service ratios, response times, and other performance objectives for fire protection. Additionally, since the City is within the CAL FIRE VHFHSZ, the SEU includes policies to enforce VHFHSZ-specific standards during development. Compliance with these standards reduces the fire vulnerability of new structures built in the City. ~~The HEU and SEU are is only~~ a policy documents, and all future development would require project-specific environmental evaluation in order to determine any potential impacts to fire protection. Further, future development would be required to adhere to State and local regulations as well as the policies, principles, standards, and mitigation as outlined in other sections of the General Plan. Therefore, the Project would have no impact on fire protection services.



- b) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?*

**No Impact.** The Los Angeles County Sheriff's Department is contracted with the City to provide police services and protection. The Lomita Station of the Sheriff's Department is located at 26123 Narbonne Avenue. The Project, which involves the SEU and HEU, would implement policies to promote maintenance of acceptable service ratios, response times, and other performance objectives for police protection. The HEU and SEU are is only a policy documents, and all future development would require project-specific environmental evaluation in order to determine any potential impacts to police protection. Further, future development would be required to adhere to State and local regulations as well as the policies, principles, standards, and mitigation as outlined in other sections of the General Plan. Therefore, the Project would have no impact on police protection services.

- c) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?*

**No Impact.** The Palos Verdes Unified School District serves the City. School-related impacts depend upon the location and intensity of a project, students generated per household, and the capacity of facilities in a given attendance area. The HEU and SEU are is only a policy documents and does not authorize future development. All future development would require project-specific environmental evaluation in order to determine any potential impacts to schools. Further, future development would be required to adhere to State and local regulations as well as the policies, principles, standards, and mitigation outlined in other sections of the General Plan. Therefore, the Project would have no impact on schools.

- d) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*

**No Impact.** Park-related impacts depend upon the location and intensity of a project. There is one public park, numerous trails, open space areas, three tennis courts, and two equestrian facilities that will not be impacted by the Project. The HEU and SEU are is a policy documents and do not authorize future development. All future development would require project-specific environmental evaluation in order to determine any potential impacts to parks. Further, future development would be required to adhere to State and local regulations as well as the policies, principles, standards, and mitigation as outlined in other sections of the General Plan. Therefore, the Project would have no impact on parks.

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

**No Impact.** The ~~HEU and SEU are~~ is a policy documents and do not authorize future development. All future development would require project-specific environmental evaluation in order to determine any potential impacts to other public facilities. Further, future development would be required to adhere to State and local regulations as well as the policies, principles, standards, and mitigation outlined in other sections of the General Plan. Therefore, the Project would have no impact on other public facilities.

## 5.16 RECREATION

16.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.16.1 Impact Analysis

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

**No Impact.** Impacts to recreational facilities depend upon the location and intensity of a project. There is one public park, numerous trails, open space areas, three tennis courts, and two equestrian facilities that will not be impacted by the Project. The ~~HEU and SEU are~~ is a policy documents and ~~does~~ not authorize future development. All future development would require project-specific environmental evaluation in order to determine any potential impacts to recreational facilities. Further, future development would be required to adhere to State and local regulations as well as the policies, principles, standards, and mitigation outlined in other sections of the General Plan. Therefore, the Project would have no impact on existing recreational facilities.

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

**No Impact.** The Project proposes adoption of the ~~HEU and SEU, both of which are~~ is a policy documents that would not result in direct development or construction. Therefore, the Project would not construct any recreational facilities or require the expansion of any recreational facilities. No impacts would occur to or from recreational facilities.

## 5.17 TRANSPORTATION

17.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Substantially increase hazards due to a geometric design feature (e. g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.17.1 Impact Analysis

- a) *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?*
- b) *Would the project Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*
- c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?*

**No Impact.** Rolling Hills has no public roads or streets; thus the City's circulation infrastructure is not conducive to uses generating high trip volumes (City 2014). Nonetheless, the HEU and SEU are is a policy documents consistent with the General Plan. The updates does not include any changes to land use designations, zoning, building heights and intensities, or residential densities. Any future development would be required to adhere to all programs, ordinances, and policies that address circulation, including those in the General Plan Circulation Element and the City's Municipal Code. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, no circulation-related impacts would result from the Project.

- d) *Would the project result in inadequate emergency access?*

**No Impact.** Many streets in the community are "dead ends" without emergency vehicle access alternatives in the event that ingress and egress is blocked (City 2014). However, the SEU addresses the protection of the existing and future population and development from both natural and man-made hazards through a number of goals, policies, implementation programs, principles, and standards. To ensure adequate emergency access, future development in the City would be required to undergo environmental analysis and comply with the provisions of the Municipal Code during construction and operation. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, the Project would result in no impacts related to emergency access.

## 5.18 TRIBAL CULTURAL RESOURCES

18.	TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.18.1 Impact Analysis

- a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*
- b) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 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?*

According to the California PRC Section 21084, a project may have a significant effect on the environment if the project “may cause a substantial adverse change in the significance of an historical resource.” Assembly Bill 52 (AB 52) specifies that a project with the potential for adverse effects on tribal cultural resources may be considered a significant effect on the environment. Additionally, Senate Bill 18 (SB 18) requires a government-to-government consultation process initiated by the local governmental agency prior to adoption or amendment of a General or Specific Plan.

The City, as the Lead Agency pursuant to CEQA and as required by AB 52 and SB 18, has consulted with the local Native American Tribes in the Project Area. Tribes that are located regionally include: Gabrieleno Band of Mission Indians - Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission



Indians, Gabrielino /Tongva Nation, Gabrielino Tongva Indians of California, Gabrielino-Tongva Tribe, Santa Rosa Band of Cahuilla Indians, and Soboba Band of Luiseño Indians. Letters were sent to these Tribes on December 13, 2021. Tribes were requested to respond to AB 52 by January 12, 2022, and SB 18 by January 27, 2022.

As of the release of this document, the Gabrieleño Band of Mission Indians - Kizh Nation responded with two separate letters on December 21, 2021 noting that they had no comments or concerns and no additional information to provide regarding the ~~HEU or SEU~~, but requesting consultation for any and all future projects with ground disturbance as shown in Appendix ~~A~~C: Tribal Consultation Response. Additionally, the Gabrielino Tongva Indians of California responded noting that the City is a highly culturally sensitive area and expressed interest in finding out more information regarding the project, however, after review of the project, they submitted a follow up email stating that they have no concerns, but requested notification on future projects.

The ~~HEU and SEU~~ are-is a policy documents that would not result in direct development or construction. As noted, to date, two Tribes responded during the consultation process and did not have any comments or concerns. Similar to the Project, future projects would be required comply with AB 52 and SB 18, which require consultation with any Tribes that request consultation. The Project would not cause a substantial adverse change in the significance of a Tribal Cultural Resource listed or eligible for listing in the California Register of Historical Resources or in the local register of historical resources as defined in PRC Section 5020.1(k). Thus, no impacts to Tribal Cultural Resources would occur.

## 5.19 UTILITIES AND SERVICE SYSTEMS

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.19.1 Impact Analysis

- a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or expansion of which could cause significant environmental effects?*

**No Impact.** The Project is for the adoption of the City's HEU and SEU, which ~~are~~ is a policy documents that would not result in direct development or construction. ~~The HEU identifies approved housing developments and the construction of ADUs within the City to meet RHNA allocation. According to the HEU, the principal site improvements required upon development of a vacant property in the City are the undergrounding of electrical lines to the structure, installation of a septic system, and conformance to the City's outdoor lighting standards.~~

All future development in the City would require project-specific environmental evaluation and would be subject to all applicable State, regional, and local regulatory requirements concerning the installation of utilities. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. ~~The HEU and SEU are~~ is a policy documents that would not result in direct development or construction. Therefore, the Project would have no impacts regarding the construction or expansion of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities.

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal dry and multiple dry years?*

**No Impact.** According to the 2020 UWMP, the District's only source of water supply is imported, purchased water from the West Basin Municipal Water District (WBMWD) (CalWater 2021). The WBMWD Draft 2020 UWMP states that it will be able to serve 100 percent of projected demands in normal, single-dry and multiple-dry years. As such, the District expects that, under all hydrologic conditions, purchased water supplies (in combination with the future recycled supplies) will fully serve future potable demands (CalWater 2021).

Further, all future development in the City would require project-specific environmental evaluation in order to determine any potential impacts to groundwater. Any future development would also be subject to all applicable State, regional, and local regulatory requirements concerning the efficient use and conservation of water resources, including measures identified in the City's General Plan. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Therefore, the Project would result in no impacts related to water supply availability.

- c) *Would the project 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?*

**No Impact.** Wastewater treatment in the City generally occurs through private septic tanks, as only several parcels on the western periphery of the City have access to sanitary sewer. For these several parcels, the Los Angeles County Sanitation Districts (LACSD) owns, operates, and maintains the sewer system consisting of gravity sewers, pumping stations, and force mains to collect wastewater from the Palos Verdes District service area (Sanitation District #5). The LACSD's Joint Water Pollution Control Plant (JWPCP) provides the wastewater service for the District service area. It provides advanced primary and partial secondary treatment for 400 million gallons per day (MGD) of wastewater and serves a population of approximately 4.8 million people (LACSD 2021). This plant currently processes 260 MGD; thus, the system has adequate capacity for the Project (CalWater 2021).

Since the Project proposes adoption of ~~two~~a policy documents, all future development in the City would require project-specific environmental evaluation in order to determine any potential impacts related to wastewater. Any future development would also be subject to all applicable State, regional, and local regulatory requirements concerning the efficient use and conservation of water resources, including measures identified in the City's General Plan. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Therefore, the Project would result in no impacts related to wastewater treatment.

- d) *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?*
- e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

**No Impact.** The closest landfill to the City is the Savage Canyon Landfill in Whittier, California. This landfill has a remaining capacity of 9,510,833 tons and is not expected to close until 2055 (CalRecycle 2021). Since the Project proposes adoption of ~~two~~a policy documents, all future development projects would require an environmental analysis to ensure compliance with the State and local standards and the federal, State, and local management and reduction statutes and regulations related to solid waste. Therefore, the Project would have no impact in regard to an increase in solid waste generation or complying with applicable regulations related to solid waste.

## 5.20 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

20.	<b>WILDFIRE.</b> If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 5.20.1 Impact Analysis

a) *Would the project impair an adopted emergency response plan or emergency evacuation plan?*

**No Impact.** The entire City is designated as a VHFHSZ by CAL FIRE (CAL FIRE 2011). As mentioned in Section 5.9, the City's CWPP identifies the potential evacuation routes described below, which include options for rapid egress from areas within the City if threatened by a wildfire.

- Main Gate at Rolling Hills Road and Palos Verdes Drive North
- Crest Gate at Crest Road near Crenshaw Boulevard
- Eastfield Gate at Eastfield Drive and Palos Verdes Drive East
- Crest Road East (emergency access only)

The SEU and HEU addresses the protection of the existing and future population and development from both natural and man-made hazards through a number of goals, policies, implementation programs, principles, and standards. Among these are measures to mitigate the risk from the hazards of fire. Regardless, potential impacts related to emergency response and evacuation are unique to a project and cannot be meaningfully determined until a project has been defined. Therefore, future development in the City would require individual environmental analysis to ensure compliance with the provisions of the City's General Plan and CWPP during construction and operation. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, the Project would result in no impacts related to the impairment of or physical interference with an adopted emergency response plan or emergency evacuation plan.

b) *Would the project, 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?*

**No Impact.** As mentioned above, the entire City is designated a VHFHSZ by CAL FIRE, and a substantial amount of land in the City is steep hillsides and canyons (CAL FIRE 2011). Although the SEU and HEU includes measures to mitigate the risk of fire hazards, potential impacts related to fire exacerbation are unique to a project and cannot be meaningfully determined until a project has been defined. Thus, future development in the City would require separate environmental analysis to ensure compliance with the provisions of the City's General Plan and CWPP during construction and operation. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, the Project would result in no impacts related to wildfire exacerbation.



- c) *Would the project 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?*

**No Impact.** Principal site improvements required upon development of a vacant property in the City are the undergrounding of electrical lines to the structure, installation of a septic system, and conformance to the City's outdoor lighting standards. The entire City is designated a VHFHSZ by CAL FIRE; however, the SEU includes measures to mitigate the risk of fire hazards. Although not anticipated under the HEU or the SEU, potential impacts related to utility installation and fire exacerbation are unique to a project and cannot be meaningfully determined until a project has been defined. Thus, future development in the City would require separate environmental analysis to ensure compliance with the provisions of the City's General Plan and CWPP during construction and operation. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, the Project would result in no impacts related to wildfire exacerbation.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?*

**No Impact.** As mentioned above, the entire City is designated a VHFHSZ by CAL FIRE, and a substantial amount of land in the City is steep hillsides and canyons highly susceptible to landslide risks (CAL FIRE 2011). Although the SEU includes measures to mitigate the risk of fire hazards, potential impacts related to post-fire instability and drainage changes are unique to a project and cannot be meaningfully determined until a project has been defined. Thus, future development in the City would require separate environmental analysis to ensure compliance with the provisions of the City's General Plan and CWPP during construction and operation. Any potentially significant environmental impacts identified from future development would be addressed through project-specific mitigation measures identified at the time a specific development project is considered by the City. Thus, the Project would result in no impacts related to post-fire slope instability or drainage changes.

## 5.21 MANDATORY FINDINGS OF SIGNIFICANCE

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 5.21.1 Impact Analysis

- a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*
- b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)*
- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

**No Impact.** As demonstrated throughout this document, the Project would have no impacts to Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, or Wildfires. Implementation of the City's HEU and SEU will not create any significant or adverse impacts and would therefore not contribute to any cumulatively considerable impacts. ~~Potential site-specific impacts that cannot be known at this time would be addressed in conjunction with any development proposal submitted for the individual project sites.~~ The Project involves adoption of ~~two~~ a policy documents consistent with the General Plan and does not include any changes to land use designations, zoning, building heights and intensities, or residential densities. Therefore, the Project would have no impacts or cumulatively considerable impacts on the environment or human beings.

## CHAPTER 6.0 – REFERENCES

### California Department of Conservation (DOC)

2017 State of California Williamson Act Contract Land. Available online at: [https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/\(E\)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf](https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf).

2021a California Important Farmland Finder. Accessed December 2021. Available online at: <https://maps.conservation.ca.gov/dlrp/ciff/>.

2021b Tsunami Hazard Area Map. Accessed December 2021. Available online at: [https://maps.conservation.ca.gov/cgs/informationwarehouse/ts\\_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm\\_source=cgs+active&utm\\_content=losangeles](https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm_source=cgs+active&utm_content=losangeles).

### California Department of Forestry and Fire Protection (CAL FIRE)

2011 Very High Fire Hazard Severity Zones in LRA: Rolling Hills. Available online at: [https://osfm.fire.ca.gov/media/5840/rolling\\_hills.pdf](https://osfm.fire.ca.gov/media/5840/rolling_hills.pdf).

### California Department of Resources Recycling and Recovery (CalRecycle)

2021 SWIS Facility/Site Activity Details: Savage Canyon Landfill (19-AH-0001). Accessed December 2021. Available online at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3494?siteID=1399>.

### California Department of Toxic Substances Control (DTSC)

2021 EnviroStor. Accessed December 2021. Available online at: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=rolling+hills%2C+CA>.

### California Department of Transportation (Caltrans)

2021 California State Scenic Highway System Map. Accessed December 2021. Available online at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

### California Department of Water Resources (DWR)

2021 California Dam Breach Inundation Map Web Publisher. Accessed December 2021. Available online at: [https://fmds.water.ca.gov/webgis/?appid=dam\\_prototype\\_v2](https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2).

### California Water Service (CalWater)

2021 2020 Urban Water Management Plan: Palos Verdes District. Available online at: [https://www.calwater.com/docs/uwmp2020/PV\\_2020\\_UWMP\\_FINAL.pdf](https://www.calwater.com/docs/uwmp2020/PV_2020_UWMP_FINAL.pdf). June.

### City of Rolling Hills (City)

1990 City of Rolling Hills General Plan. Available online at: [https://www.rolling-hills.org/government/planning\\_and\\_community\\_services/index.php](https://www.rolling-hills.org/government/planning_and_community_services/index.php).

- 2014 2014-2021 Update of the Housing Element of the General Plan. Available online at: <https://cms5.revize.com/revize/rollinghillscsca/Government/Planning%20And%20Community%20Services/Housing%20Element%202014%20201402111636398968.pdf>.

Federal Emergency Management Agency (FEMA)

- 2021 National Flood Hazard Layer Viewer. Accessed December 2021. Available online at: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>.

Los Angeles County Airport Land Use Commission (ALUC)

- 2003 Torrance Airport. Available online at: [https://planning.lacounty.gov/assets/upl/project/aluc\\_airport-torrance.pdf](https://planning.lacounty.gov/assets/upl/project/aluc_airport-torrance.pdf).

Los Angeles County Sanitation District (LACSD)

- 2021 Wastewater Treatment Process at JWPCP. Accessed on December 23, 2021, at: <https://www.lacsd.org/services/wastewater-sewage/facilities/joint-water-pollution-control-plant/wastewater-treatment-process-at-jwpcp>.

South Coast Air Quality Management District (SCAQMD)

- 1999 Map of Jurisdiction. Available online at: <http://www.aqmd.gov/docs/default-source/default-document-library/map-of-jurisdiction.pdf>.
- 2021 2022 AQMP. Accessed December 2021. Available online at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan#>.

Southern California Association of Governments (SCAG)

- 2020 The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association Of Governments: Connect SoCal. Available online at: [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan\\_0.pdf?1606001176](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176).

State Water Resources Control Board (SWRCB)

- 2021 GeoTracker. Accessed December 2021. Available online at: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=rolling+hills%2C+CA>.

United States Fish and Wildlife Service (USFWS)

- 2021 National Wetlands Inventory. Accessed December 2021. Available online at: <https://www.fws.gov/wetlands/data/Mapper.html>.



## **APPENDIX A – TRIBAL CONSULTATION RESPONSES**





GABRIELENO BAND OF MISSION INDIANS - KIZH NATION  
Historically known as The Gabrielino Tribal Council - San Gabriel Band of Mission Indians  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

December 21, 2021

Project Name: The City of Rolling Hills Housing and Safety Element  
Updates Project

Dear John F. Signo,

Thank you for your email dated December 13, 2021. Regarding the project above. This is to concur that we are in agreement with the Housing Element Update. However, our Tribal government would like to request consultation for any and all future projects within this location.

Sincerely,

Andrew Salas, Chairman

Albert Perez, treasurer I

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

[www.gabrielenoindians.org](http://www.gabrielenoindians.org)

[admin@gabrielenoindians.org](mailto:admin@gabrielenoindians.org)



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION  
Historically known as The Gabrielino Tribal Council - San Gabriel Band of Mission Indians  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

December 21, 2021

Project Name: The City of Rolling Hills Safety Element

Thank you for your letter regarding the project above. This is to concur that we are in agreement with the Safety Element. However, our Tribal government would like to request consultation for any and all future projects when ground disturbance will be occurring within this location.

Sincerely,

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation  
1(844)390-0787

Andrew Salas, Chairman

Albert Perez, treasurer I

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

[www.gabrielenoindians.org](http://www.gabrielenoindians.org)

[admin@gabrielenoindians.org](mailto:admin@gabrielenoindians.org)

**From:** CHRISTINA CONLEY-HADDOCK <christina.marsden@alumni.usc.edu>  
**Sent:** Thursday, January 6, 2022 1:17 PM  
**To:** Richard Shultz <rshultz@chambersgroupinc.com>  
**Cc:** Robert Dorame <gtongva@icloud.com>  
**Subject:** Re: Follow-up re: 21330 City of Rolling Hills Housing & Safety Element Project SB 18/AB 52 Consult Request

Good afternoon Richard,  
Apologies for the delay - I have been out on the field.

At this time, as there are no specific developments planned, we have no concerned.  
any future projects in the city of Rolling Hills as aforementioned, it is a sensitive area for our tribe.

Take good care,  
Christina

**tehoovet taamet**

CHRISTINA CONLEY  
Native American Monitor - Caretaker of our Ancestral Land  
Cultural Resource Administrator Under Tribal Chair, Robert Dorame (MLD)  
HAZWOPER Certified  
626.407.8761

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GABRIELINO TONGVA INDIANS OF CALIFORNIA



On Jan 3, 2022, at 12:56 PM, Richard Shultz <[rshultz@chambersgroupinc.com](mailto:rshultz@chambersgroupinc.com)> wrote:

Good afternoon and happy new year Christina.

I am following up on your recent letter (below). Chambers Group is assisting the City of Rolling Hills with their requirement to conduct SB 18 and AB 52 consultations related to the proposed Housing and Safety Element Updates to the General Plan and policies.

As noted in the attached consultation request letter there are no specific developments planned at this time, and the consultation is being requested for comments or concerns with the proposed Element Updates. Chambers Group and the City of Rolling Hills greatly appreciate the concerns of the Gabrielino Tongva Indians of California Tribal Council and wish to allay any apprehensions that the resources listed, and not listed, below would be affected by the proposed Element Updates.



If the Gabrielino Tongva Indians of California Tribal Council wish to consult under SB 18 or AB 52 concerning these proposed Element Updates please contact John Signo, AICP, at the City of Rolling Hills ([jsigno@cityofrh.net](mailto:jsigno@cityofrh.net) - City Of Rolling Hills – City Hall 2; Portuguese Bend Road, Rolling Hills CA 90274; O: 310.377.1521 | F: 310.377.7288). Alternatively, feel free to contact either Kellie or myself and we will coordinate with the City.

Please let Kellie or me know if you have any questions or concerns, and we will be happy to help.

Thank you,

*Richard*

**From:** CHRISTINA CONLEY-HADDOCK <[christina.marsden@alumni.usc.edu](mailto:christina.marsden@alumni.usc.edu)>  
**Sent:** Friday, December 31, 2021 10:27 AM  
**To:** Kellie Kandybowicz <[kkandybowicz@chambersgroupinc.com](mailto:kkandybowicz@chambersgroupinc.com)>  
**Cc:** Richard Shultz <[rshultz@chambersgroupinc.com](mailto:rshultz@chambersgroupinc.com)>; Robert Dorame <[gtongva@icloud.com](mailto:gtongva@icloud.com)>  
**Subject:** Re: Follow-up re: 21330 City of Rolling Hills Housing & Safety Element Project SB 18/AB 52 Consult Request

Good morning John,

We are in receipt of your 21330 City of Rolling Hills Housing & Safety Element Project SB 18/AB 52 Consult Request. Thank you for reaching out.

After conferring with Tribal Chair Dorame (the Most Likely Descendent), this property is highly culturally sensitive to the Gabrielino Tongva Indians of California (GTIOC) as it resides near one of our villages. The Gabrielino Tongva Indians of California request an AB52 and SB18 consultation for this project.

There are a minimum of 7 identified sites near the project area; LAN 110, LAN 191, LAN 276, LAN277, LAN278, LAN 279, LAN 280 (LAN 275 borders your project area).

The concern with all of these sites is that they are significant evidence of the existence of a village site and the area may still yield evidence of buried deposits. Artifacts unearthed in previous projects included obsidian projectiles, sandstone bowls, cog stones and more importantly, human remains.

The Gabrielino Tongva Indians of California tribe is deeply concerned with any ground disturbances in your project area and this project will need a monitor from the Gabrielino Tongva Indians of California for only ground disturbances.

Attached are our treatment plans for your project site.

Please let us know what your next steps are and how we may assist you.

Take good care and happy new year,  
Christina

**tehoovet taamet**

CHRISTINA CONLEY

Native American Monitor - Caretaker of our Ancestral Land

Cultural Resource Administrator Under Tribal Chair, Robert Dorame (Most Likely Descendent)

HAZWOPER Certified

626.407.8761

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GABRIELINO TONGVA INDIANS OF CALIFORNIA

<image001.png>

<image002.png>

**From:** Kellie Kandybowicz

**Sent:** Wednesday, December 15, 2021 9:28 AM

**To:** '[christina.marsden@alumni.isc.edu](mailto:christina.marsden@alumni.isc.edu)' <[christina.marsden@alumni.isc.edu](mailto:christina.marsden@alumni.isc.edu)>

**Cc:** Richard Shultz <[rshultz@chambersgroupinc.com](mailto:rshultz@chambersgroupinc.com)>

**Subject:** 21330 City of Rolling Hills Housing & Safety Element Project SB 18/AB 52  
Consult Request

Dear Christina Conley,

The City of Rolling Hills (City) is commencing its Senate Bill (SB) 18 and Assembly Bill (AB) 52 consultation processes for the Housing and Safety Element Updates Project (Project). Pursuant to Government Codes §65352.3 and §65352.4 SB 18 require local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans. Additionally, AB 52 (Public Resources Codes §21080.3.1 and §21080.3.2) requires public agencies to consult with California Native American tribes identified by the NAHC for the purpose of avoiding, protecting, and/or mitigating impacts to tribal cultural resources (TCRs) as defined, for California Environmental Quality Act (CEQA) projects. This letter is being provided to you because your Tribe, the Gabrielino Tongva Indians of California Tribal Council, was listed on the NAHC directory as an individual or group who may have additional knowledge pertaining to tribal cultural resources within this geographic area.

The Project consists of a Housing Element Update of the City of Rolling Hills General Plan and an update to the City's Safety Element to address various natural and human-caused hazards the City has dealt with including earthquakes, wildfires, droughts, and land movement.

The Housing Element and Safety Element Updates are policy updates only, and no specific developments are proposed at this time. A description of each of the updates is provided below.

### **Housing Element Update**

The City's Housing Element serves as an integrated part of the General Plan, and is subject to detailed statutory requirements, including a requirement to be updated every eight years, and mandatory review by the California Department of Housing and Community Development (HCD). The City is currently adopting their 6<sup>th</sup> cycle Housing Element Update (HEU). The City's Regional Housing Needs Allocation (RHNA) for this 6<sup>th</sup> cycle, is 45 units which the City determined can be met with existing approved developments, the underutilized Rancho Del Mar school site, and Accessory Dwelling Units (ADUs). Therefore, the HEU, is a policy document; no actual development nor rezoning of parcels is included as part of the approval.

### **Safety Element Update**

The Safety Element Update (SEU) provides the City goals, policies, and actions to minimize the hazards to safety in and around the City. The SEU evaluates natural and human-caused safety hazards that affect existing and future development and provides guidelines for protecting the community from harm. The SEU describes existing and potential future conditions and sets policies for improved public safety. The goal of the SEU is to reduce the risk of injury, death, property loss, and other hardships to acceptable levels.

As part of the proposed updates the City has requested a Sacred Lands File (SLF) search by the NAHC. The result of the SLF search conducted through the NAHC was *negative* for the Project site. The City of Rolling Hills is a rural, equestrian residential community, consisting entirely of large lot residential parcels of one acre or more (Figure 1). The community encompasses 2.99 square miles of land (approximately 1,910 acres) on the Palos Verdes Peninsula in the County of Los Angeles.

Please consider this letter notification and preliminary Project information as the initiation of the SB 18 and AB 52 requests for consultation. Pursuant to PRC 21080.3.1(d), the Gabrielino Tongva Indians of California Tribal Council have 30 days upon receipt of this letter to provide a request for AB 52 consultation on the Project. Pursuant to GC 65352.3, the Gabrielino Tongva Indians of California Tribal Council have 90 days upon receipt of this letter to provide a request for SB 18 consultation. Due to the abbreviated timeline regarding funding opportunities for this affordable housing Project, we respectfully ask that requests for SB 18 consultation also be provided within 45 days, if practicable.

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Your comments are important to the City of Rolling Hills. If the Gabrielino Tongva Indians of California Tribal Council have any concerns regarding the proposed Project as it relates to Native American issues or interests, or has any information regarding sacred sites in the vicinity of the proposed Project that may help avoid impacts to those sites, please send your response to:

**John F. Signo, AICP**

**Director of Planning and Community Services**

<image006.jpg>     **City of Rolling Hills – City Hall**  
2 Portuguese Bend Road, Rolling Hills CA 90274  
O: 310.377.1521 | F: 310.377.7288  
[jsigno@cityofrh.net](mailto:jsigno@cityofrh.net)

### **Attachments – Project Location Map**

**Kellie Kandybowicz** | Cultural Resources Specialist

<image002.png>  
t | 858.541.2800 x7140 f | 866.261.3100 m | 760.521.9005

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<21330\_CityofRollingHillsHousing&SafetyElementProject\_20211215\_Conley.pdf><21330 PLAN Fig 1 Project Location\_small.pdf>

<SB18-AB52 Letter Gabrielino Tongva Indians of California Tribal Council.pdf>