

The Old Road over Santa Clara River and the Southern Pacific Transportation Company Bridge, et al. Project

LOS ANGELES COUNTY, CALIFORNIA
DISTRICT 7 – LA – BRLS-5953(601) & STPL-5953(682)



Final Environmental Impact Report/ Environmental Assessment with Finding of No Significant Impact

Prepared for: California Department of Transportation and
Los Angeles County Department of Public Works

The environmental review, consultation, and any other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by Caltrans pursuant to 23 USC 327 and the Memorandum of Understanding dated May 27, 2022, and executed by FHWA and Caltrans.



June 2025

General Information about This Document

The California Department of Transportation (Caltrans), as assigned by Federal Highway Administration (FHWA), has prepared this Final Environmental Impact Report/Environmental Assessment (EIR/EA), with Finding of No Significant Impact for The Old Road over Santa Clara River and the Southern Pacific Transportation Company Bridge, et al. Project (proposed project) in Los Angeles County, California. Caltrans is the lead agency under the National Environmental Policy Act (NEPA), and Los Angeles County Public Works is the lead agency for the California Environmental Quality Act (CEQA). The proposed project would widen and improve The Old Road between Henry Mayo Drive and Magic Mountain Parkway in northern Los Angeles County. The document explains why the project is being proposed, what alternatives have been considered, and how the existing environment could be affected project implementation. It also describes the potential impacts of each of the alternatives and the proposed avoidance, minimization, and/or mitigation measures. The Draft EIR/EA was circulated to the public for 52 days between February 27, 2024, and April 18, 2024. Comments that were received during this period are included in Chapter 4. Elsewhere throughout this document, a vertical line in the margin indicates a change made since the draft document circulation. Minor editorial changes and clarifications have not been so indicated. Additional copies of this document and the related technical studies are available for review at 900 S. Fremont Avenue, 11th Floor in Alhambra, California. This document is available online at the following website: <https://pw.lacounty.gov/projects/the-old-road-over-santa-clara-river/>.

Alternative Formats:

For individuals with sensory disabilities, this document can be made available in Braille, in large print, on audiocassette, or on computer disk. For reasonable ADA and Title VI accommodations, interpreting services, and materials in other languages, please contact Public Works at (626) 979-5333.

The Old Road over Santa Clara River and the Southern Pacific Transportation Company Bridge, et al. Project

Widen and improve The Old Road between Henry Mayo Drive and Magic Mountain Parkway in
unincorporated Los Angeles County.

Final Environmental Impact Report/ Environmental Assessment with Finding of No Significant Impact

Submitted pursuant to: (State) Division 13, California Public Resources Code
(Federal) 42 USC 4332(2)(C)

The California Department of Transportation
and
Los Angeles County Public Works

Cooperating Agencies: United States Fish and Wildlife Service, United States Army Corps of
Engineers

Responsible Agencies: California Transportation Commission, California Department of Fish
and Wildlife

07/08/2025

Date



Gloria Roberts
District Director
California Department of Transportation
District 7
NEPA Lead Agency

June 24, 2025

Date



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**California Department of Transportation
Finding of No Significant Impact (FONSI)**

FOR

**The Old Road over Santa Clara River and the
Southern Pacific Transportation Company Bridge, et al. Project**

The California Department of Transportation (Caltrans) and the Los Angeles County Department of Public Works has determined that the Build Alternative will have no significant impact on the human environment. This FONSI is based on the attached Environmental Assessment (EA) and supporting technical studies which have been independently evaluated by Caltrans and determined to adequately and accurately discuss the need, environmental issues, and impacts of the proposed project and appropriate mitigation measures. It provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required. Caltrans takes full responsibility for the accuracy, scope, and content of the attached EA and technical studies.

The environmental review, consultation, and any other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by Caltrans pursuant to 23 USC 327 and the Memorandum of Understanding dated May 27, 2022, executed by FHWA and Caltrans.



Gloria Roberts
District Director
California Department of Transportation
District 7

07/08/2025

Date

Summary

NEPA Assignment

California participated in the “Surface Transportation Project Delivery Pilot Program” (Pilot Program) pursuant to 23 USC 327, for more than five years, beginning on July 1, 2007, and ending September 30, 2012. MAP-21 (P.L. 112-141), signed by President Obama on July 6, 2012, amended 23 USC 327 to establish a permanent Surface Transportation Project Delivery Program. As a result, the Department entered into a Memorandum of Understanding (MOU) pursuant to 23 USC 327 ([NEPA Assignment MOU](#)) with FHWA. The NEPA Assignment MOU became effective October 1, 2012, and was renewed on May 27, 2022, for a term of ten years. In summary, the Department continues to assume FHWA responsibilities under NEPA and other federal environmental laws in the same manner as was assigned under the Pilot Program, with minor changes. With NEPA Assignment, FHWA assigned and the Department assumed all of the United States Department of Transportation (USDOT) Secretary’s responsibilities under NEPA. This assignment includes projects on the State Highway System and Local Assistance Projects off the State Highway System within the State of California, except for certain categorical exclusions that FHWA assigned to the Department under the [23 USC 326 CE Assignment MOU](#), projects excluded by definition, and specific project exclusions.

Joint NEPA/CEQA Document

The Old Road over Santa Clara River and the Southern Pacific Transportation Company (SPT Co.) Bridge, et al. Project (proposed project) is subject to federal, as well as to Los Angeles County and state environmental review requirements because the Los Angeles County Department of Public Works (LACPW) proposes the use of federal funds from Federal Highway Administration (FHWA) and/or the proposed project requires an approval from FHWA. Project documentation, therefore, has been prepared in compliance with both the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA). The LACPW is the project proponent and the lead agency under CEQA. FHWA’s responsibility for environmental review, consultation, and any other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by Caltrans pursuant to 23 United States Code 327 (23 USC 327) and the Memorandum of Understanding dated May 27, 2022, and executed by FHWA and Caltrans. With NEPA Assignment, FHWA assigned and the Department assumed all of the United States Department of Transportation (USDOT) Secretary’s responsibilities under NEPA. This assignment includes projects on the State Highway System and Local Assistance Projects off the State Highway System within the State of California, except for certain categorical exclusions that FHWA assigned to the Department under the [23 USC 326 CE Assignment MOU](#), projects excluded by definition, and specific project exclusions.

Some impacts determined to be significant under CEQA may not lead to a determination of significance under NEPA. Because NEPA is concerned with the significance of the proposed project as a whole, often a “lower level” document is prepared for NEPA. One of the most common joint document types is an Environmental Impact Report/Environmental Assessment (EIR/EA).

After receiving comments from the public and reviewing agencies, this Final EIR/EA has been prepared. The Final EIR/EA includes responses to comments received on the Draft EIR/EA and identifies the preferred alternative, the Build Alternative. A Notice of Determination (NOD) will be

published for compliance with CEQA, and the Department will issue a Finding of No Significant Impact (FONSI) for compliance with NEPA. A Notice of Availability (NOA) of the FONSI will be sent to the affected units of the federal, state, and local government, and to the State Clearinghouse in compliance with Executive Order 12372.

Project Overview

LACPW proposes to implement the proposed project in Los Angeles County, California. The project area is within a variable 140 to 160-foot-wide variable right-of-way (ROW) that runs in a north/south direction, parallel to Interstate 5 (I-5) through Santa Clarita Valley. The roadway's southern terminus is the junction of San Fernando Road and Sierra Highway in Los Angeles County; the northern terminus is roughly at Oak Court in the unincorporated community of Castaic (north of Lake Hughes Road). Major intersections along The Old Road within the project limits include Sky View Lane, Rye Canyon Road, the I-5 SB ramps, Henry Mayo Drive, and the State Route 126 overcrossing.

The approximately 2-mile project corridor is in the unincorporated community of Stevenson Ranch in the northern part of Los Angeles County, as well as in the City of Santa Clarita. Thus, the project area is subject to the policies in the Los Angeles County General Plan and the Santa Clarita Valley Area Plan, which are components of the Los Angeles County General Plan. The project area also is subject to the policies in the City of Santa Clarita General Plan. The land use within the project corridor is primarily commercial, with industrial areas to the north and residential areas south and west of the project area.

The analysis of the proposed project considered a Build Alternative and a No-Build Alternative. The Build Alternative would consist of reconstruction and widening of The Old Road, replacement of two bridges, reconstruction and widening of Rye Canyon Road, and reconstruction and widening of Sky View Lane, including reconfiguration of its intersection with The Old Road. Bicycle lanes, raised medians, sidewalks, and barriers to separate pedestrians from the travel way also would be constructed. Fiber optic communication would be installed along The Old Road, and utilities would be relocated as needed. Reconstruction of existing drainage facilities and catch basins as well as construction of new drainage facilities and catch basins would be completed as needed. Other alternatives were considered but eliminated because they did not meet the proposed project's purpose and need (refer to Section 1.3.4).

The purpose of the proposed project is to address deficiencies in the project area and improve the adjacent roadway system. The adjacent roadway system includes the connecting roads and intersections to The Old Road. The proposed project would relieve congestion, increase regional roadway capacity to accommodate the expected future traffic growth projections, enhance traffic and road safety, upgrade structural safety, and meet jurisdictional goals and policies for the project area. Current intersections and traffic demands in the project area meet or exceed the roadway capacity for many of the arterial roadways. Substantial increases in traffic demand are anticipated over the next few years, based on projected growth in the area. The Old Road over the Santa Clara River Bridge currently is not high enough to allow the anticipated volume of water from an LACPW capital flood event (defined as a 50-year burned and bulked storm) to pass under it, and the bridge currently is classified as Structurally Deficient per FHWA standards for seismic, flood, and highway design.

Project Impacts

Table S-1 summarizes and compares the potential effects of Alternative 1, the Build Alternative, and Alternative 2, the No-Build Alternative. The project features and avoidance, minimization, and/or mitigation measures to reduce the effects of the Build Alternative also are shown in the table. A complete description of potential effects and recommended measures are provided in the specific sections of Chapters 2 and 3.

Table S-1: Summary of Impacts, Project Features, Avoidance, Minimization, and/or Mitigation Measures

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
Existing and Future Land Use	None.	The Build Alternative design would require some right-of-way (ROW) acquisitions. It would avoid impacts on existing built land uses to the extent practicable and during final design, efforts would be undertaken to further minimize construction and operation impacts on existing and planned land uses.	COM-1: Maintain access and parking throughout construction. Before construction, Los Angeles County Department of Public Works (LACPW) will reconfigure access and parking to residential and commercial lots, to allow continued availability of that parking and access.
Consistency with State, Regional, and Local Plans and Programs	The No-Build Alternative is inconsistent with various goals and policies shown in Table 2-3, Consistency with Plans and Policies, including the Southern California Association of Governments, Federal Transportation Improvement Program, Connect SoCal, and others.	None. The Build Alternative would be generally consistent with applicable plans and policies.	None.
Parks and Recreational Facilities	None.	None. The Build Alternative would include an extension of the Multi-Use Trail and would construct Class IV bike lanes, pedestrian pathways, and an equestrian trail, which would improve connectivity and increase recreational opportunities in the area. Construction activities would not restrict access to Six Flags Magic Mountain. No other park or recreation areas are in the immediate proposed project area; therefore, no impacts on parks and recreation would occur.	None.

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Farmlands	None.	None. Under the Build Alternative, improvements to The Old Road would occur in areas designated as Prime and Unique Farmland. As shown in Table 2-4, Alternative 2 would result in impacts on Prime Farmland, Unique Farmland, and Grazing Land as a result of partial acquisitions on those parcels. However, potential impacts on farmland would be 1.08 acres of farmland conversion to a transportation use. This land is not currently utilized as farmland, and there are no future plans to utilize it for agricultural uses. The property owner, Newhall Land and Farming Company, intends to develop these parcels into a housing tract development known as Entrada North (Los Angeles County Tentative Tract Map Number [No.] 071377).	None.
Growth	None.	None. The Build Alternative improvements are not expected to influence travel behavior, trip patterns, or the attractiveness of some areas to development over others. This alternative would not remove an impediment to growth because it would not provide an entirely new public facility.	None.
Community Character and Cohesion	None.	None. The Build Alternative would be built along an existing transportation corridor and would not divide existing neighborhoods/communities. In addition, the Build Alternative would not result in adverse impacts being predominately borne by a minority or low-income population, nor would adverse impacts be appreciably more severe to these populations.	None.

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
Relocations and Real Property Acquisition	None.	Under the Build Alternative, temporary construction, permanent drainage, and roadway ROW easements would be required on portions of several properties within the proposed project boundaries. A summary of the Assessor Parcel Numbers (APNs), street address, current owner, current occupant or land use, and ROW acquisition type of each parcel within the proposed project boundaries is shown in Table 2-11. At this preliminary stage of Build Alternative design, the Build Alternative is anticipated to require one full property acquisition; partial property acquisitions from 13 properties; and 20 temporary construction easements to accommodate roadway widening. All property owners and tenants will be made aware of any potential impacts on businesses and all businesses would be able to remain open during Build Alternative construction. The actual impacts on properties will be determined during the Build Alternative's final design phase. The Build Alternative would require the full acquisition of one vacant parcel and partial acquisitions from vacant, public utility, and commercial/industrial properties. Adverse impacts as a result of relocations and property acquisition are anticipated, and the property owner would be compensated for its loss in the property under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Throughout the proposed project area, temporary construction easements would be needed for construction access and	REL-1: Where acquisition is unavoidable, the provisions of the Uniform Act and the 1987 Amendments, as implemented by the Uniform Relocation Assistance and Real Property Acquisition Regulations for Federal and Federally Assisted Programs adopted by the U.S. Department of Transportation (March 2, 1989) and where applicable, the California Public Park Preservation Act of 1971, will be followed. An appraisal of the affected property will be obtained, and an offer for the full appraisal will be made. REL-2: Advance notice will be provided to property owners and business owners on the project construction schedule, to minimize disruptions.

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		staging. No residential or commercial properties would be displaced, and no relocation of residential units would be required with implementation of the Build Alternative.	
Environmental Justice	None.	None. The Build Alternative would not cause disproportionately high and adverse effects on any minority or low-income populations in accordance with the provisions of Executive Order 12898.	None.
Utilities/Emergency Services	None.	All utility service and emergency services/access will be maintained during construction. It would not result in long-term effects on utilities or emergency services. No impacts would occur on emergency services under the Build Alternative. Utilities within the proposed project boundary include electrical poles and cables, gas lines, oil lines, communication lines, water lines, and sanitation lines. Utilities that are currently located overhead would be placed underground. Where possible, some utility lines would be preserved in place and encased in concrete, while others would be relocated. The contractor would make the final determination during construction. Utility relocations would not exceed a maximum depth of 30 feet and would not go outside of the footprint of the existing ROW. LACPW would keep residents, businesses, community facilities, the surrounding community, and any service providers in the affected area informed about the proposed project construction schedule	COM-2: Provision will be made for motorist information (i.e., existing changeable message signs [CMSs], portable CMSs, stationary ground mounted signs). COM-3: To the extent possible, incorporation of traffic circulation construction strategies will be implemented (i.e., lane closure restrictions during holidays and special local events, closure of secondary streets during construction to allow quick construction and reopening, lane modification to maintain the number of lanes needed, allowing night work and extended weekend work, maintaining business access, and maintaining pedestrian and bicycle access). COM-4: Implementation of alternate and detour routes strategies, and street/intersection improvements will occur (e.g., widening, pavement rehabilitation, removal of median), to provide added capacity to handle detour traffic; signal improvements; make adjustments in signal timing, and/or signal coordination to increase vehicle throughput, improve traffic flow, and optimize intersection capacity; set restrictions at intersections and roadways necessary to reduce congestion and improve safety; and enforce parking restrictions on alternate and detour routes during work hours to

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		and traffic-affected areas, following traffic notification procedures.	increase capacity, reduce traffic conflicts, and improve access. COM-5: Close coordination will occur with utility service providers and emergency service providers, and a public outreach program will be implemented to minimize impacts on surrounding communities.
Traffic and Transportation/Pedestrian and Bicycle Facilities	None.	The Build Alternative would widen The Old Road from Magic Mountain Parkway north to Henry Mayo Drive near the State Route 126 / Interstate 5 (I-5) interchange and replace two bridges along The Old Road (one over Santa Clara River and another over Union Pacific Railroad [UPRR] tracks). The Build Alternative would also include an extension of the existing Multi-Use Trail, which would include bike lanes, a paved pedestrian path, and an equestrian trail. The widening of Rye Canyon is assumed to have been completed by 2026 as part of the Build Alternative; therefore, the Build conditions reflect widenings of The Old Road and Rye Canyon Road. The proposed project would alter the alignment of The Old Road, Sky View Lane, and Rye Canyon Road to better facilitate traffic flow in the area. Temporary impacts on traffic would occur during construction of the proposed project.	As discussed in Section 2.2.7, avoidance, minimization, and/or mitigation measures (AMMs) COM-2 through COM-4 would be implemented to reduce or eliminate temporary effects on traffic and emergency services. Once operational, the proposed project would improve traffic flow and, therefore, enhance emergency access in the area. As such, impacts would be less than significant.
Visual/Aesthetics	None.	There would be short-term and temporary impacts on visual resources during the construction of the Build Alternative. Construction activities including removing existing vegetation, construction equipment, staging areas, and materials; and the construction site itself would have adverse effects on the visual environment	VIS-1: Directional lighting aimed downward at a work site will be used during project construction where appropriate in the project area. VIS-2: A textured finish on the proposed retaining wall on Rye Canyon Road at I-5 will be included to discourage graffiti.

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		for some viewer groups. Construction is anticipated to occur during the day. Any nighttime activities would be limited, but it would be necessary to provide construction lighting at night that could potentially add new sources of light and glare for residents and motorists. Operational impacts would not be adverse.	
Cultural Resources	None.	There is a potential for previously unknown cultural and historical resources to be discovered during construction of the Build Alternative.	CR-1: All workers will participate in a Worker Environmental Awareness Program for cultural resources. Sign-in sheets will be maintained to document completion of the program by each worker. This training can be administered in-person by or under the supervision of, a Secretary of the Interior (SOI) qualified archaeologist or through screening of a video/slide presentation, prepared by an SOI-qualified archaeologist and overseen by an on-site manager. Contractor education will include the legal framework protecting cultural resources, typical kinds of cultural resources that may be found during project construction, artifacts that would be considered potentially significant, and proper procedures and notifications if cultural resources are discovered. The training will review types of cultural resources and artifacts that would be considered potentially significant to support operator recognition of these materials during construction. Native American tribe(s) traditionally and culturally affiliated with the project area will be given the opportunity to participate in the cultural resource training, to provide project personnel with tribal perspectives on working in areas sensitive for tribal cultural resources. CR-2: If cultural materials are discovered during construction, all earth-moving activity within 60 feet of the find will be diverted until an SOI-

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			qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures. CR-3: If human remains are discovered, Section 7050.5 of the California Health and Safety Code states that further disturbances and activities will cease in any area or nearby area suspected to overlie remains, and the County Coroner will be contacted. For the proposed project, work in the immediate vicinity (within a 100-foot buffer of the find) will cease in the event that human remains and/or funerary object(s) are encountered.
Tribal Cultural Resources	None.	Based on Assembly Bill 52 consultation results, the project has the potential to impact previously unknown tribal cultural resources during construction of the Build Alternative.	TCR-1: Any and all archaeological documents created as a part of the project (e.g., isolate records, site records, survey reports, testing reports, monitoring reports) shall be provided to consulting tribes upon request. TCR-2: The project applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians to observe the following ground-disturbing activities from the project limits at Henry Mayo Drive to the northernmost drainage improvement: grading, excavating, digging, or similar activity. Tribal monitoring services will continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to tribal monitoring are complete. If the project's scheduled ground-disturbing activities require intermittent tribal monitoring, notification shall be submitted to the consulting Tribe in writing with 5 days' notice (if possible) prior to the start of scheduled ground disturbing activities. If tribal cultural resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of the discovery,

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			and an SOI-qualified archaeologist retained by the project applicant as well as the Tribal Monitor will assess the find. TCR-3: The Lead Agency and/or project applicant shall, in good faith, consult with consulting tribes on the disposition and treatment of any tribal cultural resources encountered during all ground-disturbing activities. TCR-4: If human remains and/or funerary object(s) are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the Los Angeles County Coroner will be contacted pursuant to Section 7050.5 of the Health and Safety Code, which will be enforced for the duration of the project. In accordance with Public Resources Code, Section 5097.98, the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the NAHC, should those discoveries be determined as Native American in origin.
Hydrology and Floodplain	None.	The Build Alternative is anticipated to cause a maximum increase of 6 inches to the Federal Emergency Management Agency 100-year base flood elevation (BFE). Hydraulic Analysis results indicated that BFEs decreased upstream of the proposed bridge compared to existing conditions. Additionally, results showed no rise in BFEs downstream of river station 8714.1. The corresponding increase in the horizontal extents of the existing base floodplain is maximum of 5 feet in width, occurring predominantly within the floodplains upstream of the I-5 Bridge.	HYD-1: Any disturbed aquatic or wetland habitat will need to be restored or enhanced from existing conditions, such as revegetation, BMPs, and other applicable actions that meet the requirements of the environmental permitting of the proposed project. Where temporary disturbance areas are unavoidable, the disturbance will be minimized to the maximum extent possible, and the area will be restored or enhanced as compared to existing conditions on completion of the bridge construction. Permanent impact areas will be mitigated by restoring and enhancing nearby degraded areas of wetland/riparian habitat.

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			HYD-2: The proposed The Old Road Bridge will be designed to maintain current or improved levels of fish passage in the mainstem of the Santa Clara River. The Old Road Bridge also will be designed so that the proposed piles will not encroach into the active channel during the summer construction season, from June through September.
Water Quality and Storm Water Runoff	None.	Implementation of the Build Alternative would involve temporary soil disturbance during construction activities (i.e., building the roadways and bike lanes, associated curbs and gutters, sidewalks, wheelchair ramps, driveways, bridges, retaining walls, storm drainage improvements and bioswales, and relocating utilities). Approximately 54 acres of soil would be disturbed for construction of the Build Alternative. Implementation of the Build Alternative would result in a net increase of approximately 43 acres of impervious area.	Storm water management for the proposed project includes both short-term (construction phase) and long-term (postconstruction/ maintenance) measures. Short-term measures focus on implementing construction site BMPs designed to reduce erosion and subsequent sediment transport; long-term measures consider factors such as increased storm water runoff caused by the added impervious surface. Compliance with the standard requirements of the Construction General Permit and the County Municipal Permit for potential short-term and long-term impacts (listed below in AMMs WQ-1 and WQ-2) would be required. WQ-1: In accordance with the Construction General Permit, Order WQ 2022-0057-DWQ, NPDES NO. CAS000002, an SWPPP will be prepared and implemented to address all construction-related activities, equipment, and materials that will have the potential to affect water quality. The SWPPP will identify the sources of pollutants that may affect the quality of stormwater; include construction site BMPs to control pollutants and sediment; and provide for construction materials management and non-stormwater BMPs. All construction site BMPs will follow the latest edition of the LACPW Construction Site BMP Manual, to control and minimize the impacts of construction-related activities, materials, and pollutants on the

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			watershed. These BMPs will include temporary sediment controls, temporary soil stabilization, scheduling management, waste management, materials handling, and other non-stormwater BMPs. WQ-2: In compliance with Municipal Permit Order No. R4-2021-0105 requirements, a final project-specific Standard Urban Stormwater Mitigation Plan will be prepared. Bioswales will be constructed in roadway medians to provide water quality treatment in addition to conveying stormwater runoff. The bioswales will provide pollutant removal through settling and filtration in the vegetation lining the channels, and they also will provide the opportunity for volume reduction through infiltration and evapotranspiration. Disturbed soil areas, including slopes, will be reseeded using a California native plant seed blend. An erosion control seed mix (hydroseed) will be applied on all select material areas and slopes flatter than 1:1. Erosion control (bonded fiber matrix) will be applied on all cut slopes steeper than 1:1. As vegetation establishes in disturbed areas and cut slopes stabilize, the potential for suspended sediments coming from the project area into receiving waters gradually will be reduced.
Geology/Soils/Seismic/Topography	None.	Construction and Operation of the Build Alternative would not be anticipated to cause visual impacts on the geologic or topographic features in the proposed project vicinity. Proposed improvements associated with the Build Alternative would improve safety by adding bike lanes, a pedestrian path, and an equestrian trail, and enhancing roadway and bridge safety.	WQ-1 and WQ-2 would minimize impacts on Geology/Soils/Seismic/Topography resource areas.
Paleontology	None.	There are no known recorded fossil locations within one mile of the project.	PAL-1: Paleontological Resources Monitoring and Mitigation Plan: Before construction-related

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		However, during construction, the Built Alternative could have direct or indirect impacts on paleontological resources, particularly at depth (where drilling or augering takes place) as well as any ground disturbance in the old terrace sediments mapped as Qog.	excavations, a qualified paleontologist meeting the 2010 Society of Vertebrate Paleontology standards will be retained to develop a Paleontological Resources Monitoring and Mitigation Plan (PRIMMP). The plan will address qualifications of paleontological monitors and will stipulate that the qualified paleontologist and the paleontological resource monitors be empowered to stop excavation activity to investigate or safely remove possible fossils. The plan will incorporate the findings of the project's geotechnical report and construction plans to formulate what construction activities will be monitored, and the plan will include wet screening of boring or drilling spoils. Many paleontological mitigation efforts have recovered significant paleontological resources, especially microvertebrate fossils, from screening of such spoils. The plan also will address unexpected discoveries of paleontological resources. PAL-2: Paleontological Monitoring and Mitigation of Impacts from Construction. A qualified paleontologist will attend the preconstruction meeting and present a Worker Environmental Awareness Program (WEAP) to the project construction personnel. The Worker Environmental Awareness Program training will discuss the types of fossils that potentially may be uncovered during project excavations, laws protecting paleontological resources, and appropriate actions to be taken when fossils are discovered. A qualified paleontologist will oversee that the PRIMMP instructions are implemented. A qualified paleontologist will produce a final paleontological monitoring report that discusses the paleontological monitoring program, any paleontological discoveries, and the preparation, curation, and accessioning of

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			any fossils into a suitable paleontological repository.
Hazardous Waste/Materials	None.	With the exception of soil in the vicinity of boring B97 and B103. AMMs would be incorporated for the excavation and transport of soils to an appropriate disposal facility, the soil within the remainder of the Phase 2 project limits is considered as nonhazardous/unrestricted or suitable for reuse onsite. The Build Alternative would avoid impacts on hazardous wastes or materials to the extent practicable while adhering to design and operational criteria to maintain a safe roadway.	HAZ-1: If the plugged oil/gas well within the central portion of the project area is disturbed during project construction, it will be re-abandoned in accordance with current CalGEM regulations. In addition, because of the informal agreement between CalGEM and LACPW's Environmental Programs Division, a gas mitigation plan will be obtained and submitted to CalGEM. HAZ-2: Crude oil/liquid petroleum pipelines run along The Old Road in the project area. If the pipelines are exposed and/or relocated, impacts on the subsurface may be encountered. Impacts on the subsurface that are discovered from these pipelines and any repairs to the pipelines will be the responsibility of the pipeline owner. HAZ-3: The proposed project includes upgrades to traffic signal equipment and relocation/installation of traffic pole standards and traffic signal equipment as necessary because of new lane configurations, which may generate universal wastes and electronic wastes (E-wastes). Universal wastes and E-wastes generated as part of the proposed project will be disposed appropriately, in accordance with applicable regulations. HAZ-4: Aerially deposited lea (ADL) may be present in the unpaved areas adjacent to roadways, which, if disturbed, will be evaluated to ensure worker safety. If excavated/excess soils are transported from the project area, they will be sampled and handled in accordance with applicable regulations to protect worker safety and for classification. The potential presence of ADL will be addressed during the Plan,

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			Specifications, and Estimates phase and will be handled in accordance with LACPW Special Provisions. A Lead Compliance Plan under LACPW Special Provisions will be required during construction when handling lead-contaminated soils. HAZ-5: The proposed project includes the replacement of two bridges (over Santa Clara River and the abandoned UPRR tracks). Demolition of the two existing bridges will be subject to the National Emissions Standards for Hazardous Air Pollutants regulations. The regulations require notification to the delegated air district before demolition of concrete structures, regardless of whether asbestos is detected. The regulations require that an ACM Survey be conducted, and that the survey report be part of the notification submittal to the regulatory agency. The ACM survey will be conducted by a Certified Asbestos Consultant (CAC), and samples will be collected from concrete, brown fibrous expansion joint fill material, and other materials that the CAC suspects to contain asbestos. HAZ-6: Suspect lead-based paint associated with painted curbs, poles, protective bollards, and fire hydrants in the project area, including railings, fencing, metal beams, and other exposed metal elements associated with the bridges will be sampled and handled in accordance with applicable regulations to protect worker safety and for classification. The removal and testing of bridge paint and pavement markings, including painted curbs, will be managed during construction under specific LACPW Special Provisions. A Lead Compliance Plan under LACPW Special Provisions will be required during construction when removing

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			lead-based paint, thermoplastics, painted traffic stripes, and/or pavement markings. HAZ-7: Thermoplastic paint and yellow-painted traffic stripes/pavement markings, which typically contain lead chromate, have been used for marking in the project area (roadway and curbs), and these markings will require special removal, handling, and disposal. The removal and testing of all thermoplastic paint and pavement markings will be managed during construction in accordance with LACPW Special Provisions. HAZ-8: Utility relocations will be performed at several intersections because of widening of The Old Road and for bridge improvements. Reconstruction of drainage facilities and catch basins and construction of new drainage facilities and catch basins will be conducted, as needed. Dewatering activities will not be part of the utility relocations in the project area. HAZ-9: If soil in the area of the abandoned UPRR railroad tracks and Multi-Use Trail extension is excavated and off-site disposal is necessary, the soil will be sampled and analyzed for the potential presence of petroleum hydrocarbons, volatile organic compounds (VOCs), metals, herbicides, and pesticides. During construction, soil excavations that are conducted on site will be monitored for visible soil staining and odor. Affected soil will be disposed off-site in accordance with applicable local, State, and federal regulatory guidelines. HAZ-10: TWW (e.g., utility poles, roadside wooden signposts, metal-beam guardrail posts, former railroad ties) will be handled appropriately, in accordance with applicable

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			regulations and may require special removal, handling, and disposal. All TWW will be managed during construction in accordance with LACPW Special Provisions if TWW is generated. HAZ-11: When contractors are working in the project area and removing soil and/or groundwater, they will be trained to be aware of appropriate handling and disposal methods or options. Higher levels of potential contaminants may be present at some locations; therefore, material to be moved or removed may require individual or specific testing to verify that it is at levels below regulatory action limits. HAZ-12: Construction of the bridge piles may encounter groundwater, based on the 1997 Seismic Hazard Report for the Newhall Quadrangle. Therefore, the slurry displacement method of construction will be used and will be specified in Section B of the bridge specifications. After groundwater is encountered, drilling slurry will be placed in the hole to an elevation of 10 feet above the groundwater. As drilling progresses, drilling slurry will be added to the hole to maintain the same elevation of 10 feet above the groundwater. The slurry displacement method will contain any debris with concrete barriers and plastic sheeting. Groundwater is not anticipated from the slurry displacement method of construction, and any debris will be placed into Baker tanks. HAZ-13: Section 4216 of the California Government Code requires that any operator or excavator will call Underground Services Alert of California ("DigAlert") 2 working days before any planned excavation, by dialing 811. Delineation

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			of the proposed excavation area will be mandatory. The area to be excavated will be marked with water-soluble or chalk-based white paint on paved surfaces, or with other suitable markings such as flags or stakes on unpaved areas, before calling DigAlert. HAZ-14: A site-specific Health and Safety Plan will be prepared, consistent with LACPW Special Provisions requirements. The Health and Safety Plan will include identification of key personnel; a summary of risk assessment for workers, the community, and the environment; an air monitoring plan; and an emergency response plan. HAZ-15: As is the case for any project that proposes excavation, the potential exists for unknown hazardous contamination to be revealed during project construction. For any previously unknown hazardous wastes/materials encountered during construction, the procedures outlined in LACPW Special Provisions and Procedures will be followed and implemented during construction activities, as well as SCAQMD Rule 1166 and SCAQMD Rule 1466. HAZ-16: During construction activities, all relevant BMPs will be implemented, including temporary construction site BMPs and the regulatory permit compliance component for the State's Construction General Permit for applicability of an SWPPP (based in part on the disturbed soil areas, shown on the phased plans) and compliance with the County's MS4 NPDES permit as well as adherence to the County's Construction Site BMP Manual and SWPPP preparation manual.

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
Air Quality	None.	The Build Alternative would result in higher pollutant emissions relating to construction emissions than the No-Build Alternative because the no-build alternative would not result in construction emissions at all. Regarding operational emissions, the Build Alternative would result in lower gaseous criteria pollutant (nitrogen oxides, carbon monoxide, and reactive organic gases/volatile organic compounds) emissions than the No-Build Alternative and Existing Conditions because of improvements in vehicle delay and turnover of the regional vehicle fleet. Slight increases in particles of 10 micrometers or smaller (PM₁₀) and particles of 2.5 micrometers and smaller (PM_{2.5}) emissions are attributed to fugitive dust associated with break wear, tire wear, and resuspended road dust, which combined constitute over 90% of particulate matter emissions from vehicle travel on roadways.	AQ-1: Construction Emissions. Site preparation and roadway construction will include clearing, cut-and-fill activities, grading, removing or improving existing roadways, and paving roadway surfaces. During construction, short-term degradation of air quality will occur from the release of particulate emissions (airborne dust), generated by excavation, grading, hauling, and other activities related to construction. Implementation of the following avoidance, minimization, and/or mitigation measures will minimize construction emissions: The construction contractor will comply with LACPW Special Provisions. Section 14-9-02 specifically will require compliance by the contractor with all applicable laws and regulations related to air quality, including the Air Pollution Control District and Air Quality Management District regulations and local ordinances. Construction equipment and vehicles will be properly tuned and maintained. All construction equipment will use low-sulfur fuel, as required under Title 17, Section 93114 of the CCR. The construction contractor will comply with SCAQMD rules, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). Diesel-powered off-road equipment will limit idling in accordance with the CARB's Regulation for In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 and approved amendments). Diesel-powered on-road vehicles and trucks will limit idling in accordance with the CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (13 CCR 2485).

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Noise	None.	None. Construction equipment is expected to generate noise levels ranging from 70 to 90 dB at a distance of 50 feet, and noise produced by construction equipment would be reduced over distance at a rate of about 6 dB per doubling of distance. No adverse noise impacts from construction are anticipated because construction would be conducted in accordance with Caltrans Standard Specifications Section 14.8-02. Construction noise would be short-term, intermittent, and overshadowed by local traffic noise.	None.
Energy	None.	None. The Build Alternative is not anticipated to result in adverse direct energy impacts during construction. Energy consumption during construction would be conserved and minimized to the maximum extent feasible. Energy conservation in construction activities is assumed, as the construction contractor would have a financial incentive and statutory mandate to minimize waste and externalities, respectively. Operationally, the Build Alternative would enable The Old Road corridor to maximize productivity through improvements to the capacity of the roadway lanes allowing for more flexibility in traffic movement and higher efficiencies. In addition, the Build Alternative would construct a Class IV bikeway, which would improve safety for cyclists and provide additional options for non-motorized travel.	None.

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Natural Communities	None.	Implementation of the Build Alternative would result in permanent and temporary direct impacts on California Buckwheat Scrub, Fremont Cottonwood Forest and Woodland, and Elderberry Stand, which are summarized by acreage in Table 2-48. Indirect impacts on sensitive vegetation communities may also occur from construction and use of the Build Alternative. Temporary indirect impacts, such as construction fugitive dust (which can coat vegetation and reduce photosynthesis), sedimentation and erosion, and construction-generated trash/debris and unauthorized trespass could all adversely impact vegetation. The Build Alternative also has the potential for longer term impacts, such as the proliferation of invasive species through ground disturbing activities, which may indirectly degrade adjacent native vegetation communities. Indirect impacts may also occur in the form of increased potential for wildland fire and pollution in Santa Clara River. There is also the potential for disturbance to the root zones of adjacent native trees.	To minimize potential impacts of the proposed project on sensitive vegetation communities, the following measures will be incorporated into the proposed project design: VEG-1: Bridge construction activities will occur during dry portions of the year, to reduce impacts on the low-flow channel. The limits of grading and temporary work areas will be demarked with high-visibility construction exclusion fencing adjacent to areas with sensitive vegetation communities, to avoid unintentional encroachment into these sensitive areas. Signage will be posted, identifying the excluded areas as Environmentally Sensitive Areas. VEG-2: The project will incorporate storm drain systems to facilitate meeting water quality requirements and for stormwater management, which will minimize erosion and degradation of habitat around the bridge. VEG-3: Standard fugitive dust BMPs, and those required by a SWPPP (e.g., a water truck), will be utilized to reduce impacts of construction-generated erosion and sedimentation into the adjacent Environmentally Sensitive Areas. VEG-4: BMPs will be implemented so that invasive plant material is not spread from the project area to other areas, during disposal off-site or from tracking seed on equipment, clothing, and shoes. Equipment/material imported from an area of invasive plants will be identified, and measures will be implemented to prevent importation and spreading of non native plant material within the project area. All construction equipment will be cleaned thoroughly to remove dirt, seeds, vegetative

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			material, or other debris that may contain or hold seeds of noxious weeds before arriving at and when leaving the project area. Weeds that are removed will be bagged and disposed in an authorized sanitary landfill. VEG-5: Permanent and temporary impacts on sensitive vegetation communities will be replaced by creating or restoring habitats of similar functions and values in the BSA, or credits will be purchased through an applicable mitigation bank. Restoration will be in-kind and at a minimum 1:1 replacement ratio or other ratio, determined in consultation with the regulatory agencies. All mitigation activities will be conducted in accordance with a Habitat Mitigation and Monitoring Plan and in consultation with USACE, RWQCB, and CDFW before the issuance of permits. The Habitat Mitigation and Monitoring Plan will outline the identification and location of areas that can be used for creation, restoration, or habitat enhancement. The plan will include a list of native plant species by habitat type, and this list may be used for on-site revegetation efforts (e.g., planting and seeding). In addition, if necessary to meet mitigation needs, the plan will identify opportunities for additional enhancements of habitats in temporary impact areas, such as supplemental tree planting, weeding adjacent buffer habitat, or other opportunities. The enhancement opportunities will include acreage estimates of treated areas, acreage of invasive removal, and figures to show the treatment area and mapped invasive species. A habitat restoration specialist will determine the optimal areas for habitat establishment and restoration, and will prepare the Habitat Mitigation and Monitoring Plan with details on the concept. The plan will discuss

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			habitat restoration implementation specifically, including plant establishment methods, performance standards, the maintenance and monitoring period, and reporting. In addition, the plan will include LA County Planning in the list of regulatory agencies to consult, to determine adequate replacement ratios, to mitigate temporary and permanent impacts on sensitive vegetation communities. The minimum 1:1 replacement ratio may not be appropriate for more sensitive SEA resources. VEG-6: As an alternative to the restoration of habitats to compensate for temporary and/or permanent removal of riparian habitats, the applicant (at the discretion of USACE and CDFW) may remove exotic plant species from the BSA in the following locations: (1) where an infestation of exotics such as giant reed occurs, so that the natural habitat functions and values are substantially degraded and at risk, and where the cover of exotics is equal to or exceeds 25% of the ground; or (2) in other areas where exotics removal will be strategic in a watershed approach to weed management, as determined by USACE and CDFW. The weed removal sites will be selected in a logical manner, so that the eradication of weeds from specific sites will contribute to the overall control of exotics in the watercourses. Removal areas will be kept free of exotic plant species for 5 years after initial treatment. In addition, native riparian vegetation will need to become established through natural colonization and, after 5 years, will need to meet the revegetation plant cover goals, established by USACE and CDFW. In addition, LA County Planning will be included among the agencies listed to consult for the removal of exotic plant species, for

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			potential compensation for temporary and/or permanent removal of riparian habitats. Migration Corridors Mitigation Avoidance and minimization measures described previously under VEG-1 through VEG-4, will be implemented. These measures will include the use of BMPs and water trucks to minimize fugitive dust and other impacts. Compensation mitigation described under VEG-5 and VEG-6, and GEN-15 (detailed further below) will be implemented. Additional measures may be incorporated based on input from LA County's internal SEA impact review. Additional measures may include the use of light shields to prevent light intrusion into adjacent natural habitats (especially along The Old Road Bridge over the Santa Clara River).
Wetlands and Other Waters	None.	Permanent impacts are proposed to occur at three features- the Santa Clara River, the Northern Tributary, and Drainage A. The Build Alternative may permanently impact up to 0.33 acre, and temporarily impact 0.15 acre, of waters of the U.S. (WOTUS). New indirect impact from expanded bridge shading is 0.26 acre of WOTUS. Total impacts on CDFW-jurisdictional streambeds and riparian habitat include approximately 1.07 acre of permanent impacts and 0.43 acre of temporary impacts, as well as 0.68 acre of new bridge shading and 0.02 acre due to bridge columns.	With implementation of VEG-1 through VEG-5 and GEN-15, the potential impacts on jurisdictional areas would not be adverse. Extensive AMMs and BMPs would be implemented on the banks of the Santa Clara River. The avoidance and minimization measures described previously under VEG-1 through VEG-4 would be implemented. These measures would include use of BMPs and water trucks to minimize fugitive dust. The compensation mitigation described previously for VEG-5, VEG-6, and GEN-15 would be implemented and provide the necessary compensation for impacts on the Santa Clara River. All mitigation activities would be conducted in accordance with the Habitat Mitigation and Monitoring Plan, because of USACE, the LA RWQCB, and CDFW would be part of the regulatory permitting process. Additional mitigation measures for impacts on waters would include the following

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			WATERS-1: LACPW will notify CDFW pursuant to Section 1602 of the Fish and Game Code. LACPW will comply with the mitigation measures detailed in the Lake and Streambed Alteration Agreement issued by CDFW. LACPW also will provide compensatory mitigation for any affected stream and associated natural community. WATERS-2: LACPW will mitigate for project impacts on streams and riparian habitat by replacing habitat at no less than a 3:1 ratio for impacts on jurisdictional features as shown in Table 2-52, except for concrete-lined Drainage A. Drainage A will be mitigated at a 1:1 ratio. CDFW considers all project impacts from sediment removal and sediment placement to be permanent. Mitigated land will support streams and riparian habitat of similar vegetation composition, density, coverage, and species richness and abundance.
Plant Species	None.	There is the potential for permanent or temporary impacts on several California black walnut trees located in the vicinity of The Old Road Bridge. One Southern California black walnut would be directly removed or shaded out by expansion of The Old Road bridge. One additional Southern California black walnut is in close proximity to the limits of disturbance (LOD) between The Old Road and I-5 but could likely be avoided by installation of environmental protective fencing. The five other Southern California black walnuts are located far enough away from the LOD (located on the east side of I-5) that they are unlikely to be impacted by the Build Alternative.	Avoidance and minimization measures for potential impacts on the two Southern California black walnut trees in and around The Old Road Bridge are detailed below. WALNUT-1: The proposed project will directly impact one Southern California black walnut tree and indirectly impact one additional tree. A preconstruction survey will be conducted to identify the exact LOD, during which protective fencing will be placed around the tree that may be indirectly affected. If feasible, the Southern California black walnut tree within the direct footprint of the expanded bridge will be transplanted outside the LOD along the bank of the Santa Clara River. In addition, because transplanting is not always successful, any Southern California black walnut tree that may

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
		Fifteen (15) valley oak trees will be directly removed as a result of Build Alternative implementation and are subject to the Los Angeles County Oak Tree Ordinance. It may be necessary to obtain an oak tree permit for the permanent removal of the 15 valley oak trees.	be directly affected by the proposed project will be mitigated a 2:1 ratio (as individuals, not acreage). The mitigated trees will be planted nearby at an acceptable location for this species. Ideally, any replacement may be grown in a nursery and replanted before project implementation. Otherwise, purchasing walnut trees from a native plant nursery will be acceptable, preferably from stock originating in LA County. In addition, the LA County Department of Regional Planning will be included on the list of regulatory agencies to consult for the replacement ratio of 2:1 for removal of the one Southern California black walnut tree. Measures to minimize impacts on oak trees that will not be removed, but occur within proximity of construction activities, are provided below. These measures are intended to preserve and protect the remaining oak trees in the proposed project area. OAK-1: A plan will be developed for protecting oak trees during project construction. The intent will be to install high-visibility protective fencing along the boundary of The Old Road ROW in areas adjacent to oak trees. For any oak trees outside The Old Road ROW, this plan will be prior approved by the LA County Fire Department's Forestry Division. For any oak trees within The Old Road ROW, this plan will be prior approved by LACPW. Equipment damage to limbs, trunks, and roots of all remaining trees will be avoided during project construction. Even slight trunk injuries can result in susceptibility to long-term pathogenic maladies.

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			High-visibility protective fencing not less than 4 feet in height will be placed at the limits of The Old Road ROW, where the protective zone of any individual oak tree or dense stand of oak trees are within 200 feet of the grading limits. Oak tree high-visibility protective fencing will be in accordance with Chapter 22.176 of the LA County Code. The protective zone is defined as within the dripline of an oak tree and extending to a point at least 5 feet outside the dripline, or 15 feet from the trunk of a tree, whichever distance is greater. This fencing will be inspected before the start of project construction in the area and will remain in place until construction is completed. OAK-2: Care will be taken to limit grade changes near the protective zone of an oak tree. Grade changes can lead to plant stress from oxygen deprivation or oak root fungus at the root collar of oaks. Minor grade changes farther from the trunk are not as critical but can negatively affect the health of the tree if not carefully monitored by a County-approved certified arborist. The grade will not be lowered or raised around the trunk (i.e., within the protective zone) of any oak tree without the approval of an LA County forester or LACPW (as applicable), or an LA County-certified arborist as specified in an approved oak tree permit. A certified arborist will supervise all excavation or grading within the protective zone of an oak tree. Trenching, excavation, or clearance of vegetation within the protective zone of an oak tree will be accomplished by use of hand tools or small handheld power tools. Any major roots encountered will be conserved to the greatest extent possible and treated as recommended by the certified arborist.

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			No utility trenches will be routed within the protective zone of an oak tree unless no feasible alternative locations are available, and such action will be prior-approved by an LA County forester or LACPW, as determined appropriate. OAK-3: The following items will guide equipment storage: No storage of equipment, supplies, vehicles, or debris will be permitted within the protective zone of an oak tree. No dumping of construction wastewater, paint, stucco, concrete, or any other cleanup waste will occur within the protective zone of an oak tree. No temporary structures will be placed within the protective zone of any remaining oak tree. OAK-4: Healthy trees, if not maintained, often grow beyond their ability to support themselves and fail at their naturally occurring weakest point. This point typically is at a branch union or near the main crotch of the tree. Weight-reduction pruning and/or cabling will be part of tree maintenance and preservation program, and specifically: Pruning of replacement oak trees and preserved oak trees will include the removal of dead wood and stubs, and medium pruning of branches measuring 2 inches in diameter or less. Pruning of replacement oak trees and preserved oak trees will be in accordance with the guidelines published by the National Arborist Association. In no case will more than 25% of the overall tree canopy and 10% of the overall root mass of any oak tree be removed. After pruning, installation of support cables to prevent future main crotch failures may be necessary,

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			based on a County-certified arborist's determination. All replacement oak trees will be maintained in accordance with the principles set forth in the publication, Oak Trees: Care and Maintenance (LA County Fire Department, Forestry Division 2022). A 5-year maintenance period will begin on the start replacement tree planting. All replacement trees failing to survive within this period will be replaced. OAK-5: Care will be taken to avoid placing any irrigation devices within watering distance of the protected zone of oak trees. Oak trees survive and thrive on annual rainfall alone and generally do not require supplemental irrigation, except during periods of extreme drought or for establishment of newly planted trees (i.e., replacement trees): Irrigation water will not reach within 15 feet of any oak trunk. Grass and ground covers will not be planted under the canopy of any oak trees. OAK-6: An LA County-approved arborist will evaluate the effects of mistletoe, pathogens, and insect pests on the preserved and planted oak trees within the 5-year maintenance period, in addition to the overall health and structural integrity of the trees, to ensure the longevity of the remaining oak trees. OAK-7: Damage to remaining trees will be avoided by workers and equipment during construction activities: A qualified biologist or LA County-certified arborist will monitor on-site construction and grading activities occurring near all identified

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			oak tree protection zones, to ensure that damage to oak trees does not occur. Before the start of construction, a qualified biologist or LA County-certified arborist will schedule a field meeting to inform construction workers where all protective zones are located and the importance of avoiding encroachment within the protective zones. <u>Compensatory Mitigation.</u> As detailed previously under WALNUT-1, any Southern California black walnut trees that would be directly impacted by the proposed project would be mitigated at a 2:1 ratio (as individuals, not acreage). Pursuant to Sections 22.56.2050-2260 of the LA County Oak Tree Ordinance, the following compensatory mitigation would be implemented to compensate for the 15 valley oak trees that would be removed permanently by the proposed project: OAK-8: All oak trees that are removed will be replaced by a tree of the same species at a ratio of 2:1. All heritage trees that will be removed will be replaced at a 10:1 ratio. All replacement trees will be at least 24-inch-tall box trees and measure 1 inch or more in diameter, as measured from 1 foot above the base. Free-form trees with multiple stems will be permissible; the combined diameter of the two largest stems of such trees will measure a minimum of 1 inch in diameter, as measured from 1 foot above the base. Replacement trees will consist exclusively of indigenous oak trees and be certified as being grown from a seed source collected in LA County or Ventura County. In addition, the LA County Department of Regional Planning will be included on the list of regulatory agencies to consult for the 2:1 ratio

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
Wildlife Species	None.	Temporary, direct impacts would result from the use of upland and aquatic habitat for equipment and materials staging, grading, as well as from clearing and tree removal for construction activities and access to construction sites. Permanent impacts would result from direct removal of occupied habitat for multiple species. Operation of the Build Alternative would have minor effects on special-status wildlife species within the BSA.	replacement for the removal of 15 valley oak trees. Fish Arroyo chub has the potential to be directly and indirectly impacted by the proposed project in similar ways to those for the unarmored threespine stickleback (UTS) because they occupy the same habitat within Santa Clara River and the Northern Drainage. The avoidance and minimization measures UTS-1 and UTS-2 would be implemented for arroyo chub which restricts contact with surface water at the Northern Drainage and Santa Clara River. Therefore, no impacts on arroyo chub are anticipated. Southern steelhead have a very small potential to swim through the proposed project during high flow/flood events and since they are federally listed as endangered, informal consultation is being conducted with the National Marine Fisheries Service. The avoidance and minimization measures UTS-1 and UTS-2 along with GEN-16 would be implemented for southern steelhead and the proposed project is not likely to adversely affect the species. Amphibians and Reptiles The general measures GEN-1 through GEN-15, and southwestern pond turtle-specific measures WPT-1 and WPT-2 would be implemented. These measures would reduce potential impacts on non-listed special-status reptile and amphibian species. Birds Avoidance and minimization measures detailed in Section 2.4.5 below (GEN-1 to GEN 15 and RIP-1 to RIP-3) would be implemented and

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			provide impact avoidance for non-listed birds including those protected by the Migratory Bird Treaty Act. In particular, to remain in compliance with the Migratory Bird Treaty Act, pre-construction nesting bird surveys prior to vegetation clearing or grubbing during the avian breeding season will reduce the potential for injury or mortality to nesting birds. Furthermore, conducting ground-disturbing activities outside of the avian nesting season or noise monitoring for loud construction activities may be necessary if done during the avian nesting season. Mammals The avoidance and minimization measures presented in Section 2.4.5 (GEN-1 to GEN-15) would be implemented by proposed project and reduce potential impacts on special-status bat species. In addition, implementation of AMMs BAT-1 through BAT-3 would reduce potential impacts on special-status bat species further, as follows: BAT-1: No earlier than 7 days before the start of construction around the two bridge locations, a field survey will be conducted by a qualified biologist to determine whether active bat roosts are present on or within 300 feet of the project boundaries. If an active roost is identified, a determination will be made regarding whether the roost is used as a night roost, a day roost, or a maternity roost. If an active roost is removed, MM BAT-2 (below) will be implemented. Alternatively, if an active roost is identified within 300 feet of the disturbance boundary but will not be removed, MM BAT-3 (below) will be implemented. Trees and/or structures determined to be maternity roosts will be left in place until the end of the maternity season.

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			Because the ambient noise levels already exceed acceptable noise levels from non-project-related surrounding construction activities and traffic noise, additional noise mitigation will not be implemented. Consequently, no interference will take place with bat echolocation and insect foraging. BAT-2: If a night-roost is identified within the LOD, the roost structure will be removed during the daylight hours while the roost is not in use. If an active day roost is identified, roosting bats will be evicted by using humane exclusionary devices. Before project implementation, the proposed methods for bat exclusion will be approved by CDFW. The roost will not be removed until it has been confirmed by a qualified biologist that all bats have been successfully excluded. If an active maternity roost is identified (the breeding season of native bat species in California generally occurs from April 1 through August 31), the roost will not be disturbed and construction within 300 feet will be postponed or halted, at the discretion of the biological monitor, until the roost is vacated and juveniles have fledged, as determined by the biologist. CDFW will be consulted regarding the necessity to construct replacement roosting habitat or to modify the proposed project (as appropriate), to include features conducive to roosting. This determination will be based on the bat species to be displaced, the abundance of other roost sites in the area, and the size of the roost removed. All CDFW recommendations for roost replacement will be implemented. BAT-3: If a night roost is identified within the 300-foot buffer of the LOD, construction-related activities will be conducted during daylight hours while the roost is not in use. If an active day

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			roost is identified, a determination (in consultation with CDFW or a qualified bat expert) will be made regarding whether construction-related activities (i.e., noise and vibrations) can disturb roosting bats substantially. This determination will be based on baseline noise/vibrations levels, anticipated noise-levels associated with project construction, and the sensitivity to noise-disturbances of the bat species that are present. If noise is determined to result in the temporary abandonment of a day roost, construction-related activities will be scheduled to minimize the period that the roost will be subject to noise-related disturbances. If an active maternity roost is identified (the breeding season of native bat species in California generally occurs from April 1 through August 31), construction within 300 feet of the roost will be postponed or halted, at the discretion of the biological monitor, until the roost is vacated and juveniles have fledged, as determined by the biologist. <u>Compensatory Mitigation</u> Compensatory mitigation for temporary and permanent loss of habitat occupied by non-listed special status reptile, amphibian, bird, and mammal species would be provided in compensatory mitigation as required for federally listed species' impacts, as presented in Section 2.4.5.4. Additional compensatory mitigation may be necessary if bat roosts or maternity colonies are detected under The Old Road Bridge and need to be removed. However, additional bat roosting habitat would be in the surrounding vicinity in human-made bridges, including the adjacent I-5 overpass, that could provide roosting opportunities in the event that bat dispersal

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			occurs. In addition, after construction of the new bridge is completed, it would have the potential to provide roosting options or other features considered suitable for bats.
Threatened and Endangered Species	None.	Temporary, direct impacts would result from the use of upland and aquatic habitat for equipment and materials staging, grading, as well as from clearing and tree removal for construction activities and access to construction sites. Permanent direct impacts include the removal of habitat during expansion of The Old Road and shading of Santa Clara River from the expanded Old Road Bridge. Operation of the Build Alternative would have a minimal change to the habitat of threatened and endangered animals.	GEN-1: The contractor(s) will be informed, before the bidding process, regarding the biological constraints of the proposed project (which will be included in Section EC of the Special Provisions). The project limits will be clearly marked on the project plans that are provided to the contractor(s), and areas outside the project limits will be designated as “no construction” zones. A construction manager will be present during all construction activities, to oversee that work is limited to the designated project limits. GEN-2: High-visibility environmentally sensitive area fencing and silt fencing with appropriate signs will be installed by the contractor before the start of work, to prevent habitat impacts and the spread of silt from the construction zone into adjacent habitats. The fencing will be installed along the outer edge of work limits, in a manner that does not impact habitats to be avoided. GEN-3: Project personnel will strictly limit their activities, vehicles, equipment, and construction materials to within the fenced construction limits, staging areas, and routes between the construction limits and staging areas. The temporary construction fencing will be removed on completion of the construction. GEN-4: All workers will participate in a Worker Environmental Awareness Program for sensitive biological resources. Sign-in sheets will be maintained to document completion of the program by each worker. This training can be administered in person by a qualified biologist or

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			through screening of a video/slide presentation, prepared by a qualified biologist and overseen by an on-site manager. Contractor education training will include a review of special-status species and protected habitats occurring/potentially occurring on site. Identification of these resources and all biological avoidance and minimization measures relevant to the contractors' work will be reviewed. Stop work and notification procedures will be outlined. The training program will include a section specific to UTS, southwestern pond turtle, arroyo toad, LBVI, and SWFL. Training handouts will be provided and posted at the staging areas in the project area. In addition to a qualified biologist being available for species surveys, monitoring, and relocation activities, biological monitors will be present on a daily basis throughout the construction phase, when construction activities are adjacent to federally listed species habitat or have the potential to impact listed species. Biological monitors will be qualified for the monitoring activities and species in the area. A biological monitor will monitor the status of BMPs to ensure that they continue to be implemented after installation and prevent species that are in proximity to construction activities from being affected. In particular, construction monitoring will occur daily when ground-disturbing activities occur in/near the Santa Clara River. The biological monitors will ensure that BMPs are operating effectively, will conduct daily sweeps of the active construction areas to ensure that no listed species are impacted, and will conduct pre-activity clearance surveys ahead of vegetation/ground disturbance when in listed species habitat or critical habitat. Repeat pre-activity clearance surveys will be conducted

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			when a lapse in occurs activities in suitable listed species habitat longer than 3 days after vegetation removal or a previous survey. GEN-5: A qualified biologist, defined as an individual with the appropriate federal and State certifications to conduct the specified activities, will be available to relocate any listed species out of harm's way if detected within the project limits. The biologist will have verified previous experience with the species for which surveys are being conducted and will have been approved by USFWS as qualified to conduct species surveys, monitoring, and relocation activities. GEN-6: All equipment maintenance; staging; and dispensing of fuel, oil, coolant, or any other such activities will occur in designated areas outside jurisdictional wetlands or waters and within the fenced project limits. These designated areas will be in previously compacted and disturbed areas to the maximum extent practicable, so as to prevent any runoff from entering jurisdictional wetlands or waters. Fueling of equipment will take place within existing paved areas, if feasible, greater than 100 feet from jurisdictional wetlands or waters. Contractor equipment will be checked for leaks before operation and will be repaired as necessary. "Fueling zones" will be designated on construction plans and located away from the Santa Clara River and Northern Drainage. GEN-7: In areas that do not require excavation or grading, native vegetation will be trampled instead of completely removed, to allow regrowth and invasive plant species to be avoided to the extent practical, to reduce the potential for their spread.

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			GEN-8: To reduce impacts on listed species' critical and occupied habitat, before entering the project area, all personnel will remove invasive species materials, propagules, seeds, and individuals from project equipment, materials, and clothing to reduce the proliferation of invasive species. This will include checking to see that construction equipment has been thoroughly power-washed or cleaned, to remove any dirt/mud/sediment from tires and tracks. GEN-9: The project area will be kept as clean of construction-related trash and debris as possible, to avoid attracting predators of sensitive wildlife. All food-related trash items will be enclosed in sealed containers and removed regularly from the project area. GEN-10: Project personnel will be prohibited from bringing pets into the project area. GEN-11: Disposal or temporary placement of excess fill, brush, or other debris will not be allowed in WOTUS or their banks along the Santa Clara River. GEN-12: The majority of construction is expected to be undertaken during daylight; however, when nighttime construction is necessary, lighting will be of the lowest illumination necessary for human safety, will be diverted away from any native vegetation communities, and will consist of low-sodium or similar lighting, equipped with shields to focus light downward onto the appropriate subject area. GEN-13: Exclusionary devices will be installed underneath The Old Road Bridge over Santa

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			Clara River to prevent birds and bats from nesting during construction. Installation of these devices will be completed before February 1 (the beginning of bird breeding season) and will remain until construction is completed. A qualified biologist will inspect the area before installation for nests and evidence of breeding activity. If breeding activity is not detected, inactive nests will be destroyed to prevent birds from establishing breeding. If breeding activity is confirmed, exclusionary devices will be installed in all other areas lacking active nests. Active nests will be monitored by the biologist until breeding is completed. After breeding is completed, exclusionary devices will be installed in these areas. GEN-14: Best efforts will be implemented (within the control of LA County, taking into consideration land ownership) to restrict public access into the Santa Clara River that can adversely affect listed fish and wildlife resources. These actions will include posting signs along the Multi-Use Trail and where sidewalks abut the Santa Clara River, promoting public education and awareness of such ecological sensitivities, and maintaining fences and barricades to prevent unauthorized or unrestricted access to the river bottom, as applicable. GEN-15: Compensatory mitigation for impacts on sensitive natural communities (jurisdictional wetlands and waters) will consist of a combination of in-place and in-kind restoration (at a minimum a 1:1 ratio) and enhancement. A Vegetation Management and Restoration Plan will be prepared for agency review and approval before initiating project impacts. Only native plant species will be included in the plans. Final

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			plans will include the following information and conditions: All habitat restoration/enhancement sites will be prepared for planting in a way that mimics natural habitat to the maximum extent practicable. All planting will be installed in a way that mimics natural plant distribution and not in rows. Planting will be accomplished through planting palettes of container plants (and plan will specify plant species, size, and number/acre) and planting seed mix (the Vegetation Management and Restoration Plan will specify plant species and pounds/acre). The upland plant palette will include native species specifically associated with existing habitat types. The source and proof of local native status of plant material and seeds will be provided. Container plant survival will be 80% of the initial plantings for the first 5 years. At the first and second anniversaries of plant installation, all dead plants will be replaced unless their function has been replaced by natural recruitment. The final Restoration/Enhancement Plan will outline the irrigation schedule to the extent practical, to prevent overwatering, runoff, and plants that are artificially robust (in comparison with nearby native vegetation). Irrigation will cease after year 2 or 3, except in cases of extreme drought. The final implementation schedule will indicate when all habitat effects, as well as on-site and off-site restoration/enhancement planting and irrigation, will begin and end. Off-site restoration/enhancement planting and irrigation will be completed during the concurrent or next planting season (i.e., late fall to early spring) after beginning project impacts. On-site habitat restoration/enhancement planting and irrigation

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			(if required) will be completed during the concurrent or next planting season (i.e., late fall to early spring), after finishing each phase of project impacts in the restoration/ enhancement area. Any temporal loss of habitat caused by delays in restoration/enhancement will be mitigated through habitat preservation or restoration/enhancement at a 0.5:1 ratio for every 6 months of delay (e.g., 1:1 for 12 months of delay, 1.5:1 for 18 months of delay). If LA County is wholly or partly prevented from performing its obligations under the final plans (causing temporal loss from delays) because of unforeseeable circumstances of causes beyond reasonable control, and without the fault or negligence of LA County, they will be excused by such unforeseeable cause(s). The 5 years of success criteria for restoration/enhancement areas will include a 40 to 65% absolute native cover (in comparison with adjacent native vegetation communities) or greater, depending on the native vegetation community being restored/enhanced; evidence of the natural recruitment of multiple species; 0% coverage for Cal-IPC's "Invasive Plant Inventory" species that are rated "High," and no more than 10% coverage of other exotic/weed species. Each vegetation community that is restored/enhanced will have a separate percent absolute native cover, as appropriate for the specific vegetation community. For example, this will vary with riparian woodland and marsh vegetation communities having a higher native coverage percent. The final restoration/enhancement plan will detail the specific success criteria with the target percent absolute native cover for each vegetation community. A qualitative and quantitative vegetation monitoring plan with a map of proposed

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			sampling locations will be included. Photo points will be used for qualitative monitoring, and stratified random sampling will be used for all quantitative monitoring. Annual mitigation and monitoring reports will be submitted to the appropriate regulatory agency after the monitoring period, no later than December 1 of each year. If maintenance of the habitat/restoration enhancement area is necessary between February 1 and September 1, a qualified biologist will survey for nesting birds within the restoration/enhancement area, access paths to it, and other areas susceptible to disturbances by site maintenance. Surveys will consist of three visits separated by 2 weeks, starting March 1 of each maintenance/monitoring year. Work will be allowed to continue on site during the survey period. However, if sensitive avian species are found during any of the visits, LACPW will notify and coordinate with the regulatory agencies to identify measures to avoid and/or minimize effects on the sensitive species (e.g., nests and an appropriate buffer will be flagged by a biological monitor and avoided by maintenance workers). LACPW will mitigate at a 1:1 ratio for temporary impacts on listed species and a ratio of 3:1 for permanent impacts on listed species. In addition, the plan will include LA County Planning in the list of regulatory agencies to consult, to determine adequate replacement ratios, to mitigate temporary and permanent impacts on sensitive vegetation communities. GEN-16: LACPW will conclude Section 7 informal consultation with NMFS during the Plans Specifications and Estimates (PS&E) phase.

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			Species-Specific Avoidance and Minimization Measures The following measures may be refined, removed, or added to during consultation with USFWS and NMFS. Any measures issued in the Biological Opinion, will supersede these species-specific avoidance and minimization measures. No species-specific measures are included for arroyo toad because the species is extirpated from the BSA. The following steelhead-specific avoidance and minimization measure will be implemented during project construction to reduce impacts: FISH-1: Prior to the start of construction, surveys for steelhead would be conducted by a qualified biologist highly knowledgeable and experienced with identifying the species. Immediately prior to the start of construction, the qualified biologist would conduct no-take visual-only surveys for steelhead throughout the northern drainage (e.g., from the existing The Old Road culvert down to the stream's confluence with the mainstem of the Santa Clara River) and the mainstem Santa Clara River to confirm absence. Immediately following the steelhead survey, a fish-excluding device would be installed and maintained in the northern drainage. No fish exclusion device is proposed for the mainstem Santa Clara River. This device would be designed, installed, monitored, and maintained to: (a) completely exclude steelhead and other aquatic life from the proposed action in the northern drainage during the entire term of work in or near surface waters; and (b) avoid stranding, entrapment, or entanglement of wildlife. The fish-exclusion device would be

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			regularly monitored by a qualified biologist to ensure it is functional. A surface water diversion would also be designed, installed, monitored, and maintained in a manner that ensures that sufficient water flow continues to maintain aquatic life downstream from the proposed project area in the northern drainage. Additional BMPs would be implemented to avoid and minimize proposed action effects to steelhead. BMPs would be placed around the periphery of work areas to ensure no inadvertent spills, erosion, sedimentation, or construction-related effects occur. If steelhead are detected within the proposed project area, work would be halted, and NMFS would be contacted immediately. FISH-2: For the mainstem of the Santa Clara River, work activities would be conducted in a way to ensure no surface water contact, and a biological monitor would be present during all ground disturbing activities when near the Santa Clara River. Vegetation trimming and removal would be conducted in a way to prevent contact with surface water, and BMPs would be placed along the length of the Santa Clara River to ensure no inadvertent spills, erosion, or sedimentation occurs. A biological monitor would ensure that materials from concrete decking installation and concrete pouring do not fall into the Santa Clara River, and all construction personnel and equipment remain outside of the active channel. Construction of the piles within the Santa Clara River would occur during summer months, to coincide with periods of low flow for the Santa Clara River, to

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			minimize the potential for effects to surface water in the Santa Clara River. The cast-in-drilled-hole pile with slurry displacement installation method was specifically selected to avoid the need for dewatering and potential affects to steelhead. A biological monitor would be present during cast-in-drilled-hole pile installation when in proximity to the Santa Clara River, to ensure that vibration effects are not negatively affecting aquatic species. If unforeseen circumstances arise during construction of the bridge piles that may result in effects to steelhead, the NMFS would be contacted to discuss additional potential measures to avoid effects. The following unarmored threespine stickleback-specific avoidance and minimization measure will be implemented during construction of the proposed project to reduce impacts: UTS-1: Prior to the start of construction, thorough surveys for UTS will be conducted by a qualified biologist highly knowledgeable and experienced with identifying UTS. The qualified biologist and survey methodology will be approved by USFWS prior to survey commencement. Immediately before the start of construction, the qualified biologist (in close coordination with USFWS) will conduct no-take visual-only surveys for UTS throughout the Northern Drainage, to confirm absence. If UTS are detected during either survey, the Northern Drainage will be considered occupied by UTS. If this is the case, the project culvert extension option will not be considered, and an alternative design will be necessary.

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			If UTS are not detected, the project potentially can begin. Immediately following the UTS survey, a fish-excluding device will be installed and maintained. This device will be designed, installed, monitored, and maintained to (a) completely exclude UTS and other aquatic life from the project area in the Northern Drainage during the entire term of work in or near surface waters, and to (b) avoid stranding, entrapment, or entanglement of wildlife. The fish-exclusion device will be monitored regularly by a qualified biologist to verify that it is functional. A surface water diversion will also be designed, installed, monitored, and maintained in a manner that ensures that sufficient water flow continues to maintain aquatic life downstream from the proposed project area in the northern drainage. Additional BMPs will be implemented to avoid and minimize project impacts on water quality, aquatic life, nesting birds, and other natural resources. BMPs will be implemented around the periphery of work areas so that no inadvertent spills, erosion, sedimentation, or construction-related effects occur. If UTS are detected within the project area or Northern Drainage, work will be halted and USFWS and CDFW will be contacted immediately. UTS-2: For the mainstem of the Santa Clara River where UTS are assumed present, work activities will be conducted so that no surface

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			water contact will occur, and a biological monitor will be present during all ground-disturbing activities when near the Santa Clara River. Vegetation trimming and removal will be conducted in a way to prevent contact with surface water, and BMPs will be implemented along the length of the Santa Clara River so that no inadvertent spills, erosion, or sedimentation occurs. A biological monitor will ensure that materials from concrete decking installation and concrete pouring do not fall into the Santa Clara River, and that all construction personnel and equipment remain outside the active channel. Construction of the piles within the Santa Clara River will occur during summer months to coincide with periods of low flow for the Santa Clara River, to minimize the potential for impacts on surface water in the river. The cast-in-drilled-hole pile with slurry displacement installation method has been selected specifically to avoid the need for dewatering and potential impacts on UTS. A biological monitor will be present during cast-in-drilled-hole pile installation when in proximity to the Santa Clara River, to ensure that vibration impacts do not negatively affect any aquatic species. If unforeseen circumstances arise during construction of the bridge piles that may result in impacts on UTS, USFWS will be contacted to discuss additional potential measures to avoid impacts. Southwestern Pond Turtle WPT-1: A qualified biologist will survey the work site no more than 48 hours before the onset of activities, to monitor for southwestern pond turtle and/or southwestern pond turtle nesting activity (i.e., recently excavated nests, nest plugs) or nest depredation (partially to fully excavated nest chambers, nest plugs, scattered

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			eggshell remains, and eggshell fragments). Preconstruction surveys to detect western pond turtle nesting activity will be concentrated within suitable upland habitat in the project area and will focus on areas along south- or west-facing slopes with bare hard-packed clay or silt soils or a sparse vegetation of short grasses or forbs. Survey efforts will focus on suitable aerial and aquatic basking habitat, such as logs, branches, root wads, and riprap, as well as the shoreline and adjacent warm, shallow waters where southwestern pond turtle may be present below the water surface, beneath algal mats or other surface vegetation. WPT-2: If southwestern pond turtle is observed during the preconstruction survey, the species will be avoided to the greatest extent practicable. If avoidance is not feasible, LACPW will confer with USFWS to determine the best approach so that no take of the species occurs, including additional measures such as implementation of exclusion buffers, nest enclosures, silt fencing, screening, and additional BMP implementation, as appropriate. Least Bell's Vireo and Southwestern Willow Flycatcher The following avoidance and minimization measures will be implemented during construction of the proposed project to reduce impacts on LBVI and SWFL. RIP-1: To the greatest extent possible, construction activities (such as vegetation removal) will be timed to avoid the nesting season for riparian avian species (February 1 through September 1).

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			RIP-2: If work is scheduled during the riparian avian breeding season (February 1 through September 1), and within LBVI or SWFL-occupied and critical habitat, a qualified biologist will conduct a preconstruction nesting survey to verify that no active bird nests are present within 500 feet of construction activities. If no nests are detected, then vegetation removal will be permitted during the nesting season. The biologist will establish and maintain a minimum 300-foot no-disturbance buffer around all active bird nests. For raptors and special-status species, this buffer will be expanded to a minimum of 500 feet. RIP-3: If an active LBVI or SWFL nest is detected, no construction activities will be permitted within 500 feet of the nest. Work within nest buffers may not resume until the young fledge and disperse, or the nest has been determined to fail by a qualified biologist. Limits of construction to avoid a nest site will be established in the field with flagging and stakes or construction fencing. Mountain Lion The following avoidance and minimization measures will be implemented during construction of the proposed project to reduce impacts on mountain lions. LION-1: During construction of The Old Road Bridge, any nighttime lighting necessary for work or placed around temporary work areas/laydown yards will be shielded away from the Santa Clara River. Security lights around temporarily fenced areas under or adjacent to the Santa Clara River will have motion-activated sensors, so that they are not continually on

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			throughout the night but only trigger if someone enters the fenced work area. LION-2: Any permanent streetlights installed on The Old Road Bridge or along the west side of The Old Road adjacent to the Santa Clara River will be shielded, so that the light does not glare directly into native habitat in the river. LION-3: Pending the State-listing status of mountain lion, impacts will be assessed by CDFW during the permitting process, and any necessary avoidance and minimization measures will be implemented. Compensatory Mitigation <u>Steelhead</u> None. <u>Unarmored Threespine Stickleback</u> None. <u>Arroyo Toad</u> None. <u>Southwestern Pond Turtle</u> None. <u>Least Bell's Vireo and Southwestern Willow Flycatcher</u> Included under GEN-15. <u>Mountain Lion</u> None.
Invasive Species	None.	Implementation of the Build Alternative has the potential to spread invasive species to adjacent native habitats in the BSA through the entering and exiting of contaminated construction equipment, the inclusion of invasive species in seed	Avoidance and minimization measures, and compensatory mitigation, described previously under GEN-15 and VEG-4 and VEG-5, would be implemented. These measures include use of BMPs to ensure invasive plant material is not spread from the proposed project site to other

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
		mixtures and mulch, and the improper removal and disposal of invasive species causing seed to be spread along the highway.	areas by disposal off-site or by tracking seed on equipment, clothing, and shoes. Compensation mitigation described previously for VEG-6 would be implemented and provide the necessary compensation for impacts.
Wildfire	None.	Emergency Access. The proposed project will not cause any permanent road closures but will cause temporary lane closures during construction.	The proposed project would not cause any permanent road closures but would cause temporary lane closures during construction. However, as discussed in Section 2.2.7, AMMs COM-2 through COM-4 would be implemented to reduce or eliminate the temporary effects on traffic and emergency services. In addition, although the project area is susceptible to wildfire risks, standard construction practices and regulatory safety compliance measures would reduce the risks. The impact would be reduced to a less-than-significant level with mitigation incorporated.
Climate Change	None.	None. The Build Alternative will improve traffic operations and accommodate future traffic projections which would result in less pollutant emissions than the No-Build Alternative because of improvements in vehicle delay.	None.
Public Services	None.	The proposed project would not involve the construction of any infrastructure or developments that would increase the local population, thereby necessitating the provision of new or physically altered government facilities. During construction, temporary impacts on traffic are anticipated due to possible lane closures and detours.	During construction, temporary impacts on traffic are anticipated because of possible lane closures and detours. However, as discussed in Section 2.2.7, COM-2 through COM-4 would be implemented to reduce or eliminate temporary effects on emergency services. In addition, as stated in AMM COM-5, coordination would occur with utility service providers, and a public outreach program would be implemented to minimize impacts on surrounding communities. Thus, impacts on public services, including police and fire protection, would minimal. Therefore, the proposed project would not cause existing public services to provide

Affected Resource	Potential Impact: No-Build Alternative	Potential Impact: Build Alternative	Project Features, Avoidance, Minimization, or Mitigation Measures
			additional services or create new associated facilities. The impacts would be reduced to a less-than-significant level with mitigation incorporated.
Cumulative Impacts	None. Two other projects within a three-year time frame of the Build Alternative implementation were identified. These projects include the I-5 Rye Canyon Ramps Project and Newhall Ranch Specific Plan.	None. Although the acquisitions that are anticipated as part of the Build Alternative would represent adverse effects, they are not anticipated to contribute to cumulative impacts. The proposed full property acquisition partial acquisitions would occur primarily to vacant or public utility and commercial/industrial properties. The proposed project area is anticipated to undergo notable changes with the proposed developments, but no adverse cumulative impacts from relocations and real property acquisition are foreseeable.	None.

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Acronyms and Abbreviations

AADT	average annual daily traffic
AB	Assembly Bill
ACHP	Advisory Council on Historic Preservation
ACM	asbestos-containing material
ACS	American Community Survey
ADI	area of direct impacts
ADL	aerially deposited lead
AMM	avoidance, minimization, and/or mitigation measure
APE	area of potential effects
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ARTO	arroyo toad
ASR	Archaeological Survey Report
ASTM	American Society for Testing and Materials
BFE	base flood elevation
BHCO	brown-headed cowbird
BMP	best management practices
B.P.	Before Present
BSA	biological study area
BVBMI	Barbareno/Ventureno Band of Mission Indians
CAC	Certified Asbestos Consultant
CAFE	Corporate Average Fuel Economy
CAL-CET	Caltrans Construction Emissions Tool
CalGEM	California Geologic Energy Management Division
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CE	Candidate Endangered
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CH ₄	methane
CIA	Community Impact Assessment
CNDDB	California Natural Diversity Database
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibels
DEIR	Draft Environmental Impact Report

DOT	U.S. Department of Transportation
EA	Environmental Assessment
EDR	Environmental Database Report
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EO	Executive Order
EPA	U.S. Environmental Protection Agency
EPD	Environmental Programs Division
ESU	Evolutionary Significant Unit
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FTA	Federal Transit Administration
FTBMI	Fernandeno Tataviam Band of Mission Indians
FTIP	Federal Transportation Improvement Program
GDP	gross domestic product
GHG	greenhouse gas
GTN	Gabrielino/Tongva Nation
GTT	Gabrielino-Tongva Tribe
HCM	Highway Capacity Manual
HFC	hydrofluorocarbons
HPSR	Historic Property Survey Report
HRER	Historic Resources Evaluation Report
I-5	Interstate 5
IS	Initial Study
KVIC	Kern Valley Indian Community
KYTI	Kitanemuk and Yowlumne Tejon Indians
LA	Los Angeles
LACPW	Los Angeles County Department of Public Works
LBVI	least Bell's vireo
LEDPA	least environmentally damaging practicable alternative
LOD	limits of disturbance
LT	long-term
MM	mitigation measure
MMT	million metric tons
MMTCO ₂ e	million metric tons of carbon dioxide equivalent
mph	miles per hour
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MSAT	mobile source air toxic
Multi-Use Trail	Los Angeles County Multi-Purpose Regional River Trail
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAC	noise abatement criteria

NAHC	Native American Heritage Commission
NB	northbound
NCST Calculator	National Center for Sustainable Transportation-Induced Travel Calculator
NEPA	National Environmental Policy Act
NES	Natural Environment Study
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOA	Notice of Availability
NOP	Notice of Preparation
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NSA	Noise Study Area
O ₃	ozone
OHWM	ordinary high-water mark
OPR	Governor's Office of Planning and Research
Pb	lead
PE	Proposed Endangered
PM	particulate matter
PM ₁₀	particles of 10 micrometers or smaller
PM _{2.5}	particles of 2.5 micrometers and smaller
Porter-Colone Act	Porter-Cologne Water Quality Control Act
PS&E	Plans Specifications and Estimates
PRC	Public Resources Code
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
ROG	reactive organic gas
ROW	right-of-way
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
San Manuel	Yuhaaviatam of San Manuel Nation
SB	southbound
SBL/SPB	Santa Barbara Line (Santa Paula Branch)
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCREMP	Santa Clara River Enhancement and Management Plan
SCS	Sustainable Communities Strategy
SE	State Endangered
SEA	Significant Ecological Area
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SOI	Secretary of the Interior
SPRR	Southern Pacific Railroad
SPT Co.	Southern Pacific Transportation Company
SR	State Route
SVP	Society for Vertebrate Paleontology
SWFL	southwestern willow flycatcher
SWPPP	Stormwater Pollution Prevention Plan

SWRCB	State Water Resources Control Board
TCE	temporary construction easement
TNM	Traffic Noise Model
TWW	treated wood waste
UPRR	Union Pacific Railroad
USACE	U.S. Army Corps of Engineers
USC	U.S. Code
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UTS	unarmored threespine stickleback
V/C	volume/capacity
VMT	vehicle miles traveled
VOC	volatile organic compound
WellSTAR	Well Statewide Tracking and Reporting
WMI	Watershed Management Initiative
WOTS	waters of the State
WOTUS	waters of the U.S.
XPI	Extended Phase I

Chapter 1 Proposed Project

1.1 Introduction

The California Department of Transportation (Caltrans), as assigned by the Federal Highway Administration (FHWA), is the lead agency under the National Environmental Policy Act (NEPA), and the Los Angeles County Department of Public Works (LACPW) is the lead agency under the California Environmental Quality Act (CEQA). LACPW proposes to implement The Old Road over Santa Clara River and the Southern Pacific Transportation Company (SPT Co.) Bridge, et al. Project (proposed project), which would relieve congestion, enhance traffic safety, and make necessary safety upgrades to the bridges over the Santa Clara River and the abandoned SPT Co. railroad tracks through implementation of various roadway improvements along The Old Road between Henry Mayo Drive and Magic Mountain Parkway in Los Angeles County, California. Additionally, the proposed project would include an extension of the County of Los Angeles Multi-Purpose Regional River Trail (Multi-Use Trail).

1.2 Purpose and Need

1.2.1 Project Purpose

The fundamental purpose of the proposed project is to address The Old Road deficiencies in the project area and improve the adjacent roadway system, including the connecting roads and intersections to The Old Road. The proposed project would relieve congestion, enhance traffic and road safety, upgrade structural safety, increase regional roadway capacity to accommodate expected future traffic growth projections, and meet jurisdictional goals and policies for the project area. The specific objectives would be to:

- Replace and upgrade the FHWA designated Structural Deficient Santa Clara River Bridge to a status of good condition.
- Provide water passage for the volume of water of a LACPW capital flood event (50-year burned and bulked storm) scenario at The Old Road over the Santa Clara River Bridge.
- Reduce forecasted traffic congestion and increase regional roadway capacity on The Old Road and adjacent roadway system to accommodate projected growth in the area.
- Provide an emergency overflow route on The Old Road to enhance safety for the adjacent roadway system that would support Operation Snowflake, an effort implemented by Caltrans, the California Highway Patrol, and local partner agencies in response to emergency closures of Interstate 5 (I-5), by providing an alternative route when the I-5 experiences full closures because of snowy and icy conditions.
- Improve multimodal travel facilities (e.g., trails, bike lanes) in the project area.
- Improve traffic operations to be consistent with LACPW highway design speed safety standards.
- Alleviate current congestion on The Old Road and the adjacent roadway system.
- Enhance traffic flow and roadway safety on The Old Road and adjacent roadways.

1.2.2 Project Need

The need for the proposed project is summarized as follows: Existing roadway intersection conditions currently are deficient and characterized by roadway congestion, specifically at The Old Road and I-5 southbound (SB) ramps, Avenue Stanford and Rye Canyon Road, and The Old Road and Sky View Lane. Substantial increases in traffic demand are anticipated over the next few years, based on projected growth in the area.

The Old Road over the Santa Clara River Bridge currently is not high enough to allow the volume of water of a LACPW capital flood event (50-year burned and bulked storm) to pass under it. Constructing the replacement bridge at a higher elevation would provide a minimum freeboard of 2.5 feet and meet LA County capital storm floodway requirements.

Existing safety deficiencies exist with the lack of emergency overflow because of the current road network capacity. The Old Road currently is an ineffective Operation Snowflake alternative route in the scenario of I-5 experiencing full closures because of snowy and icy conditions, because of its existing lane capacity of four lanes.

Emergency repairs were performed on the superstructure, piles, and abutment seats of The Old Road over Santa Clara River Bridge immediately following the 1994 Northridge earthquake. The bridge currently is classified as Structurally Deficient per FHWA standards for seismic, flood, and highway design. Replacing the bridge would eliminate this classification.

In addition, current traffic demand in the project area, based on projected growth in the area, meets or exceeds roadway capacity for many arterial roadways. The roadways are expected to worsen because of their current capacity relative to the substantial increases in traffic demand. These roadway segments include The Old Road between Rye Canyon Road and Skyview Lane, and The Old Road between I-5 SB ramps and Rye Canyon Road. These roadway capacity deficiencies are inconsistent with the City of Santa Clarita and Los Angeles County General Plan goals and policies.

Furthermore, the existing roadways are inconsistent with the improvements that are described in the County of Los Angeles Mobility Element for the Highway Plan for Santa Clarita Valley Plan Area. The needed improvements are stated to include widening The Old Road or re-striping it from four lanes to a six-lane major highway between I-5 SB ramps at Rye Canyon Road, and between Rye Canyon Road and Magic Mountain Parkway.

1.2.3 Independent Utility and Logical Termini

The project alternatives would address the purpose and need without additional improvements; therefore, the proposed project would have independent utility. Additional project improvements would not be required to meet the project purpose and need.

Logical termini for project development are defined as (1) rational end points for a transportation improvement, and (2) rational end points for a review of the environmental impacts. The environmental impact review frequently covers a broader geographic area than the strict limits of the transportation improvements. In the past, the most common termini have been points of major traffic generation, especially intersecting roadways. This is because in most cases traffic generators determine the size and type of facility being proposed. However, in some cases where project improvement is not related primarily to congestion because of traffic generators, the choice of termini based on these generators may not be appropriate. When developing a transportation

project, project sponsors need to consider how the end points of the action are determined, both for the improvement itself and for the scope of the environmental analysis.

The logical termini for the proposed project have been identified to accommodate the new bridges replacement, including realignment of the bridge approaches from the existing roadway, and include placement of the construction signage to allow for project construction. These limits were defined to encompass the entire action necessary to address project needs.

1.3 Project Description

This section describes the proposed action and project alternatives that were developed to meet the project purpose and need, while avoiding or minimizing its potential environmental impacts. The proposed alternatives are the Build Alternative and the No-Build Alternative.

1.3.1 Project Location and Setting

The project site includes the approximately 2-mile stretch of the existing The Old Road right-of-way (ROW) between Henry Mayo Drive and Magic Mountain Parkway in western LA County. Because ROW acquisitions would be required for project implementation, the project site also includes areas adjacent to and on either side of the roadway. In addition, the proposed project would include an extension of the Multi-Use Trail. Thus, the project site would include an approximately 0.58-mile extension of the trail on the SB side of The Old Road, from where the trail travels under The Old Road and I-5 just southeast of Rye Canyon Road to just northwest of the I-5 on- and off-ramps. The area where the trail would be extended currently is developed with an access road. Regional access to the project site is via I-5, which roughly parallels The Old Road alignment and runs on the east and north sides of the roadway. Local access is via Henry Mayo Road that forms the northern boundary of the project site, Rye Canyon Road that intersects with The Old Road in the middle of the project site, Sky View Lane that intersects with The Old Road in the southern portion of the project site, and Magic Mountain Parkway that forms the southern boundary of the project site. Figure 1 shows the regional location of the project site, and Figure 2 shows the project limits and components.

The Old Road is a four-lane (two northbound [NB] and two SB lanes) roadway, located within a ROW variably measuring 140 to 160 feet wide that runs in a north/south direction parallel to I-5 through Santa Clarita Valley. The roadway's southern terminus is the junction of San Fernando Road and Sierra Highway in LA County; the northern terminus is roughly at Oak Court in the unincorporated community of Stevenson Ranch, north of Lake Hughes Road. The Old Road is identified as a Major Highway in the LA County General Plan. The roadway includes two bridges (the Santa Clara River Bridge and the SPT Co. Bridge) within the project site.

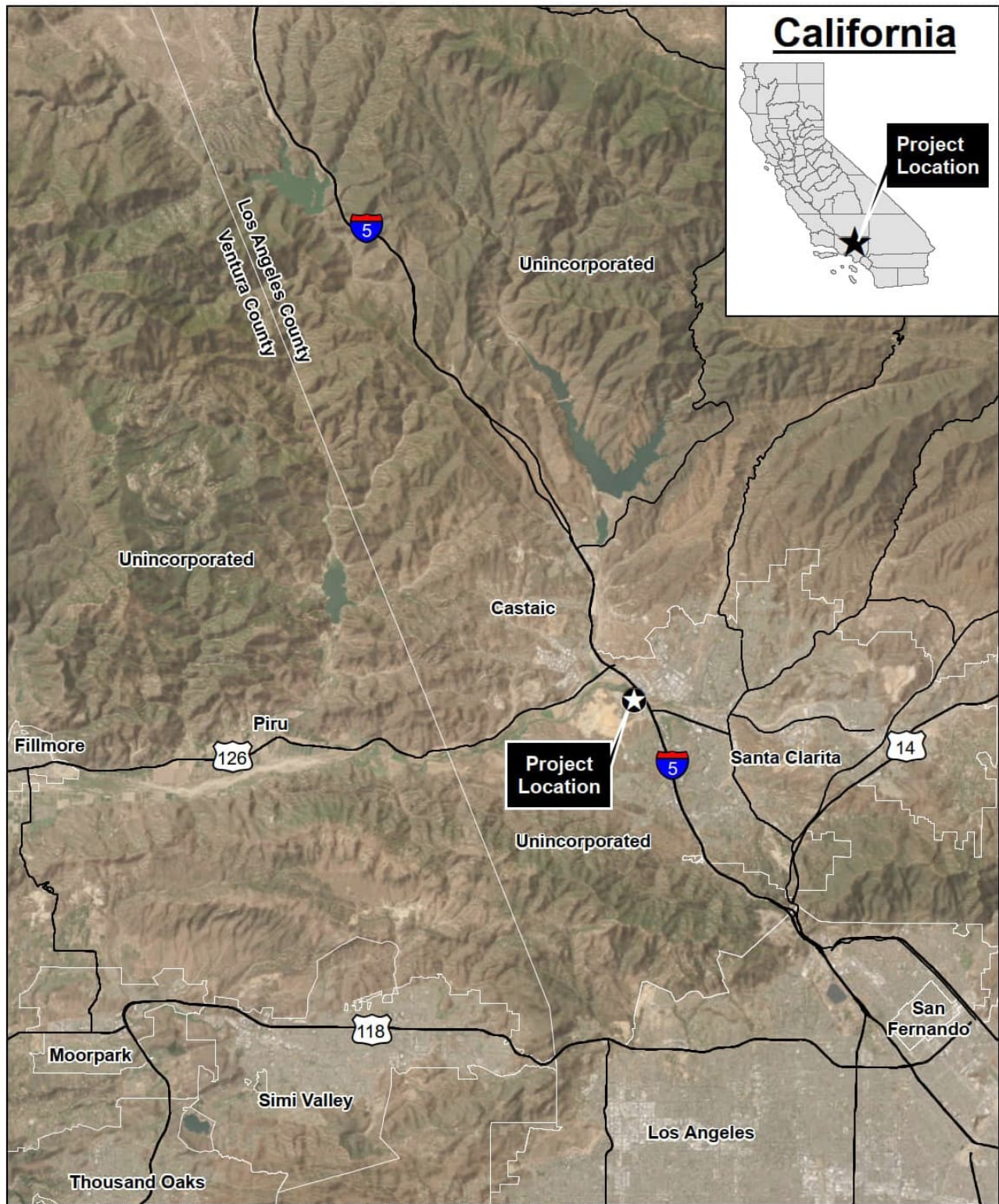


Figure 1
Project Vicinity Map



Source: Esri Maps & Data, 2018; Prepared By: AECOM, 2019.



0 500 1,000 Feet

- Multi-Use Trail
- Project Limits
- Proposed Staging Area

Figure 2
Proposed Action Components

The area on the south side of the roadway is characterized primarily by undeveloped land, with an office complex west of the intersection of The Old Road and Magic Mountain Parkway, and a recreational vehicle storage facility south of the intersection of The Old Road and Henry Mayo Drive. The Old Road also crosses over the Santa Clara riverbed. Directly adjacent to The Old Road to the south is the Valencia Water Reclamation Plant, which is a LA County Sanitation District facility and serves the Santa Clarita Valley Sanitation District. Further south of the project site, approximately 0.40 mile southwest of The Old Road, is the Magic Mountain amusement park. I-5 is north of The Old Road ROW, which roughly parallels the road ROW. A few locations exist where the space between The Old Road and I-5 is wider, and these areas generally include commercial uses, such as a hotel, gas station, and various restaurants. The area north of I-5 generally is characterized by commercial office uses closer to I-5 and residential uses further to the north. Currently, The Old Road does not allow parking within the roadway ROW.

1.3.2 Project Objectives

The specific project objectives include the following:

- Alleviate current congestion on The Old Road and adjacent roadway system.
- Reduce forecasted traffic congestion on adjacent streets to accommodate projected traffic growth on The Old Road and adjacent roadway system.
- Increase regional roadway capacity on The Old Road and adjacent roadway system to accommodate projection growth in the area.
- Enhance traffic and roadway safety on The Old Road and adjacent roadway system.
- Improve multimodal travel facilities (e.g., trails, bike lanes) in the project area.
- Replace and upgrade the FHWA-designated Structural Deficient Santa Clara River Bridge to a status of good condition.
- Provide water passage for the volume of water anticipated from an LACPW capital flood event (50-year burned and bulked storm) scenario, by repairing and increasing the height of The Old Road over the Santa Clara River Bridge.
- Replace and upgrade the SPT Co. Bridge.
- Meet the goals and policies as identified in the County of Los Angeles Mobility Element, which identifies The Old Road as part of the future roadway improvements needed to implement the Highway Plan for the Santa Clarita Valley Plan Area.
- Provide an emergency overflow route on The Old Road to enhance safety for the adjacent roadway system, in support of Operation Snowflake, an effort implemented by Caltrans, the California Highway Patrol, and local partner agencies in response to emergency closures of I-5, by providing an alternative route when I-5 experiences full closures because of snowy and icy conditions.
- Improve traffic operations to be consistent with LACPW highway design speed safety standards.

1.3.3 Description of the Proposed Project

The project improvements primarily would consist of reconstructing and widening The Old Road, replacing two bridges, reconstructing and widening Rye Canyon Road, and reconstructing and widening Sky View Lane, including reconfiguration of its intersection with The Old Road, as shown on Figure 2.

The Old Road over the Santa Clara River Bridge currently is not high enough to allow the volume of water anticipated from an LACPW capital flood event (defined as a 50-year burned and bulked storm) to pass under it. Replacing the bridge at a higher elevation would provide a minimum freeboard of 2.5 feet, which would allow a capital flood event to pass under it. In addition, emergency repairs were performed on the superstructure, piles, and abutment seats of the bridge immediately following the 1994 Northridge earthquake. Nonetheless, the bridge currently is classified as structurally deficient, per FHWA standards. Replacing the bridge as part of the proposed project would eliminate that classification.

Current traffic demand in the project area meets or exceeds roadway capacity for many arterial roadways. Increases in traffic demand are anticipated over the next few years, concurrent with projected population growth in the area. Thus, the widening of The Old Road to six lanes would be critical for passage of traffic and emergency vehicles in the area.

The primary project components are discussed next.

1.3.3.1 The Old Road Improvements

The proposed project would re-align and widen the existing roadway alignment from two lanes in each direction to three lanes in each direction, as well as provide intersection improvements. Class IV bicycle lanes, raised medians, sidewalks, and barriers on the bridges to separate pedestrians from the travel way would be provided. Fiberoptic communication would be installed along The Old Road, and utilities would be relocated as needed. Reconstruction of existing drainage facilities and catch basins as well as and construction of new drainage facilities and catch basins would be completed as needed.

1.3.3.2 Bridge Replacements

The Old Road over the Santa Clara River Bridge is proposed for reconstruction as a six-lane bridge, at an elevation of approximately 9 feet higher on the northern end and 15 feet higher on the southern end than the existing bridge, to meet LA County capital storm floodway requirements. The new bridge would be a multi-span structure with a precast, prestressed concrete girder superstructure on bents, supported by columns and piles in the riverbed.

The extent of the dry season low-flow was determined from a hydrological study. To comply with the California Department of Fish and Wildlife's (CDFW's) No Contact directive, no piles would be constructed within the extent of the dry season low-flow. The bridge superstructure was selected so that no falsework would be placed within the extent of the dry season low-flow, and no construction equipment or falsework would be placed within the extent of the dry season low-flow. In addition, construction equipment would be placed outside the predicted maximum flow width during the summer season. The location of an existing high-pressure gas line would need to be verified before construction. If a conflict exists, the gas line may need to be abandoned under the river and replaced with a new line, installed on the bridge.

The Old Road over the abandoned SPT Co. railroad tracks is proposed for reconstruction as a six-lane bridge. The bridge would be reconstructed at a lower grade, to improve roadway safety and match the road elevation at Rye Canyon Road. The new bridge would be a single-span structure with a precast, prestressed concrete girder superstructure. A minimum of 12 feet of vertical clearance would be maintained over the abandoned railroad ROW. This ROW currently is used as a utility corridor. A Multi-Use Trail would be built along this ROW as part of the proposed project, as described next. Before construction, utilities would be verified and relocated if necessary.

Both The Old Road bridge replacements would include additional roadway improvements (i.e., the addition of bicycle lanes, raised medians, sidewalks, and concrete barriers to separate pedestrians from traffic lanes).

1.3.3.3 Multi-Use Trail Extension

The proposed project would extend the existing Multi-Use Trail from its existing terminus just south of Rye Canyon Road to just northwest of the I-5 on- and off-ramps. The improvements would:

- Extend the existing Multi-Use Trail, with bike lanes, a paved pedestrian path, and an equestrian trail; and
- Add bicycle and pedestrian access ramps, constructed from The Old Road to the Multi-Use Trail at the I-5 hook ramp intersection.

1.3.3.4 Sky View Lane Improvements

The proposed project would reconstruct and widen Sky View Lane between The Old Road and Entertainment Drive, from two lanes in each direction to two lanes westbound and four lanes eastbound. The improvements would:

- Add retaining walls at needed locations;
- Reconstruct catch basins;
- Add intersection improvements at The Old Road and Sky View Lane, including two additional eastbound turn lanes; and
- Add a traffic signal.

1.3.3.5 Rye Canyon Road Improvements

Rye Canyon Road would be widened as follows:

- Three through lanes, one left-turn lane, and one right-turn lane westbound; three through-lanes, two left-turn lanes, and a right-turn lane eastbound; one shared through right-turn lane and two left-turn lanes NB; and one through-lane, one right-turn lane, and one SB left-turn lane would be at Rye Canyon Road and Avenue Stanford.
- Three left-turn lanes and two right-turn lanes westbound; three through-lanes and two right-turn free right-turns NB; and three through-lanes and two SB left-turn lanes would be at The Old Road and Rye Canyon Road,
- Signal improvements would be implemented to accommodate the widening. In addition, a soil nail retaining wall would be constructed along the north side abutment of the

I-5/Rye Canyon Road undercrossing, and a standard retaining wall would be constructed along the south side concrete slope of the I-5/Rye Canyon Road undercrossing.

1.3.3.6 Construction Scenario

Project construction is anticipated to begin in fall 2025, and to take approximately 3.5 years to complete, in winter 2028. Construction activities would occur for 12 hours per day, 7 days per week, during the construction phase. The maximum roadway fill to be installed would be approximately 15 feet. The maximum depth for piles would be approximately 150 feet, and construction of the project components would occur as described next.

The Old Road Improvements

Roadway Improvements

The Old Road improvements would include realignment and widening of the existing roadway alignment, as well as intersection improvements that would be constructed in two phases. Phase 1 would be between Henry Mayo Drive and the I-5 on/off-ramps (fall 2025–spring 2027), and Phase 2 would be between the I-5 on/off-ramps and Magic Mountain Parkway (spring 2026–winter 2028). The phased activities would be as follows:

- Reconstruction, re-alignment, and widening of the roadway from two lanes in each direction to three lanes in each direction
- Installation of bike lanes, sidewalks, curbs and gutters, curb access ramps, and raised medians, and planting trees
- Installation of fiberoptic communication along The Old Road for traffic signal communications
- Utility relocation
- Reconstruction of existing drainage facilities and construction of new drainage facilities as needed
- Reconstruction of existing catch basins and construction of new catch basins as needed
- Construction of retaining walls at needed locations

Intersection Improvements

1. The Old Road at Henry Mayo Drive (existing signalized intersection):
 - o Upgrade new traffic signal equipment as necessary because of new lane configurations
 - o Restripe all approaches as necessary because of new lane configurations
2. The Old Road at Gateway Drive (existing signalized intersection):
 - o Upgrade traffic signal equipment as necessary because of road widening and new lane configurations
 - o Restripe approaches on the north and south sides of the roadway because of new lane configurations
 - o Relocate traffic signal pole standards and traffic signal equipment because of the widening of The Old Road
3. The Old Road at I-5 on/off-ramps (proposed signalized intersection):
 - o Caltrans to install new traffic signal at new I-5 on/off ramp location
 - o Restripe approaches on north and south sides because of new lane configurations

4. The Old Road at I-5 on/off ramps (existing signalized intersection):
 - o Caltrans to remove traffic signal equipment at existing location at I-5 on/off ramps
5. The Old Road at Rye Canyon Road (existing signalized intersection):
 - o Upgrade traffic signal equipment as necessary because of road widening and new lane configurations
 - o Restripe approaches on north and south sides because of new lane configurations
 - o Relocate traffic signal pole standards and traffic signal equipment because of the widening of The Old Road
6. The Old Road at Sky View Lane (proposed signalized intersection):
 - o Install new signalized intersection at Sky View Lane, including construction of Americans with Disability Act curb ramps, signal standards, and traffic signal equipment
 - o Restripe all approaches as necessary because of new lane configurations
7. The Old Road at Project Entry–Private Driveway:
 - o Upgrade traffic signal equipment as necessary because of widening and new lane configurations
 - o Restripe all approaches as necessary because of new lane configurations
 - o Relocate traffic signal pole standards and traffic signal equipment because of the widening of The Old Road
8. The Old Road at Magic Mountain Parkway (existing signalized intersection):
 - o Re-align vehicle heads and raised median to accommodate new lane configurations
 - o Upgrade traffic signal equipment as necessary because of widening and new lane configurations
 - o Restripe all approaches as necessary because of new lane configurations

Construction Equipment

Construction equipment to be used for this component of the proposed project would include approximately five dump trucks, excavators, and a water truck. The trucks would travel to and from the project site each day, but the heavy-duty construction equipment would remain on site throughout this construction phase.

Bridge Replacements

Two bridges along The Old Road alignment would be replaced, including the Santa Clara River Bridge, which crosses over the Santa Clara River, and the SPT Co. Bridge, which crosses over the abandoned SPT Co. railroad tracks. Construction activities associated with bridge replacement would be similar for both bridges. The bridge construction would occur concurrently and would be divided into two stages, one for the west side and one for the east side of the bridge. Construction would begin with the west side replacement; after the west side is completed, traffic would be switched to that side, and construction would begin on the east side. The stages would follow the same steps, as follows.

Stage 1: West Side Bridge Replacement**Phase 1: Site Preparation (spring or summer 2026)**

- o Implement traffic control detour.
- o Install shoring along the north and south roadway bridge approaches.
- o Create an embankment by backfilling within the shoring 15 feet high at the north and south bridge approaches.
- o Install subgrade and base course materials.
- o Remove part of the existing bridge foundation and construct the west side of the bridge over the SPT Co. Railroad tracks.

Phase 2: Bridge Foundations (spring 2026–fall 2026)

- o Clear and grub at the riverbed easement for tree removals and construct a temporary access ramp.
- o Construct embankment 2:1 slope from the riverbed to the face of the north abutment.
- o Construct the bridge substructure on the west side of the bridge over the Santa Clara River, including abutment, column pile extensions, and cap beams; install piles at approximately 150 feet deep within the riverbed and 100 feet deep at the abutments.
- o Erect prestressed girders.
- o Construct continuity diaphragms between girders at all bents.

Phase 3: Bridge Deck (fall 2026–spring 2027)

- o Install concrete deck falsework, pour deck, and add barrier rails.
- o Apply asphalt paving on road approach.

Stage 2: East Side Bridge Replacement**Phase 1: Site Preparation (spring 2027)**

- o Implement traffic control detour to switch traffic to the west side of the bridge.
- o Create an embankment by backfilling within the shoring 15 feet high at the north and south bridge approaches.
- o Install subgrade and base course materials.
- o Remove the bridge superstructure over the abandoned SPT Co. railroad tracks, including deck and barrier rails.
- o Remove the existing bridge over the Santa Clara River, including deck, barrier rails, and pier walls.

Phase 2: Bridge Foundations (summer 2027–fall 2027)

- o Clear and grub at the riverbed easement.
- o Construct embankment 2:1 slope from the riverbed to the face of the north abutment.
- o Construct the bridge substructure on the east side of the bridge over the Santa Clara River, including abutment, column pile extensions, and cap beams; install piles at approximately 150 feet deep within the riverbed and 100 feet deep at the abutments.
- o Erect prestressed girders.
- o Construct continuity diaphragms between the girders at all bents.
- o Construct the east side of the bridge over the abandoned SPT Co. railroad tracks.

Phase 3: Bridge Deck (spring 2028–winter 2028)

- o Install concrete deck falsework, pour deck, and add barrier rails.
- o Apply asphalt paving on the road approach.
- o Construct the closure pour to connect the two halves of the river replacement bridge.
- o Construct the closure pour to connect the two halves of the replacement bridge over the abandoned railroad ROW together.
- o Remove the deck falsework, including deck closure pour construction.

Construction Equipment

The construction equipment to be used for this component of the proposed project would include five pieces of heavy equipment (i.e., loader, drill rig, backhoe, hoe ram, and 100-ton-capacity hydraulic crane), approximately five to 10 concrete trucks, approximately five dump trucks, one forklift, excavators, and several telescopic man-lifts. The trucks would travel to and from the project site each day during the bridge replacements, but the construction equipment would remain on site throughout this construction phase.

Construction Personnel

On-site construction personnel during a typical construction day would include:

- Project Manager
- Project Superintendent
- a road foreman
- a bridge foreman
- four operators
- 10 journeymen
- 10 laborers

The number of construction personnel traveling to and from the project site each day during the peak construction period would double from those listed above.

1.3.3.7 Best Management Practices

An appropriate combination of monitoring and resource impact avoidance would be employed during all the construction activities, including implementation of the following best management practices (BMPs):

- Temporary construction site BMPs and the regulatory permit compliance component for the State's Construction General Permit for applicability of a Stormwater Pollution Prevention Plan (SWPPP) and compliance with LA County's Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Permit.
- Implementation of a Construction and Demolition Debris Recycling and Re-use Plan, in accordance with Chapter 20.87 of the LA County Code.
- Adherence to LA County's Construction Site BMP Manual and SWPPP preparation manual.
- Adherence to the requirements of both Rule 402 and 403 (standard contract requirements that are specified in Section EC of the LACPW contract special provisions) as governed under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

LACPW would work with the local authorities to prepare a construction traffic notification procedure, to minimize transportation and traffic project effects.

1.3.4 Project Alternatives

Two project alternatives are proposed: the No-Build Alternative and the Build Alternative. The criteria used for the alternative evaluation included whether the alternative would meet the project purpose and need, would avoid potential environmental impacts, and if the alternative would be within the estimated project cost.

1.3.4.1 Alternative 1: No-Build Alternative

Alternative 1, the No-Build Alternative, would maintain the existing lane configuration of The Old Road. The Old Road would continue to be a four-lane (two NB and two SB) roadway and would not accommodate current or projected traffic demands, and intersection improvements would not be installed. Under the No-Build Alternative, the proposed project would not be constructed, and no impacts on land use would occur. The No-Build Alternative would not repair the structurally deficient bridge or allow the anticipated volume of water from an LACPW capital flood event (defined as a 50-year burned and bulked storm) to pass under it. Vehicular, pedestrian, and bicycle safety would not be enhanced.

1.3.4.2 Alternative 2: Build Alternative

Alternative 2, the Build Alternative (the proposed project), would improve existing traffic operations and accommodate future traffic projections along the roadway. The improvements primarily would consist of reconstruction and widening of The Old Road, replacement of two bridges, reconstruction and widening of Rye Canyon Road, and reconstruction and widening of Sky View Lane, including reconfiguration of its intersection with The Old Road. In addition, the proposed project would include an extension of the Multi-Use Trail. Current traffic demand in the project area would meet or exceed roadway capacity for many arterial roadways. Because increases in traffic demand are expected over the next few years, concurrent with projected population growth in the area, the widening of The Old Road to six lanes would be critical to passage of traffic and emergency vehicles through the area.

The Old Road over the Santa Clara River Bridge currently is not high enough to allow the anticipated volume of water from an LACPW capital flood event (defined as a 50-year burned and bulked storm) to pass under it. Replacing the bridge at a higher elevation would provide a minimum freeboard of 2.5 feet to allow a capital flood event to pass under it. In addition, emergency repairs were performed on the superstructure, piles, and abutment seats of the bridge immediately following the 1994 Northridge earthquake. Nonetheless, the bridge currently is classified as structurally deficient, per FHWA standards. Replacing the bridge as part of this project would eliminate that classification. The primary components of the Build Alternative are discussed in Section 1.3.3.

1.3.5 Alternatives Considered but Eliminated from Further Discussion Prior to the Draft Initial Study/Environmental Assessment (IS/EA)

Other alternatives were considered during the early stages of project development but were eliminated because they would not meet the project's purpose and need or were considered infeasible. The proposed project has been modified several times, to reduce potential impacts on sensitive resources and facilitate wildlife movement. Earlier iterations of the proposed project were eliminated from further detailed analysis because the currently proposed project presents more environmentally friendly options toward fulfilling project objectives.

Raising the Santa Clara River Bridge with No Road Widening

This alternative proposed to construct the Santa Clara River Bridge to accommodate the capital flood requirements and proposed reconstruction of the necessary bridge approach lengths to accommodate the raising of the Santa Clara River Bridge approximately 14 feet, as well as to lower the Multi-Use Trail bridge to meet vertical sight distance requirements. The proposed cross-section of the roadway and the bridge would follow the existing configuration of two NB and two SB lanes in each direction. During the scoping period, LACPW eliminated this alternative because of it would fail to meet the LA County Highway and Bikeway Master Plan objectives as well as avoid the potential impacts on the projected future traffic.

Arched Corrugated Steel Plate Tunnel for Trail Crossing The Old Road

This alternative proposed to replace the existing bridge, formerly known as the SPT Co. Bridge, with a tunnel consisting of arched corrugated steel plates. The proposed tunnel would span 33 feet to accommodate the proposed Multi-Use Trail. As a steel structure, the corrugated steel would require periodic repainting and coating as part of its maintenance. During the scoping period, LACPW eliminated this alternative because of the long-term maintenance costs, additional backfill material that would be required, and the non-standard design.

Alternative Alignment for the Multi-Use Trail

This alternative proposed an alternate alignment for the Multi-Use Trail along the western boundary of The Old Road ROW. This alternative was eliminated from further consideration because it would not avoid or reduce the potential impacts or require less mitigation than the chosen alternative, for the following reasons:

Cultural Resources: This alternative would require substantial additional excavation, and this area has not been analyzed for cultural and historical resources. The proposed alignment has had cultural studies completed and no impacts would occur.

Water Quality and Stormwater Runoff: This alternative would increase the amount of impervious area compared to the proposed project, and the amount of low-impact development devices necessary to treat the stormwater runoff would require more surface area.

Plant Species: The alternative alignment would not reduce the number of trees that would need to be removed and would not lessen any of the project impacts on plant species.

Public Services: The alternative alignment would reduce the corner sight distance for trail users at the connection to the proposed bridge.

1.3.6 Permits and Approvals Needed

The following permits, licenses, agreements, and certifications (PLACs) would be required for project construction:

Agency	PLAC	Status
U.S. Fish and Wildlife Service	Biological Opinion	A Biological Opinion was received (dated August 30, 2024), prior to the approval of the Environmental Impact Report/Environmental Assessment EIR/EA and issuance of the Finding of No Significant Impact (FONSI).
National Marine Fisheries Service	Letter of Concurrence	An informal consultation package was submitted to the National Marine Fisheries Service for their concurrence that the project is not likely to adversely affect listed species under their purview.
U.S. Army Corps of Engineers	Section 404 permit for filling or dredging waters of the U.S.	Following approval of the Final EIR/EA and issuance of the FONSI, permit applications will be submitted.
California Department of Fish and Wildlife	1602 Agreement for Streambed Alteration	Following approval of the Final EIR/EA and issuance of the FONSI, permit applications will be submitted.
Regional Water Quality Control Board (RWQCB)	Potential Section 401 Water Quality Certification or waiver and or/Porter Cologne Act Waste Discharge Requirements Compliance with the NPDES Construction General Permit	The applicable RWQCB permit would be determined during design. If needed, this permit may involve a joint "Application for 401 Water Quality Certification" and/or "Report of Waste Discharge." A statewide National Pollutant Discharge Elimination System permit for construction and operations would be in effect for the proposed project. A compliance review would take place during the design phase.
Federal Highway Administration (FHWA)	Concurrence with the proposed project's conformity to the Clean Air Act and other requirements	Air quality studies were submitted for FHWA determination. FHWA determined that the proposed project conformed with the Clean Air Act on May 6, 2025.
State Historic Preservation Officer	National Historic Preservation Act Section 106 consultation	The Fernandefio Tataviam Band of Mission Indians requested consultation and Section 106 and AB 52 consultation has concluded.

Chapter 2 **Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures**

This chapter discusses potential environmental impacts of the proposed project and recommended avoidance, minimization, and/or mitigation measures (AMMs). The proposed AMMs also are provided in Appendix C. Additional relevant information is provided in the following appendices: Appendix A provides the Caltrans Title VI Policy Statement, and Appendix B lists the technical studies prepared for the proposed project. This chapter also addresses issues of concern pursuant to NEPA.

2.1 Topics Considered but Determined Not to be Relevant

As part of the scoping and environmental analysis that was conducted for the proposed project, the following environmental issues were considered, but either the resources are not present or no adverse impacts were identified. Therefore, the following resources are not discussed further in this document.

Coastal Zone: The project area is in unincorporated LA County but is not within the coastal zone; therefore, no coastal resources would be affected by project construction or operation.

Timberlands: No forest resources or timberlands are in the project area or vicinity. Therefore, the California Timberland Productivity Act would not apply.

Wild and Scenic Rivers: No wild and scenic rivers are in the project area or vicinity. Therefore, the National Wild and Scenic Rivers Act and the California Wild and Scenic Rivers Act would not apply.

2.2 Human Environment

2.2.1 Existing and Future Land Use

The discussion in this section is based on the Community Impact Assessment (CIA) (AECOM 2023a) that was prepared for the proposed project. This section describes the existing and future regional land uses in the project area and vicinity.

2.2.1.1 Regulatory Setting

Sections 21083 and 21087 of the Public Resources Code (PRC) and Section 15126.2(a) of the CEQA Guidelines require lead agencies to assess the potential impacts of a proposed project by examining potential alterations in the human use of the land, including population distribution and population concentration, and commercial and residential development. Section 15131 of the CEQA Guidelines allows public agencies to consider economic and social impacts when determining the significance of an environmental impact. Furthermore, The Council on Environmental Quality (CEQ) regulation under Section 1502.16(c), Title 40 of the Code of Federal Regulations (CFR) requires environmental documents to identify possible conflicts between the proposed project and local land use plans.

2.2.1.2 Affected Environment

Project Area

The project area could be directly affected by project construction and operation, and it would include the permanent footprint of the Build Alternative (i.e., the permanently affected areas) plus the construction footprint, including staging areas associated with the Build Alternative (i.e., the temporarily affected areas). The project area is within a variable 140- to 160-foot-wide ROW that runs in a north/south direction, parallel to I-5 through Santa Clarita Valley. The roadway's southern terminus is the junction of San Fernando Road and Sierra Highway in LA County; the northerly terminus is roughly at Oak Court in the unincorporated community of Castaic (north of Lake Hughes Road). Major intersections along The Old Road within the project limits include Sky View Lane, Rye Canyon Road, the I-5 SB ramps, Henry Mayo Drive, Magic Mountain Parkway, and the State Route (SR) 126 overcrossing.

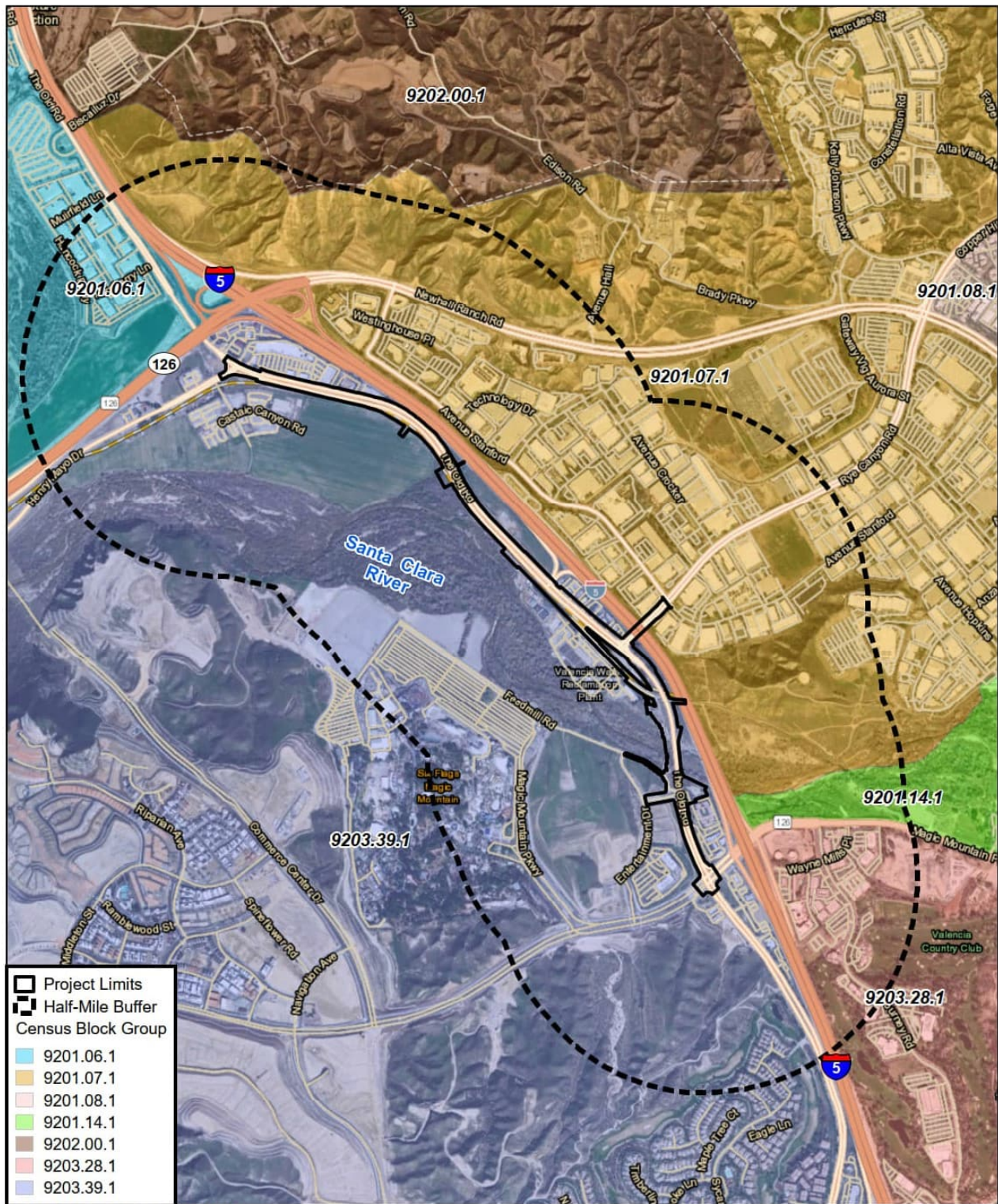
Study Area

The study area is defined as the areas and nearby communities that would have the greatest potential to be directly or indirectly affected by the proposed project during its construction and operation. The study area was delineated using aerial photographs, municipal boundaries, and physical characteristics that naturally delineate an area and the area in which both direct and indirect effects would be likely to occur at their greatest intensity.

The study area includes an area much larger than that which could be directly affected by project construction and ROW acquisitions, to provide a broader picture of the area that potentially could be affected by the proposed project than by City and County demographics alone. City and County demographic data were analyzed to present the general population and housing characteristic of the study area. Census tracts also were used to incorporate populations that may not be directly affected by the proposed project but may be indirectly affected by project construction and operation. The study area encompasses the project area as well as a 0.5-mile buffer around the study area. A 0.5-mile buffer was determined to be a sufficient range for all potential environmental impacts that could affect human population. In addition, the study area includes the unincorporated community of Stevenson Ranch, the City of Santa Clarita (the incorporated community nearest the project area), and Los Angeles County for reference.

Study Area Census Tracts

The study area for the proposed project includes the seven U.S. Census Tracts that are shown on Figure 3, which come in direct contact with the study area. These are U.S. Census Tracts 9201.06, 9201.07, 9201.08, 9201.14, 9202.00, 9203.28, and 9203.39, Block Group 1.



Source: CENSUS 2010; Prepared By: AECOM, 2023.

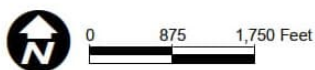


Figure 3
Census Map

Zoning and Existing Land Uses

Existing Land Use Patterns

Existing land uses are defined as those uses of the study area and adjacent areas that existed at the time the CIA was conducted. The applicable land use planning documents for the study area are the Los Angeles County General Plan, 2012 Santa Clarita Valley Area Plan, and the 2011 City of Santa Clarita General Plan.

The project area is within the Santa Clarita Valley Area Plan, a component of the Los Angeles County General Plan, which is intended to guide the regulation of development within the unincorporated portions of Santa Clarita Valley. In addition, a portion of the project area along Rye Canyon Road is guided by the City of Santa Clarita General Plan.

The project area is in unincorporated areas in LA County as well as in the city of Santa Clarita. Specifically, the project area is in the community of Stevenson Ranch, developed from its role as a highway stop and containing small cafes, hotels, and automotive services along the Old Ridge Route, which opened in 1914.

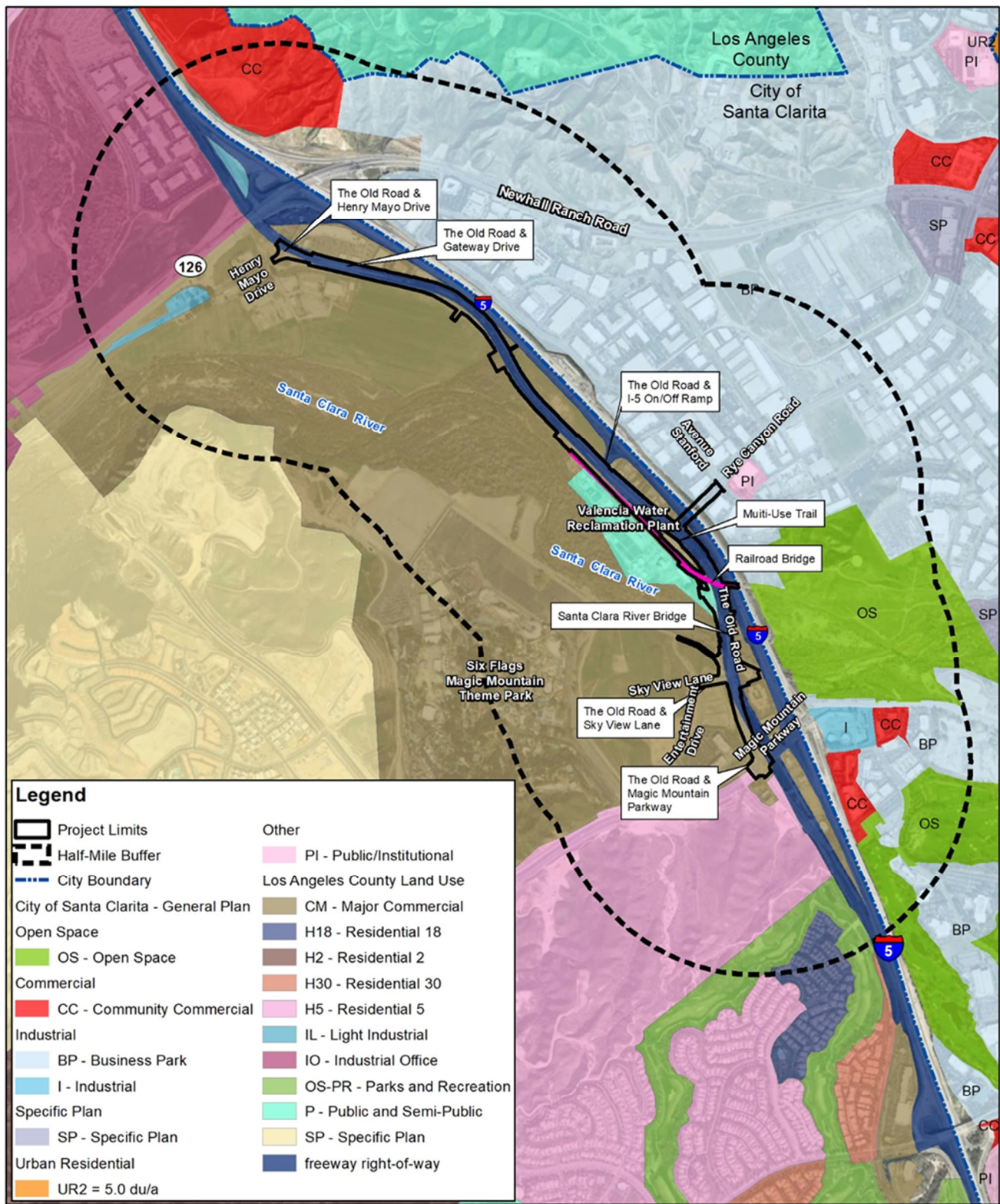
The Old Road is a four-lane (two NB and two SB) roadway, within a variable 140- to 160-foot-wide ROW that runs in a north/south direction, parallel to I-5 through Santa Clarita Valley. The roadway's southern terminus is the junction of San Fernando Road and Sierra Highway in the city of Santa Clarita; and the northern terminus is roughly at Oak Court in the unincorporated community of Castaic (north of Lake Hughes Road).

Rye Canyon Road is a six-lane (three eastbound and three westbound) roadway that runs in an east/west direction, mainly within the city of Santa Clarita. The roadway's western terminus is the junction of The Old Road at Rye Canyon Road within LA County; and the eastern terminus is the junction of Newhall Ranch Road and Rye Canyon Road within the city of Santa Clarita.

Zoning

Los Angeles County General Plan, 2012 Santa Clarita Valley Area Plan, and the 2011 City of Santa Clarita General Plan

The roughly 2-mile project corridor is in the unincorporated community of Stevenson Ranch in the northern part of LA County as well as in the city of Santa Clarita. Thus, the project area is subject to the policies in the Los Angeles County General Plan and the Santa Clarita Valley Area Plan. The project area also is subject to the policies in the City of Santa Clarita General Plan. Figure 4 shows the land use designations, and Figure 5 shows the zoning designations of the project area, which are described next.



Source: Land Use, SCAG, 2017; Prepared By: AECOM, 2023.



Figure 4
General Plan Land Use

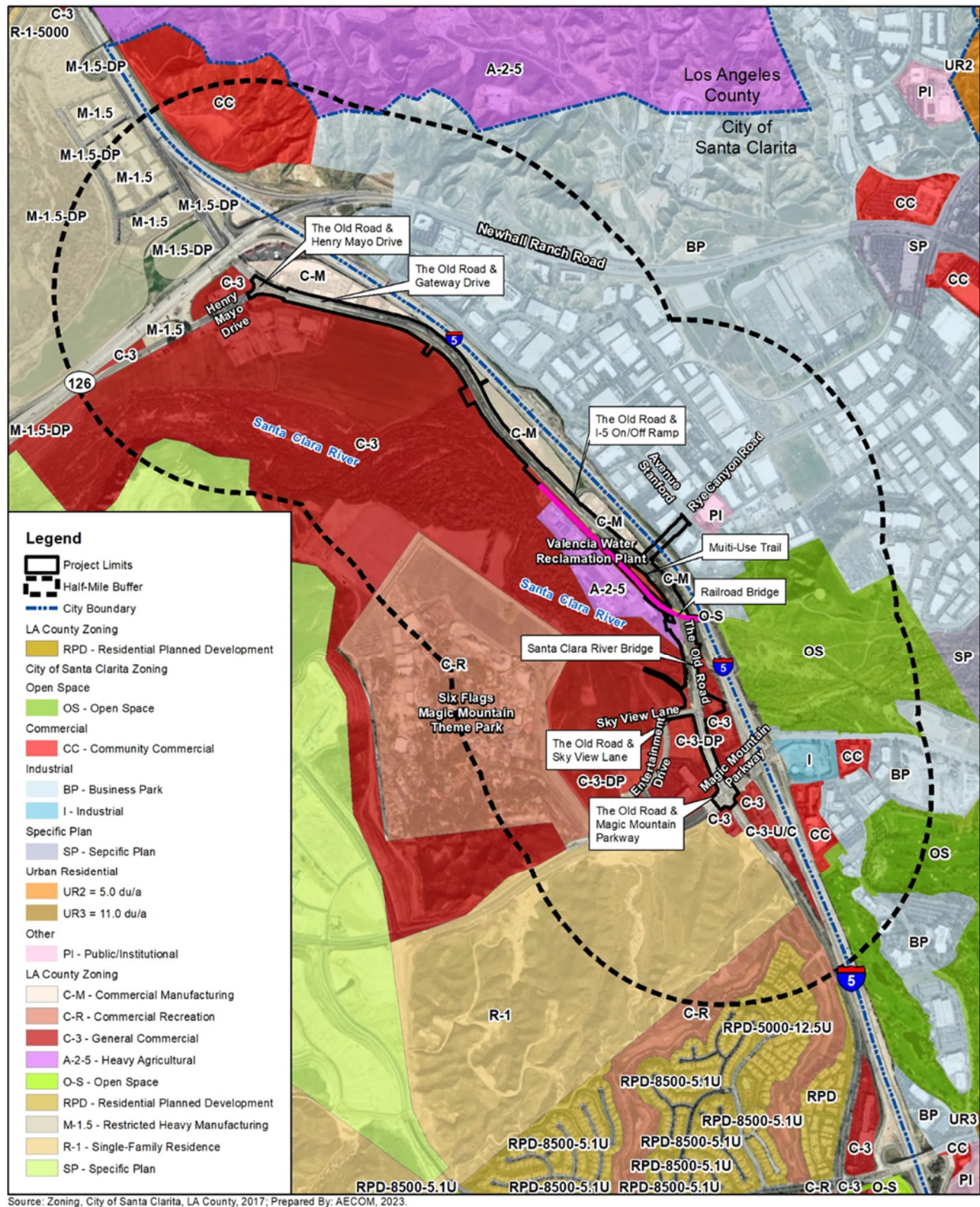


Figure 5
Zoning Map

The area immediately west of The Old Road and the portion of Henry Mayo Road within the project area is zoned C-3, which is noted as General Commercial. The purpose of this area is described as “local-serving commercial uses, including retail, restaurants, and personal and professional services; single family and multifamily residences; and residential and commercial mixed uses.” A boys camp (27211 Henry Mayo Drive), a recreational vehicle storage facility (28755 Castaic Canyon Road), and the Castaic Union School District Transportation and Maintenance Yard (27051 Henry Mayo Drive) are along Henry Mayo Drive within the project area.

The area immediately east of The Old Road and west of I-5 is zoned Commercial Manufacturing (C-M). The purpose of this area is described as “large and intense commercial uses, such as regional and destination shopping centers, tourist and recreation related commercial services; multifamily residences; and residential and commercial mixed uses.” Land uses include a boys camp (27211 Henry Mayo Drive), a recreational vehicle storage facility (28755 Castaic Canyon Road), and a commercial complex that includes a church, Subway Restaurant, a sports complex, and commercial offices. A California Highway Patrol office (28648 The Old Road) also is east of The Old Road and just south of SR-126 and Henry Mayo Drive. A commercial complex is further southeast of The Old Road and consists of several restaurants, including Jack in the Box (28144 The Old Road), Starbucks (28120 The Old Road), Original Tommy’s (28116 The Old Road), Del Taco (28082 The Old Road), and Jimmy Dean’s Charbroiled Burgers (28018 The Old Road).

The area immediately west of I-5, between Rye Canyon Road and Avenue Stanford, is within the City of Santa Clarita. This area is zoned Business Park (BP) and is designated BP in the City of Santa Clarita General Plan. Land uses in the project area along Rye Canyon Road include Riedel Communications (25702 Rye Canyon Road), Concentra Urgent Care (25733 Rye Canyon Road), Artex Kitchen Design (25700 Rye Canyon Road), and DTC (25709 Rye Canyon Road).

The majority of the project area south of Henry Mayo Drive is designated General Commercial (C-3) in the Los Angeles County General Plan. The Santa Clara River crosses The Old Road, and the Valencia Water Reclamation Plant (an area zoned A-2-5 for Heavy Agriculture) is west of The Old Road across the aforementioned commercial complex.

The land southwest of the project area includes an area designated as Commercial Recreation (C-R), which is limited to low-intensity commercial uses “that are compatible with rural and agricultural activities, including retail, restaurants, and personal and professional services.” This area includes Six Flags Magic Mountain (26101 Magic Mountain Parkway). North of Magic Mountain Parkway are areas designated as General Commercial (C-3-DP and C-3). Businesses include the Hilton Garden Inn Valencia Six Flags (27710 The Old Road). South of Magic Mountain Parkway are areas designated as General Commercial (C-3-U/C) that consist of various restaurant chains as well as single-family residential areas designated as R-1.

Surrounding Zoning and Land Use

Historically, the project area and vicinity have been used primarily for agricultural purposes or cattle grazing, between about 1928 through 1994. By 2002, the areas adjacent to the project area were developed by grading and were intended mainly for industrial and commercial uses.

I-5 is a major transportation corridor east of The Old Road. The agricultural land and the hillsides east of I-5 generally are undisturbed by development. In general, commercial

businesses are primarily north of Magic Mountain Parkway. The area further north of the project corridor includes residential homes, which are both single-family and multi-family residences. Single-family residences encompass the southern portion of the project limits. Figure 5 shows the zoning designations of the project area, which is described next.

Unincorporated Los Angeles County

Zoning in the project vicinity within unincorporated LA County includes M-1.5 or M-1.5-DP, which is north and west of Henry Mayo Drive. According to the Los Angeles County General Plan, this area is designated as Restricted Heavy Manufacturing. Areas designated as Heavy Agricultural (A-2-5) are north of Newhall Ranch Road and east of I-5. Areas south of the project area and Magic Mountain Parkway are zoned as Single-Family Residential (R-1) and Residential Planned Development. These areas include single-family and multi-family residential areas. Golf courses that are zoned C-R are in these areas.

City of Santa Clarita

Zoning in the project vicinity within the city of Santa Clarita includes areas zoned Community Commercial (CC) north of Henry Mayo Drive and east of The Old Road and I-5. The surrounding area east of The Old Road and I-5, along Rye Canyon Road, is predominantly zoned BP. Businesses along this portion of the project area include technology firms, consulting agencies, insurance companies, hotels (along Newhall Ranch Road), and the Santa Clarita Valley Chamber of Commerce (28494 Westinghouse Place). The California Highway Patrol Commercial Vehicle Enforcement Facility is east of The Old Road and I-5 (27858 Golden State Highway).

An area is designated Open Space (O-S), south of Rye Canyon Road, north of Magic Mountain Parkway, and east of The Old Road and I-5 (City of Santa Clarita 2018). The Valencia Country Club (27330 Tourney Road) is south of Magic Mountain Parkway and east of I-5.

Areas zoned BP also are south of Magic Mountain Parkway along Tourney Road. These areas include Kaiser Permanente Santa Clarita Medical Offices (27107 Tourney Road) and the U.S. Social Security Administration (27200 Tourney Road).

Future Land Use

Future land uses are planned land uses that are expected to occur because of land use designations and policies contained in applicable land planning documents. Recent development trends in the project area have been focused primarily on transportation projects. Table 2-1 lists the development projects in the project vicinity. The project time frame would include any other projects in the vicinity that may occur within 3 years of the proposed project's implementation. The projects that are listed were used to analyze the potential cumulative impacts of the proposed project.

Table 2-1: Planned Local Developments

Name	Jurisdiction	Proposed Uses	Status
Interstate 5 (I-5) Rye Canyon Ramps Project	County of Los Angeles	I-5 Ramps (connect The Old Road to I-5)	95% plans
Newhall Ranch Specific Plan	County of Los Angeles	15,000-acre Master Planned Community	Under construction

Source: AECOM 2023a

The Newhall Ranch Project, a development that broke ground in 2018 and began to sell homes in 2021, intends to add more than 21,500 homes in Santa Clarita Valley along SR-126 (Daily News 2021). As discussed in further detail in Section 2.2.5, the Build Alternative would not change current access along The Old Road or provide new access; only improvements or re-alignments of intersections along The Old Road would occur. The intersection and other improvements associated with the Build Alternative would create benefits for travelers, by decreasing congestion; however, the Build Alternative would not accommodate additional traffic beyond what currently is projected for the area. Furthermore, the Build Alternative would address existing operational demand and capacity deficiencies and would not be expected to influence the amount, location, and/or distribution of growth currently expected in and around the study area. The proposed project would not be expected to induce land development or encourage changes in population density or construction of additional housing beyond what already is planned for the study area.

2.2.1.3 Environmental Consequences

Alternative 1: No-Build Alternative

The No-Build Alternative would maintain the current configuration of The Old Road in the study area. The No-Build Alternative would not be consistent with the LA County Circulation Element, which calls for The Old Road to become a six-lane major highway. The Old Road over the Santa Clara River bridge would continue to be substandard for the following reasons: (a) the bridge would continue to have insufficient freeboard to allow an LACPW capital flood to pass under the bridge; (b) the bridge would continue to not meet Caltrans bridge seismic criteria; and (c) the bridge would continue to not meet LACPW highway design speed safety standards (it currently is designed for 40 miles per hour [mph], whereas the master plan highway criterion is 65 mph).

The existing lane configurations would be unchanged, no ROW acquisitions would be required, and no intersection improvements would be undertaken. Under the No-Build Alternative, the proposed project would not be constructed and would not affect land use.

Alternative 2: Build Alternative

Temporary Impacts

Construction of the Build Alternative is expected to last approximately 4.5 years. Typical roadway construction activities would result in some temporary local impacts on land uses in the area, including additional truck traffic, pollutant emissions from construction activities, increased noise and vibration, and temporary delays and/or detours. However, such potential construction impacts would be temporary and intermittent. Temporary construction easements (TCEs) would be needed for construction access and staging.

Currently, The Old Road, Rye Canyon Road, and Sky View Lane do not allow parking within the roadway ROW. Parking lots for commercial properties would be affected temporarily by project construction activities. Temporary easements would be required from some parcels.

The selection of suitable staging sites would be determined by the project contractor. Figure 2 shows a potential staging site near the proposed bridges. Access to businesses would remain open during project construction.

Permanent Direct Impacts

The majority of roadway improvements and construction would occur within the existing ROW. However, acquisition of the ROW would be required along almost all the west side of The Old Road. The majority of this property is vacant, with the exception of the Valencia Water Reclamation Plant. This land currently is owned by the Newhall Land and Farming Company and the LA County Sanitation District. No ROW extensions would occur on the east side of the road, with the exception of a small acquisition on the southeast corner of the intersection of Rye Canyon Road and The Old Road, and a small portion on the southeast corner of the intersection of Sky View Lane and The Old Road. Both parcels are owned by Newhall Land and Farming Company and currently are vacant. Therefore, farmland may be acquired for the proposed project, which may lead indirectly to the conversion of farmland. However, none of the existing parcels are being used for farming, and this land would not be suitable for farming because sufficient land area is not available for farming on these parcels. Table 2-2 and Figure 6 show the parcels and Assessor Parcel Numbers (APNs) that would be affected by the ROW acquisition.

Table 2-2: Land Use Impacts

Impacted Parcel (APN)	Owner of Record	Land Use	Parcel Size (square feet)	Acquisition Area (square feet)	Acquisition and Type
2826005007	Newhall Land and Farming Co	Vacant	38,738	686.96	Partial Right-of-Way (ROW) Acquisition
2826005013	Newhall Land and Farming Co	Vacant	648,292	166,041.54	Partial ROW Acquisition
2826006008	Newhall Land and Farming Co	Vacant	209,259	274.5	Partial ROW Acquisition and Temporary Easement
2826006905	County Sanitation District No 32	Public Utility	292,994	49,608.40	Partial ROW Acquisition and Temporary Easement
2826006906	County Sanitation District No 32	Public Utility	104,344	925.66	Partial ROW Acquisition and Temporary Easement
2826007021	Newhall Land and Farming Co	Vacant	6,403,327	38,076.48	Partial ROW Acquisition and Temporary Easement
2826037018	Studio Inn & Suites, LLC and Maruti Investments, Inc.	Commercial /Industrial	150,958	9,445.64	Temporary Easement
2826121002	Fleet Properties	Commercial /Industrial	25,525	1,976.77	Temporary Easement
2826121006	Deme Properties LLC	Commercial /Industrial	27,961	3,047.83	Partial ROW Acquisition and Temporary Easement
2826121007	28038 The Old Road LLC	Commercial /Industrial	36,819	2,923.92	Temporary Easement

Table 2-2: Land Use Impacts

Impacted Parcel (APN)	Owner of Record	Land Use	Parcel Size (square feet)	Acquisition Area (square feet)	Acquisition and Type
2826163031	Newhall Land and Farming Co	Vacant	241,149	778.05	Partial ROW Acquisition and Temporary Easement
2826006003	Newhall Land and Farming Co	Commercial /Industrial	19,415	910.75	Partial ROW Acquisition and Temporary Easement
2826006009	Newhall Land and Farming Co	Access Road/ Vacant	110,537	79,521.71	Partial ROW Acquisition and Temporary Easement
2826006901	County Sanitation District No 32	Public Utility	617	617	Temporary Easement
2826006907	County Sanitation District No 32	Public Utility	2,622	374.60	Temporary Easement
2826037025	Newhall Land and Farming Co	Vacant	18,697	21,735.65	Temporary Easement
2826037026	Newhall Land and Farming Co	Vacant	97,993	42,250	Temporary Easement
2826037027	CEF Equities LLC and Rexford Pico LLC	Vacant	69,583	56,500	Temporary Easement
2866007062	Newhall Land and Farming Co	Vacant	33,792	19,905.44	Full Permanent ROW Acquisition
2866008001	Rye Canyon Industrial LLC	Commercial /Industrial	117,130	3,245.00	Partial ROW Acquisition and Temporary Easement
2866009014	Di Pietro Holdings	Commercial /Industrial	91,725	6,451.00	Partial ROW Acquisition and Temporary Easement
2826163034	Newhall Land and Farming	Vacant	221,814	4,409	Partial ROW Acquisition
2826005056	Old Road Realty LLC	Vacant	144,994	644	Temporary Easement

Source: AECOM 2023a

In addition, ROW acquisition also would be required along Rye Canyon Road, between The Old Road and Avenue Stanford, to accommodate the roadway widening and sidewalk improvements from three commercial properties. The roadway widening would affect the I-5 bridge over Rye Canyon Road, which would require the concrete slopes under the bridge to be reconstructed with retaining walls. These acquisitions would cause direct impacts on the commercial properties along the Rye Canyon Road ROW.

One full parcel acquisition would be required, as shown in Table 2-2. The full parcel acquisition would occur on vacant land owned by the Newhall Land and Farming Company. The land use would permanently change from the existing use to transportation land use, where the ROW would be expanded to construct the Build Alternative. In addition, as shown in Table 2-2, partial acquisitions would be required for additional properties, which would change the land use designation for the portion of the properties acquired, while the remaining portions would retain their existing use.



Source: Esri Maps & Data, 2023; Prepared By: AECOM, 2023.



0 500 1,000 Feet

Project Limits

Project Parcels

2826163031 Parcel Number

Figure 6
Parcels Selection for Review

The Build Alternative would not preclude any of the planned projects listed in Table 2-1. Overall, the Build Alternative would provide enhanced access within this portion of LA County.

No park or recreational activities are anticipated to be affected by the acquisitions.

Permanent Indirect Impacts

Based on Caltrans guidance, indirect impacts on land use typically occur outside a proposed project's study area and can last longer than direct impacts (Caltrans 2011). Regional development impacts (e.g., changes in regional development and growth-related changes) on land use patterns are not anticipated with Build Alternative implementation.

The proposed project is not anticipated to induce growth or change regional development patterns. Growth has been occurring in the study area at a slow rate and is expected to continue to grow at a slow rate (as discussed in Section 2.2.5). The Build Alternative would address existing operational and capacity deficiencies and would not be expected to influence the amount, location, and/or distribution of growth in and around the study area. The proposed project is not anticipated to induce land development or encourage changes in population density or the construction of additional housing.

The area that would be subject to ROW acquisition is urbanized and also contains vacant parcels. As shown in Table 2-2, the Build Alternative would affect 23 parcels (permanently or temporarily), from partial acquisitions or easements of the majority of them. As discussed above, one full parcel acquisition would be required. The majority of ROW acquisitions and easements would occur on vacant parcels or commercial/office use properties fronting The Old Road. Businesses would be slightly affected in terms of the permanent acquisitions; driveways and parking likely would be affected but not the buildings themselves. No relocations would be required, and construction would accommodate continued access to the businesses. The acquired properties would be used for ROW and converted to transportation uses, which would be a direct impact on land use. However, the Build Alternative would not require permanent displacement of structures or changes in access to homes or businesses. Overall, the proposed project would involve ROW acquisition for transportation uses and would not have adverse effects on land use and zoning designations.

Because the impacts would be contained within the project area, Build Alternative implementation would not result in indirect impacts on land use. The project improvements would result in a more efficient transportation system, which would be locally and regionally beneficial.

2.2.1.4 Avoidance, Minimization, and/or Mitigation Measures

The project design would require some ROW acquisitions, but this would be consistent with current and future planned local land use, with the exception of acquisitions required for the Build Alternative. The Build Alternative would avoid impacts on existing built land uses to the extent practicable while adhering to design and operational criteria to maintain a safe roadway. During the final design phase, efforts would be made to further minimize construction and operation impacts on existing and planned land uses. The following AMMs would be implemented:

COM-1: Maintain access and parking throughout construction. Before construction, LACPW will reconfigure access and parking to residential and commercial lots, to allow continued availability of that parking and access.

2.2.1.5 Consistency with State, Regional, and Local Plans and Programs

The following section is based on the CIA (AECOM 2023a), prepared for the proposed project, and describes the adopted plans in the study area and the goals, policies, or objectives that would be applicable to the proposed project. State law is the foundation for local planning in California. All references in this section are available in the CIA.

The California Government Code (Sections 65000 et seq.) contains many of the laws pertaining to the regulation of land uses by local governments, including the general plan requirement, specific plans, subdivisions, and zoning. However, the State seldom is involved in local land use and development decisions; these have been delegated to the City councils and boards of supervisors of the individual cities and counties. Local decision-makers adopt their own set of land use policies and regulations based on State laws.

The study area falls under the jurisdiction of the Southern California Association of Governments (SCAG). The SCAG region, which is the largest Metropolitan Planning Organization (MPO) in the nation, includes six counties (i.e., Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities. As the designated MPO, the SCAG is mandated by federal and State law to prepare a long-range Regional Transportation Plan (RTP) every 4 years. The RTP now incorporates a Sustainable Communities Strategy (SCS), to comply with the Sustainable Communities and Climate Protection Act (Senate Bill 375), which requires development of regional reduction targets for greenhouse gas (GHG) emissions in long-range regional planning for land use, housing, and transportation. In 2020, the SCAG's Regional Council adopted the Connect SoCal (2020–2045 RTP/SCS). Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals through 2045.

In addition to the regional plans, State law requires that each city and county adopt a general plan containing the following seven components or elements: land use, circulation, housing, conservation, open space, noise, and safety (California Government Code Sections 65300 et seq.). At the same time, each jurisdiction is free to adopt additional elements covering subjects of particular interest to that jurisdiction, such as recreation, urban design, or public facilities. The local general plan can be described as the City or County's "blueprint" for future development.

Community plans and specific plans often are used by cities and counties to plan the future of a particular area at a finer level of detail than that provided by the general plan. A community plan is a portion of the local general plan focusing on the issues pertinent to a particular area or community within the city or county. It supplements the policies of the general plan. Specific plans describe allowable land uses, identify open space, and detail the availability of facilities and financing for a portion of the community. Specific plans must be consistent with the local general plan. A specific plan implements but is not technically a part of a general plan.

The general plans of the communities (Los Angeles County; City of Santa Clarita; and the unincorporated community of Stevenson Ranch, which is under the jurisdiction of Los Angeles County) that could be affected by the proposed project were reviewed to understand the development trends, land use-related goals, and specific policies of the local jurisdictions. The land use, community design, open space, and/or mobility elements for each plan provide most of the goals or policies relevant to the project area. Figure 4 shows the General Plan Land Use designations in the study area. The following sections discuss the relevant regional and local policies.

2.2.1.6 Affected Environment

The proposed project's consistency with the following types of plans was considered and is discussed next: Transportation Plans/Programs, Regional Growth Plans, Regional Conservation Plans, and General and Community Plans.

Transportation Plans/Programs

SCAG Federal Transportation Improvement Program

The Federal Transportation Improvement Program (FTIP) is a federally mandated 4-year program for all federally funded transportation projects in the region, as well as all regionally significant transportation projects for which approval from federal funding agencies would be required, regardless of funding source. The FTIP is a comprehensive listing of such transportation projects, proposed over a 6-year period. As the MPO for the region, the SCAG is responsible for developing the FTIP for submittal to Caltrans and the federal funding agencies. The FTIP for the SCAG region is developed in partnership between the six County Transportation Commissions of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The projects in the FTIP have been determined to be consistent with the SCAG's approved RTP/SCS.

The proposed project is included in the 2023 FTIP (Project Identification [ID] LAF3136) and 2023 FTIP Amendment 23-37 and is proposed for federal funding from the Surface Transportation Block Grant Program and Caltrans's Highway Bridge Program.

The proposed project's operational emissions, which would include ozone precursors, reactive organic gases (ROGs) and nitrogen oxides (NOx), would meet the transportation conformity requirements imposed by the U.S. Environmental Protection Agency (EPA) and SCAQMD.

Regional Growth Plans

Connect SoCal (SCAG RTP/SCS)

The SCAG is a regional agency established pursuant to Section 6500 of the California Government Code, also referred to as the Joint Powers Authority law. The SCAG is designated as a Council of Governments, a Regional Transportation Planning Agency, and an MPO. The proposed project area is within the SCAG's regional authority. As an MPO and public agency, the SCAG develops transportation and housing strategies that transcend jurisdictional boundaries affecting the quality of life for Southern California as a whole.

On September 3, 2020, the SCAG's Regional Council adopted Connect SoCal. Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal embodies a collective vision for the region's future and was developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders in Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. Connect SoCal includes more than 4,000 transportation projects, ranging from highway improvements to railroad grade separations, bicycle lanes, new transit hubs, and replacement bridges. These future investments were included in county plans that were developed by the six County Transportation Commissions, all seeking to reduce traffic bottlenecks, improve the efficiency of the region's transportation network, and expand mobility choices. The goals of Connect SoCal are to: 1) encourage regional economic prosperity and global competitiveness; 2) improve mobility, accessibility, reliability, and travel safety for people and goods; 3) enhance the

preservation, security, and resilience of the regional transportation system; 4) increase person and goods movement and travel choices within the transportation system; 5) reduce GHG emission and improve air quality; 6) support healthy and equitable communities; 7) adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) encourage development of diverse housing types in areas that are supported by multiple transportation options; and 10) promote conservation of natural and agricultural lands and restoration of habitats.

Regional Conservation Plans

Los Angeles Regional Water Quality Control Board's Watershed Management Initiative for the Santa Clara River Watershed

The California State Water Resources Control Board (SWRCB) and Los Angeles Regional Water Quality Control Board (RWQCB) adopted the Watershed Management Initiative (WMI) to integrate surface and groundwater regulatory programs while promoting cooperative, collaborative efforts within the watershed to achieve water resource protection, enhancement, and restoration while balancing economic and environmental impacts. Specifically, the WMI has three main goals/objectives:

- i Use water quality to identify and prioritize water resource problems within individual watersheds. Involve stakeholders to develop solutions.
- ii Better coordinate point source and nonpoint source regulatory efforts. Establish working relationships between staff from different programs.
- iii Better coordinate local, State, and federal activities and programs, especially those related to regulations and funding, to assist local watershed groups.

The Santa Clara River WMI identifies a number of programs and actions to address water quality impairments in the Santa Clara River watershed, including Total Maximum Daily Load and NPDES waste discharge permit requirements. The Santa Clara River WMI also has developed a Watershed Management Program to implement compliance with permit requirements on a watershed scale, through customized strategies, control measures, and BMPs.

2005 Santa Clara River Enhancement and Management Plan

Santa Clara River flows in a generally western direction for approximately 84 miles through Tie Canyon, Aliso Canyon, Soledad Canyon, Santa Clarita Valley, Santa Clara River Valley, and Oxnard Plain before discharging to the Pacific Ocean near the Ventura Marina. The Santa Clara River and its tributary system have a watershed area of about 1,634 square miles, 40% in Los Angeles County and 60% in Ventura County.

The project area is within the jurisdictional boundaries of the Los Angeles RWQCB (Region 4) and is within the Upper Santa Clara River watershed, specifically Reach 5 as identified in the Upper Santa Clara River Integrated Regional Water Management Plan. Thus, it is subject to the river-wide issues and recommendations of the Santa Clara River Enhancement and Management Plan (SCREMP). The SCREMP is a guidance document for the preservation, enhancement, and sustainability of the physical, biological, and economic resources that occur within the 500-year floodplain limits of the Santa Clara River.

The primary objectives of the SCREMP are to:

- i Develop a comprehensive management plan for the resources of Santa Clara River within its 500-year floodplain that will achieve a balance among the various ways that these resources are used and the ways they will be sustained.
- ii Develop strategies for the enhancement of certain resource categories that will, over time, result in a net increase in these resources and their associated beneficial uses.
- iii Develop the SCREMP so that it is fully compliant with existing federal, state, county, and local jurisdictional entities' laws, codes, regulations, ordinances, plans, policies, and/or programs.
- iv Develop the SCREMP so that it facilitates implementation of public agency mandates so as to promote strategies for the preservation, enhancement, and sustainability of physical, biological, and economic resources.
- v Develop the SCREMP so that it acknowledges and respects the private property and water rights of private property owners for the duration that the SCREMP is implemented, and also provides that the exercise of private property rights will occur so as to promote strategies for preservation, enhancement, and sustainability of physical, biological, and economic resources.
- vi Develop the SCREMP so that it facilitates implementation of mandated public agency actions and the exercise of private property rights by providing guidance on obtaining and expediting necessary permitting from federal, state, and county regulatory agencies.

County of Los Angeles – Significant Ecological Areas (SEAs) Program Ordinance

The project area is within LA County's Significant Ecological Areas (SEAs) program boundary, and thus the proposed project would have to comply with the program ordinance. Specifically, the proposed project would need to comply with County Code 22.102.080.D, SEA Conditional Use Permit, and County Code 22.102.130, Review Procedures for County Projects.

SEAs are officially designated areas within LA County with irreplaceable biological resources. The SEA Program objective is to conserve genetic and physical diversity within LA County by designating biological resource areas that are capable of sustaining themselves into the future.

The SEA Program Ordinance establishes the permitting, design standards, and review process for development within SEAs, balancing preservation of the County's natural biodiversity with private property rights.

The SEA Program, through the goals and policies of the General Plan and the SEA Program Ordinance (Title 22 zoning regulations), helps to guide development within SEAs. The General Plan goals and policies are intended to ensure that privately held lands within the SEAs retain the right of reasonable use while avoiding activities and developments that are incompatible with the ability of SEAs to thrive in the long term.

General and Community Plans

2035 Los Angeles County General Plan

The Los Angeles County General Plan is the guide for long-term physical development and conservation through a framework of goals, policies, and implementation programs. This General Plan guides growth countywide, through goals, policies, and programs that discourage

sprawling development patterns; protects areas with hazard, environment, and resource constraints; encourages infill development in areas near transit, services, and existing infrastructure; and makes a strong commitment to ensuring sufficient services and infrastructure. It also lays the foundation for future community-based planning initiatives that will identify additional opportunities for accommodating growth and development of plans that respond to the unique and diverse character of local communities. The most current General Plan was adopted by the LA County Board of Supervisors on October 6, 2015. The 2035 General Plan provides the policy framework for how and where the unincorporated areas will grow through 2035, establishing goals, policies, and programs to foster healthy, livable, and sustainable communities. Relevant policies to the proposed project in the Land Use, Mobility, Conservation and Natural Resources, Noise, Safety, and Public Services and Facilities elements were reviewed, as follows:

- *Land Use* – Chapter 6 of the Los Angeles County General Plan is the Land Use Element. This element provides strategies and planning tools to facilitate and guide future development and revitalization efforts. In accordance with the California Government Code, the Land Use Element designates the proposed general distribution, general location, and extent of uses.
- *Mobility* – Chapter 7 of the Los Angeles County General Plan is the Mobility Element. This element provides an overview of the transportation infrastructure and strategies for developing an efficient and multimodal transportation network. The Mobility Element contains two sub-elements: 1) the Highway Plan, and 2) the Bicycle Master Plan. The Highway Plan provides policy guidance for building a comprehensive highway network and was used to determine the proposed project's design speeds and future roadway network. Both the Highway Plan and Bicycle Master Plan establish policies for the roadway and bikeway systems in unincorporated areas, which are coordinated with the networks in the 88 cities in LA County. The General Plan also establishes a program to prepare community pedestrian plans, with guidelines and standards to promote walkability and connectivity throughout unincorporated areas.
- *Conservation and Natural Resources* – Chapter 9 of the Los Angeles County General Plan is the Conservation and Natural Resources Element. This element guides the long-term conservation of natural resources and preservation of available open space areas. The Conservation and Natural Resources Element addresses the following conservation areas: Open Space Resources; Biological Resources; Local Water Resources; Agricultural Resources; Mineral and Energy Resources; Scenic Resources; and Historic, Cultural, and Paleontological Resources.
- *Noise* – Chapter 11 of the Los Angeles County General Plan is the Noise Element. The purpose of this element is to reduce and limit the exposure of the general public to excessive noise levels. The Noise Element sets the goals and policy direction for management of noise in unincorporated areas.
- *Safety* – Chapter 12 of the Los Angeles County General Plan is the Safety Element. The purpose of this element is to reduce the potential risk of death, injuries, and economic damage resulting from natural and human-made hazards. The Safety Element addresses only limited aspects of human-made disasters, such as hazardous waste and materials management, and in particular, those aspects related to seismic events, fires, and floods. In general, hazardous materials management is addressed in the Los Angeles County Integrated Waste Management Plan (California Code of Regulations [CCR] Section 18755.5).

- *Public Services and Facilities* – Chapter 13 of the Los Angeles County General Plan is the Public Services and Facilities Element. This element promotes the orderly and efficient planning of public facilities and infrastructure in conjunction with land use development and growth. This element focuses on services and facilities that are affected the most by growth and development: Drinking Water, Sanitary Sewers, Solid Waste, Utilities, Early Care and Education, and Libraries.

2012 Los Angeles County Bicycle Master Plan

The Los Angeles County Bicycle Master Plan, adopted in March 2012, provides policy guidance for building a comprehensive bicycle network throughout unincorporated areas. The Bicycle Master Plan identifies bikeways and transportation systems that are available for use by bicyclists, such as roadways with bike lanes or designated bike routes, and dedicated off-road bike paths, such as bike paths along the flood protection channels. The purposes of the Bicycle Master Plan are to: 1) guide development of infrastructure, policies, and programs that improve the bicycling environment; 2) depict the general location of planned bikeway routes; and 3) provide a system of bikeways that is consistent with the General Plan.

2012 Santa Clarita Valley Area Plan

The Los Angeles County General Plan identifies 11 planning areas, one being the Santa Clarita Valley Planning Area. According to the General Plan Guidelines published by the State, an “Area Plan” is a planning tool that focuses on a particular region or community within the overall General Plan area. The project area is primarily within the Santa Clarita Valley Planning Area (Planning Area). The Planning Area is bordered on the west by the Ventura County line, on the north by the Los Padres National Forest and Angeles National Forest, on the east by the Angeles National Forest, and on the south by a major ridgeline that separates Santa Clarita Valley from San Fernando Valley. The Planning Area encompasses more than 480 square miles, of which about 195 square miles are unincorporated. The Planning Area is approximately 30 to 40 miles northwest of Downtown Los Angeles. Santa Clarita Valley contains territory under the jurisdiction of two political entities. The unincorporated areas under the jurisdiction of LA County are addressed in the Santa Clarita Valley Area Plan, and the incorporated area within the boundaries of the City of Santa Clarita is included in the City’s General Plan.

The Santa Clarita Valley Area Plan, *One Valley One Vision*, a component of the Los Angeles County General Plan, is intended to provide focused goals, policies, and maps to guide regulation of development within the unincorporated portions of Santa Clarita Valley. The Santa Clarita Valley Area Plan has been prepared to ensure consistency with both the County’s comprehensive General Plan and the City of Santa Clarita’s General Plan. Relevant policies in the Land Use, Circulation, Conservation and Open Space, Safety, and Noise elements were reviewed, as follows:

- *Land Use Element* – This element contains a land use map and descriptions of the designations applied to land in Santa Clarita Valley, to guide the type, intensity, and density of future uses. The element also contains goals, policies, and implementation measures to ensure that new development and the use of land reflect community goals, enhance quality of life, are supported by adequate services, utilities, roadways, and other infrastructure, ensure public safety through consideration of hazardous land use conditions, and conserve valuable resources and amenities in the Valley.
- *Circulation Element* – This element plans for the continued development of efficient, cost-effective, and comprehensive transportation systems that are consistent with regional plans, local needs, and the Valley’s community character. The Circulation

Element contains maps showing major transportation facilities in Santa Clarita Valley, including streets and highways, rail and public transit routes, stations and terminals, airport facilities, and trails. The Circulation Element has been developed in conformance with Caltrans; the Regional Mobility Plan prepared by the SCAG; the Los Angeles Metropolitan Transportation Authority's (Metro) Congestion Management Program and Bikeway Strategic Plan; Santa Clarita Transit's Transportation Development Plan; Los Angeles County Airport Land Use Plan, as well as the Los Angeles County General Plan. The Old Road is the principal alternative to I-5. However, The Old Road often is subject to the same constraints, as it parallels I-5 through Castaic.

The proposed project is listed as part of future roadway improvements needed to implement the recommended Highway Plan, in Table C-3 of the Santa Clarita Valley Area Plan. Specifically, improvements between I-5 SB ramps at Rye Canyon Road, and between Rye Canyon Road and Magic Mountain Parkway call for The Old Road to be widened or re-stripped from four lanes to a six-lane major highway.

Based on the traffic model analysis undertaken for the Santa Clarita Valley Area Plan planning effort, which evaluated 23 key intersections in Santa Clarita Valley, intersection improvements were determined to be required. Within the project area, this improvement included The Old Road at Magic Mountain Parkway.

In addition, a portion of The Old Road also is designated as a gap in the interjurisdictional bikeway network that is identified by the Metro Plan, which is summarized in Table C-4 of the Santa Clarita Valley Area Plan.

- *Conservation and Open Space Element* – This element contains maps, goals, policies, and implementation measures to ensure preservation of an open space greenbelt around most portions of Santa Clarita Valley, in addition to preserving water quality, historic and cultural resources, scenic views, and providing recreational facilities to enhance the quality of life for Valley residents. A key component of this element is preservation of resources within portions of designated SEAs in the County General Plan.
- *Safety Element* – The Safety Element contains maps, goals, policies, and implementation measures to ensure that residents are not exposed to health risks related to air pollution, earthquakes, wildland fires, or other environmental hazards, and that adequate provisions are made for crime prevention, law enforcement, and fire protection services.
- *Noise Element* – The Noise Element identifies current noise conditions within the planning area and projects future noise impacts resulting from continued growth allowed by the Land Use Element. The Noise Element identifies noise-sensitive land uses and noise sources and defines areas of noise impact for developing programs to ensure that Santa Clarita Valley residents will be protected from excessive noise intrusion. Table N-2 in the Santa Clarita Valley Area Plan shows roadway links that will experience an increase of 1 decibel with the updated City General Plan and County Area Plan, as compared to the previously adopted City General Plan and County Area Plan. Per Table N-2, within the project area, Magic Mountain Parkway west and east of The Old Road has been identified as a roadway link projected to experience a noise increase.

2011 City of Santa Clarita General Plan

Land use decisions are guided by the City of Santa Clarita's General Plan, which establishes goals and policies related to land use, transportation, population growth and distribution, development, open space, resource preservation and utilization, air and water quality, noise impacts, public safety, infrastructure, and other related physical, social, and economic factors. As stated in the General Plan, in addition to serving as a basis for local decision-making, the General Plan establishes a clear set of development guidelines for citizens, developers, neighboring jurisdictions, and agencies, and provides the community with an opportunity to participate in the planning process. The purposes of this General Plan are to comply with State requirements and provide the City with a comprehensive, long-range policy guideline for future development. Relevant policies in the Land Use, Circulation, Noise, Conservation and Open Space, and Safety elements were reviewed, as follows:

- *Land Use* – Chapter 2 of the City of Santa Clarita General Plan is the Land Use Element. This element is the City's and County's long-term blueprint for development of property to meet Santa Clarita Valley's future needs for new housing, retail, office, industrial, parks, open space, and other uses.
- *Circulation* – Chapter 4 of the City of Santa Clarita General Plan is the Circulation Element. This element plans for the continued development of efficient, cost effective, and comprehensive transportation systems that are consistent with regional plans, local needs, and the Valley's community character. The Old Road is the principal alternative to I-5. However, The Old Road often is subject to the same constraints, as it parallels I-5 through Castaic.

Henry Mayo Drive (from Commerce Center Drive to The Old Road) also is designated as a Parkway on Table C-2 of the Circulation Element. The proposed project is listed because future roadway improvements are needed to implement the recommended Highway Plan in Table C-3 of the Santa Clarita Valley Area Plan, specifically, improvements between I-5 SB ramps at Rye Canyon Road, and between Rye Canyon Road and Magic Mountain Parkway, which call for The Old Road to be widened or re-stripped from four lanes to a six-lane major highway. In addition, a portion of The Old Road also is designated as a gap in the interjurisdictional bikeway network, identified by the Metro plan, which is summarized in Table C-4 of the Santa Clarita Valley Area Plan. Based on the traffic model analysis undertaken for the Santa Clarita Valley Area Plan planning effort, which evaluated 23 key intersections in the Santa Clarita Valley, intersection improvements were determined to be required. Within the project area, this included The Old Road at Rye Canyon Road and The Old Road at Magic Mountain Parkway.

- *Noise* – Chapter 5 of the City of Santa Clarita General Plan is the Noise Element. This element identifies current noise conditions within the planning area, and projects future noise impacts resulting from the continued growth allowed by the Land Use Element. The element identifies noise-sensitive land uses and noise sources and defines areas of noise impact for developing programs, to ensure that Santa Clarita Valley residents will be protected from excessive noise intrusion.
- *Conservation and Open Space* – Chapter 6 of the City of Santa Clarita General Plan is the Conservation and Open Space Element. This element combines two of the mandatory General Plan elements that are required by State law into a single element: conservation and open space. This combined element establishes a policy framework for the designation and long-term preservation of open space within the planning area, and it addresses the wide range of community benefits derived from open space.

- *Safety* – Chapter 7 of the City of Santa Clarita General Plan is the Safety Element. The aim of this element is to reduce the potential risk of death, injuries, property damage, and economic and social dislocation resulting from these hazards, by providing a framework to guide local land use decisions related to zoning, subdivisions, and entitlement permits.

2.2.1.7 Environmental Consequences

The following discussion focuses on the impacts of the proposed project on State, regional, and local plans. The proposed project's consistency with relevant plans and policies are shown in Table 2-3.

Alternative 1: No-Build Alternative

Implementation of the No-Build Alternative would maintain the existing lane configuration of The Old Road, which would continue to be four lanes (two NB and two SB). In addition, implementation of the No-Build Alternative would maintain the existing lane configuration of Rye Canyon Road and Sky View Lane. The No-Build Alternative would not enhance safety, alleviate congestion on roadways in the project area, reduce forecasted traffic congestion on adjacent streets and intersections and accommodate projected traffic growth in the surrounding area, or increase regional roadway capacity. In addition, this alternative would not be consistent with the Los Angeles County Mobility Element, improve emergency access, or improve highway operations for consistency with the LACPW highway design speed safety standards.

The No-Build Alternative is inconsistent with the various goals and policies shown in Table 2-3.

The No-Build Alternative generally is inconsistent with the goals and policies in the 2035 Los Angeles County General Plan, which includes the Mobility Element, Safety Element, and Public Services and Facilities Element. The No-Build Alternative also generally is inconsistent with the goals and policies in the 2015 Santa Clarita Valley Area Plan and the 2011 City of Santa Clarita General Plan, which include Land Use, Circulation, and Safety elements. Some of the goals and policies with which the No-Build Alternative would be consistent are the Land Use Element, including not resulting in additional stormwater pollutants (Policy LU 7.3.2); the Circulation Element, because it would not result in any ROW impacts (Policy C-2.1.4); the Conservation and Open Space Element, because it would not result in additional stormwater pollutants (Policy CO-4.3.7); and the Noise Element, because the No-Build Alternative would not result in noise increases (Policy N-1.1.3 and Policy N-3.1.4). In addition, the No-Build Alternative would be inconsistent with the Bicycle Master Plan in the Mobility Element of the Los Angeles County General Plan.

Transportation Plans/Programs

The No-Build Alternative is inconsistent with various goals and policies shown in Table 2-3, Consistency with Plans and Policies, including the SCAG FTIP, Connect SoCal, SCREMP, and 2012 County of Los Angeles Bicycle Master Plan.

Table 2-3: Consistency with Plans and Policies

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
SCAG FTIP		
Project ID - LAF3136; RTIP ID - 1A1005. Widen The Old Road from north of Magic Mountain Parkway to Henry Mayo Drive to 1200 feet west of The Old Road. Project located on The Old Road from approximately 700 feet north of Magic Mountain Parkway to Henry Mayo Drive from The Old Road to the State Route 126 hook ramps, and Rye Canyon Road between The Old Road and Avenue Stanford. Widening bridge approaches from four to six lanes, replace bridge #53C0327 & #53C0328 to reduce bottleneck. Add 150 ft turn pockets EB Sky View Lane from The Old Road to Entertainment Dr. Toll Credits will be used to match Surface Transportation Program-Local (STP-L) funds.	Not Consistent. Alternative 1 would maintain the existing lane configuration of The Old Road, which would continue to be a four-lane (two northbound and two southbound) roadway.	Consistent. Alternative 2 would reconstruct and widen The Old Road from Magic Mountain Parkway to Henry Mayo Drive. In addition, Alternative 2 would result in intersection improvements at The Old Road/Interstate 5 (I-5) on and off ramps.
Connect SoCal RTP/SCS		
<i>Goal 2: Maximize mobility and accessibility for all people and goods in the region.</i>	Not Consistent. Traffic conditions under Alternative 1 would continue to worsen.	Consistent. Alternative 2 would alleviate congestion on roadways in the study area and reduce forecasted traffic congestion on adjacent streets through intersection enhancements. In addition, Alternative 2 would improve traffic flow and decrease congestion along The Old Road, thereby improving mobility and enhancing goods movement capabilities.
<i>Goal 3: Ensure travel safety and reliability for all people and goods in the region.</i>	Not Consistent. Under Alternative 1, the following would remain the same: The Old Road over the Santa Clara River Bridge would continue to not meet Los Angeles County Department of Public Works (LACPW) highway design speed safety standards (it	Consistent. Alternative 2 would include a replacement bridge that would be constructed at a higher elevation to allow proper floodway clearance. In addition, The Old Road over the Santa Clara River Bridge would be replaced to meet current seismic design criteria. These project features would ensure safety and reliability for all people and goods in the region.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
	currently is designed for 40 miles per hour [mph], whereas the master plan highway criterion is 65 mph). In addition, The Old Road over the Santa Clara River Bridge would continue to be classified as Structurally Deficient per Federal Highway Association (FHWA) standards for seismic, flood, and highway design. Furthermore, The Old Road over the Santa Clara River Bridge would remain not high enough to allow an LACPW capital flood to pass under the bridge.	
<i>Goal 4: Preserve and ensure a sustainable regional transportation system.</i>	Not Consistent. See response under Goal 2.	Consistent. See response under Goal 2.
<i>Goal 6: Protect the environment and health of residents by improving air quality and encouraging active transportation (non-motorized transportation such as bicycling and walking).</i>	Not Consistent. Traffic conditions under Alternative 1 would continue to worsen, thereby increasing air quality impacts and decreasing energy efficiency.	Consistent. Air quality impacts were evaluated in the Air Quality Report (TAHA 2023) for the proposed project. The Build Alternative would result in less criteria pollutant emissions than the No-Build Alternative and existing conditions because of improvements in vehicle delay. Proposed improvements also would include installing a segment of the Multi-Use Trail, which would consist of bike lanes, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.
<i>Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation.</i>	Not Consistent. No changes to transit or non-motorized transportation would result under Alternative 1.	Consistent. Alternative 2 would consist of bicycle lanes, sidewalk improvements, widened shoulders, and raised medians along various segments, providing safer streets while enhancing pedestrian accessibility. Proposed improvements also would include installing a segment of the Multi-Use Trail, which would consist of bike lanes, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.
<i>Policy 2: Ensuring safety, adequate maintenance, and efficiency of operations on the existing multimodal</i>	Not Consistent. See response under Goal 8.	Consistent. See response under Goal 8.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
<i>transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.</i>		
<i>Policy 4: Transportation demand management and nonmotorized transportation will be focus areas, subject to Policy 1.</i>	Not Consistent. See response under Goal 8.	Consistent. See response under Goal 8.
<i>Policy 7: The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.</i>	Not Consistent. See response under Goal 6.	Consistent. See response under Goal 6.
SCREMP		
<i>Goal 6.4: It is of utmost concern to protect the lives of people and their properties that afford shelter or the basis for their economic livelihood, and all measures to achieve this protection will be implemented in full consideration of the other resources but will not be constrained to such an extent as to place the lives of people or their properties at foreseeable undue risk.</i>		
RR 10. Maintenance of Design Flow Capacity: When the effectiveness and adequacy of public flood protection facilities is reduced below the design and/or Federal Emergency Management Agency (FEMA)-required levels and upon submittal of documentation on the hydraulic impact on the facility to regulatory agencies, sediment deposition removal will be allowed to the level of the pre-determined design flow line. The sediment deposition removal would be subject to all laws, regulations, and permit requirements including mitigation. The mitigation for sediment deposition removal for future facilities will be addressed in the original permit. However, the requirement for alternative analyses and justifications shall be waived where legally possible or	Not Consistent. Alternative 1 would maintain existing conditions. The Old Road over the Santa Clara River Bridge would remain classified as Structurally Deficient per FHWA standards for seismic, flood, and highway design. Furthermore, The Old Road over the Santa Clara River Bridge would remain not high enough to allow an LACPW capital flood to pass under the bridge.	Consistent. Under Alternative 2, The Old Road over the Santa Clara River Bridge would be replaced to meet current seismic design criteria. Furthermore, the replacement bridge would be constructed at a higher elevation to allow proper floodway clearance and pass an LACPW capital flood event, which would improve flooding control in the project area. Implementation of best management practices (BMPs) and project design features would minimize erosion and sediment discharge during construction and while vegetation is established. Any sediment deposition removal that would be required would be subject to all laws, regulations, and permit requirements, including mitigation.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
minimized in accordance with available regional general permits.		
2035 Los Angeles County General Plan		
Land Use Element		
<i>Goal LU 7: Compatible land uses that complement neighborhood character and the natural environment.</i>		
Policy LU 7.1: Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers and other design techniques.	Consistent. No changes to adjacent neighborhoods would result under Alternative 1.	Consistent. Alternative 2 would be compatible with existing land uses, as The Old Road would remain as a primary north/south arterial through Santa Clarita Valley. Alternative 2 would be consistent with the Santa Clarita Valley Planning Area Plan and the Los Angeles County Circulation Element, which calls for The Old Road to be a six-lane major highway.
<i>Goal LU 9: Land use patterns and community infrastructure that promote health and wellness.</i>		
Policy LU 9.2: Encourage patterns of development that promote physical activity.	Not Consistent. No changes to transit or non-motorized transportation would result under Alternative 1.	Consistent. Alternative 2 would include bicycle lanes, sidewalk improvements, widened shoulders, and raised medians along various segments, providing safer streets while enhancing pedestrian accessibility. Proposed improvements also would include installing a segment of the Multi-Use Trail, which would consist of bike lanes, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.
County of Los Angeles, Significant Ecological Areas Program		
County Code 22.102.080.D. - Significant Ecological Area (SEA) Conditional Use Permit (CUP): Findings. The Commission or Hearing Officer shall approve an application for a SEA CUP, if the Commission or Hearing Officer finds that the application substantiates, in addition to those required by Section 22.158.050 (Findings and Decisions)	Consistent: No changes to land within SEA boundaries would occur under Alternative 1.	Consistent: Under Alternative 2, the lead agency would submit a SEA CUP application to the lead County Department. This application would include the project scope of work; location map; environmental documents, if applicable; and regulatory permit requirements, if applicable.
County Code 22.102.130 - Review Procedures for County Projects. County projects proposing development in a SEA shall submit an application for a review by the Department. County projects and maintenance activities performed as a result of emergency or	Consistent: No changes to land within SEA boundaries would occur under Alternative 1.	Consistent: Under Alternative 2, the lead agency would submit an application to the lead County Department, which would include the project scope of work; location map; environmental documents, if applicable; and regulatory permit requirements, if applicable.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
hazard management shall be documented. The documentation shall be provided to the Department for a determination of the applicability of this Chapter. Emergency or hazard management activities include any activity required, requested, authorized, or permitted by a local, State, or federal agency, in response to an emergency.		
Mobility Element		
<i>Goal M 1: Street designs that incorporate the needs of all users.</i>		
Policy M 1.1: Provide for the accommodation of all users, including pedestrians, motorists, bicyclists, equestrians, users of public transit, seniors, children, and persons with disabilities when requiring or planning for new, or retrofitting existing, transportation corridors/networks whenever appropriate and feasible.	Not Consistent. See response under Policy LU 9.2.	Consistent. See response under Policy LU 9.2.
<i>Goal M 2: Interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths and trails that promote active transportation and transit use.</i>		
Policy M 2.1: Provide transportation corridors/networks that accommodate pedestrians, equestrians and bicyclists, and reduce motor vehicle accidents through a context-sensitive process that addresses the unique characteristics of urban, suburban, and rural communities whenever appropriate and feasible.	Not Consistent. Alternative 1 would maintain the existing lane configuration of The Old Road, which would continue to be a four-lane (two northbound and two southbound) roadway, and no bicycle lanes or a Multi-Use Trail would be constructed.	Consistent. Alternative 2 would reconstruct and widen of The Old Road from Magic Mountain Parkway to Henry Mayo Drive. These improvements would enhance traffic safety and improve local vehicular circulation. In addition, Alternative 2 would include a Class IV bikeway, sidewalk improvements, widened shoulders, and raised medians along various roadway segments, providing safer streets while enhancing pedestrian accessibility. Furthermore, other improvements would include installing a segment of the Multi-Use Trail, which would consist of bike lanes, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.
Policy M 2.6: Encourage the implementation of future designs concepts that promote active transportation, whenever available and feasible.	Not Consistent. See response under Policy LU 9.2.	Consistent. See response under Policy LU 9.2.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
<i>Goal M 4: An efficient multimodal transportation system that serves the needs of all residents.</i>		
Policy M 4.1: Expand transportation options that reduce automobile dependence.	Not Consistent. See response under Policy LU 9.2.	Consistent. See response under Policy LU 9.2.
<i>Goal M 5: Land use planning and transportation management that facilitates the use of transit.</i>		
Policy M 5.4: Support and pursue funding for the construction, maintenance and improvement of roadway, public transit, and equestrian, pedestrian and bicycle transportation systems.	Not Consistent. See response under Policy LU 9.2.	Consistent. See response under Policy LU 9.2.
<i>Goal M 7: Transportation networks that minimizes negative impacts on the environment and communities.</i>		
Policy M 7.1: Minimize roadway runoff through the use of permeable surface materials, and other low impact designs, wherever feasible.	Not Consistent. Under Alternative 1, The Old Road would be maintained in its current condition and would not result in erosion control improvements. Alternative 1 would not provide the necessary level of flood protection as The Old Road over the Santa Clara River Bridge would remain not high enough to allow an LACPW capital flood to pass under the bridge.	Consistent. Alternative 2 would alter existing drainage patterns, rates, and volumes through construction of a new road alignment, by reconstructing existing catch basins and constructing new catch basins and drainage facilities, and by increasing the impervious surface in the project area. A net increase in impervious surface would result from the increase of two lanes to three lanes in each direction of The Old Road. However, the total increase in impervious surface area would be insignificant in comparison to the watershed area of Santa Clara River at The Old Road Bridge crossing. Nonetheless, potential changes in runoff rates/volumes would be addressed by drainage facility improvements and treatment BMPs, designed to increase stormwater retention and reduce runoff volumes (e.g., bioswales). In addition, under Alternative 2, the Santa Clara Bridge would be designed to pass an LACPW capital flood event, which would improve flooding conditions in the project area.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
Conservation and Natural Resources Element		
<i>Goal C/NR 3: Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and Significant Ecological Areas (SEAs).</i>		
Policy C/NR 3.9: Consider the following in the design of a project that is located within an SEA, to the greatest extent feasible: Preservation of biologically valuable habitats, species, wildlife corridors and linkages; Protection of sensitive resources on the site within open space; Protection of water sources from hydromodification in order to maintain the ecological function of riparian habitats; Placement of the development in the least biologically sensitive areas on the site (prioritize the preservation or avoidance of the most sensitive biological resources on-site); Design required open spaces to retain contiguous undisturbed open space that preserves the most sensitive biological resources on-site and/or serves to maintain regional connectivity; Maintenance of watershed connectivity by capturing, treating, retaining, and/or infiltrating stormwater flows on site; and Consideration of the continuity of on-site open space with adjacent open space in project design.	Not Consistent. Alternative 1 would not provide the necessary level of flood protection because The Old Road over the Santa Clara River Bridge would remain not high enough to allow an LACPW capital flood to pass under the bridge.	Consistent. Alternative 2 would reconstruct The Old Road over Santa Clara River Bridge at an elevation approximately 9 feet higher on the north end and 15 feet higher on the south end, to allow sufficient floodway clearance for an LACPW capital flood event. Alternative 2 also would improve drainage facilities and catch basins; which would provide protection to the Santa Clara River. Furthermore, treatment BMPs would be implemented, designed to increase stormwater retention and reduce runoff volumes (e.g., bioswales). BMPs would be incorporated into the design, to comply with the County Municipal Stormwater National Pollutant Discharge Elimination System (NPDES) Permit.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
<i>Goal C/NR 5: Protected and useable local surface water resources.</i>		
Policy C/NR 5.1: Support the Low Impact Device (LID) philosophy, which seeks to plan and design public and private development with hydrologic sensitivity, including limits to straightening and channelizing natural flow paths, removal of vegetative cover, compaction of soils, and distribution of naturalistic BMPs at regional, neighborhood, and parcel-level scales.	Consistent. Under Alternative 1, no impacts on hydrology would occur.	Consistent. Alternative 2 would alter existing drainage patterns, rates, and volumes through construction of the new road alignment, by reconstructing existing catch basins and constructing new catch basins and drainage facilities, and by increasing the impervious surface in the project area. A net increase in impervious surface would result from the increase of two lanes to three lanes in each direction of The Old Road. However, the total increase in impervious surface area would be insignificant in comparison to the watershed area of the Santa Clara River at The Old Road Bridge crossing. Nonetheless, potential changes in runoff rates/volumes would be addressed by drainage facility improvements and treatment BMPs, designed to increase stormwater retention and reduce runoff volumes (e.g., bioswales). BMPs would be incorporated into project design.
Policy C/NR 5.2: Require compliance by all County California Departments of Transportation (Caltrans) with adopted Municipal Separate Storm Sewer System (MS4), General Construction, and point source NPDES permits.	Consistent. Under Alternative 1, no changes would result to stormwater drainage.	Consistent. Under Alternative 2, construction activities would cause short-term and temporary impacts from the generation of pollutants, such as sediment, metals, oil and grease, soil stabilization residues, nutrients, organic compounds, and trash and debris. Alternative 2 would implement temporary BMPs with respect to erosion, sediment, good housekeeping, and pollution prevention, in compliance with the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order WQ 2022-0057-DWQ, NPDES NO. CAS000002 (Construction General Permit), to minimize stormwater pollutants during the construction phase. Alternative 2 would alter existing drainage patterns, rates, and volumes through construction of the new road alignment, by reconstructing existing catch basins and constructing new catch basins and drainage facilities, and by increasing the impervious surface in the project area. A net increase in impervious surface would result from the increase of two lanes to three lanes in each direction of The Old Road. However, the total increase in impervious surface area would be insignificant in comparison to the watershed area of the Santa Clara River at The Old Road Bridge crossing. Nonetheless, potential changes in runoff rates/volumes would be addressed by drainage facility improvements and treatment BMPs, designed to increase stormwater retention and reduce runoff volumes (e.g., bioswales). BMPs would be incorporated into the design, to comply with the County Municipal Stormwater NPDES Permit.
Policy C/NR 5.7: Actively support the design of new and retrofit of existing infrastructure to accommodate watershed protection goals, such as	Not Consistent. See response under Policy C/NR 3.9.	Consistent. See response under Policy C/NR 3.9.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
roadway, railway, bridge, and other - particularly -tributary street and greenway interface points with channelized waterways.		
<i>Goal C/NR 6: Protected and usable local groundwater resources.</i>		
Policy C/NR 6.1: Support the LID philosophy, which incorporates distributed, post-construction parcel-level stormwater infiltration as part of new development.	Consistent. Under Alternative 1, no impacts on hydrology would occur.	Consistent. Alternative 2 would alter existing drainage patterns, rates, and volumes through construction of the new road alignment, by reconstructing existing catch basins and constructing new catch basins and drainage facilities, and by increasing the impervious surface in the project area. A net increase in impervious surface would result from the increase of two lanes to three lanes in each direction of The Old Road. However, the total increase in impervious surface area would be insignificant in comparison to the watershed area of the Santa Clara River at The Old Road Bridge crossing. Nonetheless, potential changes in runoff rates/volumes would be addressed by drainage facility improvements and treatment BMPs, designed to increase stormwater retention and reduce runoff volumes (e.g., bioswales). BMPs would be incorporated into the project design.
Policy C/NR 6.5: Prevent stormwater infiltration where inappropriate and unsafe, such as in areas with high seasonal groundwater, on hazardous slopes, within 100 feet of drinking water wells, and in contaminated soils.	Not Consistent. Alternative 1 would not provide the necessary level of flood protection because The Old Road over Santa Clara River Bridge would remain not high enough to allow an LACPW capital flood to pass under the bridge.	Consistent. Alternative 2 would reconstruct The Old Road over Santa Clara River Bridge at an elevation approximately 9 feet higher on the north end and 15 feet higher on the south end, to allow sufficient floodway clearance to accommodate an LACPW capital flood event. Alternative 2 also would improve drainage facilities and catch basins, which would provide protection for the Santa Clara River. Furthermore, treatment BMPs, designed to increase stormwater retention and reduce runoff volumes (e.g., bioswales), would be implemented. BMPs would be incorporated into the design, to comply with the County Municipal Stormwater NPDES Permit. However, BMPs would not be incorporated in areas with high seasonal groundwater, on hazardous slopes, within 100 feet of drinking water wells, or in contaminated soils.
<i>Goal C/NR 7: Protected and healthy watersheds.</i>		
Policy C/NR 7.4: Promote the development of multi-use regional facilities for stormwater quality improvement, groundwater recharge, detention/attenuation, flood management, retaining non-stormwater runoff, and other compatible uses.	Not Consistent. Under Alternative 1, The Old Road would be maintained in its current condition and no stormwater quality improvements would occur.	Consistent. Alternative 2 would improve drainage facilities and catch basins, which would provide protection for the Santa Clara River. Furthermore, treatment BMPs, designed to increase stormwater retention and reduce runoff volumes (e.g., bioswales), would be implemented. BMPs would be incorporated into the design, to comply with the County Municipal Stormwater NPDES Permit.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
Noise Element		
<i>Goal N 1: The reduction of excessive noise impacts.</i>		
Policy N 1.9: Require construction of suitable noise attenuation barriers on noise sensitive uses that would be exposed to exterior noise levels of 65 A-weighted decibels (dBA) CNEL and above, when unavoidable impacts are identified.	Consistent. Alternative 1 would maintain the existing lane configuration of The Old Road and would not result in noise increases.	Not Consistent. Traffic noise impacts were evaluated in the Noise Study Report. No adverse noise impacts from construction of Alternative 2 are anticipated because construction would be conducted in accordance with Caltrans Standard Specifications Section 14.8-02. Construction noise would be short-term, intermittent, and overshadowed by local traffic noise. Although the noise abatement criteria (NAC) were determined to be exceeded at some commercial and trail locations, noise abatement, in the form of noise walls, were determined to be not feasible because of access restrictions (business access driveways from the project roadway) and substantial noise contributed from non-project roadway sources (I-5 and the local water treatment plant). Therefore, noise abatement is not recommended under Alternative 2.
Policy N 1.12: Decisions on land adjacent to transportation facilities, such as the airports, freeways and other major highways, must consider both existing and future noise levels of these transportation facilities to assure the compatibility of proposed uses.	Consistent. See response under Policy N 1.9.	Consistent. See response under Policy N 1.9.
Safety Element		
<i>Goal S 2: An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage because of flood and inundation hazards.</i>		
Policy S 2.4: Ensure that developments located within the County's Flood Hazard Zones are sited and designed to avoid isolation from essential services and facilities in the event of flooding.	Not Consistent. The project area is within the base of a 100-year flood plain. Under Alternative 1, The Old Road would be maintained in its current condition, which would not accommodate an LACPW capital flood level. Furthermore, The Old Road over Santa Clara River Bridge would remain classified as Structurally Deficient, per FHWA standards for seismic, flood, and highway design. Alternative 1 would not result	Consistent. Alternative 2 would improve flood control by reconstructing The Old Road as a six-lane bridge at a higher elevation, to meet LACPW capital storm floodway requirements. In addition, Alternative 2 would improve drainage facilities through catch basin improvements and construction of drainage facilities, which would provide protection for the Santa Clara River.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
	in any flood control improvements, but would allow conditions to worsen.	
Policy S 2.6: Work cooperatively with public agencies with responsibility for flood protection, and with stakeholders in planning for flood and inundation hazards.	Not Consistent. Under Alternative 1, no changes would occur to flood protection or hazards.	Consistent. Under Alternative 2, a public hearing would allow agencies and the public to provide input project planning for flood and inundation hazards.
<i>Goal S 4: Effective County emergency response management capabilities.</i>		
Policy S 4.6: Ensure that essential public facilities are maintained during natural disasters, such as flooding.	Not Consistent. See response under Policy S 2.4.	Consistent. See response under Policy S 2.4.
Public Services and Facilities Element		
<i>Goal PS/F 1: A coordinated, reliable, and equitable network of public facilities that preserves resources, ensures public health and safety, and keeps pace with planned development.</i>		
Policy PS/F 1.4: Ensure the adequate maintenance of infrastructure.	Not Consistent. See response under Policy S 2.4.	Consistent. See response under Policy S 2.4.
2012 County of Los Angeles Bicycle Master Plan		
<i>Goal 1 - Bikeway System: Expanded, improved, and interconnected system of county bikeways and bikeway support facilities to provide a viable transportation alternative for all levels of bicycling abilities, particularly for trips of less than five miles.</i>		
Policy IA1.1.3: Implement bikeways proposed in this Plan when reconstructing or widening existing streets.	Not Consistent. Under Alternative 1, no changes to transit or non-motorized transportation would occur.	Consistent. Under Alternative 2, a Class IV bikeway, sidewalk improvements, widened shoulders, and raised medians along various segments would provide safer streets while enhancing pedestrian accessibility. Proposed improvements also would include installing a segment of the Multi-Use Trail, which would consist of bike lanes, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.
<i>Goal 2 – Safety: Increased safety of roadways for all users.</i>		
Policy 2.1 Implement projects that improve the safety of bicyclists at key locations.	Not Consistent. See response under Policy IA1.1.3.	Consistent. See response under Policy IA1.1.3.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
Policy 2.4: Evaluate impacts on bicyclists when designing new or reconfiguring streets.	Not Consistent. See response under Policy IA1.1.3.	Consistent. See response under Policy IA1.1.3.
2015 Santa Clarita Valley Area Plan		
Land Use Element		
<i>Goal LU-1: An interconnected Valley of Villages providing diverse lifestyles, surrounded by a greenbelt of natural open space.</i>		
<i>Objective LU-1.2: Maintain the distinctive community character of villages and neighborhoods throughout the planning area by establishing uses, densities, and design guidelines appropriate to the particular needs and goals of each area, including but not limited to the following:</i>		
Policy LU-1.2.8: In Castaic, promote expansion of neighborhood commercial uses to serve local residents; address traffic congestion; ensure compatibility between highway-oriented commercial uses and nearby residential uses; and maintain community character in accordance with the County's Castaic Area Community Standards District.	Not Consistent. Under Alternative 1, traffic conditions would continue to worsen.	Consistent. Under Alternative 2, congestion on roadways would be alleviated in the study area and forecasted traffic congestion would be reduced on adjacent streets through intersection enhancements. In addition, traffic operations would be improved to be consistent with LACPW highway design speed safety standards. Improvements also would include adding a Class IV bikeway, sidewalk improvements, widened shoulders, and raised medians along various segments, providing safer streets while addressing traffic congestion.
<i>Goal LU 2: A mix of land uses to accommodate growth, supported by adequate resources and maintaining community assets.</i>		
<i>Objective LU 2.2: Protect significant community resources from encroachment by incompatible uses, where feasible and appropriate.</i>		
Policy LU 2.2.3: Consistent with adopted plans, ensure that adequate open space is set aside and protected from development throughout the planning area in order to provide the benefits of watershed management, habitat preservation and connectivity, and recreational opportunities.	Not Consistent. Under Alternative 1, no open space improvements would occur.	Consistent. Under Alternative 2, a segment of the Multi-Use Trail would be installed, which would consist of bike lanes, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.
<i>Goal LU 3: Healthy and safe neighborhoods for all residents.</i>		
<i>Objective LU-3.2: Promote walkable neighborhoods that provide safe access to community services and essential services.</i>		
Policy LU-3.2.2: In planning residential neighborhoods, include pedestrian linkages, landscaped parkways with	Not Consistent. Alternative 1 would maintain existing conditions with no improvements.	Consistent. Under Alternative 2, improvements would include adding bicycle lanes, sidewalk improvements, widened shoulders, and raised medians along various segments, providing safer streets while enhancing pedestrian accessibility. Proposed improvements also would include installing a segment of the Multi-Use Trail, which would consist of bike lanes, a paved pedestrian

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
sidewalks, and separated trails for pedestrians and bicycles.		path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.
<i>Goal LU 5: Enhanced mobility through alternative transportation choices and land use patterns.</i>		
<i>Objective LU-5.1: Provide for alternative travel modes linking neighborhoods, commercial districts, and job centers.</i>		
Policy LU-5.1.1: Require safe, secure, clearly-delineated, adequately-illuminated walkways and bicycle facilities in all commercial and business centers.	Not Consistent. Alternative 1 would maintain existing conditions, with no improvements.	Consistent. Alternative 2 would include Class IV bicycle lanes, sidewalk improvements, streetlights on the new bridges, widened shoulders, and raised medians along various segments, providing safer streets while enhancing pedestrian accessibility. Proposed improvements also would include installing a segment of the Multi-Use Trail, which would consist of bike lanes, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.
Policy LU-5.1.2: Require connectivity between walkways and bikeways serving neighborhoods and nearby commercial areas, schools, parks, and other supporting services and facilities.	Not Consistent. No mobility improvements would result under Alternative 1.	Consistent. Alternative 2 would include installing a segment of the Multi-Use Trail, which would consist of bike lanes, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.
<i>Goal LU 7: Environmentally responsible development through site planning, building design, waste reduction, and responsible stewardship of resources.</i>		
<i>Objective LU-7.3: Protect surface and ground water quality through design of development sites and drainage improvements.</i>		
Policy LU 7.3.2: Maintain stormwater runoff on-site by directing drainage into rain gardens, natural landscaped swales, rain barrels, permeable areas, and use of drainage areas as design elements, where feasible and reasonable.	Consistent. Under Alternative 1, The Old Road would be maintained in its current condition and increased stormwater runoff would not occur.	Consistent. Alternative 2 would improve drainage facilities and catch basins, which would provide protection for the Santa Clara River. Furthermore, treatment BMPs, designed to increase stormwater retention and reduce runoff volumes (e.g., bioswales), would be implemented. BMPs would be incorporated into the design, to comply with the County Municipal Stormwater NPDES Permit.
Policy LU-7.3.4: Implement best management practices for erosion control throughout the construction and development process	Not Consistent. Under Alternative 1, The Old Road would be maintained in its current condition, and no erosion control improvements would occur.	Consistent. Alternative 2 would improve drainage facilities and catch basins, which would provide protection for the Santa Clara River.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
Circulation Element		
<i>Goal C 1: An inter-connected network of circulation facilities that integrates all travel provides viable alternatives to automobile use, and conforms with regional plans.</i>		
<i>Objective C-1.1: Provide multimodal circulation systems that move people and goods efficiently while protecting environmental resources and quality of life.</i>		
Policy C-1.1.1: Reduce dependence on the automobile, particularly single-occupancy vehicle use, by providing safe and convenient access to transit, bikeways, and walkways.	Not Consistent. Under Alternative 1, existing conditions would be maintained, with no improvements.	Consistent. Alternative 2 would include bicycle lanes, sidewalk improvements, widened shoulders, and raised medians along various segments, providing safer streets while enhancing pedestrian accessibility. Proposed improvements also would include installing a segment of the Multi-Use Trail, which would consist of bike lanes, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.
Policy C-1.1.4: Promote public health through provision of safe, pleasant, and accessible walkways, bikeways, and Multi-Use Trail systems for residents.	Not Consistent. See response under Policy C-1.1.1.	Consistent. See response under Policy C-1.1.1.
Policy C-1.1.7: Consider the safety and convenience of the traveling public, including pedestrians and cyclists, in design and development of all transportation systems.	Not Consistent. See response under Policy C-1.1.1.	Consistent. See response under Policy C-1.1.1.
<i>Objective C-1.3: Ensure conformance of the Circulation Plan with regional transportation plans.</i>		
Policy C-1.3.3: Through trip reduction strategies and emphasis on multimodal transportation options, contribute to achieving the air quality goals of the South Coast Air Quality Management District Air Quality Management Plan.	Not Consistent. Traffic conditions under Alternative 1 would continue to worsen, thereby increasing air quality impacts and decreasing energy efficiency.	Consistent. Alternative 2 would increase regional roadway capacity and reduce congestion. Air quality impacts were evaluated in the Air Quality Report. Alternative 2 would result in less criteria pollutant emissions than Alternative 2, because of improvements in vehicle delay. Alternative 2 also would include installing a segment of the Multi-Use Trail, which would consist of bike lanes, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
Policy C-1.3.4: Coordinate circulation planning with the Regional Transportation Plan prepared by the Southern California Association of Governments (SCAG), to ensure consistency of planned improvements with regional needs.	Not Consistent. See responses under SCAG Federal Transportation Improvement Program (FTIP) regarding consistency with the SCAG FTIP and the Connect SoCal.	Consistent. See responses under SCAG FTIP regarding consistency with the SCAG FTIP and the Connect SoCal. Furthermore, the need for implementation of Alternative 2 is based on an assessment of the existing and future transportation demand in the project area compared to the existing capacity. The improvements would be developed based on the approved land use plan by Los Angeles County and as defined in the SCAG forecast traffic volumes for the 2040 horizon year.
<i>Goal C 2: A unified and well-maintained network of streets and highways which provides safe and efficient movement of people and goods between neighborhoods, districts, and regional centers, while maintaining community character.</i>		
<i>Objective C 2.1: Implement the Circulation Plan (as shown on Exhibit C-2) for streets and highways to meet existing and future travel demands for mobility, access, connectivity, and capacity.</i>		
Policy C-2.1.3: Protect and enhance the capacity of the roadway system by upgrading intersections to meet level of service standards, widening and/or restriping for additional lanes, synchronizing traffic signals, and other means.	Not Consistent. Alternative 1 would maintain the existing lane configuration of The Old Road, which would continue to be a four-lane (two northbound and two southbound) roadway. No intersection improvements would be performed. Level of Service (LOS) would continue to degrade, specifically at the Rye Canyon Road and The Old Road intersection.	Consistent. Alternative 2 would include intersection enhancements at The Old Road and Sky View Lane, The Old Road and Rye Canyon Road, the proposed Old Road/I-5 ramps, The Old Road and Henry Mayo Drive, The Old Road and Gateway Drive, and The Old Road and Magic Mountain Parkway. Furthermore, based on the results of the LOS analysis, the proposed roadway widening and associated improvements along The Old Road and Sky View Lane would improve intersection traffic operations in the study area.
Policy C-2.1.4: Ensure that future dedication and acquisition of right-of-way is based on the adopted Circulation Plan, proposed land uses, and projected demand.	Consistent. Under Alternative 1, the existing lane configurations would be unchanged, no ROW acquisitions would be required, and no intersection improvements would be undertaken.	Consistent. Under Alternative 2, temporary construction, permanent drainage, and roadway ROW easements would be required on portions of several properties within the project boundary. ROW access would be needed at The Old Road, Multi-Use Trail, and Sky View Lane. Because no structures are on these parcels where ROW acquisitions are planned, no relocation of businesses or residences, or structure demolitions would be required.
<i>Objective C-2.2: Adopt and apply consistent standards throughout the Santa Clarita Valley for street design and service levels, which promote safety, convenience, and efficiency of travel.</i>		
Policy C-2.2.1: Designate roadways within the planning area based on their	Not Consistent. Under Alternative 1, the roadway would continue to not meet the	Consistent. Alternative 2 would be consistent with the Santa Clarita Valley Planning Area Plan and the Los Angeles County Circulation Element, which calls for The Old Road to be a six-lane major highway.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
functional classification as shown on Exhibit C-2.	objectives of the Los Angeles County General Plan for a six-lane major highway designation.	
Policy C-2.2.4: Strive to maintain a LOS D or better on most roadway segments and intersections to the extent practical; in some locations, a LOS E may be acceptable, or a LOS F may be necessary, for limited durations during peak traffic periods.	Not Consistent. Traffic conditions under Alternative 1 would continue to worsen.	Consistent. Alternative 2 would alleviate congestion on roadways in the study area and reduce forecasted traffic congestion on adjacent streets, through intersection enhancements. The future year projected LOS at the following intersections would improve: The Old Road and I-5 southbound (SB) ramps, from LOS F to LOS C in the AM peak hour and LOS D in the PM peak hour; The Old Road and Rye Canyon Road intersection, from LOS F to LOS D in the AM peak hour and LOS E in the PM peak hour; and The Old Road and Sky View Lane, from LOS F to LOS B in the AM peak hour and LOS C in the PM peak hour.
<i>Objective C-2.3: Balance the needs of congestion relief with community values for aesthetics and quality of life.</i>		
Policy C-2.3.3: When evaluating road widening projects, consider the impacts of additional traffic, noise, and fumes on adjacent land uses and use context-sensitive design techniques where appropriate.	Not Consistent. Alternative 1 would maintain existing conditions and would not add additional impacts on traffic, noise, and fumes on adjacent land uses. LOS would continue to degrade, specifically at the Rye Canyon Road and The Old Road intersection and Old Road and I-5 SB ramps intersection.	Consistent. Under Alternative 2, the improvements primarily would consist of reconstructing and widening The Old Road, replacing two bridges, and reconstructing and widening Sky View Lane and Rye Canyon Road, including reconfiguring their intersections at The Old Road. Traffic impacts were evaluated in the Transportation Assessment Report (AECOM 2023b). Under Alternative 2, the future year projected LOS would improve at the following intersections: The Old Road and I-5 SB ramps, from LOS F to LOS C in the AM peak hour and LOS D in the PM peak hour; The Old Road and Rye Canyon Road intersection, from LOS F to LOS D in the AM peak hour and to LOS E in the PM peak hour; and The Old Road and Sky View Lane, from LOS F to LOS B in the AM peak hour and LOS C in the PM peak hour. Furthermore, traffic noise impacts were evaluated in the Noise Study Report (TAHA 2022). The traffic noise modeling results indicated that traffic noise levels at modeled receivers in Noise Study Area (NSA)-2 would be in the range of 69 to 74 A-weighted dBA $L_{eq}(h)$ in the design year, and that the increase in noise would be 1 to 5 decibels (dB) in the design year. Because the predicted noise level in the design year would exceed 66 dBA $L_{eq}(h)$ for Category C and 71 dBA $L_{eq}(h)$ for Category E receivers, traffic noise impacts are predicted at receptors in this area. Noise abatement was evaluated and considered infeasible. Air quality impacts were evaluated in the Air Quality Report. Alternative 2 would result in less criteria pollutant emissions than Alternative 1 because of improvements in vehicle delay.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
<i>Goal C 6: A unified and well-maintained bikeway system with safe and convenient routes for commuting, recreational use and utilitarian travel, connecting communities and the region.</i>		
<i>Objective C-6.1: Adopt and implement a coordinated master plan for bikeways for the Valley, including both City and County areas, to make bicycling an attractive and feasible mode of transportation.</i>		
Policy C-6.1.1: For recreational riders, continue to develop Class I bike paths, separated from the right-of-way, linking neighborhoods to open space and activity areas.	Not Consistent. Alternative 1 would maintain existing conditions and not add any bikeways.	Consistent. Alternative 2 would add a Class IV bikeway. Alternative 2 also would include installing a segment of the Multi-Use Trail, which would include bike lanes.
Policy C-6.1.2: For long-distance riders and those who bicycle to work or services, provide striped Class II bike lanes within the right-of-way, with adequate delineation and signage, where feasible and appropriate.	Not Consistent. Alternative 1 would maintain existing conditions and not add any bikeways.	Consistent. Alternative 2 would include the addition of a Class IV bikeway.
Policy C-6.1.3: Continue to acquire or reserve right-of-way and/or easements needed to complete the bicycle circulation system as development occurs.	Not Consistent. Alternative 1 would maintain existing conditions and not add bikeways.	Consistent. Alternative 2 would add a Class IV bikeway. Alternative 2 also would include installing a segment of the Multi-Use Trail, which would include bike lanes. Alternative 2 would contribute to the bicycle circulation system.
Policy C-6.1.4: Where inadequate right-of-way exists for Class I or II bikeways, provide signage for Class III bike routes or designate alternative routes as appropriate.	Not Consistent. Alternative 1 would maintain existing conditions and not add bikeways.	Consistent. Alternative 2 would include the addition of a Class IV bikeway.
<i>Goal C 7: Walkable communities, in which interconnected walkways provide a safe, comfortable and viable alternative to driving for local destinations.</i>		
<i>Objective C-7.1: A continuous, integrated system of safe and attractive pedestrian walkways, paseos and trails linking residents to parks, open space, schools, services, and transit.</i>		
Policy C-7.1.8: Upgrade streets that are not pedestrian-friendly because of lack of sidewalk connections, safe street crossing points, vehicle sight distance, or other design efficiencies.	Not Consistent. Alternative 1 would maintain the existing lane configuration of The Old Road, which would continue to be a four-lane (two northbound and two southbound) roadway. No	Consistent. Alternative 2 would include a Class IV bikeway, sidewalk improvements, widened shoulders, and raised medians along various segments, providing safer streets while enhancing pedestrian accessibility. Proposed improvements also would include installing a segment of the Multi-Use Trail, which would consist of a Class IV bikeway, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
	intersection improvements would occur.	
Policy C-7.1.10: Continue to expand and improve the Valley's Multi-Use Trail system to provide additional routes for pedestrian travel.	Not Consistent. Under Alternative 1, improvements to portions of the Multi-Use Trail would not occur.	Consistent. Alternative 2 would install a segment of the Multi-Use Trail, which would consist of a Class IV bikeway, a paved pedestrian path, and an equestrian trail.
Conservation and Open Space Element		
<i>Goal CO-1: A balance between the social and economic needs of Santa Clarita Valley residents and protection of the natural environment, so that these needs can be met in the present and in the future.</i>		
<i>Objective CO-1.1: Protect the capacity of the natural "green" infrastructure to absorb and break down pollutants, cleanse air and water, and prevent flood and storm damage.</i>		
Policy CO-1.1.1: In making land use decisions, consider the complex, dynamic, and interrelated ways that natural and human systems interact, such as the interactions between energy demand, water demand, air and water quality, and waste management.	Not Consistent. Alternative 1 would not provide the necessary level of flood protection as The Old Road over Santa Clara River Bridge would remain in its existing condition and remain not high enough to allow an LACPW capital flood to pass under the bridge. Traffic conditions would continue to worsen, thereby increasing air quality impacts and decreasing energy efficiency.	Consistent. Alternative 2 would reconstruct The Old Road over the Santa Clara River Bridge at an elevation approximately 9 feet higher on the north end and 15 feet higher on the south end, to allow sufficient floodway clearance. Alternative 2 also would improve drainage facilities and catch basins, which would provide protection for the Santa Clara River. Air Quality impacts were evaluated in the Air Quality Report. Alternative 2 would result in less criteria pollutant emissions than Alternative 1 because of improvements in vehicle delay.
Policy CO-1.1.2: In making land use decisions, consider the impacts of human activity within watersheds and ecosystems, to maintain the functional viability of these systems.	Not Consistent. See response provided in Policy CO-1.1.1.	Consistent. See response provided in Policy CO-1.1.1.
<i>Objective CO-1.5: Manage urban development and human-built systems to minimize harm to ecosystems, watersheds, and other natural systems, such as urban runoff treatment trains that infiltrate, treat and remove direct connections to impervious areas.</i>		
Policy CO-1.5.2: Design and manage public urban infrastructure systems to reduce impacts on natural systems.	Not Consistent. See response provided in Policy CO-1.1.1.	Consistent. See response provided in Policy CO-1.1.1.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
<i>Goal CO-2: Conserve the Santa Clarita Valley's hillsides, canyons, ridgelines, soils, and minerals, which provide the physical setting for the natural and built environments.</i>		
<i>Objective CO-2.1: Control soil erosion, waterway sedimentation, and airborne dust generation, and maintain the fertility of topsoil.</i>		
Policy CO-2.1.1: Review soil erosion and sedimentation control plans for grading activities related to development, where appropriate to ensure mitigation of potential erosion by water and air.	Not Consistent. Alternative 1 would not provide the necessary level of flood protection because The Old Road over the Santa Clara River Bridge would remain in its existing condition, not high enough to allow an LACPW capital flood to pass under the bridge.	Consistent. Alternative 2 would alter existing drainage patterns, rates, and volumes, through construction of the new road alignment, reconstruction of existing catch basins, and construction of new catch basins and drainage facilities, which would increase the impervious surface in the project area. A net increase in impervious surface would result from the increase of two lanes to three lanes in each direction of The Old Road. However, the total increase in impervious surface area would be insignificant in comparison to the watershed area of the Santa Clara River at The Old Road Bridge crossing. Nonetheless, potential changes in runoff rates/volumes would be addressed by drainage facility improvements and treatment BMPs, designed to increase stormwater retention and reduce runoff volumes (e.g., bioswales). BMPs would be incorporated into the design, to comply with the County Municipal Stormwater NPDES Permit.
<i>Goal CO-4: An adequate supply of clean water to meet the needs of present and future residents and businesses, balanced with the needs of natural ecosystems.</i>		
<i>Objective CO-4.3: Limit disruption of natural hydrology by reducing impervious cover, increasing on-site infiltration, and managing stormwater runoff at the source.</i>		
Policy CO-4.3.2: On previously developed sites proposed for major alteration, provide stormwater management improvements to restore natural infiltration, as required by the reviewing authority.	Not Consistent. Under Alternative 1, The Old Road would be maintained in its current condition and would not provide stormwater management improvements.	Consistent. Alternative 2 would alter existing drainage patterns, rates, and volumes through construction of the new road alignment, by reconstructing existing catch basins and constructing new catch basins and drainage facilities, and by increasing the impervious surface in the project area. A net increase in impervious surface would result from the increase of two lanes to three lanes in each direction of The Old Road. However, the total increase in impervious surface area would be insignificant in comparison to the watershed area of the Santa Clara River at The Old Road Bridge crossing. Nonetheless, potential changes in runoff rates/volumes would be addressed by drainage facility improvements and treatment BMPs, designed to increase stormwater retention and reduce runoff volumes (e.g., bioswales). BMPs would be incorporated into the design, to comply with the County Municipal Stormwater NPDES Permit.
Policy CO-4.3.7: Reduce the number of pollutants entering the Santa Clara River and its tributaries by capturing and treating stormwater runoff at the source, to the extent possible.	Consistent. Under Alternative 1, The Old Road would be maintained in its current condition and increased stormwater runoff would not occur.	Consistent. Under Alternative 2, construction would cause short-term and temporary impacts from the generation of pollutants, such as sediment, metals, oil and grease, soil stabilization residues, nutrients, organic compounds, and trash and debris. Alternative 2 would implement temporary BMPs with respect to erosion, sediment, good housekeeping, and pollution prevention, in compliance with the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order WQ 2022-0057-DWQ, NPDES NO. CAS000002 (Construction General Permit), to minimize stormwater

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
		pollutants during the construction phase. Furthermore, Alternative 2 would alter existing drainage patterns, rates, and volumes through construction of the new road alignment, by reconstructing existing catch basins and constructing new catch basins and drainage facilities, and by increasing the impervious surface in the project area. The net increase in impervious surface would result from the increase of two lanes to three lanes in each direction of The Old Road. However, the total increase in impervious surface area would be insignificant in comparison to the watershed area of the Santa Clara River at The Old Road Bridge crossing. Nonetheless, potential changes in runoff rates/volumes would be addressed by drainage facility improvements and treatment BMPs, designed to increase stormwater retention and reduce runoff volumes (e.g., bioswales). BMPs would be incorporated into the design, to comply with the County Municipal Stormwater NPDES Permit.
<i>Goal CO-9: Equitable distribution of park, recreational, and trail facilities to serve all areas and demographic needs of existing and future residents.</i>		
<i>Objective CO-9.2: Recognize that trails are an important recreational asset that, when integrated with transportation systems, contribute to mobility throughout the Santa Clarita Valley. (Guiding Principle #34)</i>		
Policy CO-9.2.1: Plan for a continuous and unified multi-use (equestrian, bicycling, and pedestrian/hiking) trail network for a variety of users, to be developed with common standards, in order to unify Santa Clarita Valley communities and connect with City, Regional, State, and Federal trails such as the dual-use (equestrian and hiking) Pacific Crest Trail.	Not Consistent. Alternative 1 would maintain existing conditions, with no improvements.	Consistent. Improvements under Alternative 2 would include installing a segment of the Multi-Use Trail, which would consist of bike lanes, a paved pedestrian path, and an equestrian trail, furthering continuity with bike trails and improving the bicycle and equestrian environment.
Policy CO-9.2.3: Use the Santa Clara River as a major recreational focal point for development of an integrated system of bikeways and trails, while protecting sensitive ecological areas.	Not Consistent. See response under Policy CO-9.2.1.	Consistent. See response under Policy CO-9.2.1.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
Safety Element		
<i>Goal S-1: Protection of public safety and property from hazardous geological conditions, including seismic rupture and ground shaking, soil instability, and related hazards.</i>		
<i>Objective S-1.3: Reduce risk of damage in developed areas from seismic activity.</i>		
Policy S-1.3.1: Identify any remaining unreinforced masonry buildings or other unstable structures, and require remediation or seismic retrofitting as needed to meet seismic safety requirements.	Not Consistent. Alternative 1 would maintain existing conditions, and The Old Road over the Santa Clara River Bridge would remain classified as Structurally Deficient, per FHWA standards for seismic, flood, and highway design.	Consistent. Alternative 2 would replace The Old Road over the Santa Clara River Bridge to meet current seismic design criteria, which would be consistent with FHWA standards and Caltrans bridge seismic criteria.
Policy S-1.3.4: Cooperate with other agencies as needed to ensure regular inspections of public infrastructure such as bridges, dams, and other critical facilities, and require repairs to these structures as needed to prevent failure in the event of seismic activity.	Not Consistent. See response under Policy S-1.3.1.	Consistent. See response under Policy S-1.3.1.
<i>Goal S-2: Protection of public safety and property from unreasonable risks because of flooding.</i>		
<i>Objective S-2.2: Identify areas in the Santa Clarita Valley that are subject to inundation from flooding.</i>		
Policy S-2.2.2: Identify areas subject to localized short-term flooding because of drainage deficiencies.	Not Consistent. Under Alternative 1, The Old Road would be maintained in its current condition and would not be reconstructed as a six-lane bridge at a higher elevation, which would be inconsistent with the LACPW capital flood level of protection. Furthermore, The Old Road over the Santa Clara River Bridge would remain classified as Structurally Deficient, per FHWA standards for seismic, flood, and highway design.	Consistent. Alternative 2 would reconstruct The Old Road as a six-lane bridge at an elevation approximately 9 feet higher on the north end and 15 feet higher on the south end, to meet LACPW capital storm floodway requirements. In addition, Alternative 2 would improve drainage facilities through catch basin improvements and construction of additional drainage facilities, which would provide protection for the Santa Clara River.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
<i>Objective S-2.5: Limit risks to existing developed areas from flooding.</i>		
Policy S-2.5.1: Address drainage problems that cause flooding on prominent transportation corridors by working with multi-jurisdictional agencies and stakeholders to construct needed drainage improvements.	Not consistent. See response under Policy S-2.2.2. Alternative 1 would not address or construct drainage improvements.	Consistent. See response under Policy S-2.2.2. Under Alternative 2, The Old Road as a six-lane bridge at an elevation approximately 9 feet higher on the north end and 15 feet higher on the south end would meet LACPW capital storm floodway requirements. In addition, a public hearing would be held to allow agencies to comment on the project design.
Policy S-2.5.2: Provide for the maintenance of drainage structures and flood control facilities to avoid system malfunctions and overflows.	Not Consistent. Under Alternative 1, The Old Road would be maintained in its current condition and no erosion control improvements would occur.	Consistent. Alternative 2 would improve drainage facilities, through catch basin improvements and construction of drainage facilities, which would provide protection for the Santa Clara River. Stormwater management would include both short-term (construction phase) and long-term (post-construction/maintenance) measures. Short-term measures would focus on implementing construction site BMPs, designed to reduce erosion and subsequent sediment transport. Long-term measures would consider factors such as increased stormwater runoff caused by the added impervious surface.
<i>Goal S-6: Reduced risk to public safety and property damage from accidental occurrences.</i>		
<i>Objective S-6.2: Increase public safety through the design of public facilities and urban spaces.</i>		
Policy S-6.2.4: Continue to monitor traffic accident data in order to evaluate and address any traffic control needs to enhance public safety.	Not Consistent. Under Alternative 1, The Old Road over the Santa Clara River Bridge would continue not to meet LACPW highway design speed safety standards (it is currently designed for 39 mph, whereas the master plan highway criterion is 65 mph).	Consistent. Alternative 2 would construct a Class IV bikeway, Multi-Use Trail, as well as sidewalks on the bridge, which would improve safety for pedestrians and cyclists. The Old Road traffic conditions would improve and The Old Road over the Santa Clara River Bridge would be re-designed to meet LACPW highway design speed safety standards.
Noise Element		
<i>Goal N-1: A healthy and safe noise environment for Santa Clarita Valley residents, employees, and visitors.</i>		
<i>Objective N-1.1: Protect the health and safety of the residents of the Santa Clarita Valley by the elimination, mitigation, and prevention of significant existing and future noise levels.</i>		
Policy N-1.1.3: Include consideration of potential noise impacts in land use planning and development review decisions.	Consistent. Alternative 1 would maintain the existing lane configuration of The Old Road,	Consistent. No adverse noise impacts would occur from construction of Alternative 2 because construction would be conducted in accordance with Caltrans Standard Specifications Section 14.8-02. Construction noise would be short-term, intermittent, and overshadowed by local traffic noise.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
	and noise increases would not occur.	Traffic noise impacts were evaluated in the Noise Study Report (TAHA 2022). Traffic noise modeling results indicated that traffic noise levels at modeled receivers in NSA-2 would be in the range of 69 to 74 dBA $L_{eq}(h)$ in the design year, and that the increase in noise would be 1 to 5 dB in the design year. Because the predicted noise level in the design year would exceed 66 dBA $L_{eq}(h)$ for Category C and 71 dBA $L_{eq}(h)$ for Category E receivers, traffic noise impacts would occur at receptors in this area. Noise abatement was evaluated and considered infeasible. Although noise impacts were predicted, the proposed project would be consistent with this policy, because the policy simply requires consideration of noise impacts in land use planning and development review decisions.
<i>Goal N 2: Protect residents and sensitive receptors from traffic-generated noise.</i>		
<i>Objective N-2.1: Prevent and mitigate adverse effects of noise generated from traffic on arterial streets and highways through implementing noise reduction standards and programs.</i>		
Policy N-2.1.2: Encourage the use of noise absorbing barriers, where appropriate.	Consistent. Alternative 1 would maintain the existing lane configuration of The Old Road and noise absorbing barriers would not be required.	Consistent. Traffic noise impacts were evaluated in the Noise Study Report. Under Alternative 2, no adverse noise impacts would occur from construction because construction would be conducted in accordance with Caltrans Standard Specifications Section 14.8-02. Construction noise would be short-term, intermittent, and overshadowed by local traffic noise. The traffic noise modeling results indicated traffic noise levels at modeled receivers in NSA-2 would be in the range of 69 to 74 dBA $L_{eq}(h)$ in the design year, and the increase in noise would be 1 to 5 dB in the design year. Because the predicted noise level in the design year would exceed 66 dBA $L_{eq}(h)$ for Category C and 71 dBA $L_{eq}(h)$ for Category E receivers, traffic noise impacts would occur at receptors in this area. Noise abatement was evaluated and considered infeasible.
Policy N-2.1.3: Where appropriate, coordinate with Caltrans to ensure that sound walls or other noise barriers are constructed along Interstate 5 and State Route 14 in the immediate vicinity of residential and other noise sensitive developments, where setbacks and other sound alleviation devices do not exist.	Consistent. See response under Policy N-2.1.2.	Consistent. See response under Policy N-2.1.2.

Policy/Goal	Alternative 1 No-Build Alternative	Alternative 2 Build Alternative
<i>Goal N-3: Protect residential neighborhoods from excessive noise.</i>		
<i>Objective N-3.1: Prevent and mitigate significant noise levels in residential neighborhoods.</i>		
Policy N-3.1.4: Require that those responsible for construction activities develop techniques to mitigate or minimize the noise impacts on residences, and adopt standards that regulate noise from construction activities that occur in or near residential neighborhoods.	Consistent. Alternative 1 would maintain the existing lane configuration of The Old Road and noise increases would not occur.	Consistent. No adverse noise impacts would occur from construction of Alternative 2 because construction would be conducted in accordance with Caltrans Standard Specifications Section 14.8-02. Construction noise would be short-term, intermittent, and overshadowed by local traffic noise.
2011 City of Santa Clarita General Plan		
The Santa Clarita Valley Area Plan has been prepared to ensure consistency with the City of Santa Clarita's General Plan. Thus, the goals, objectives, and policies reviewed in the Santa Clarita Valley Area Plan would be the same for the 2011 City of Santa Clarita General Plan.		

Source: AECOM 2023a

Alternative 2: Build Alternative

The Build Alternative would be consistent with State, regional, and local plans and programs, and/or would be consistent with incorporation of the proper AMMs, where applicable and feasible. Relevant goals and policies have been considered, as shown in Table 2-3, determining that the goals, objectives, and policies of the plans and programs discussed in Section 2.2.1 would promote improvement in the transportation infrastructure, improve traffic circulation, accommodate many modes of transportation, improve air quality, support economic growth, and accommodate existing and future residents as well as businesses.

Transportation Plans/Programs

The Build Alternative would be consistent with all transportation plans and programs shown in Table 2-3, including the SCAG FTIP, Connect SoCal, SCREMP, and 2012 County of Los Angeles Bicycle Master Plan. The Build Alternative would be inconsistent with Policy C-6.1.1 of the 2015 Santa Clarita Valley Area Plan related to Class I bike paths; however, the Build Alternative would add a Class IV bikeway, which would provide further protection for cyclists. Therefore, the overarching Objective C-6.1 would be met by the Build Alternative. The Build Alternative would be inconsistent with Policy N 1.9 in the Noise Element of the 2035 Los Angeles County General Plan, related to construction of suitable noise attenuation barriers when unavoidable impacts are identified; however, noise barriers were considered and deemed to be infeasible for the proposed project.

2.2.1.8 Avoidance, Minimization, and/or Mitigation Measures

The Build Alternative would be consistent with all relevant land use plan policies and programs. No AMMs are required.

2.2.2 Parks and Recreational Facilities

The following section is based on the CIA (AECOM 2023a) that was prepared for the proposed project. All references in this section are available in the CIA.

2.2.2.1 Regulatory Setting

The Park Preservation Act (California PRC Sections 5400–5409) prohibits local and State agencies from acquiring any property that is in use as a public park at the time of acquisition, unless the acquiring agency pays sufficient compensation or land, or both, to enable the operator of the park to replace the park land and any park facilities on that land.

Section 4(f) of the Department of Transportation Act of 1966, codified in federal law at 49 U.S. Code (USC) 303, declares that “it is the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites.”

2.2.2.2 Affected Environment

No planned or publicly owned public parks, recreation areas, or wildlife or waterfowl refuges are within or immediately adjacent to the project area. The following parks and recreation facilities

are within a 1-mile radius of the project area. The Oaks Club at Valencia is an 18-hole golf course that stretches 7,218 yards, with sweeping views of Santa Clarita Valley. In addition, according to the Los Angeles Bicycle Master Plan, no bikeways are in the project area or immediate vicinity. The entrance to the Six Flags Magic Mountain amusement park is at the south end of the project boundary.

2.2.2.3 Environmental Consequences

Alternative 1: No-Build Alternative

Under the No-Build Alternative, no modifications would occur to the existing roadway. No impacts on parks or recreation facilities would occur.

Alternative 2: Build Alternative

Temporary Impacts

Construction of the Build Alternative is expected to last approximately 4.5 years. Typical roadway construction activities would result in some temporary local impacts on land uses in the area, including additional truck traffic, pollutant emissions from construction activities, increased noise and vibration, and temporary delays and/or detours. However, such potential construction impacts would be temporary and intermittent. TCEs would be needed for construction access and staging. Therefore, potential construction impacts would be temporary and intermittent, and would not be considered adverse.

Permanent Impacts

The majority of roadway improvements and construction would occur within the existing ROW. However, acquisition of ROW would be required along almost all the west side of The Old Road. The majority of this property is vacant, with the exception of the Valencia Water Reclamation Plant. This land currently is owned by the Newhall Land and Farming Company and the LA County Sanitation District. No ROW extensions would occur on the east side of the road, with the exception of a small acquisition on the southeast corner of the intersection of Rye Canyon Road and The Old Road, and a small portion on the southeast corner of the intersection of Sky View Lane and The Old Road. Both parcels are owned by Newhall Land and Farming Company and currently are vacant.

ROW acquisition also would be required along Rye Canyon Road, between The Old Road and Avenue Stanford. The ROW acquisition would be required from three commercial properties to accommodate the roadway widening and sidewalk improvements. The roadway widening would affect the I-5 bridge over Rye Canyon Road, which would require the concrete slopes under the bridge to be reconstructed with retaining walls. These acquisitions would cause direct impacts on the commercial and vacant properties along the ROW of Rye Canyon Road.

Public use of parks and recreational facilities would not be affected because no recreational activities are occurring at these locations. In addition, no access to parks and recreational facilities are provided at the locations of the ROW acquisitions.

In addition, under the Build Alternative, improvements to recreational facilities would occur. The Build Alternative would include an extension of the Multi-Use Trail and would construct Class IV bike lanes, pedestrian pathways, and an equestrian trail, which would improve connectivity and

increase recreational opportunities in the area. Construction activities would not restrict access to Six Flags Magic Mountain. No other park or recreation areas are in the immediate project area; therefore, no impacts on parks and recreation would occur.

2.2.2.4 Avoidance, Minimization, and/or Mitigation Measures

The Build Alternative would not affect parks or recreation facilities; therefore, no AMMs are required.

2.2.3 Farmlands

The following section is based on the CIA (AECOM 2023a) that was prepared for the proposed project. All references in this section are available in the CIA.

2.2.3.1 Regulatory Setting

NEPA and the Farmland Protection Policy Act (7 USC 4201–4209; and their regulations, 7 CFR Part 658) require federal agencies, such as FHWA, to coordinate with the Natural Resources Conservation Service (NRCS) if their activities may irreversibly convert farmland (directly or indirectly) to nonagricultural use. Under the Farmland Protection Policy Act, farmland includes prime farmland, unique farmland, and land of statewide or local importance.

CEQA requires review of projects that would convert Williamson Act contract land to nonagricultural uses. The main purposes of the Williamson Act are to preserve agricultural land and encourage open space preservation and efficient urban growth. The Williamson Act provides incentives to landowners through reduced property taxes, to discourage the early conversion of agricultural and open space lands to other uses.

The California Department of Conservation monitors farmland through the Farmland Mapping and Monitoring Program. The program was established in 1982, to continue the Important Farmland mapping efforts that began in 1975 by the NRCS. The program prepares and maintains an automated map and database system to record and report changes in the use of agricultural lands.

2.2.3.2 Farmland Conversion Impact Rating

Projects where farmland may be adversely affected require close coordination with the NRCS and completion of a Farmland Conversion Impact Rating Form. The rating form provides a basis for assessing the extent of farmland impacts based on federally established criteria. The rating form is based on a Land Evaluation and Site Assessment system, which is a numerical system that measures the quality of farmland. Land Evaluation and Site Assessment systems have two components. The Land Evaluation element rates soil quality. The Site Assessment (Form AD-1006) component measures other factors that affect the viability of a farm, including proximity to water and sewer lines and the size of the parcel. Sites receiving a combined score of less than 160 points do not require further evaluation. Alternatives need to be proposed for sites with a combined score greater than 160. On the basis of this analysis, a federal agency may but is not required to deny assistance to private parties and State and local governments undertaking projects that would convert farmland.

2.2.3.3 Affected Environment

Some prime farmland and unique farmland, as identified in the Farmland Mapping and Monitoring Program, exist in the northern portion of the project area, as shown in Figure 7. Prime Farmland is defined as farmland with the best combination of physical and chemical features for sustaining long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture.

Cultivated farmland, identified as Prime Farmland, is south of the intersection of The Old Road and Henry Mayo Drive. This area has been designated for commercial use, according to the Los Angeles County General Plan. Portions of this land are developed, including Los Angeles County Fire Station 76, the Castaic Union School District Transportation and Maintenance Yard, Kennedy Enterprise RV storage, and Furman MJ auto wrecker.

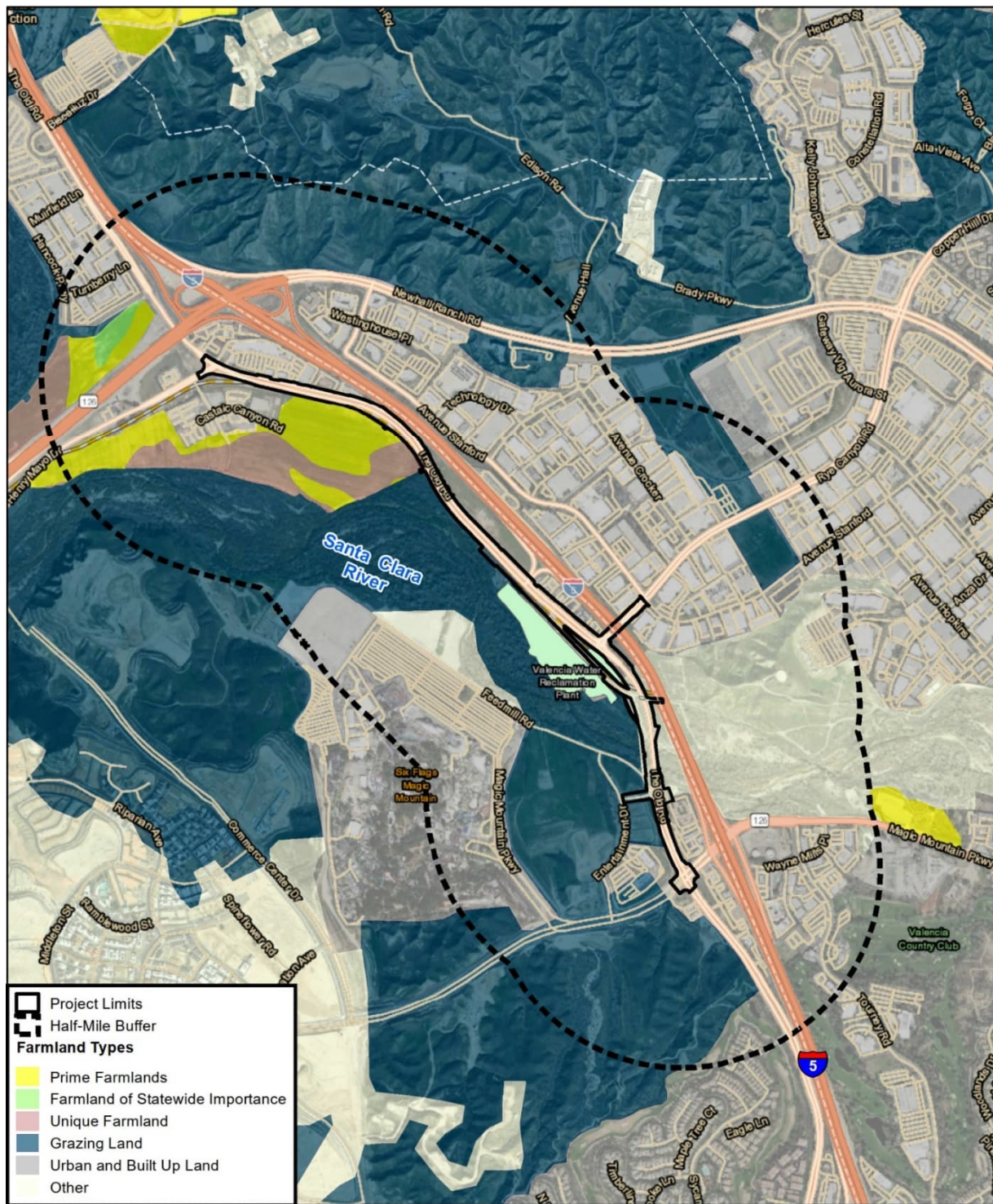
The additional area of Prime Farmland north of Henry Mayo Drive would not be affected by either of the project alternatives. Therefore, it is not included in this discussion.

No portion of the project area is under a Williamson Act Contract, as established in the Williamson Land Conservation Act or any other local agricultural land conservation act. In addition, LA County does not participate in the program. Therefore, no analysis or discussion is required.

2.2.3.4 Environmental Consequences

Alternative 1: No-Build Alternative

Under the No-Build Alternative, no modifications to the existing roadway would occur. Therefore, no impacts on farmland would occur in the area surrounding The Old Road.



Source: California Department of Conservation 2023; Prepared By: AECOM, 2023.

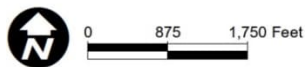


Figure 7
Existing Farmland

Alternative 2: Build Alternative

Under the Build Alternative, improvements to The Old Road would occur in areas designated as Prime and Unique Farmland. As shown in Table 2-4, the Build Alternative would result in impacts on Prime Farmland, Unique Farmland, and Grazing Land from partial acquisitions on those parcels.

Table 2-4: Summary of Potential Impacts on Farmlands under the Build Alternative

Impacted Parcel (APN)	Farmland Designation	Parcel Size (square feet)	Land Converted (square feet)	Percent of Farmland in County	Percent of Farmland in State
2826005013	Prime Farmland, Unique Farmland, Grazing Land	648,292	166,041.54	0.00015%	0.0000042%
2826006008	Grazing Land	209,259	274.5	0.00000001%	n/a
2826006905	Grazing Land	292,994	49,608.40	0.00005%	n/a
2826007021	Grazing Land	6,403,327	38,076.48	0.00015%	n/a

Source: AECOM 2023a

The Build Alternative would convert approximately 1.08 acres of Prime and Unique Farmland. However, the new ROW associated with the Build Alternative would not require acquisition of the entire parcel. Form AD-1006 was completed for the Build Alternative and submitted to the NRCS local field office to determine the farmland conversion impact rating (provided in Appendix D).

The NRCS determined that the Build Alternative would traverse areas currently being devoted to a variety of agricultural uses, including hay, vegetables, and fruit and nut trees. However, the Build Alternative rated a combined score of 125 points on Form AD-1006, which is below the threshold of 160 points. According to the instructions for completing Form AD-1006, sites receiving a total score of less than 160 points do not need to “consider alternative actions, as appropriate, that could reduce adverse impacts (e.g., Alternative Sites, Modifications, or Mitigation).” Therefore, according to the results of Form AD-1006, no further analysis is needed for farmland issues under the Farmland Protection Policy Act. In addition, these areas currently are not used for agricultural purposes, and the surrounding area is highly urbanized. Therefore, the acquisition of Farmland of Statewide Importance would not be adverse because of the zoning of the project area and the combined score of 125 points on the Farmland Conversion Impact Rating Form.

2.2.3.5 Avoidance, Minimization, and/or Mitigation Measures

Potential impacts on farmland would be 1.08 acres of farmland conversion to a transportation use. This land currently is not used as farmland, and no future plans exist to use it for agricultural. The property owner, Newhall Land and Farming Company, intends to develop these parcels into a housing tract development, known as Entrada North (Los Angeles County Tentative Tract Map Number 071377). No impacts would occur on farmlands. Therefore, no AMMs are required.

2.2.4 Growth

2.2.4.1 Regulatory Setting

The CEQ regulations, which established the steps necessary to comply with the NEPA of 1969, require evaluation of the potential environmental effects of all proposed federal activities and programs. This provision includes a requirement to examine indirect effects, which may occur in areas beyond the immediate influence of a proposed action and at some time in the future. The CEQ regulations (40 CFR 1508.8) refer to these consequences as indirect impacts. Indirect impacts may include changes in land use, economic vitality, and population density, which are all elements of growth.

CEQA also requires the analysis of a project's potential to induce growth. The CEQA Guidelines (Section 15126.2[d]) require that environmental documents "...discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment..."

2.2.4.2 Affected Environment

The information in this section is based on the CIA (AECOM 2023a) that was prepared for the proposed project. The potential growth-related impacts of the proposed project were assessed using the *Guidance for Preparers of Growth-Related, Indirect Impacts Analyses* (Caltrans, 2006). Under NEPA and CEQA, growth inducement is not necessarily considered detrimental or beneficial, or even environmentally significant. Generally, growth inducement of a project is considered significant only if it would foster a population growth greater than what is assumed for applicable master plans, land use plans, or regional projections made by planning agencies. Growth induced by a project is considered to be significant if it directly or indirectly would affect the ability of agencies to provide public services, or if the potential growth would significantly affect the environment in some other way.

Different transportation projects influence growth to different degrees and in different ways, and the guidance has adopted a two-phase approach to evaluation of potential growth-related impacts. The first phase, called "first cut screening," helps the environmental planner determine the likely growth potential effect and whether further analysis may be necessary.

The first-cut screening involves examining a variety of interrelated factors to answer the following questions:

- To what extent would travel times, travel cost, or accessibility to employment, shopping, or other destinations be changed? Would this change affect travel behavior, trip patterns, or the attractiveness of some areas to development over others?
- To what extent would change in accessibility affect growth or land use change – its location, rate, type, or amount?
- To what extent would resources of concern be affected by this growth or land use change?

The SCAG population, household, and employment estimates and the annual average growth rate forecasts for 2020–2045 for the region, LA County, and local jurisdictions are shown in

Table 2-5. The SCAG data did not include the individual unincorporated community of Stevenson Ranch, and therefore the entire unincorporated LA County was included for reference.

Table 2-5: Annual Average Growth Rate Percentages

Jurisdiction	Population 2016–2045	Households 2016–2045	Employment 2016–2045
Southern California Association of Governments region	0.6	0.8	0.6
Los Angeles County	0.6	0.7	0.4
City of Santa Clarita	1.3	1.4	1.2
Unincorporated Los Angeles County	1.2	1.3	1.3

Source: AECOM 2023a

According to the forecasts, the local jurisdictions are projected to grow at a faster annual rate than LA County and the overall SCAG region. The area east and south of the project area is generally built-out, with some undeveloped land to the north and west (see Section 2.2.1 for a discussion on land use in the project vicinity).

2.2.4.3 Environmental Consequences

Alternative 1: No-Build Alternative

Under the No-Build Alternative, no modifications would occur to the existing roadway. The Old Road in its current state would not meet the goals and objectives of the Los Angeles County Circulation Element, LACPW planning, FHWA standards, and other regional forecasts. The Connect SoCal anticipates that the growth planned within the local jurisdictions in and around the study area adequately responds to this projected growth. The No-Build Alternative would not influence the level of growth in the study area and adjacent jurisdictions. The Old Road would remain in its current condition, and therefore is not anticipated to influence the amount, location, and/or distribution of growth or housing and jobs in local cities and the unincorporated areas in the study area. Deficiencies in traffic demand and roadway operations (e.g., congestion, safety, and inconsistency with jurisdictional plans and policies) would remain and continue to worsen under this scenario, because this alternative would not increase regional roadway capacity and improve safety to accommodate expected future traffic growth projections.

Alternative 2: Build Alternative

The “first-cut screening” for the Build Alternative is discussed next.

The Build Alternative would not change existing points of accessibility along The Old Road, Sky View Lane, or Rye Canyon Road, or provide new access; it would provide only improvements or re-alignments of intersections along The Old Road, Sky View Lane, and Rye Canyon Road. The intersections and other improvements associated with the Build Alternative would create benefits for travelers by decreasing congestion; however, the alternative would not accommodate additional traffic beyond what currently is projected for the area. The improvements are not expected to influence travel behavior, trip patterns, or the attractiveness

of some areas to development over others. This alternative would not remove an impediment to growth because it would not provide an entirely new public facility.

The Build Alternative would address existing operational and capacity deficiencies and would not be likely to influence the amount, location, and/or distribution of growth in and around the study area. The proposed project would not be likely to induce land development, encourage changes in population density, or cause construction of additional housing. All land use plans in the counties and cities in and around the study area include future growth. Service providers also regularly evaluate growth trends and provide required infrastructure upgrades as needed. No infrastructure plans have been identified in any local agency plans or service providers for the study area.

This “first cut screening” demonstrates that the Build Alternative would not change access but would facilitate improved mobility in the study area. Utilities, land use, community facilities, and traffic would not be affected because this alternative would not be growth-inducing and would not result in reasonably foreseeable growth. Based on this analysis, the Build Alternative does not require further analysis of potential growth-related impacts.

2.2.4.4 Avoidance, Minimization, and/or Mitigation Measures

The Build Alternative would not be growth-inducing, and no further analysis of growth-related impacts is required. Local and regional plans account potential growth in and around the study area, and the minimal road and intersection improvements to The Old Road and Rye Canyon Road would not encourage additional growth beyond those projections. No AMMs are required.

2.2.5 Community Character and Cohesion

2.2.5.1 Regulatory Setting

The NEPA of 1969, as amended, established that the federal government should use all practicable means to ensure safe, healthful, productive, and aesthetically and culturally pleasing surroundings for all Americans (42 USC 4331[b][2]). FHWA, in its implementation of NEPA (23 USC 109[h]), directs that final decisions on projects are to be made in the best overall public interest. This requires taking into account adverse environmental impacts, such as destruction or disruption of human-made resources, community cohesion, and the availability of public facilities and services.

Under CEQA, an economic or social change by itself is not to be considered a significant effect on the environment. However, if a social or economic change is related to a physical change, then social or economic change may be considered in determining whether the physical change is significant. Because the proposed project would result in physical change to the environment, considering changes to community character and cohesion is appropriate in assessing the proposed project's significant effects.

2.2.5.2 Affected Environment

The information in this section is based on the CIA that was prepared for the proposed project (AECOM 2023a).

Community character is defined as the combination of demographics, housing characteristics, economic conditions, and community facilities. *Community cohesion* is defined as the degree to which residents have a sense of belonging in their neighborhood; a level of commitment to the community; or a strong attachment to neighbors, groups, and institutions, usually from continued association over time.

Other potential indicators of cohesion include a high proportion of the following: ethnic homogeneity, long-term residents, households of two or more people, rates of home ownership, and percentage of elderly residents.

Population and Housing

Demographic data were collected from the U.S. Census (U.S. Census Bureau 2010) and the 2020 American Community Survey (ACS) 5-year estimates (U.S. Census Bureau 2019) for the analysis discussed next. The ACS 5-year estimates were used because the data are more reliable than other ACS estimates (e.g., the 1- and 3-year estimates) and data were available for smaller geographies. Data were collected for U.S. Census tracts within 0.5 mile of the project area. Data also were collected for the community of Stevenson Ranch, city of Santa Clarita, and LA County as points of reference for demographic trends. In addition, Connect SoCal growth forecasts were used to estimate projected growth for the area.

Regional Population Characteristics

The current populations of the study area, local area, region, and state are shown in Table 2-6. Typically, the growth rates between 2010 and 2019 in the study area are higher compared to the rest of the state, region, and local area. However, Census Tract 9201.14 has a slightly lower growth rate than the state and local area, and Census Tract 9202.00 experienced a negative growth rate. Census Tract 9202.00 contains the North County Correctional Facility and no other housing units. The decrease in population shown in Table 2-6 likely represents a decrease in inmate population.

Table 2-6: Current State, Regional, and Local Populations and Change

Geographic Area	2010	2019	Change	Percent Change
California	37,253,956	39,283,497	2,029,541	5.45%
County of Los Angeles	9,818,605	10,081,570	262,965	2.68%
City of Santa Clarita	176,320	213,411	37,091	21.04%
Unincorporated Community of Stevenson Ranch	16,934	19,179	2,245	13.26%
Census Tract 9201.06	3,110	3,381	271	8.71%
Census Tract 9201.07	3,954	6,295	2,341	59.21%
Census Tract 9201.08	3,439	5,386	1,947	56.62%
Census Tract 9201.14	6,490	6,518	28	0.43%
Census Tract 9202.00	6,920	5,393	-1,527	-22.07%
Census Tract 9203.28	1,990	2,036	46	2.31%
Census Tract 9203.39	7,337	7,420	83	1.13%

Sources: U.S. Census Bureau 2010, 2019

SCAG Connect SoCal growth forecasts were used to predict long-term growth of the area, shown in Table 2-7. The SCAG region is expected to see a 19 to 27% growth rate from 2016 to 2045, in population, households, and employment. LA County is expected to see a 13 to 24% growth rate from 2016 to 2045, in population, households, and employment. The city of Santa Clarita is expected to experience a roughly 15 to 18% growth rate in population and employment, with a 32% growth rate in households from 2016 to 2045, and unincorporated LA County is predicted to experience a roughly 19 to 20% growth rate in population and employment, with a 42% growth rate in households from 2016 to 2045.

Table 2-7: Regional and Local Growth Rate

	2016	2045	2016-2045 Growth Rate (%)
SCAG Region			
Population	18,832,000	22,504,000	19.5
Households	6,012,000	7,633,000	27.0
Employment	8,389,000	10,049,000	19.8
Los Angeles County			
Population	10,110,000	11,674,000	15.5
Households	3,319,000	4,119,000	24.1
Employment	4,743,000	5,382,000	13.5
City of Santa Clarita			
Population	218,200	258,800	18.6
Households	71,800	95,200	32.6
Employment	91,200	105,200	15.4
Unincorporated County of Los Angeles			
Population	1,044,500	1,258,000	20.4
Households	294,800	419,300	42.2
Employment	269,100	320,100	19.0

Source: SCAG 2020

Neighborhoods/Communities/Community Character

The following neighborhoods were identified in the study area: the Santa Clarita neighborhoods of Newhall Ranch Road/McBean Parkway, Valencia Boulevard/Tourney Road, and Valencia; and the Stevenson Ranch neighborhoods of Val Verde, Sulphur Springs, and Del Valle. These neighborhoods are shown on Figure 8.

Santa Clarita

Newhall Ranch Road/McBean Parkway: This neighborhood roughly follows the Santa Clarita River, Dickason Drive, and Decoro Drive to the north. The eastern boundary follows Grandview Drive and McBean Parkway and extends out slightly along Newhall Ranch Road. The southern boundary is Magic Mountain Parkway, and the western boundary is I-5. This neighborhood aligns with Census Tract 9201.14.

Valencia Boulevard/Tourney Road: This neighborhood is bounded by I-5 on the west, Magic Mountain Parkway on the north, McBean Parkway on the east, and Valencia Boulevard on the south. The Valencia Boulevard/Tourney Road neighborhood corresponds to Census Tract 9203.28.

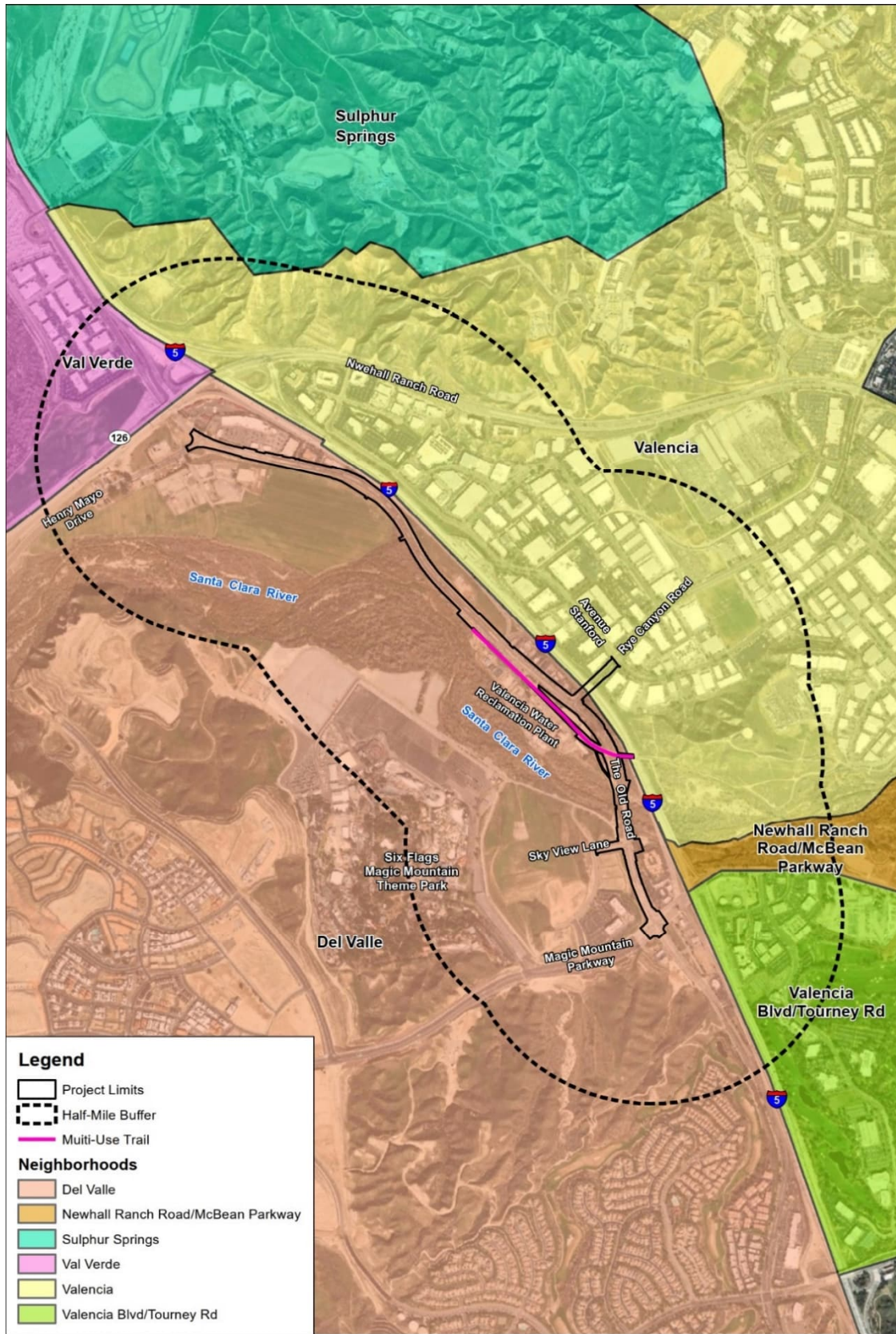


Figure 8
Neighborhoods Map

Valencia: Valencia is a small town and consists of just one neighborhood. The neighborhood is bounded by I-5 on the west, the Santa Clarita River and Avenue Rockefeller on the south, Newhall Ranch Road and Copper Hill Drive on the east, and San Francisquito Motorway/Company Road and the Census Tract 9202.00 boundary on the north. Valencia contains Census Tracts 9201.07 and 9201.08.

Stevenson Ranch

Del Valle: The eastern boundary of Del Valle is I-5, and the northern boundary is SR-126. The western and southern boundaries generally follow Potrero Canyon Road, Pico Canyon Road, Mallory Drive, Kavenagh Lane, Hemmingway Avenue, and Stevenson Ranch Parkway. Based on population density, the neighborhood is designated as suburban. This neighborhood closely aligns with Census Tract 9203.39.

Val Verde: The neighborhood is north of SR-126 and west of I-5. The western boundary of the neighborhood is the Los Angeles/Ventura County line, and the northern boundary roughly follows Hasley Canyon Road, Lechler Fire Truck Trail, and Oak Canyon Road. Based on population density, the neighborhood is designated as rural. This neighborhood falls partially within Census Tract 9201.06.

Sulphur Springs: The boundary for the Sulphur Springs neighborhood follows the boundary for Census Tract 9202.00. The Sulphur Springs neighborhood generally is undeveloped, with the exception of some industrial uses and the North County Correctional Facility.

Demographic Data

Demographic data can be used to describe community cohesion and characteristics. Information was gathered from the 2010 U.S. Census and the 2020 ACS 5-year estimates for the elements of age, ethnicity, employment and income, and transit-dependent population.

Age

Age can be a defining characteristic for community character and cohesion. Elderly and stay-at-home parents tend to be more active in their communities, because they generally have more time to become involved. Transit-dependent populations are defined as coming from the population under age 19 or age 65 and older. Residents who tend to walk or use public transportation tend to correlate with a higher degree of community cohesion. Table 2-8 shows the distribution of the population by age in the state, region, locally, and in the study area.

As stated previously, Census Tract 9202.00 contains the North County Correctional Facility and no other residential properties. Therefore, it was excluded from the analysis of age trends in the study area that is presented next.

According to the U.S. Census Bureau, the population under 19 years of age has increased for all geographies. The population between 19 and 64 years old decreased for all geographies. The population over age 65 increased for all geographies between 2010 and 2019, with the exception of Census Tract 9201.08 (Valencia), which experienced an extremely minor decrease in population. No major changes occurred in age distribution for any geography in any age group, with all changes being less than a 5% increase or decrease except for Census Tract

9201.08 (Valencia), which experienced a roughly 7% change in a population of less than 19 years old.

Table 2-8: Age Distribution

Geographic Area	Year	Population Less than 19 Years Old		Population 19 to 64 Years Old		Population Greater than 64 Years Old	
California	2010	9,295,040	25.0%	23,712,402	63.7%	4,246,514	11.4%
	2019	10,060,387	25.6%	23,737,069	60.4%	5,486,041	14.0%
Los Angeles County	2010	2,402,208	24.5%	6,350,698	64.7%	1,065,699	10.9%
	2019	2,476,983	24.60%	6,268,609	62.1%	1,335,978	13.3%
City of Santa Clarita	2010	46,180	26.2%	113,289	64.3%	16,851	9.6%
	2019	60,698	28.5%	127,638	59.8%	25,075	11.7%
Unincorporated Community of Stevenson Ranch	2010	6,254	36.9%	9,766	57.7%	1,433	5.3%
	2019	5,464	28.5%	11,892	62.1%	1,823	9.5%
Census Tract 9201.06	2010	899	28.9%	2,034	65.4%	177	5.7%
	2019	909	26.8%	2,135	63.1%	337	10.0%
Census Tract 9201.07	2010	1,490	37.7%	2,355	59.6%	109	2.8%
	2019	2,478	39.4%	3,416	54.1%	401	6.4%
Census Tract 9201.08	2010	1,061	30.9%	2,230	64.8%	148	4.3%
	2019	1,976	36.6%	3,184	59.1%	226	4.2%
Census Tract 9201.14	2010	1,882	29.0%	4,363	67.2%	245	3.8%
	2019	1,818	27.8%	4,367	67.0%	333	5.1%
Census Tract 9202.00*	2010	0	0.0%	6,903	99.8%	17	0.2%
	2019	219	4.1%	5,159	95.5%	15	0.3%
Census Tract 9203.28	2010	409	20.6%	1,457	73.2%	124	6.2%
	2019	400	19.7%	1,454	71.5%	182	8.9%
Census Tract 9203.39	2010	2,411	32.7%	4,617	62.6%	349	4.7%
	2019	2,361	31.8%	4,592	62.0%	467	6.3%

Note:

* Census Tract 9202.00 was excluded from analysis because it contains the North County Correctional Facility and no other residential properties.

Sources: U.S. Census Bureau 2010, 2019

For all census tracts in the study area, the 19–64 age range contained the majority of the population, ranging from roughly 54 to 72% of the population in 2019. The census tract with the lowest percentage of people in this age range was 9201.07 (Valencia), and the tract with the highest percentage was 9203.28 (Valencia Boulevard/Tourney Road). The census tract with the lowest percentage of population under age 19 was 9203.28 (Valencia Boulevard/Tourney Road) at 19.7%, with the highest in census tract 9201.07 (Valencia) at 39.4%. The census tract with the lowest percentage of population over age 65 was 9201.08 (Valencia) at 4.2%, with the highest in census tract being 9203.28 (Valencia Boulevard/Tourney Road) at 8.9%.

Because the majority of the population in the study area falls within the 19–64 age range, a high level of transit-dependence is not likely in this area. The population's lower age range, in conjunction with a lower percentage of the population over the age of 65, suggests a lower level of community cohesion.

Ethnicity

Because Census Tract 9202.00 contains the North County Correctional Facility and does not represent a typical community, it was excluded from the analysis of ethnicity trends in the study area that is presented next.

Typically, throughout the state, region, and local jurisdictions, Hispanic or Latino and White racial groups tend to be the largest communities. This tendency generally is reflected in the study area; however, the Hispanic or Latino community tends to be much smaller in the study area, with the exceptions of Census Tracts 9201.07 (Valencia), 9201.08 (Valencia), and 9203.39 (Del Valle), which have much larger populations of Asians. Table 2-9 shows the ethnic composition of the state, region, local jurisdictions, and census tracts in the study area.

The census tract with the lowest population of Hispanic or Latino racial group is Census Tract 9203.28 (Valencia Boulevard/Tourney Road) with 12.0%, while the largest Hispanic or Latino population occurs in Census Tract 9201.06 (Valencia) with 61.6%. The smallest population, the White population occurs in Census Tract 9201.06 (Valencia) at 32.8%, with the largest population in Census Tract 9203.39 (Del Valle) at 51.2%. The largest Black/African American population in the study area is in Census Tract 9201.07 (Valencia) at 3.6%, and the smallest is in Census Tract 9203.28 (Valencia Boulevard/Tourney Road) at 2.0%. The lowest percentage of Asian population in the study area is in Census Tract 9201.06 (Valencia) at 3.4%, and the highest percentage of Asian population is in Census Tract 9201.08 (Valencia) at roughly 29.6%. All other populations in the study area were found in very small percentages in each Census Tract, all falling under 10.0%.

A large amount of ethnic diversity exists, with few groups above 50% of the population in the area, which could indicate a lack of community cohesion.

Housing

Households of two or more people and households that have been residents of a community for a longer period tend to correlate with a higher degree of community cohesion. In addition, ownership of a home, rather than a rental, can correlate with a higher degree of community cohesion.

As shown in Table 2-10, Census Tract 9202.00 (Sulphur Springs) was reported as having no housing units. As discussed previously, the population associated with this census tract is connected with the North County Correctional Facility. This census tract has been removed from the following discussion of housing trends. For all other census tracts, the ratio of owner- to renter-occupied housing was comparable to local jurisdictions and higher than the region and state. The average household size in the study area is similar to the state, region, or local jurisdictions, with the exceptions of Census Tracts 9201.06 (Valencia), 9201.07 (Valencia), 9201.08 (Valencia), and 9203.39 (Del Valle), which have larger average household sizes. All census tracts have a 93% or higher occupancy rate. This generally is consistent with the state, region, and local jurisdictions. Each census tract has between approximately 800 and 2,500 housing units. The average household size ranges from two to four people. Census Tract 9203.28 (Valencia Boulevard/Tourney Road) has the smallest household size, while Census

Table 2-9: Ethnic Composition

Geographic Area	Total Population	Hispanic or Latino of Any Race		Not Hispanic or Latino														Total Minority	
				White		Black/African American		American Indian and Alaskan Native		Asian		Native Hawaiian/ Pacific Islander		Some Other Race		Two or More Races			
California	38,832,994	15,100,054	38.9%	14,481,927	37.2%	2,250,792	5.8%	300,304	0.1%	5,645,773	14.5%	153,557	0.03%	5,408,569	14.0%	1,871,497	0.05%	28,859,049	74.3%
Los Angeles County	9,969,032	4,822,776	48.4%	2,620,622	26.2%	812,132	0.08%	72,494	0.07%	1,461,604	14.6%	27,184	0.03%	2,087,932	21.0%	392,031	4.0%	9,284,122	93.1%
City of Santa Clarita	210,469	70,204	33.4%	100,967	48.0%	8,322	4.0%	1,612	0.08%	23,494	11.1%	188	0.01%	15,120	7.2%	12,120	5.8%	118,940	56.5%
Unincorporated Community of Stevenson Ranch	19,179	2,773	14.5%	11,327	59.0%	685	3.6%	76	0.0%	4,821	25.1%	0	0.0%	518	0.0%	1,619	0.1%	10,494	54.7%
Census Tract 9201.06	3,336	2,056	61.6%	1,095	32.8%	72	2.2%	38	1.1%	115	3.4%	8	0.2%	515	15.4%	177	5.3%	2,804	84.1%
Census Tract 9201.07	6,182	1,068	17.2%	3,085	50.0%	222	3.6%	59	1.0%	1,615	26.1%	0	0.0%	214	3.5%	219	1.0%	3,178	51.4%
Census Tract 9201.08	5,279	827	15.7%	2,155	40.8%	165	3.1%	50	1.0%	1,565	29.6%	0	1.3%	275	6.0%	311	10.1%	2,923	55.4%
Census Tract 9201.14	6,445	1,268	19.6%	3,690	57.3%	183	2.8%	0	0.0%	1,098	17.0%	0	0.0%	41	0.6%	153	2.4%	2,590	40.2%
Census Tract 9202.00	5,393	3,206	49.7%	723	11.2%	978	15.2%	253	4.0%	83	1.3%	30	0.5%	659	10.2%	583	9.0%	5,209	80.8%
Census Tract 9203.28	2,036	243	12.0%	1,204	59.1%	42	2.0%	13	0.6%	413	20.2%	7	0.3%	22	1.1%	135	6.6%	740	36.3%
Census Tract 9203.39	7,374	884	12.0%	3,775	51.2%	161	2.2%	76	1.0%	2,118	28.7%	0	0.0%	145	1.2%	712	9.7%	3,384	45.9%

Source: U.S. Census Bureau 2019

Table 2-10: Household Profile

Geography	Total Housing Units	Housing Units, Occupied		Housing Units, Vacant		Owner-Occupied Units*		Renter-Occupied Units*		Average Household Size
California	14,175,976	12,914,001	91.0%	1,261,975	8.9%	7,024,315	54.3%	5,889,686	45.6%	2.95
Los Angeles County	3,542,800	3,316,795	94.0%	226,005	6.4%	1,519,516	45.8%	1,797,279	54.2%	2.99
City of Santa Clarita	71,134	69,046	97.3%	2,088	2.9%	48,365	70.0%	20,681	30.0%	3.06
Unincorporated Community of Stevenson Ranch	6,769	6,486	95.8%	286	4.2%	4,536	83.1%	1,950	16.9%	2.96
Census Tract 9201.06	940	915	97.3%	25	2.7%	763	83.4%	152	16.6%	3.70
Census Tract 9201.07	1,683	1,672	99.3%	11	0.7%	1,395	83.4%	277	16.6%	3.76
Census Tract 9201.08	1,757	1,749	99.5%	8	0.5%	1,317	75.3%	432	24.7%	3.08
Census Tract 9201.14	2,319	2,258	97.4%	61	2.6%	1,167	51.7%	1,091	48.3%	2.89
Census Tract 9202.00**	0	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
Census Tract 9203.28	894	835	93.4%	59	6.6%	403	48.3%	432	51.7%	2.44
Census Tract 9203.39	2,445	2,383	97.5%	62	2.5%	1,792	75.2%	591	24.8%	3.11

Notes:

* May not add up to total housing units because of margin of error of the survey data.

** Census Tract 9202.00 was excluded from the analysis because it contains the North County Correctional Facility and no other residential properties.

Source: U.S. Census Bureau 2019

Tract 9201.07 (Valencia) has the largest. Property value reflects the desirability of a particular property with regard to aesthetic qualities, accessibility, safety, and many other factors. As of June 2022, the median home price in Santa Clarita was \$807,146, and the median home price in Stevenson Ranch was \$1,093,709 (Zillow 2022). Housing units in and around the study area typically are single-family suburban homes, with some multi-family housing. Vacancy rates in the study area generally are low, less than 7%, reflecting a high demand for housing. Unincorporated parts of LA County (e.g., the project area) are expected to experience the most housing and population growth in coming years because of the availability of developable land (CEF 2017).

Households of two or more people and households that have been residents of a community for a longer period tend to correlate with a higher degree of community cohesion. In addition, ownership of a home, rather than a rental, can correlate to a higher degree of community cohesion. Overall, the ratio of owner- to renter-occupied housing was comparable to local jurisdictions and higher than the region and state. The average household size in the study area is similar to the state, region, or local jurisdictions, with the exceptions of Census Tracts 9201.06 (Valencia), 9201.07 (Valencia), 9201.08 (Valencia), and 9203.39 (Del Valle), which have larger average household sizes. All census tracts have a 93% or higher occupancy rate. This generally is consistent with the state, region, and local jurisdictions. Based on the demographic indicators, community cohesion is relatively high.

2.2.5.3 Environmental Consequences

Alternative 1: No-Build Alternative

Under the No-Build Alternative, no modifications would occur to the existing roadway. The No-Build Alternative would not affect the distribution of existing or planned housing, nor the economic conditions of the project area. No housing is in the project area, and economic activity and employment would not be changed.

Alternative 2: Build Alternative

According to several indicators of community cohesion, including high homeownership rates, housing tenure, size of households, and a high percentage of persons aged 65 and over, the study area does represent any level of community cohesion.

During project construction, residents may be disrupted temporarily and inconvenienced by detours, local road closures, dust, noise, and heavy construction equipment traffic. These issues would be addressed in advance of project construction; LACPW would work with local authorities by following a construction traffic notification procedure to minimize transportation and traffic effects. In addition, project construction would not displace any residential units or nonresidential properties.

After construction is completed, the proposed bridge would widen and increase The Old Road to six-lanes. The Build Alternative would not provide new access to an undeveloped area, nor would it influence development opportunities by expanding capacity. Minority and low-income populations are within and around the study area. However, the proposed project would benefit most area residents, including minority and low-income populations, by improving mobility and circulation throughout the area. The proposed project would not have disproportionately high or adverse impacts per Executive Order (EO) 12898 on Non-White, Hispanic, Latino, or low-income populations within the reference populations, because it would not result in adverse

impacts being borne predominately by a minority or low-income population, nor would adverse impacts be appreciably more severe to these populations. Overall, the proposed project would be built along an existing transportation corridor and would not divide existing neighborhoods/communities. Therefore, no adverse impacts would occur.

2.2.5.4 Avoidance, Minimization, and/or Mitigation Measures

Based on the above discussion and analysis, the Build Alternative would be built along an existing transportation corridor and would not divide existing neighborhoods/communities. In addition, the Build Alternative would not result in adverse impacts being borne predominately by a minority or low-income population, nor would adverse impacts be appreciably more severe to these populations. No further community character and cohesion analysis is required.

2.2.5.5 Relocations and Real Property Acquisition

2.2.5.6 Regulatory Setting

Caltrans' Relocation Assistance Program (RAP) is based on the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act), and Title 49 CFR Part 24. The purpose of the program is to ensure that persons displaced as a result of a transportation project are treated fairly, consistently, and equitably, so that such persons will not suffer disproportionate injuries because of projects designed for the benefit of the public as a whole. Appendix C provides a summary of the Relocation Assistance Program.

All relocation services and benefits are administered without regard to race, color, national origin, persons with disabilities, religion, age, or sex. Appendix B provides a copy of the Caltrans' Title VI Policy Statement.

2.2.5.7 Affected Environment

The information in this section is based on the CIA (AECOM 2023a) that was prepared for the proposed project. In the study area, the land adjacent to the project area has been developed by a variety of land uses, including residential, commercial, and recreation uses.

No residential parcels would be acquired or used for temporary construction access or staging for the proposed project. However, as shown in Table 2-2, the Build Alternative would affect 23 parcels (permanently or temporarily), and the majority of the affected parcels would result in partial acquisitions or easements. As discussed in Section 2.2.1, one full parcel acquisition would be required.

The acquisition of ROW would be required along almost all of the west side of The Old Road. The majority of this property is vacant, with the exception of the Valencia Water Reclamation Plant. This land currently is owned by the Newhall Land and Farming Company and the Los Angeles County Sanitation District. No ROW extensions would occur on the east side of the road, with the exception of a small drainage easement on the southeast corner of the intersection of Rye Canyon Road and The Old Road, and on the southeast corner of the intersection of Sky View Lane and The Old Road. Both parcels are owned by Newhall Land and Farming Company and currently are vacant.

ROW acquisition also would be required along Rye Canyon Road, between The Old Road and Avenue Stanford. The roadway widening would affect the I-5 bridge over Rye Canyon Road, which would require the concrete slopes under the bridge to be reconstructed with retaining

walls. ROW acquisition would be required from three commercial properties, to accommodate the roadway widening and sidewalk improvements. Driveways and parking likely would be affected but not the buildings themselves. No relocations would be required, and construction would accommodate continued access to the businesses.

In addition, one full parcel acquisition would be required on vacant land owned by the Newhall Land and Farming Company. The land use would change permanently from the existing use to transportation land use, where the ROW would be expanded to construct the Build Alternative. Overall, compensation would be provided in accordance with federal relocation assistance and property acquisition policies.

2.2.5.8 Environmental Consequences

Alternative 1: No-Build Alternative

The No-Build Alternative would maintain the current configuration of The Old Road. Under the No-Build Alternative, the proposed project would not be constructed, and no impacts would occur on relocations or property acquisitions.

Alternative 2: Build Alternative

Under the Build Alternative, temporary construction, permanent drainage, and roadway ROW easements would be required on portions of several properties within the project boundaries. A summary of the APNs, street address, current owner, current occupant or land use, and ROW acquisition type of each parcel within the project boundaries is shown in Table 2-11.

At this preliminary stage of project design, the Build Alternative is anticipated to require one full property acquisition, partial property acquisitions from 13 properties, and 20 temporary construction easements to accommodate roadway widening. All property owners and tenants would be advised of any potential impacts on businesses, and all businesses would be able to remain open during project construction. The actual impacts on properties would be determined during the final design phase.

The Build Alternative would require the full acquisition of one vacant parcel and partial acquisitions from vacant, public utility, and commercial/industrial properties. Adverse impacts from relocations and property acquisition are anticipated, and property owners would be compensated for any loss in the property under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Throughout the project area, TCEs would be needed for construction access and staging. No residential or commercial properties would be displaced, and no relocation of residential units would be required with implementation of the Build Alternative.

Table 2-11: APN Summary Table and Planned ROW Acquisition and Type

#	APN	Street Address	Owner of Record	Current Occupant/Use	Parcel Size (square feet)	Acquisition Area (square feet)	Acquisition and Type	Description of Impacts
1	2826005007	n/a	Newhall Land and Farming Co	Vacant	35,906.21	686.96	Partial Right-of-Way (ROW) Acquisition	A small acquisition will occur on the southeast corner of the parcel, adjacent to The Old Road.
2	2826005013	n/a	Newhall Land and Farming Co	Vacant	646,355.77	166,041.54	Partial ROW Acquisition and Temporary Easement	A ROW extension will occur along The Old Road.
3	2826006008	n/a	Newhall Land and Farming Co	Vacant	209,259	274.5	Partial ROW Acquisition and Temporary Easement	Parcel will experience partial ROW acquisition and temporary impacts for construction access.
4	2826006905	28185 The Old Road, Valencia	County Sanitation District No 32	Public Utility	292,994	49,608.40	Partial ROW Acquisition and Temporary Easement	Parcel will experience partial ROW acquisition and temporary impacts for construction access and staging.
5	2826006906	28185 The Old Road, Valencia	County Sanitation District No 32	Public Utility	104,344	925.66	Partial ROW Acquisition and Temporary Easement	Parcel will experience partial ROW acquisition and temporary impacts along The Old Road.
6	2826007021	n/a	Newhall Land and Farming Co	Vacant	6,403,327	38,0760.48	Partial ROW Acquisition and Temporary Easement	Parcel will experience partial ROW acquisition and temporary impacts for construction access and staging.
7	2826037018	27710 The Old Road, Valencia	Studio Inn & Suites, LLC and Maruti Investments, Inc.	Commercial/ Industrial	134,856.42	9,445.64	Temporary Easement	Temporary impacts will occur in the parking lot of this parcel.
8	2826121002	28070 The Old Road, Valencia	Fleet Properties	Commercial/ Industrial	32,696.33	1,976.77	Temporary Easement	Parking lot will be temporarily impacted along The Old Road.

#	APN	Street Address	Owner of Record	Current Occupant/Use	Parcel Size (square feet)	Acquisition Area (square feet)	Acquisition and Type	Description of Impacts
9	2826121006	28018 The Old Road, Valencia	Deme Properties LLC	Commercial/Industrial	27,972.92	3,047.83	Temporary Easement	Parking lot will be temporarily impacted along The Old Road.
10	2826121007	28038 The Old Road, Santa Clarita	28038 The Old Road LLC	Commercial/Industrial	36,857.37	2,923.92	Temporary Easement	Parking lot will be temporarily impacted along The Old Road.
11	2826163031	n/a	Newhall Land and Farming Co	Vacant	249,084.24	778.05	Partial ROW Acquisition	The ROW will be extended along a small portion of the parcel along The Old Road.
12	2826006003	n/a	Newhall Land and Farming Co	Vacant	19,503.17	910.75	Partial ROW Acquisition and Temporary Easement	Permanent and temporary impacts will occur along a portion of the parcel along The Old Road and a small ROW extension on the northwest corner.
13	2826006009	n/a/	Newhall Land and Farming Co	Access Road/Vacant	110,537	79,521.71	Partial ROW Acquisition and Temporary Easement	ROW acquisition will occur along the entirety of the parcel. Permanent and temporary impacts will occur because of the trail extension.
14	2826006901	28185 The Old Road, Valencia	County Sanitation District No 32	Public Utility	720.27	720.27	Temporary Easement	Temporary impacts will occur along The Old Road.
15	2826006907	28185 The Old Road, Valencia	County Sanitation District No 32	Public Utility	3,897.25	374.60	Temporary Easement	Temporary impacts will occur along The Old Road.
16	2826037025	n/a	Newhall Land and Farming Co	Vacant	21,735.65	21,735.65	Temporary Easement	Temporary impacts will occur along The Old Road.
17	2826037026	n/a	Newhall Land and Farming Co	Vacant	118,365.62	42,250	Temporary Easement	Temporary impacts will occur along The Old Road.
18	2826037027	n/a	CEF Equities LLC and Rexford Pico LLC	Vacant	69,583	56,500	Temporary Easement	Temporary construction impacts will occur along The Old Road.

#	APN	Street Address	Owner of Record	Current Occupant/Use	Parcel Size (square feet)	Acquisition Area (square feet)	Acquisition and Type	Description of Impacts
19	2866007062	n/a	Newhall Land and Farming Co	Vacant	19,905.44	19,905.44	Full Permanent ROW Acquisition	Permanent impacts will occur, associated with construction of the trail extension.
20	2866008001	25702 Rye Canyon Road, Valencia, and 25700 Rye Canyon Road, Valencia	Rye Canyon Industrial LLC	Commercial/Industrial	116,267.91	3,245.00	Partial ROW Acquisition and Temporary Easement	Permanent and temporary impacts will occur along Rye Canyon Road.
21	2866009014	25733 Rye Canyon Road, Valencia, and 25709 Rye Canyon Road, Valencia	Di Pietro Holdings	Commercial/Industrial	90,848.75	6,451.00	Partial ROW Acquisition and Temporary Easement	Permanent and temporary impacts will occur along Rye Canyon Road.
22	2826121006	28018 The Old Road, Valencia	DEME Properties LLC	Commercial/Industrial	27,972.92	2,231.00	Partial ROW Acquisition and Temporary Easement	Permanent and temporary impacts will occur along Rye Canyon Road.
23	2826006003	Intersection of The Old Road and Rye Canyon Road	Newhall Land and Farming Co.	Vacant	19,503.17	1,075.00	Partial ROW Acquisition and Temporary Easement	Permanent and temporary impacts will occur along Rye Canyon Road.
24	2826163034	n/a	Newhall Land and Farming	Vacant	221,814	4,409	Partial ROW Acquisition	The ROW will be extended to widen Skyview Lane.
25	2826005056	28656 The Old Road, Santa Clarita	Old Road Realty LLC	Vacant	144,994	644	Temporary Easement	Temporary impacts will occur along The Old Road.

Source: AECOM 2023a

2.2.5.9 Avoidance, Minimization, and/or Mitigation Measures

REL-1: Where acquisition is unavoidable, the provisions of the Uniform Act and the 1987 Amendments, as implemented by the Uniform Relocation Assistance and Real Property Acquisition Regulations for Federal and Federally Assisted Programs adopted by the U.S. Department of Transportation (March 2, 1989) and where applicable, the California Public Park Preservation Act of 1971, will be followed. An appraisal of the affected property will be obtained, and an offer for the full appraisal will be made.

REL-2: Advance notice will be provided to property owners and business owners on the project construction schedule, to minimize disruptions.

2.2.6 Environmental Justice

2.2.6.1 Regulatory Setting

All projects involving a federal action (funding, permit, or land) must comply with Executive Order (EO) 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, signed by President William J. Clinton on February 11, 1994. This EO directs federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law. Low income is defined based on the Department of Health and Human Services poverty guidelines. For 2024, this was \$31,200 for a family of four.

EO 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All was enacted on April 21, 2023. EO 14096 on environmental justice does not rescind EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, which has been in effect since February 11, 1994 and currently is implemented through the U.S. Department of Transportation (DOT) Order 5610.2C. This implementation will continue until further guidance is provided regarding implementation of the new EO 14096 on environmental justice. All considerations under Title VI of the Civil Rights Act of 1964 and related statutes also have been included in this project. Caltrans' commitment to upholding the mandates of Title VI is demonstrated by its Title VI Policy Statement, signed by the Director, which is provided in Appendix B.

2.2.6.2 Affected Environment

The environmental justice analysis was conducted using census tract data from the U.S. Census Bureau ACS 5-year estimates (2015–2019) for the reference populations of LA County, the city of Santa Clarita, the unincorporated community of Stevenson Ranch, and census tracts within 0.5 mile of the project area (see Figure 3). The following analysis compares four measures with which to evaluate environmental justice:

- Percentage of Non-White residents in the study area census tracts (see Table 2-9)
- Percentage of Hispanic or Latino residents in the study area census tracts (see Table 2-9)
- Median household income in the study area census tracts (see Table 2-12)
- Percentage of population below poverty level in the study area census tracts (see Table 2-12)

Table 2-12: Income and Poverty Statistics for the Region and the Study Area

Geographic Area/ Block Group	Median Household Income	Population for Whom Poverty Status Is Determined	Population below Poverty Line	Percent of Population below Poverty Line
California	\$106,916	38,535,926	5,149,742	13.4%
Los Angeles County	\$99,133	9,928,773	1,480,446	14.9%
City of Santa Clarita	\$119,314	211,295	17,345	8.2%
Unincorporated Community of Stevenson Ranch	\$166,328	19,165	1,043	5.4%
Census Tract 9201.06	\$102,497	3,381	138	4.1%
Census Tract 9201.07	\$201,581	6,295	212	3.4%
Census Tract 9201.08	\$130,354	5,369	508	9.5%
Census Tract 9201.14	\$129,088	6,464	441	6.8%
Census Tract 9202.00*	\$0	0	0	0.0%
Census Tract 9203.28	\$156,443	2,036	202	9.9%
Census Tract 9203.39	\$189,341	7,420	381	5.1%

Note:

* Census Tract 9202.00 (Sulphur Springs) contains the North County Correctional Facility and no other residences; no household income or poverty data were collected by the U.S. Census Bureau.

Source: AECOM 2023a

Minority groups make up over half the population of the state, LA County, the city of Santa Clarita, and the unincorporated community of Stevenson Ranch. Minority populations in the census tracts range from 36.3% in Census Tract 9203.28 (Valencia Boulevard/Tourney Road) to 84.1% in Census Tract 9201.06 (Val Verde).

Typically, throughout the state, region, and local jurisdictions, Hispanic or Latino and White populations tend to be the largest communities. The Hispanic or Latino community tends to be much smaller in the study area census tracts, with the exception of Census Tract 9201.06 (Val Verde), which has much larger Hispanic or Latino population.

Census Tract 9202.00 (Sulphur Springs) contains the North County Correctional Facility and no other residences. Therefore, no household income or poverty data were collected by the U.S. Census Bureau for this census tract, and it is not included in the following discussion of income and poverty trends. The median household income for the census tracts in the study area ranges from \$102,497 in Census Tract 9201.06 (Val Verde) to \$201,581 in Census Tract 9201.07 (Valencia). With the exception of Census Tracts 9201.08 (Valencia) and Census Tract 9203.28 (Valencia Boulevard/Tourney Road), the census tracts in the study area have a lower poverty rate compared to that of the state, LA County, and the City of Santa Clarita. Percents of poverty rate in the study area census tracts range from 3.4% in Census Tract 9203.07 (Valencia) to 9.9% in Census Tracts 9203.28 (Valencia Boulevard/Tourney Road).

2.2.6.3 Environmental Consequences

Census tracts are considered to have substantial minority populations if the percentage of minority residents is more than 10% higher than the county subdivision and/or the county average. Census tracts are considered to have substantial low-income populations if the percentage of residents who are living below the Census Bureau's defined poverty threshold is more than 5% higher than the county subdivision and/or the county average. The Census

Bureau determines the number of persons living below the poverty line based on their poverty thresholds. For 2019, the Census Bureau's preliminary weighted average poverty threshold for a family of four was \$26,172.

Generally, impacts are considered to be disproportionately high or adverse if: a) adverse impact(s) of the proposed project would be borne predominately by a minority or low-income population group; or b) if adverse impact(s) of the proposed project would be appreciably more severe or greater in magnitude for minority and/or low-income groups than the adverse impact(s) to nonminority and/or non-low-income population groups even after implementation of mitigation measures and offsetting project benefits are considered.

Alternative 1: No-Build Alternative

The No-Build Alternative would maintain the current configuration of The Old Road. Deficiencies in traffic demand and roadway operations (e.g., congestion, safety, and inconsistency with jurisdictional plans and policies) would remain and continue to worsen for environmental justice populations and non-environmental justice populations under this scenario because this alternative would not increase regional roadway capacity and improve safety to accommodate expected future traffic growth projections.

Alternative 2: Build Alternative

Under the Build Alternative, temporary construction, permanent drainage, and roadway ROW easements would be required. However, no homes or businesses would be displaced or relocated, and the Build Alternative would keep The Old Road and Rye Canyon Road in the same general alignment. The proposed project would not physically divide any neighborhoods. This alternative also would provide benefits of transportation efficiency improvements to community members and commuters, as well as to emergency response vehicles.

Table 2-13 summarizes the environmental justice indicators for the census tracts in the study area, as well as local, regional, and state populations for comparison. As stated previously, Census Tract 9202.00 (Sulphur Springs) contains a nontraditional population and was not considered in the analysis trends, although the data are shown in the table. As shown, Census Tract 9201.06 (Val Verde) contains minority populations more than 10% higher than the county subdivision. Hispanic or Latino populations also are more than 10% higher in Census Tract 9201.06 (Val Verde), compared to the county subdivision. Census Tract 9023.28 (Valencia Boulevard/Tourney Road) had approximately 10% of the population below the poverty line, which was approximately 5% higher than the county subdivision. No census tracts had a median household income less than the national poverty line.

The Build Alternative would benefit most study area residents, including minority and low-income populations, by improving mobility and circulation. Project construction would occur in census tracts with large minority and Hispanic or Latino populations; however, construction would not occur near residences and would not be likely to cause disproportionate impacts. Construction associated with the Build Alternative would have the potential to affect non-minority and higher income populations as well. Any impacts related to construction would be temporary.

As discussed in Section 2.2.1, the Build Alternative would affect 23 parcels (permanently or temporarily), the majority being partial acquisitions or easements. One full parcel acquisition would be required. However, access to businesses and community facilities would not be

restricted during construction or after construction is completed, so that minority or low-income populations would not be cut off from any services. Furthermore, no communities would be divided, and thus the proposed project would not separate minority or low-income populations from the rest of the community.

Table 2-13: Environmental Justice Indicators

Geography	Total Minority Population	Hispanic or Latino Population	Percent below Poverty Line	Median Household Income
California	74.3%	38.9%	13.4%	\$106,916
Los Angeles County	93.1%	48.4%	14.9%	\$99,133
Santa Clarita	56.5%	33.4%	8.2%	\$119,314
Unincorporated Community of Stevenson Ranch	54.7%	14.5%	5.4%	\$166,328
Census Tract 9201.06	84.1%	61.6%	4.1%	\$102,497
Census Tract 9201.07	51.4%	17.2%	3.4%	\$201,581
Census Tract 9201.08	55.4%	15.7%	9.5%	\$130,354
Census Tract 9201.14	40.2%	19.6%	6.8%	\$129,088
Census Tract 9202.00	80.8%	49.7%	0.0%	\$0
Census Tract 9203.28	36.3%	12.0%	9.9%	\$156,443
Census Tract 9203.39	45.9%	12.0%	5.1%	\$189,341

Source: AECOM 2023a

The Build Alternative would not have disproportionately high or adverse impacts per EO 12898 on a minority, Hispanic or Latino, or low-income population within the referenced populations because it would not result in adverse impacts, directly or indirectly, being predominately borne by a minority or low-income population, nor would adverse impacts be appreciably more severe to these populations. In addition, under this alternative, deficiencies in traffic demand and roadway operations (e.g., congestion, safety, and inconsistency with jurisdictional plans and policies) would improve because this alternative would increase regional roadway capacity and improve safety to accommodate expected future traffic growth projections.

2.2.6.4 Avoidance, Minimization, and/or Mitigation Measures

Based on the above discussion and analysis, the Build Alternative would not cause disproportionately high and adverse effects on any minority or low-income populations in accordance with the provisions of EO 12898. No further environmental justice analysis is required.

2.2.7 Utilities/Emergency Services

2.2.7.1 Affected Environment

Power, gas, telecommunication, and water utilities are in the project vicinity. Southern California Edison (SoCal Edison) and Southern California Gas Company (SoCal Gas) provide electric and gas services in the area, respectively, for the city of Santa Clarita and unincorporated community of Stevenson Ranch. The Valencia Water Company is the water purveyor for the properties in the area. AT&T, DirecTV, Dish Network, Exede, Hughesnet, and Spectrum provide cable, internet, and phone services in the project area. Fire protection and emergency medical services are provided by the Los Angeles County Fire Department, and police services are provided by the Los Angeles County Sheriff's Department and California Highway Patrol, Newhall (540). The information in this section is based on the CIA (AECOM 2023a) that was prepared for the proposed project.

2.2.7.2 Environmental Consequences

No-Build Alternative

The No-Build Alternative would not require utility relocations and would not affect emergency services.

Build Alternative

Utilities within the project boundary include electrical poles and cables, gas lines, oil lines, communication lines, water lines, and sanitation lines. Some of the overhead utilities are anticipated to be placed underground. Utilities that would be relocated include the following:

Telecommunication:

- Southern California Edison pole charter overhead lines because of road widening, as existing poles would be within the proposed pavement area; and
- AT&T conduits because of the proposed road finished grade exposing the utilities as well as because of bridge construction.

Natural Gas:

- 12-inch-diameter Southern California Gas Company line because of conflict with a single reinforced concrete box culvert extension.

Wastewater:

- 12-inch-diameter Santa Clarita Valley Water Agency steel recycled water pipeline because of the proposed road finished grade exposing utilities and bridge construction.

Electrical:

- 750-22,500-volt overhead lines because of road widening because existing utility poles would be within the proposed pavement area.

Oil:

- Several oil lines because of the proposed road finished grade exposing the utilities as well as because of bridge construction.

In addition, new catch basins and laterals would be added throughout the project site to provide surface drainage along The Old Road, and existing culverts would be extended to accommodate for roadway widening.

An underground utility pothole assessment was conducted by the LACPW Geotechnical and Materials Engineering Division, in which 83 potholes were investigated. Four pothole locations required mitigation because of lead concentrations exceeding soluble threshold limit concentration State regulatory levels for hazardous waste. The pothole locations were mitigated through the removal of approximately 11.5 cubic yards of non-Resource Conservation and Recovery Act lead-impacted soil.

During construction of the Build Alternative, the contractor would make the final determination on which utility lines would be preserved in place and encased in concrete, and which would be relocated. Utility relocations would not exceed a maximum depth of 30 feet and would not go outside the footprint of the existing ROW. Utility companies would be consulted during the planning and construction phases, so that no disruptions in service would occur. Therefore, no temporary or permanent impacts would occur on utilities.

2.2.7.3 Avoidance, Minimization, and/or Mitigation Measures

LACPW and Caltrans would keep residents, businesses, community facilities, the surrounding community, and any service providers in the affected area informed about the project construction schedule and traffic-affected areas, following traffic notification procedures. The following AMMs would be implemented.

COM-2: Provision will be made for motorist information (i.e., existing changeable message signs [CMSs], portable CMSs, stationary ground mounted signs).

COM-3: To the extent possible, incorporation of traffic circulation construction strategies will be implemented (i.e., lane closure restrictions during holidays and special local events, closure of secondary streets during construction to allow quick construction and reopening, lane modification to maintain the number of lanes needed, allowing night work and extended weekend work, maintaining business access, and maintaining pedestrian and bicycle access).

COM-4: Implementation of alternate and detour routes strategies, and street/intersection improvements will occur (e.g., widening, pavement rehabilitation, removal of median), to provide added capacity to handle detour traffic; signal improvements; make adjustments in signal timing, and/or signal coordination to increase vehicle throughput, improve traffic flow, and optimize intersection capacity; set restrictions at intersections and roadways necessary to reduce congestion and improve safety; and enforce parking restrictions on alternate and detour routes during work hours to increase capacity, reduce traffic conflicts, and improve access.

COM-5: Close coordination will occur with utility service providers and emergency service providers, and a public outreach program will be implemented to minimize impacts on surrounding communities.

2.2.8 Traffic and Transportation/Pedestrian and Bicycle Facilities

The information in this section is based on the Transportation Assessment Report (AECOM 2023b) and the Vehicle Miles Traveled (VMT) Analysis (AECOM 2023c).

2.2.8.1 Regulatory Setting

Caltrans, as assigned by FHWA, directs that full consideration should be given to the safe accommodation of pedestrians and bicyclists during the development of federal-aid highway projects (23 CFR 652). It further directs that the special needs of the elderly and the disabled must be considered in all federal-aid projects that include pedestrian facilities. When current or anticipated pedestrian and/or bicycle traffic would present a potential conflict with motor vehicle traffic, every effort must be made to minimize the detrimental effects on all highway users who share the facility.

In July 1999, U.S. Department of Transportation (USDOT) issued an Accessibility Policy Statement, pledging a fully accessible multimodal transportation system. Accessibility in federally assisted programs is governed by the DOT regulations (49 CFR 27) implementing Section 504 of the Rehabilitation Act (29 USC 794). FHWA has enacted regulations for implementation of the 1990 Americans with Disabilities Act (ADA), including a commitment to build transportation facilities that provide equal access for all persons. These regulations require application of the ADA requirements to federal-aid projects, including transportation enhancement activities.

2.2.8.2 Affected Environment

Study Area

Key roadway facilities in the study area are described as follows; the project corridor generally is on the southwestern quadrant of the junction of two regional highway systems, composed of SR-126 and I-5:

- **The Old Road:** The Old Road is a four-lane (two NB and two SB) roadway, within a ROW, measuring variably 140 to 160 feet wide, running in a north/south direction parallel to I-5 through Santa Clarita Valley. The roadway's southern terminus is the junction of San Fernando Road and Sierra Highway in LA County; the northern terminus is roughly at Oak Court in the unincorporated community of Castaic, north of Lake Hughes Road. The Old Road is identified as a Major Highway in the County's General Plan. The roadway includes two bridges in the study area, and the posted speed limit is 55 mph.
- **SR-126:** SR-126 is an east/west State highway just north of the project corridor. The segment of SR-126 in the project vicinity also is known as the Santa Paula Freeway and forms a vital link connecting I-5 from the east to U.S. Highway 101 on the west toward the coast. The highway provides four lanes in each direction in the project vicinity and has an average annual daily traffic (AADT) value of 42,430.
- **I-5:** I-5 is a north/south interstate freeway just east of the project corridor. The segment of I-5 in the project vicinity also is known as the Golden State Freeway. The freeway provides four lanes in each direction in the project vicinity and has an AADT of 144,000.

For the traffic analysis, the study intersections that were specifically evaluated in the Transportation Assessment Report (AECOM 2023b) are summarized in Table 2-14.

Table 2-14: Study Locations

ID	Intersection	Control Type
1	The Old Road/Turnberry Lane	Unsignalized
2	The Old Road/Henry Mayo Drive	Signalized
3	The Old Road/Gateway Center Drive	Signalized
4	The Old Road/I-5 Southbound Ramps	Signalized
5	The Old Road/Rye Canyon Road	Signalized
6	Avenue Stanford/Rye Canyon Road	Signalized
7	The Old Road/Sky View Lane	Unsignalized
8	The Old Road/Magic Mountain Parkway	Signalized

Source: AECOM 2023b

Study intersection traffic operating conditions and roadway segment capacities were evaluated for each of the following scenarios:

- Existing (2022) Conditions
- Project Opening Year (2028) No-Build
- Project Opening Year (2028) Build
- Design Year (2048) No-Build
- Design Year (2048) Build

Traffic Operations Analysis Methods and Existing Conditions

Intersection Operations

Under Senate Bill 743, a project's effect on automobile delay would not constitute a significant environmental impact. Therefore, Level of Service (LOS) and other similar vehicle delay or capacity metrics no longer may serve as transportation impact metrics for CEQA impact analyses. The Governor's Office of Planning and Research (OPR) updated the CEQA Guidelines and provided a final technical advisory in December 2018, recommending VMT as the most appropriate measure of transportation impacts under CEQA. For land use and transportation projects, Senate Bill 743-compliant CEQA analysis became mandatory on July 1, 2020. Automobile delay, as described solely by LOS or similar measure of traffic congestion, no longer is considered a significant impact under CEQA. However, LACPW has completed a transportation assessment to analyze the circulation system outside CEQA. This included an analysis on roadway capacity and LOS for intersections and road segments to identify existing and future deficiencies. Thus, this assessment identified improvements needed to the circulation system outside CEQA. Therefore, the criteria and analysis of LOS are discussed further in this analysis.

The study area intersections and arterial roadway segments fall within two jurisdictions: the City of Santa Clarita and LA County. The City's standard for LOS on arterial streets is LOS D. According to LA County Transportation Impact Analysis guidelines, this is the acceptable LOS on arterial roads in the study area whether the roadways are operating in excess of their

intended capacity. Acceptable LOS is determined on a case-by-case basis, but generally LOS D is the desired minimum LOS. In some instances, LOS below LOS D is deemed acceptable to further other General Plan goals and policies, such as those that protect environmentally sensitive areas, and when meeting active transportation goals and encouraging infill development, particularly within transit-oriented districts.

Intersection LOS analysis was conducted to evaluate existing intersection operations during the weekday AM and PM peak hours. As shown in Table 2-15, intersections 4 and 6 in the PM peak hour and intersection 7 in the AM and PM peak hour currently are operating at LOS E or worse. The Highway Capacity Manual (HCM) LOS calculation worksheets are provided in Appendix B of the Transportation Assessment (AECOM 2023b).

Table 2-15: Existing (2022) Conditions Intersection LOS

Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
		Delay ¹	LOS ²	Delay ¹	LOS ²
1 The Old Road & Turnberry Lane	TWSC	11.0	B	12.4	B
2 The Old Road & Henry Mayo Drive	Signal	4.0	A	4.7	A
3 The Old Road & Gateway Drive	Signal	14.6	B	14.2	B
4 The Old Road & I-5 SB Ramps	Signal	34.1	C	77.4	E
5 The Old Road & Rye Canyon Road	Signal	25.3	C	29.3	C
6 Ave Stanford & Rye Canyon Road	Signal	38.0	D	56.6	E
7 The Old Rd & Sky View Lane	TWSC	136.7	F	>300	F
8 The Old Road & Magic Mountain Parkway	Signal	15.3	B	16.8	B

Notes:

> = greater than; I-5 = Interstate 5; LOS = level of service; SB = southbound; TWSC = two-way stop control

BOLD indicates unsatisfactory LOS.

1. Average control delay, in seconds per vehicle.

2. Intersections were analyzed using HCM 6th methodologies, except intersection 4 was analyzed using HCM 2010 edition methodology because HCM 6th does not apply.

Source: AECOM 2023b

Table 2-16 summarizes the ramp queue length analyses that were conducted at the study intersection of The Old Road and I-5 SB ramps during AM and PM peak hours to determine the ramp queues. The westbound left-turn storage lane is adequate for the 95th percentile queue length. The queuing analysis worksheets are provided in Appendix C of the Transportation Impact Study (AECOM 2023b).

Table 2-16: Existing Ramp Queue Length Analysis

Intersection	Ramp Direction	Queue Length (feet)		Storage (feet)
		AM Peak	PM Peak	
The Old Road & I-5 SB Ramps	Westbound Left	74	53	400

Notes:

I-5 = Interstate 5; SB = southbound

95th percentile queue is reported from the intersection analysis using Synchro 11.

Source: AECOM 2023b

The roadway segment capacity analysis was conducted to evaluate existing roadway conditions during a typical weekday. Under existing conditions, The Old Road is a four-lane divided major

highway between Henry Mayo Drive and Magic Mountain Parkway. With the existing capacity of four lanes (five lanes between I-5 SB ramps and Rye Canyon Road), the roadway volume/capacity (V/C) ratio was calculated for the study roadway segments, as shown in Table 2-17. According to the V/C capacity thresholds, the road segments of The Old Road are currently operating at LOS D or better. Therefore, The Old Road is adequate for the existing travel demand.

Table 2-17: Existing (2022) Conditions Roadway Capacity

Location	Lanes	Capacity	Existing Weekday Volume	Volume/ Capacity	LOS
The Old Road between SR-126 and Henry Mayo Drive	4	36,000	11,560	0.32	A
The Old Road between Gateway Drive and I-5 Southbound Ramps	4	36,000	15,774	0.44	A
The Old Road between I-5 Southbound Ramps and Rye Canyon Road	5	45,000	29,819	0.66	B
The Old Road between Rye Canyon Road and Sky View Lane	4	36,000	30,683	0.85	D

Notes:

I-5 = Interstate 5; LOS = level of service; SB = southbound

Capacity based on City of Santa Clarita General Plan/Los Angeles County Area Plan Circulation Element.

Source: AECOM 2023b

Forecast Traffic Volumes and Vehicle Miles Traveled

The future forecast volumes for the study area were developed using the SCAG RTP/SCS Travel Demand Forecasting Model (SCAG model) to assess changes in VMT for the proposed project. For regional travel demand modeling, the SCAG has a trip-based model and an activity-based model. The trip-based model was developed and adopted for the 2016 RTP/SCS analysis, and it has a base year of 2012. The activity-based model is a new generation of travel demand models and is a tour-based model in which individuals and their interaction with each other and their environment are represented explicitly. The latest version of the activity-based model has adopted the 2020 RTP/SCS, and this model has a base year of 2016 and horizon years of 2026 and 2045.

The SCAG model has been run for the No-Build Alternative scenarios in model years 2026 and 2045. As part of the proposed project, road widening along The Old Road between Henry Mayo Drive and Magic Mountain Parkway, Rye Canyon Road between The Old Road and Avenue Stanford, and Sky View Lane between The Old Road and Entertainment Drive are proposed. The proposed roadway improvements were coded into the model network, and the model was run for the 2026 and 2045 Build Alternative scenarios to analyze the impacts of the roadway improvements on the project's local area and the regional area. The proposed project opening year is 2028, and the design year is 2045; the opening year (2028) VMT measurements are interpolated from the 2026 and 2045 VMT results.

The change between the No-Build Alternative and Build Alternative scenarios is network changes. In the No-Build Alternative scenario model network within the project limits, The Old Road is a four-lane roadway, Rye Canyon Road has four lanes, and Sky View Lane has four lanes. In the Build Alternative scenario networks within the project limits, The Old Road has

been increased to six lanes, Rye Canyon Road has been changed to six lanes, and Sky View Lane has been changed to six lanes.

Bicycle and Pedestrian Facilities

Currently, no bicycle facilities are in the project area. From Henry Mayo Drive to where The Old Road parallels I-5, a sidewalk is on the east side of The Old Road. Beyond the I-5 on-and off-ramps to the intersection of Rye Canyon Road, a sidewalk is on the east side of the roadway. In addition, from Sky View Lane to Magic Mountain Parkway, a sidewalk is on the east side of the roadway.

2.2.8.3 Environmental Consequences

The No-Build Alternative assumes that no modifications would be made to The Old Road and no improvements would be made to local roadway intersections, other than routine maintenance and rehabilitation of the facility and any currently planned and programmed projects within LA County.

The Build Alternative would widen The Old Road from Magic Mountain Parkway north to Henry Mayo Drive near the SR-126/I-5 interchange and replace two bridges along The Old Road (one over the Santa Clara River and another over the Union Pacific Railroad [UPRR] tracks). The Build Alternative also would include creating an extension of the Multi-Use Trail, which would include bike lanes, a paved pedestrian path, and an equestrian trail. The widening of Rye Canyon Road is assumed to have been completed by 2026 as part of the Build Alternative; therefore, the Build conditions reflect widenings of The Old Road and Rye Canyon Road.

Alternative 1: No-Build Alternative

Opening Year (2028)

Under the project opening year (2028) No-Build Alternative conditions, the I-5 at Rye Canyon Ramp improvements are assumed to have been completed, which is included in the baseline conditions in 2028. To establish future baseline conditions without the proposed roadway widening and associated improvements, the 2022 baseline lane geometry was used for the No-Build analysis at the study area intersections and roadway segments.

Intersection LOS Analysis

Intersection LOS analysis was conducted to evaluate project opening year (2028) No-Build Alternative conditions during the weekday AM and PM peak hours. Table 2-18 summarizes the opening year (2028) No-Build Alternative LOS at the study area intersections. As shown in Table 2-18, intersection 6 in the PM peak hour and intersection 7 in the AM and PM peak hours currently are operating at LOS E or worse.

Table 2-18: Opening Year (2028) No-Build Alternative Intersection LOS

	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay ¹	LOS	Delay ¹	LOS
1	The Old Road & Turnberry Lane	TWSC	11.4	B	13.2	B
2	The Old Road & Henry Mayo Drive	Signal	4.1	A	5.0	A
3	The Old Road & Gateway Drive	Signal	14.6	B	14.0	B
4	The Old Road & I-5 Southbound Ramps	Signal	12.2	B	18.6	B
5	The Old Road & Rye Canyon Road	Signal	28.1	C	37.7	D
6	Ave Stanford & Rye Canyon Road	Signal	50.6	D	71.7	E
7	The Old Road & Sky View Lane	TWSC	270.6	F	>300	F
8	The Old Road & Magic Mountain Parkway	Signal	15.7	B	17.4	B

Notes:

I-5 = Interstate 5; LOS = level of service; TWSC = two-way stop control

1. Average control delay, in seconds per vehicle.

2. Intersections were analyzed using HCM 6th methodologies, except intersection 3 was analyzed using HCM 2010 edition methodology because HCM 6th does not apply.

BOLD indicates unsatisfactory LOS; the worst approach delays are reported for two-way stop control (TWSC) intersections.

Ramp Queuing Analysis

Table 2-19 summarizes the ramp queue length analyses that was conducted at the study intersection at The Old Road and I-5 SB ramps during AM and PM peak hours to determine the ramp queues. The westbound left-turn storage lane is adequate for the 95th percentile queue length.

Table 2-19: Opening Year (2028) No-Build Alternative Ramp Queuing Analysis

Intersection	Ramp Direction	Queue Length (feet)		Storage (feet)
		AM Peak	PM Peak	
The Old Road & I-5 Southbound Ramps	Westbound Left	77	40	400

Notes:

I-5 = Interstate 5

95th percentile queue is reported from the intersection analysis using Synchro 11.

Roadway Capacity Analysis

A roadway segment capacity analysis was conducted to evaluate the opening year (2028) No-Build Alternative conditions during typical weekday conditions. The number of lanes that were provided for the opening year (2028) No-Build Alternative scenario would remain the same as existing conditions. With the capacity of four lanes, the roadway V/C ratios were calculated for the study roadway segments. Future year volumes were projected based on the growth rate from the SCAG model and the 2018 daily traffic counts. As shown in Table 2-20, the capacity of The Old Road between Rye Canyon Road and Skyview Lane would not be adequate to handle the projected (2028) travel demand.

Table 2-20: Opening Year (2028) No-Build Alternative Roadway Capacity

Location	Lanes	Capacity	Weekday Volume	Volume/Capacity	LOS
The Old Road between SR-126 and Henry Mayo Drive	4	36,000	12,851	0.36	A
The Old Road between Gateway Drive and I-5 Southbound Ramps	4	36,000	17,535	0.49	A
The Old Road between I-5 Southbound Ramps and Rye Canyon Road	5	45,000	33,148	0.74	C
The Old Road between Rye Canyon Road and Skyview Lane	4	36,000	34,108	0.95	E

Notes:

I-5 = Interstate 5; LOS = Level of Service; SR = State Route

Capacity is based on the City of Santa Clarita General Plan/Los Angeles County Area Plan Circulation Element.

BOLD indicates unsatisfactory LOS.

Design Year (2048)

Under the future No-Build Alternative Conditions, no changes would occur to the lane geometry of the study area intersections. To establish future baseline conditions without the proposed roadway widening and associated improvements, the baseline lane geometry of the I-5 at Rye Ramp intersection improvements were assumed to have been completed and were used for the No-Build Alternative analysis at the study area intersections and roadway segments.

Intersection LOS Analysis

Intersection LOS analysis was conducted to evaluate the design year (2048) No-Build Alternative conditions during the weekday AM and PM peak hours. Table 2-21 summarizes the design year (2048) No-Build Alternative LOS at the study area intersections. As shown in the table, intersection 6 and 7 would operate at LOS F in both AM and PM peak hours, and intersection 5 would operate at LOS F in the PM peak hour using HCM 6th edition methodology.

Table 2-21: Design Year (2048) No-Build Alternative Intersection LOS

Intersection		Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay ¹	LOS	Delay ¹	LOS
1	The Old Road & Turnberry Lane	TWSC	13.5	B	17.5	C
2	The Old Road & Henry Mayo Drive	Signal	4.5	A	5.8	A
3	The Old Road & Gateway Drive	Signal	14.4	B	13.6	B
4	The Old Road & I-5 Southbound Ramps	Signal	15.1	B	40.9	D
5	The Old Road & Rye Canyon Road	Signal	54.5	D	100.3	F
6	Ave Stanford & Rye Canyon Road	Signal	115.1	F	152.7	F
7	The Old Road & Sky View Lane	TWSC	>300	F	>300	F
8	The Old Road & Magic Mountain Parkway	Signal	16.9	B	19.6	B

Notes:

I-5 = Interstate 5; LOS = level of service; TWSC = two-way stop control

¹ Average control delay, in seconds per vehicle.

² Intersections were analyzed using HCM 6th methodologies, except intersection 3 was analyzed using HCM 2010 edition methodology because HCM 6th does not apply.

BOLD indicates unsatisfactory LOS; the worst approach delays are reported for two-way stop control (TWSC) intersections.

Ramp Queuing Analysis

Table 2-22 summarizes the ramp queue length analyses that was conducted at the study intersection at The Old Road and I-5 SB ramps during AM and PM peak hours to determine the ramp queues. The westbound left-turn storage lane is adequate for the 95th percentile queue length.

Table 2-22: Design Year (2048) No-Build Alternative Ramp Queuing Analysis

Intersection	Ramp Direction	Queue Length (feet)		Storage (feet)
		AM Peak	PM Peak	
The Old Road & I-5 Southbound Ramps	Westbound Left	93	69	400

Notes:

I-5 = Interstate 5

95th percentile queue is reported from the intersection analysis using Synchro 11.

Roadway Capacity Analysis

Roadway segment capacity analysis was conducted to evaluate the design year (2048) No-Build Alternative conditions during typical weekday conditions. The number of lanes for the design year (2048) No-Build Alternative scenario would remain the same as existing conditions. With the capacity of four lanes, the roadway V/C ratios were calculated for the study roadway segments. The design year traffic volumes typically rely on travel demand models that often implicitly assume steady traffic growth. Design year volumes are projected based on the growth rate from the SCAG model and the 2018 daily traffic counts. As shown in Table 2-23, the capacity of The Old Road between the I-5 SB ramps and Skyview Lane would not be adequate to handle the projected (2048) travel demand.

Table 2-23: Design Year (2048) No-Build Alternative Roadway Capacity

Location	Lanes	Capacity	Weekday Volume	Volume/ Capacity	LOS
The Old Road between SR-126 and Henry Mayo Drive	4	36,000	17,152	0.48	A
The Old Road between Gateway Drive and I-5 Southbound Ramps	4	36,000	23,404	0.65	B
The Old Road between I-5 Southbound Ramps and Rye Canyon Road	5	45,000	44,243	0.98	E
The Old Road between Rye Canyon Road and Skyview Lane	4	36,000	45,525	1.26	F

Notes:

I-5 = Interstate 5; LOS = Level of Service; SR = State Route

Capacity is based on the City of Santa Clarita General Plan/Los Angeles County Area Plan Circulation Element.

BOLD indicates unsatisfactory LOS.

Vehicle Miles Traveled

The VMT analysis consisted of an initial screening of project type and determined whether the project would be likely to induce travel. This methodology is consistent with the guidance in Caltrans' transportation analysis under CEQA.

LA County also has adopted VMT thresholds in its Transportation Impact Analysis guidelines (LACPW 2020). The guidelines provide screening criteria, which can be used to quickly identify whether a project should be expected to cause a less-than-significant impact related to VMT. Per the County's guidelines, a transportation project would have a potentially significant VMT impact if it would increase the project area VMT.

The SCAG RTP/SCS Travel Demand Forecasting Model (SCAG model) was used to calculate direct changes in VMT because of the proposed project. The SCAG model network was modified to reflect the vehicle capacity enhancements that would result from the proposed project, and the model outputs were used to calculate the change in VMT for the No-Build Alternative and Build Alternative conditions.

The change between the No-Build Alternative and Build Alternative condition would be network changes. In the No-Build Alternative condition model network within the project limits, The Old Road would have four lanes, Rye Canyon Road would have four lanes, and Sky View Lane would have four lanes. In the Build Alternative condition networks within the project limits, The Old Road would be increased to have six lanes, Rye Canyon Road would have six lanes, and Sky View Lane would have six lanes. Changes in VMT were computed from the SCAG model outputs.

For VMT changes, the No-Build Alternative condition and Build Alternative condition results were analyzed for the study area and regional area. Table 2-24 summarizes VMT for the regional area for the No-Build and Build conditions in the opening year (2028) and design year (2045). VMT percentage changes between the No-Build Alternative condition and Build Alternative condition would be minor (less than $\pm 1\%$). VMT would decrease by 119,921 VMT in the opening year and decrease by 1,036,971 VMT in the design year, based on the SCAG model. Based on these results, the No-Build Alternative would have a less-than-significant project level and cumulative level VMT impact for the regional area.

Table 2-24: SCAG VMT Changes for Regional Area

Area	Opening Year				Design Year			
	No-Build VMT (vehicle miles)	Build VMT (vehicle miles)	VMT Change (vehicle miles)	VMT Change (%)	No-Build (vehicle miles)	Build (vehicle miles)	VMT Change (vehicle miles)	VMT Change (%)
Regional Area	217,849,258	217,729,337	-119,921	-0.06%	225,893,139	224,856,168	-1,036,971	-0.46%

Notes:

SCAG = Southern California Association of Governments; VMT = vehicle miles traveled

Source: AECOM 2023c

Alternative 2: Build Alternative

Level of Service

This section analyzes the effects of the proposed geometric improvements to the study area locations with implementation of the Build Alternative. The Build Alternative would widen The Old Road from Magic Mountain Parkway north to Henry Mayo Drive near the SR-126/I-5 interchange and replace two bridges along The Old Road (one over the Santa Clara River and another over the UPRR tracks). The Build Alternative also would extend the Multi-Use Trail, adding bike lanes, a paved pedestrian path, and an equestrian trail. The widening of Rye Canyon is anticipated to be completed by 2026 as part of the Build Alternative; therefore, the Build conditions reflect the widenings of The Old Road and Rye Canyon Road.

Opening Year (2028)

Intersection LOS Analysis

Intersection LOS analysis was conducted with opening year (2028) conditions during weekday AM and PM peak hours. Table 2-25 summarizes the opening year (2028) LOS using HCM methodology at the study area intersections with implementation of the Build Alternative. With completion and opening of the Build Alternative, all study intersections are anticipated to operate at satisfactory LOS (LOS D or better), except intersection 6, which is expected to operate at LOS E in the PM peak hour. Overall, the majority of the study intersections showed improvements in delay and LOS when compared to the No-Build Alternative conditions.

Table 2-25: Project Opening Year (2028) Build Alternative Intersection LOS

Intersections		Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay ¹	LOS	Delay ¹	LOS
1	The Old Road & Turnberry Lane	TWSC	11.4	B	13.2	B
2	The Old Road & Henry Mayo Drive	Signal	7.7	A	8.3	A
3	The Old Road & Gateway Drive	Signal	12.7	B	14.1	B
4	The Old Road & I-5 Southbound Ramps	Signal	11.7	B	13.6	B
5	The Old Road & Rye Canyon Road	Signal	22.0	C	23.5	C
6	Ave Stanford & Rye Canyon Road	Signal	43.4	D	63.5	E
7	The Old Road & Sky View Lane	Signal	9.2	A	14.7	B
8	The Old Road & Magic Mountain Parkway	Signal	20.8	C	22.4	C

Notes:

I-5 = Interstate 5; LOS = Level of Service; TWSC = two-way stop control

1. Average control delay, in seconds per vehicle.

2. Intersections were analyzed using HCM 6th methodologies, except intersection 3 was analyzed using HCM 2010 edition methodology because HCM 6th does not apply.

BOLD indicates unsatisfactory LOS; the worst approach delays are reported for two-way stop control (TWSC) intersections.

Ramp Queuing Analysis

Table 2-26 summarizes the ramp queue length analyses that were conducted at the study area intersection for The Old Road and I-5 SB ramps during AM and PM peak hours, to determine the ramp queues. The westbound left-turn storage lane is adequate for the 95th percentile queue length.

Table 2-26: Project Opening Year (2028) Ramp Queuing Analysis

Intersection	Ramp Direction	Queue Length (feet)		Storage (feet)
		AM Peak	PM Peak	
The Old Road & I-5 Southbound Ramps	Westbound Left	75	48	400

Note:

I-5 = Interstate 5

95th percentile queue is reported from the intersection analysis using Synchro 11.

Roadway Capacity Analysis

The roadway segment capacity analysis was conducted to evaluate the project opening year (2028) conditions during typical weekdays. With implementation of the proposed widening and associated improvements (capacity of six lanes) for the opening year (2028) scenario, the roadway V/C ratios were calculated for the study roadway segments. Future year volumes are projected based on the growth rate from the SCAG model and the 2018 daily traffic counts. As shown in Table 2-27, project implementation would provide the needed capacity to The Old Road to accommodate the projected 2028 travel demand.

Table 2-27: Opening Year (2028) Build Alternative Roadway Capacity

Location	Lanes	Capacity	Weekday Volume	Volume/ Capacity	LOS
The Old Road between SR-126 and Henry Mayo Drive	6	54,000	12,876	0.24	A
The Old Road between Gateway Drive and I-5 Southbound Ramps	6	54,000	17,570	0.33	A
The Old Road between I-5 Southbound Ramps and Rye Canyon Road	7	63,000	33,214	0.53	A
The Old Road between Rye Canyon Road and Skyview Lane	6	54,000	34,177	0.63	B

Notes:

I-5 = Interstate 5; LOS = Level of Service; SR = State Route

Capacity is based on the City of Santa Clarita General Plan/Los Angeles County Area Plan Circulation Element.

Design Year (2048)

This section analyzes the effects of the proposed geometric improvements to the study area locations with implementation of the Build Alternative. The Build Alternative would widen The Old Road from Magic Mountain Parkway north to Henry Mayo Drive near the SR-126/I-5 interchange and replace two bridges along The Old Road (one over the Santa Clara River and another over the UPRR tracks). The Build Alternative also would extend the Multi-Use Trail, adding bike lanes, a paved pedestrian path, and an equestrian trail.

Intersection LOS Analysis

The intersection LOS analysis was conducted to evaluate design year (2048) Build Alternative conditions during weekday AM and PM peak hours. Table 2-28 summarizes the design year (2048) LOS using HCM methodology at the study area intersections with Build Alternative implementation. On completion of the Build Alternative, all intersections are anticipated to operate at satisfactory LOS (LOS D or better) except intersection 6, which would operate at LOS E in the PM peak hour. Although intersection 6 operates at LOS F in the design year No-Build Alternative conditions, after optimizing the traffic signal timing plan, intersection 6 would operate at LOS E in the design year Build Alternative conditions. Overall, most of the study intersections exhibited improvements in delay and LOS when compared to the No-Build

Alternative conditions. Intersection 6 during the PM peak hour is improved by the Build Alternative.

Table 2-28: Design Year (2048) Build Alternative Intersection LOS

	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay ¹	LOS	Delay ¹	LOS
1	The Old Road & Turnberry Lane	TWSC	13.5	B	17.6	B
2	The Old Road & Henry Mayo Drive	Signal	8.3	A	9.7	A
3	The Old Road & Gateway Drive	Signal	12.6	B	13.5	B
4	The Old Road & I-5 Southbound Ramps	Signal	14.2	B	29.2	C
5	The Old Road & Rye Canyon Road	Signal	28.3	C	35.5	D
6	Ave Stanford & Rye Canyon Road	Signal	47.2	D	67.9	E
7	The Old Road & Sky View Lane	Signal	10.1	B	21.3	C
8	The Old Road & Magic Mountain Parkway	Signal	21.8	C	24.3	C

Notes:

I-5 = Interstate 5; LOS = Level of Service; TWSC = two-way stop control

1. Average control delay, in seconds per vehicle.

2. Intersections were analyzed using HCM 6th methodologies, except intersection 3 was analyzed using HCM 2010 edition methodology because HCM 6th does not apply.

BOLD indicates unsatisfactory LOS; the worst approach delays are reported for two-way stop control (TWSC) intersections.

Ramp Queuing Analysis

Table 2-29 summarizes the ramp queue length analyses that was conducted at the study area intersection at The Old Road and I-5 SB ramps during AM and PM peak hours. The westbound left-turn storage lane is adequate for the 95th percentile queue length.

Table 2-29: Design Year (2048) Build Alternative Ramp Queuing Analysis

Intersection	Ramp Direction	Queue Length (feet)		Storage Length (feet)
		AM Peak	PM Peak	
The Old Road & I-5 Southbound Ramps	Westbound Left	90	60	400

Notes:

I-5 = Interstate 5

95th percentile queue is reported from the intersection analysis using Synchro 11.

Roadway Capacity Analysis

The roadway segment capacity analysis was conducted to evaluate the design year (2048) Build Alternative conditions during typical weekdays. With implementation of the proposed widening and associated improvements (capacity of six lanes) for the design year (2048) Build Alternative scenario, the roadway V/C ratios were calculated for the study roadway segments. Future year volumes are projected based on the growth rate from the SCAG model and the 2018 daily traffic counts. As shown in Table 2-30, implementation of the Build Alternative would provide the needed capacity to The Old Road to accommodate the projected design year (2048) travel demand.

Table 2-30: Design Year (2048) Build Alternative Project Roadway Capacity

Location	Lanes	Capacity	Weekday Volume	Volume/ Capacity	LOS
The Old Road between SR-126 and Henry Mayo Drive	6	54,000	17,216	0.32	A
The Old Road between Gateway Drive and I-5 Southbound Ramps	6	54,000	23,490	0.44	A
The Old Road between I-5 Southbound Ramps and Rye Canyon Road	7	63,000	44,406	0.70	B
The Old Road between Rye Canyon Road and Skyview Lane	6	54,000	45,694	0.85	D

Notes:

I-5 = Interstate 5; LOS = Level of Service; SR = State Route

Capacity is based on the City of Santa Clarita General Plan/Los Angeles County Area Plan Circulation Element.

Queue Length Analysis

Consistent with the previous study, intersection queue length analyses were conducted at the study intersection for design year (2048) Build Alternative conditions during AM and PM peak hours, to determine the recommended turn pocket lengths. Table 2-31 summarizes the turn pocket recommendations for The Old Road (NB and SB approaches) at the study intersections and for Sky View Lane (eastbound approach) at The Old Road intersection.

Table 2-31: Design Year (2048) Storage Length Analysis

Intersection	Approach Direction	Lane	Queue Length (feet)		Storage Length (feet)
			AM Peak	PM Peak	
The Old Road & Henry Mayo Drive	Northbound	Left	112	105	200
The Old Road & Gateway Drive	Northbound	Right	16	15	100
	Southbound	Left	16	24	100
The Old Road & I-5 Southbound Ramps	Northbound	Right	30	153	250
	Southbound	Left	43	#118	300
The Old Road & Rye Canyon Road	Northbound	Right	#648	#808	600
	Southbound	Left	307	471	500
Ave Stanford & Rye Canyon Road	Northbound	Left	71	#468	400
	Southbound	Left	44	#248	250
	Eastbound	Left	#148	30	150
	Westbound	Left	13	30	100
The Old Road & Sky View Lane	Northbound	Left	170	49	200
	Southbound	Left	6	19	100
	Southbound	Right	31	0	100
	Eastbound	Left	14	78	100

Notes:

I-5 = Interstate 5

95th percentile queue is reported from the intersection analysis using Synchro 11.

Recommended storage is based on intersection traffic operations.

95th percentile volume exceeds capacity; queue may be longer.

Based on the results of the LOS analysis, the proposed roadway widening and associated improvements along The Old Road and Sky View Lane would improve intersection traffic operations in the study area. In addition, the analysis indicates that the traffic demand on The Old Road justifies a six-lane facility to operate more efficiently.

Because the Build Alternative would improve the existing intersection LOS and roadway segment capacity, implementation of the Build Alternative would not result in negative traffic impacts. However, although the following recommendations would not be feasible for the Build Alternative, these enhancements would further improve the intersection LOS at the Avenue

Stanford and Rye Canyon Road intersection to LOS D or better and reduce queue lengths at The Old Road and Rye Canyon Road intersection:

- Avenue Stanford and Rye Canyon Road intersection: provide a right-turn lane pocket for the NB approach and the westbound approach in the City of Santa Clarita jurisdiction.
- The Old Road and Rye Canyon Road intersection: provide double left-turn lane pockets for the SB approach and double right-turn lane pockets for the NB approach.

Vehicle Miles Traveled

As discussed previously, the VMT analysis consisted of an initial screening of project type to determine whether the proposed project would be likely to induce travel. This methodology is consistent with the guidance in the Caltrans Transportation Analysis under CEQA.

LA County also has adopted VMT thresholds in its Transportation Impact Analysis guidelines (LACPW 2020). The guidelines provide screening criteria, which can be used to quickly identify whether a project would be expected to cause a less-than-significant impact related to VMT. Per the County's guidelines, a transportation project would have a potentially significant VMT impact if it would increase the project area VMT.

Construction Impacts

Construction of the Build Alternative is anticipated to begin in fall 2024 and take approximately 4.5 years to complete, concluding in winter 2028. Construction activities would occur for 12 hours per day, 7 days per week.

VMT that would be generated because of construction of the Build Alternative generally would be minor and limited to construction equipment and personnel and material haul trips. Most workers would be employed primarily from the local labor pool; therefore, they simply would be relocating from other construction sites and would not be traveling long distances. Local workers would be using the regional transportation network regardless of project approval; therefore, the VMT of the local workers would remain approximately the same as existing conditions. Construction traffic from implementation of the proposed modifications would not result in substantial levels of VMT. These transitory and temporary trips would occur only during construction activities; thus, no long-term VMT would be generated by project construction in the project area or wider region.

Periodic lane closure may be required during construction, but one lane in each direction always would remain open for the duration of construction. No detours would be required.

Transportation demand management plans, including reducing single-occupancy vehicle trips of workers, decreasing the construction trip distances by optimizing logistics, and providing flexible work schedules would be considered during the construction phase. Therefore, the construction impacts would be less than significant.

Operational Impacts

The No-Build Alternative and Build Alternative condition results were analyzed for the study area and regional area. VMT percentage changes between the No-Build Alternative condition and Build Alternative condition are minor (less than $\pm 1\%$). VMT decreases by 119,921 VMT in the opening year and decreases by 1,036,971 VMT in the design year, based on the SCAG model.

Transportation studies consistently show that adding roadway capacity increases network-wide VMT by a nearly equivalent proportion within a few years, reducing or negating any initial congestion relief. That increase in VMT is called “induced travel.” To calculate induced travel VMT, the National Center for Sustainable Transportation-Induced Travel Calculator (NCST Calculator) is used. The induced VMT results derived from the NCST Calculator are shown in Table 2-32, which shows the induced VMT for the Build Alternative. The total lane miles added by the Build Alternative is 4.12. The induced VMT is 9.7 million additional VMT per year in the regional area (LA County), resulting in a total of 26,575 VMT per day.

Table 2-32: Induced VMT for Regional Area

Area	Existing Total Regional VMT per Year (billion vehicle miles)	Existing Total Facility Lane Miles of Los Angeles County (vehicle miles)	Lane Miles Added (vehicle miles)	Elasticity Factor	Induced Daily VMT (vehicle miles)
Regional Area	30.1 billion	9,592	4.12	0.75	26,575

Note: VMT = vehicle miles traveled
Source: AECOM 2023c

Table 2-33 shows the VMT changes in the regional area for the opening year and design year. The total regional VMT decreases by 93,346 VMT for the opening year and decreases by 1,010,396 VMT for the design year. Therefore, a reduction in total VMT occurs under both scenarios.

Table 2-33: VMT Changes for the Regional Area

Area	Opening Year (2028)			Design Year (2048)		
	Induced VMT (vehicle miles)	VMT Change (vehicle miles)	Total VMT Change (vehicle miles)	Induced VMT (vehicle miles)	VMT Change (vehicle miles)	Total VMT Change (vehicle miles)
Regional Area	26,575	-119,921	-93,346	26,575	-1,036,971	-1,010,396

Note: VMT = vehicle miles traveled
Source: AECOM 2023c

The Build Alternative also would incorporate the following improvements that would have the potential to decrease the VMT generated by the Build Alternative:

- A Class IV bikeway, bike share programs, bike parking, and an extended Multi-Use Trail to encourage non-automobile trips and improve safety for cyclists.
- The addition of an extended Multi-Use Trail, sidewalks, and other improved pedestrian facilities to encourage non-automobile trips and create a complete sidewalk network.

The VMT Analysis Memorandum (AECOM 2023c) also lists regional level improvements that are a part of LA County’s ongoing efforts to implement VMT-reducing improvements. Based on the results, the Build Alternative would have a less-than-significant project level and cumulative level VMT impact on the regional area. In summary, the impacts during Build Alternative operation would be less than significant.

Bicycle and Pedestrian Facilities

The No-Build Alternative would not alter the existing bicycle and pedestrian facilities in the project area. For the Build Alternative, bicycle lanes, raised medians, sidewalks, and barriers to separate pedestrians from the travel way also would be constructed.

Construction of the Build Alternative is not anticipated to adversely affect any existing bicycle facilities in the project area. Existing pedestrian facilities would be closed temporarily during construction. Pedestrians would be allowed to pass through the project area, however, and the details of pedestrian facility closures would be described in the Transportation Management Plan, which would be developed during the project design phase.

As discussed in Chapter 1, the proposed project would include an extension of the Multi-Use Trail, including an approximately 0.58-mile extension of the trail on the SB side of The Old Road, from where the trail travels under The Old Road and I-5 just southeast of Rye Canyon Road to just northwest of the I-5 on- and off-ramps. The area where the trail would be extended currently is developed with an access road to add additional pedestrian facilities. The proposed project also would add a Class IV bikeway, which would include bicycle lanes on both sides of The Old Road between Henry Mayo Drive and Magic Mountain Parkway.

2.2.8.4 Avoidance, Minimization, and/or Mitigation Measures

No AMMs are required to improve LOS, VMT, or the bicycle and pedestrian facilities.

2.2.9 Visual/Aesthetics

2.2.9.1 Regulatory Setting

NEPA of 1969, as amended, establishes that the federal government is to use all practicable means to ensure all Americans safe, healthful, productive, and *aesthetically* (emphasis added) and culturally pleasing surroundings (42 USC 4331[b][2]). To further emphasize this point, the FHWA, in its implementation of NEPA (23 USC 109[h]), directs that final decisions on projects are to be made in the best overall public interest, taking into account adverse environmental impacts, including among others, the destruction or disruption of aesthetic values.

CEQA establishes that it is the policy of the State to take all action necessary to provide the people of the state “with...enjoyment of *aesthetic*, natural, scenic and historic environmental qualities” (California PRC Section 21001[b]).

Section 92.3 of the California Streets and Highways Code directs Caltrans to use drought-resistant landscaping and recycled water when feasible, and incorporate native wildflowers and native and climate-appropriate vegetation into its planting designs when appropriate.

2.2.9.2 Affected Environment

The following discussion is based on the Minor Visual Impact Assessment (AECOM 2023d) that was completed for the proposed project.

Visual Setting

The project area is characterized by commercial buildings, the LA County Sanitation District No. 32 Treatment Plant, and rolling terrain. The primary land use within the project corridor is urban commercial, with additional residential areas northwest and southwest of the project area.

The Santa Clara River flows approximately 100 miles from its headwaters near Acton, California to the Pacific Ocean, through the Santa Susana Mountains and the Transverse Ranges. The portion of the Santa Clara River that flows through the project area is not a California or federally designated wild and scenic river. In addition, no unique or scenic views or vistas are found in the project area.

The project area is not designated as, or considered eligible to be considered as, a scenic resource by LA County or the State. However, the Santa Clarita Valley Area Plan, prepared by LA County, calls for carefully managed urban development in the Santa Clarita Valley Area Plan area, to reduce potential disruption of views of prominent ridgelines and hillsides along roadways in Santa Clarita Valley. The specific policies and objectives identified in the Conservation and Open Space Element of the Santa Clarita Valley Area Plan are as follows:

- Objective CO-6.1: Protect the scenic character of local topographic features.
- Policy CO-6.1.2: Preserve significant ridgelines as a scenic backdrop throughout the community by maintaining natural grades and vegetation.
- Objective CO-6.2: Protect the scenic characters of view corridors;
- Policy CO-6.2.1: Where feasible, encourage development proposals to have varied building heights to maintain view corridor sight lines.
- Objective CO-6.5: Maintain the scenic character of designated routes, gateways, and vista points along roadways.
- Policy CO-6.5.2: Establish scenic routes in appropriate locations as determined by the reviewing agency, and adopt guidelines for these routes to maintain their scenic character.
- Objective CO-6.6: Limit adverse impacts by humans on the scenic environment.
- Policy CO-6.6.1: Enhance views of the night sky by reducing light pollution through use of light screens, downward directed lights, minimized reflective paving surfaces and reduced lighting levels, as deemed appropriate by the reviewing authority.
- Policy CO-6.6.5: Encourage undergrounding of all new utility lines, and promote undergrounding of existing lines where feasible and practicable.

Visual Resources

The visual resources of the project corridor have been defined and identified by assessing visual character and visual quality. Visual character is a description of the project corridor using attributes such as form, line, color, and texture, and is used to describe, not evaluate. A change in visual character can be evaluated when it is compared with the viewer response to that change. Changes in visual character can identify how visually compatible a project would be with the existing conditions by using visual character attributes as an indicator. For the proposed project, the following attributes were considered:

- Dominance: position, size, or contrast

- Scale: apparent size as related to the surroundings
- Diversity: variety of visual patterns
- Continuity: uninterrupted flow of form, line, color, or textual pattern

Visual quality is evaluated by identifying the vividness, intactness, and unity present in a project corridor. Public attitudes validate the assessed level of quality and predict how changes to the project corridor could affect these attitudes. This process helps identify specific methods for addressing each visual impact that may occur from a project. The three criteria for evaluating visual quality are defined as follows:

- *Vividness* is the extent to which the landscape is memorable and is associated with distinctive, contrasting, and diverse visual elements.
- *Intactness* is the integrity of visual features in the landscape and the extent to which the existing landscape is free from non-typical visual intrusions.
- *Unity* is the extent to which all visual elements combine to form a coherent, harmonious visual pattern.

Viewers and Viewer Response

Two types of viewer groups would be associated with the proposed project—roadway neighbors and roadway users.

Roadway Neighbors (views toward the road)

Roadway neighbors are people who would have views toward the road. Area residents would be considered highly sensitive to visual changes because they are exposed to existing views for prolonged periods and would notice changes easily. Two groups of residents are near the project area. The first group is approximately 1 mile northwest of the northern project boundary near Henry Mayo Drive. A second group is approximately one-third mile southwest of the southern portion of the project area, south of Magic Mountain Parkway. Neither group of residents has direct views of the project area.

The commercial and industrial businesses along the project corridor contain views that would be considered to have moderately low sensitivity, because viewers would not be exposed to these views for prolonged periods and would not be sensitive to changes in the views after construction is completed. However, these viewers would be in a closer proximity to the project area than area residents. The potential for response from these viewers would be moderately low.

Roadway Users (views from the road)

Roadway users are people who would have views from the road. They are subdivided into viewer groups by mode of travel or reason for travel. For example, subdividing roadway users by mode of travel may yield pedestrians, bicyclists, transit riders, car drivers and passengers, and truck drivers. Dividing roadway users or viewer groups by reason for travel creates categories such as tourists, commuters, and haulers. Both mode and reason for travel can be used simultaneously, creating a third category (e.g., bicycling tourists). Two types of roadway users have been considered in the analysis of the proposed project.

Motorists traveling through the project area along The Old Road, Rye Canyon Road, and Sky View Lane would have a moderately low sensitivity to visual changes, because the exposure of these viewers to existing views would be fleeting and primarily associated with travel to and

from fixed points within and outside the project area. These viewers would be more likely to notice more pronounced changes to a viewshed, including construction, but would not necessarily notice compatible uses. Therefore, moderately low potential for responses would be expected from these viewers.

Outdoor enthusiasts would make up a small number of roadway users in the project area. The proposed project would include continuous opportunities for them to travel through the project area on foot or by non-motorized forms of transportation. These viewers normally would be considered highly sensitive to visual change, but the current lack of opportunities to travel through the project area by these forms of transportation would create a low potential for responses from these viewers in the proposed project's preconstruction condition.

2.2.9.3 Environmental Consequences

Alternative 1: No-Build Alternative

Under the No-Build Alternative, no improvements would be made in the project area. The visual character and quality would remain unchanged. This alternative would make no improvements to The Old Road, Rye Canyon Road, or Sky View Lane, and no bridge replacements or trail construction would occur. No changes to visual resources or views would occur. Therefore, the No-Build Alternative would have no impacts on visual character or quality.

Alternative 2: Build Alternative

Visual impacts have been determined by assessing changes to the visual resources and predicting viewer response to those changes.

Construction Impacts

Short-term and temporary impacts on visual resources would occur during project construction. Construction activities (including removing existing vegetation), construction equipment, staging areas, and materials; and the construction site itself would have adverse effects on the visual environment for the viewer groups discussed above. Construction is anticipated to occur during the day. Any nighttime activities would be limited, but it would be necessary to provide construction lighting at night that potentially could add new sources of light and glare for residents and motorists. Implementation of AMM VIS-1 would ensure that directional lighting would be aimed downward during project construction, where appropriate in the project area, so that the proposed project would comply with the Santa Clarita Valley Area Plan. The overall visual impact from the proposed project would be moderate with implementation of AMM VIS-1.

Operational Impacts

With the exception of the raised elevation of the I-5 SB on-ramp, all elements of the proposed project would be compatible with existing views. As previously discussed, the Santa Clarita Valley Area Plan requires for the visual character of projects to contain a balanced approach to growth within existing viewsheds, without introducing new dominant elements. The proposed project would be consistent with existing land uses and would not dominate new views or introduce more diverse landforms to the project area. Structural aesthetics would reflect the surrounding riparian habitat by using earth-tone colors and textures resembling rocks or other geologic natural features. In addition, the bridge barrier would have a see-through Caltrans Type 85 design. The additional proposed lanes on The Old Road, Rye Canyon Road, and Sky View Lane would not expand the scale of the roadway substantially and would maintain the visual character of the roadway.

Furthermore, the corridor views would maintain their continuity with existing views from The Old Road and associated intersections in the project area, by introducing only compatible elements that already exist in some form in the project area. The proposed project would be fully compatible with the existing visual character of the corridor.

The visual quality of the existing corridor would not be altered by the proposed project because the proposed project would be consistent with the existing vividness, intactness, and unity in the project area after construction has been completed.

Area residents would not be affected by the proposed project because no direct views would be available of project area from residences, because all potentials views of the project area would be blocked and interrupted by rows of trees and vegetation, as well as by intervening development. Therefore, a low potential would exist for responses from residential viewers because they would not have direct views of the proposed project.

Commercial and industrial business viewers would be in a closer proximity to the project area than area residents. The potential for response from these viewers would be moderately low. These viewers would be more likely to notice more pronounced changes to the viewshed, including construction, but would not necessarily notice compatible uses. Therefore, a moderately low potential would exist for responses from these viewers.

In addition, new lighting would be installed along The Old Road and the proposed overcrossing structure, and this would be finalized during the project's plan, specifications, and estimates phase. However, these elements are not expected to be a notable change to the existing lighting in the area, because the project area is urbanized and has a moderate level of existing ambient lighting.

For the reasons stated above, the potential for impacts on visual resources, visual quality, and visual character would not be adverse. In addition, AMM VIS-2 would be implemented to discourage graffiti on the proposed retaining wall on Rye Canyon Road, which would further reduce visual impacts because of the proposed project.

2.2.9.4 Avoidance, Minimization, and/or Mitigation Measures

In accordance with the policies and objectives discussed in the Santa Clarita Valley Area Plan, the following measures to avoid or minimize visual impacts would be incorporated into the proposed project:

VIS-1: Directional lighting aimed downward at a work site will be used during project construction where appropriate in the project area.

VIS-2: A textured finish on the proposed retaining wall on Rye Canyon Road at I-5 will be included to discourage graffiti.

2.2.10 Cultural Resources

The information in this section is based on the Historic Resources Evaluation Report (HRER) (AECOM 2023e), the Historic Property Survey Report (HPSR) (AECOM 2023f), the Archaeological Survey Report (ASR) (AECOM 2023g), the Extended Phase I (XPI) Report (AECOM 2024c), the Supplemental HPSR (AECOM 2024a), and the Supplemental ASR (AECOM 2024b). Information provided during Section 106 Native American consultation also has been incorporated in this section, and information related to the proposed project's Assembly Bill (AB) 52 tribal consultation is presented in Chapter 3.

2.2.10.1 Regulatory Setting

The term “*cultural resources*,” as used in this document, refers to the “built environment” (e.g., structures, bridges, railroads, water conveyance systems, etc.), places of traditional or cultural importance, and archaeological sites (both prehistoric and historic), regardless of significance. Under federal and State laws, cultural resources that meet certain criteria of significance are referred to by various terms including “historic properties,” “historic sites,” “historical resources,” and “tribal cultural resources.” Laws and regulations dealing with cultural resources include:

The National Historic Preservation Act (NHPA) of 1966, as amended, sets forth national policy and procedures for historic properties, defined as districts, sites, buildings, structures, and objects included in or eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the act requires federal agencies to take into account the effects of their undertakings on historic properties, and to allow the Advisory Council on Historic Preservation (ACHP) the opportunity to comment on those undertakings, following regulations issued by the ACHP (36 CFR 800). On January 1, 2014, the First Amended Section 106 Programmatic Agreement among FHWA, ACHP, the California State Historic Preservation Officer, and Caltrans went into effect for Caltrans projects, both statewide and local, with FHWA involvement. The Programmatic Agreement implements the ACHP's regulations (36 CFR 800), streamlining the Section 106 process and delegating certain responsibilities to Caltrans. The FHWA's responsibilities under the Programmatic Agreement have been assigned to Caltrans as part of the Surface Transportation Project Delivery Program (23 USC 327).

The Archaeological Resources Protection Act applies when a project may involve archaeological resources on federal or tribal land. The Archaeological Resources Protection Act requires that a permit be obtained before excavation of an archaeological resource can take place on such land.

CEQA requires consideration of tribal cultural resources in addition to cultural resources (including historical resources, archaeological resources, and paleontological resources). Section 5024.1 of the PRC established the California Register of Historical Resources (CRHR) and outlined the necessary criteria for a cultural resource to be considered eligible for listing in the CRHR, and therefore to be a historical resource. Historical resources are defined in Section 5020.1(j) of the PRC. Unique archaeological resources are referenced in Section 21083.2 of the PRC. In 2014, AB 52 added the term “tribal cultural resources” to CEQA and set forth requirements for identifying measures to avoid, preserve, or mitigate effects on tribal cultural resources. Defined in PRC Section 21074(a), a tribal cultural resource is a CRHR or local register-eligible site, feature, place, cultural landscape, or object that has a cultural value to a California Native American tribe.

2.2.10.2 Affected Environment

Study Area

The area of potential effects (APE) established for the proposed project encompasses the extent of the project footprint discussed above and all areas of ground disturbance, referred to as the area of direct impacts (ADI), and extends beyond the ROW to consider the proposed project's visual, atmospheric, and audible effects on properties near the project footprint. The APE includes the developed properties adjacent to the areas where the roadway would be widened, new bridges would be added, and new intersections would be added, and where alterations associated with these changes may affect the setting or feeling of adjacent historic properties. Full parcel boundaries were included for the developed properties adjacent to the project footprint, with the exception of properties with substantial building setbacks on large parcels, where the parcels were undeveloped, vacant, or currently are used as surface parking lots.

The ADI is limited to those areas that would be directly affected by the proposed project, including all sliver takes. The vertical extent of the ADI encompasses the maximum depth of excavation, which may extend 17 to 43 feet beneath the existing ground surface for retaining wall foundation piles. At the bridge locations, the APE extends substantially deeper; piles would be installed at approximately 150 feet deep within the riverbed and 100 feet deep at the abutments and wingwalls. The vertical APE also includes the maximum height of construction, which would extend no more than 54 feet above the existing ground surface.

Cultural Context

Although people are known to have inhabited Southern California at least 13,000 years Before Present (B.P.), the first incontestable evidence of human occupation in the Los Angeles area dates to at least 9000 years B.P. and is associated with a period known as the Millingstone Cultural Horizon. Although many aspects of Millingstone culture persisted, by 3500 B.P., a number of socioeconomic changes occurred. These changes are associated with the period known as the Intermediate Horizon, which began around 5,000 B.P.

The Late Prehistoric period, spanning from approximately 1500 years B.P. to the Spanish mission era, is the period associated with the florescence of contemporary Native American groups. The project area is in the traditional native lands of the Tataviam (known in older ethnographic literature by the Chumash name, Alliklik). The Tataviam occupied the upper reaches of the Santa Clara River drainage east of Piru Creek and the south-facing slopes of the Sawmill and Libre mountains. In proximity to the project area, the Tataviam village of *tasavayu(?)u* has been noted ethnographically to have been near the confluence of Castaic Creek and the Santa Clara River. The Tataviam occupied settlements ranging in size from hamlets of 10 to 15 people to small villages of up to 200 people. The total Tataviam population at the time of European contact is estimated to have totaled less than 1,000 persons (King and Blackburn 1978).

Following establishment of the mission system and the coerced participation in new economic and social structures, Native Americans engaged in active and passive forms of resistance to maintain connections to their families, language, and traditions. By the twentieth century, the Tataviam had married mainly into related groups, in particular the closely related Fernandeano and Gabrielino to the south and west, and the Kitanemuk to the east. The descendant

communities of the Tataviam, Fernandeño, and their neighbors continue to live throughout the region today.

The history of Los Angeles County includes the following four periods: Early Explorer Period (1542 to 1769), Spanish Mission Period (1769 to 1822), Mexican Ranch Period (1822 to 1846), and Anglo-American Period (1846 to present).

A records search was completed on June 26 and July 18, 2018, at the South Central Coastal Information Center of the California Historical Resources Information System, at California State University, Fullerton, for the ADI and a 0.25-mile radius of the project area. The South Central Coastal Information Center records search data determined four previously recorded cultural resources are within the records search area. Of these four previously recorded cultural resources, three are within the APE. One additional precontact archaeological resource was identified initially in the records search radius but was confirmed to be 0.7 mile from the APE following further review. In addition, a review of ethnographic maps indicated that a Tataviam village was in the project vicinity.

An intensive-level architectural history survey and archaeological survey of the APE were performed on July 10, 2018. On September 23, 2022, and March 29 and June 22, 2023, AECOM conducted supplemental archaeological surveys to inspect expanded areas of the APE. The archaeological surveys consisted of a reconnaissance-level pedestrian survey, which covered 100% of the proposed ground disturbance locations within the APE.

In total, eight resources were identified in the APE:

- Rancho San Francisco Adobe Headquarters Monument (P-19-186567) (Map Reference 1)
- PD-1 concrete culvert (Map Reference 2)
- Oak of the Golden Dream Monument (P-19-186541) (Map Reference 3)
- Valencia Water Reclamation Plant (Map Reference 4)
- The Old Road Bridge over the Santa Clara River (CA53C0327) (P-19-190315) (Map Reference 5)
- The Old Road Bridge over the SPT Co. (CA53C0328) (Map Reference 6)
- The Route 5/126 Separation Bridge (CA532928) (Map Reference 7)
- Southern Pacific Railroad (SPRR) Santa Barbara Line (Santa Paula Branch) [SBL/SPB] (FJH-03292023-S-01) (Map Reference 8)

Seven of the properties either were evaluated previously or evaluated as part of the proposed project under the NRHP and CRHR criteria for evaluation, and none were found eligible for listing in the NRHP or the CRHR. The three bridges were determined not eligible before this study, and four resources (i.e., P-19-186567, PD-1 concrete culvert, P-19-186541, and the Valencia Water Reclamation Plant) were evaluated for the proposed project and determined not eligible. One resource, the SPRR SBL/SPB is assumed eligible for the purpose of the proposed project; however, the section of the SPRR SBL/SPB that is within the APE is not eligible as a contributing resource. Additional information is included in the project HRER (AECOM 2023e) and the Assumption of Eligibility for the SPRR SBL/SPB, provided in Appendix D of the 2023 HPSR (AECOM 2023f).

Section 106 Native American Consultation

As the federal lead agency, Caltrans conducted Native American consultation in compliance with Section 106 of the NHPA. Consultation efforts are summarized next.

Section 106 consultation efforts for the proposed project included a review of the Sacred Lands File by the Native American Heritage Commission (NAHC), which produced negative results per a letter dated July 25, 2018. The NAHC provided a list of 16 Native American representatives from 11 tribal entities who may have interest in or knowledge of the project area. Tribes identified by the NAHC include:

- Barbareno/Ventureno Band of Mission Indians (BVBMI)
- Fernandeno Tataviam Band of Mission Indians (FTBMI)
- Gabrieleno Band of Mission Indians – Kizh Nation (GBMIKN)
- Gabrielino/Tongva Nation (GTN)
- Gabrieleno/Tongva San Gabriel Band of Mission Indians (GTSGBMI)
- Gabrielino-Tongva Tribe (GTT)
- Kern Valley Indian Community (KVIC)
- Kitanemuk & Yowlumne Tejon Indians (KYTI)
- Santa Ynez Band of Chumash Indians (Santa Ynez)
- Soboba Band of Luiseno Indians (Soboba)
- Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians) (San Manuel)

These individuals were contacted by letter in August 2018. An attempt was made to contact those who had not responded to the letter by phone. Because of these initial contact efforts, seven responses were received. Four stated that the APE lies outside their tribal territory or deferred to other Native American groups (BVBMI, GBMIKN, San Manuel, and Soboba). Three (BVBMI, GTSGBMI, FTBMI) said that the proposed project APE was sensitive for cultural resources and recommended monitoring, including one tribe, the FTBMI, who also stated the tribe would like to formally consult on the proposed project. The Santa Ynez had no comment. No response was received from four tribes (GTN, GTT, KVIC, KYTI).

In December 2022, letters were sent to the initial tribal representatives as identified by the NAHC in 2018, to provide them with an update on the project status. Because of these re-notification letters, the Santa Ynez requested formal consultation, a representative from the BVBMI requested to participate in monitoring for proposed archaeological fieldwork, and the San Manuel indicated that the project area is outside the tribe's ancestral territory, and they would not request consulting party status.

Between April 18, 2023 and May 3, 2023, representatives identified by the NAHC were provided with an update on the project status and were offered an opportunity to review the XPI proposal for the project. Thereafter, the Santa Ynez concluded consultation, the BVBMI deferred consultation to a local tribe, the San Manuel requested the opportunity to consult on placement of environmentally sensitive areas, if they are needed, and representatives from two tribes, the BVBMI and the FTBMI, indicated that they were interested in providing Native American monitoring for future work.

On July 30, 2024, six representatives that previously engaged in consultation, including representatives from the BVBMI, FTBMI, GTSGBMI, Santa Ynez, and San Manuel, were contacted via e-mail with an informational letter, detailing project refinements, including a map of APE refinements. The contact letter included a brief introduction and history of the proposed project, details on the project changes, and next steps. Representatives were invited to reach out with any project-related questions or concerns. A follow-up e-mail was sent to those contacts who did not respond to the letter of August 14, 2024. The follow-up e-mail also included information regarding the Notice of Availability (NOA) for the Draft Environmental Impact Report/Environmental Assessment (EIR/EA). The email stated that the NOA had been provided via mail in April 2024. The follow-up e-mail also informed representatives that comments from the public review period were being reviewed, responses were being compiled, and the Final EIR/EA was being revised for approval.

In the process of the updated consultation efforts, three responses were received. The San Manuel indicated that the project area was outside their territory, and they did not wish to request consulting party status. The Santa Ynez reached out to LACPW, requesting a consultation meeting following the Notice of Filing. In a call on August 14, 2024, the Santa Ynez wanted to ensure that the FTBMI were being consulted and requested that the Santa Ynez be informed of any future project changes. The FTBMI also responded to the updated consultation notice. The tribe responded on August 14, 2024 to the follow-up e-mail and requested that moving forward, all documentation for projects related to regulatory frameworks be sent to a specific e-mail address, to ensure receipt by the correct staff. The tribe also requested information on accessing the Draft EIR/EA and asked that the letter and map that were sent on July 30, 2024 be forwarded to the Cultural Resources Management Division Manager. AECOM provided the requested information, and on August 20, 2024, the tribe followed up via e-mail, requesting a meeting with Caltrans to address questions and provide confidential information. Caltrans held a call with the tribe on August 20, 2024.

A call was held for Section 106 consultation on September 3, 2024, which included Caltrans, LACPW, and the FTBMI. Confidential information was discussed in the call, which has been incorporated into the tribal cultural resources assessment. The tribe provided recommended mitigation measures for tribal cultural resources, which have been incorporated into the EIR/EA. Caltrans agreed to FTBMI requests during the Section 106 call, which have been incorporated in TCR-1 to TCR-4.

No response was received from three contacted individuals who represented two different tribes, the BVBMI and the GTSGBMI. A detailed summary of consultation efforts for the proposed project is available in the 2023 Archaeological Survey Report (AECOM 2023g) and the 2024 Supplemental HPSR (AECOM 2024i).

Cultural Resource Sensitivity

Archival research, tribal consultation, and the field survey results indicate that the project area has a moderate to high sensitivity for tribal cultural resources and both prehistoric and historic archaeological resources. The project does not exhibit a potential to impact significant historical built-environment resources. No historic Section 4(f) resources were identified in the study area.

The project area is in the general vicinity of an ethnohistoric village and near to the natural resources surrounding the confluence of Castaic Creek and the Santa Clara River, which create an environment that may have been used by Native Americans in the past. In addition, a number of archaeological sites are within 1 mile of the APE, including a site with human remains that was documented about 0.7 mile to the east. Archaeological components consisting of an abandoned berm and bridge segment of the built-environment resource SPRR SBL/SPB (FJH-03292023) is recorded within the APE. Although these elements were determined not to contribute to the significance of the SPRR SBL/SPB and any project impacts would not result in a significant impact on a historical resource, the presence of the site indicates the potential to encounter additional historical archaeological resources. The sedimentary deposits north of the Santa Clara River are younger Holocene age quaternary alluvium that would have the potential to overlay buried archaeological materials, although the sediments at the bridge over the Santa Clara River mainly are gravels, indicating a high-energy environment less likely to preserve archaeological deposits.

Based on the archival research and pedestrian survey, an XPI assessment was conducted to determine the presence or absence of archaeological resources within the APE. Fieldwork was completed in August and September 2023. A total of 16 trenches and 54 shovel test pits were excavated, in accordance with the XPI plan. Four shovel test pits were positive for historic-age archaeological material in proximity to the abandoned SPRR SBL/SPB alignment. All other shovel test pit and trench test locations were determined to be negative for archaeological resources, and no previously unrecorded archaeological resources were identified.

The potential to encounter intact archaeological resources below ground surface would exist but appears to be low, based on the results of the XPI study and archival research. From the Native American consultation, multiple tribes identified the APE as sensitive for cultural resources, including tribal cultural resources.

2.2.10.3 Environmental Consequences

Alternative 1: No-Build Alternative

Under the No-Build Alternative, no improvements would be made in the project area, including no improvements to The Old Road, Rye Canyon Road, Sky View Lane, bridge replacements, or trail construction. Thus, no impacts on any historical or archaeological resources would occur.

Alternative 2: Build Alternative

The results of the HRER (AECOM 2023e), 2023 HPSR (AECOM 2023f), and the 2024 Supplemental HPSR (AECOM 2024a) indicate that eight built-environment resources were identified within the APE. Of these eight resources, three previously were determined ineligible for the NRHP—The Old Road over Santa Clara River Bridge (P-19-190315), The Old Road Bridge over the SPT Co. (CA53C0328), and the Route 5/126 Separation Bridge (CA532928)—and four resources (P-19-186567, PD-1 concrete culvert, P-19-186541, and Valencia Water

Reclamation Plant) were determined ineligible for listing in the NRHP based on the current studies. One resource, the SPRR SBL/SPB is assumed eligible; however, the section of the SPRR SBL/SPB that is within the APE is not eligible as a contributing element. In addition, the ASR (AECOM 2023g), XPI investigation (AECOM 2024c), and Supplemental ASR/XPI (AECOM 2024b and 2024c) determined that the project area does exhibit archaeological sensitivity, but the potential to encounter intact archaeological deposits would be low.

The results of the Native American consultation did not identify any previously recorded tribal cultural resources within the APE. However, confidential information that was provided during consultation indicated that the APE exhibits sensitivity for previously unrecorded tribal cultural resources. In addition, the potential exists for previously unknown archaeological and historical resources to be discovered during construction of the Build Alternative. Therefore, the project would have the potential to affect cultural resources and tribal cultural resources. With implementation of the AMMs discussed in the next subsection, the potential impacts on cultural resources and tribal cultural resources would not be adverse.

2.2.10.4 Avoidance, Minimization, and/or Mitigation Measures

The following AMMs would be implemented to reduce adverse effects on cultural resources under the Build Alternative:

CR-1: Worker Environmental Awareness Program. All workers will participate in a Worker Environmental Awareness Program for cultural resources. Sign-in sheets will be maintained to document completion of the program by each worker. This training can be administered in-person by or under the supervision of, a Secretary of the Interior (SOI) qualified archaeologist or through screening of a video/slide presentation, prepared by an SOI-qualified archaeologist and overseen by an on-site manager. Contractor education will include the legal framework protecting cultural resources, typical kinds of cultural resources that may be found during project construction, artifacts that would be considered potentially significant, and proper procedures and notifications if cultural resources are discovered. The training will review types of cultural resources and artifacts that would be considered potentially significant to support operator recognition of these materials during construction. Native American tribe(s) traditionally and culturally affiliated with the project area will be given the opportunity to participate in the cultural resource training, to provide project personnel with tribal perspectives on working in areas sensitive for tribal cultural resources.

CR-2: Inadvertent Cultural Resource Discovery. If cultural materials are discovered during construction, all earth-moving activity within 60 feet of the find will be diverted until an SOI-qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures.

CR-3: Discovery of Human Remains. If human remains are discovered, Section 7050.5 of the California Health and Safety Code states that further disturbances and activities will cease in any area or nearby area suspected to overlie remains, and the County Coroner will be contacted. For the proposed project, work in the immediate vicinity (within a 100-foot buffer of the find) will cease in the event that human remains and/or funerary object(s) are encountered.

2.3 Physical Environment

2.3.1 Hydrology and Floodplain

2.3.1.1 Regulatory Setting

Executive Order 11988

EO 11988 (Floodplain Management) directs all federal agencies to refrain from conducting, supporting, or allowing actions in floodplains unless this is the only practicable alternative. FHWA requirements for compliance are outlined in 23 CFR 650 Subpart A.

To comply, the following must be analyzed:

- The practicability of alternatives to any longitudinal encroachments
- Risks of the action
- Impacts on natural and beneficial floodplain values
- Support of incompatible floodplain development
- Measures to minimize floodplain impacts and preserve/restore any beneficial floodplain values affected by the proposed project

The *base floodplain* is defined as “the area subject to flooding by a flood or tide having a one percent chance of being exceeded in any given year.” An *encroachment* is defined as “an action within the limits of the base floodplain.”

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) is the nationwide administrator of the National Flood Insurance Program (NFIP), which is a program established by the National Flood Insurance Act of 1968 to protect lives and property, and to reduce the financial burden of disaster relief. Under the NFIP, FEMA has responsibility for flood hazard assessment and mitigation, and it offers federally backed flood insurance to homeowners, renters, and business owners in communities that choose to participate in the program. FEMA has adopted the 100-year floodplain as the base flood standard for the NFIP. FEMA also is concerned with construction that would be within a 500-year floodplain for projects considered *critical actions*, which are defined as any activities where even a slight chance of flooding is too great. FEMA issues Flood Insurance Rate Maps (FIRMs) for communities that participate in the NFIP. These FIRMs present delineations of flood hazard zones. In California, nearly all of the state’s flood-prone communities participate in the NFIP.

2.3.1.2 Affected Environment

The following discussion is based on the Location Hydraulic Study and Floodplain Evaluation Report (AECOM 2023f).

Santa Clara River Watershed

The project area is in the Santa Clara River watershed. The Santa Clara River flows roughly 100 miles, from its headwaters at Pacifico Mountain in the San Gabriel Mountains and westward into Ventura County, before discharging into the Pacific Ocean near the city of Ventura. Major tributaries include San Francisquito and Castaic creeks in LA County and Piru, Sespe, and Santa Paula creeks in Ventura County. The watershed generally is undeveloped, with a large

portion in the Angeles National Forest. The Santa Clara River exhibits some perennial flow in its eastern-most reaches in the Angeles National Forest. As the river continues westward in LA County, the stream and its tributaries become ephemeral because of the climate and basin characteristics of the watershed. However, flows can increase rapidly in response to high-intensity rainfall, with the potential for severe flooding (VCWPD/LACPW 2005).

The project area is near the mainstem of the Santa Clara River, just downstream from Santa Clarita Valley in western LA County. Regional access to the project area is provided by I-5, which runs in a north/south direction, connecting to the nearby unincorporated community of Stevenson Ranch and the city of Santa Clarita. The I-5 bridge crossing over the Santa Clara River is approximately 1 mile downstream from the river junction with San Francisquito Creek. The Old Road Bridge is 500 feet downstream from the I-5 bridge. Approximately 4 miles downstream from The Old Road bridge, Castaic Creek joins the Santa Clara River.

FEMA 100-Year Base Flood

As discussed above, floodplains are defined using FIRMs, which categorize floodplains into different areas. The project area is within FIRM Panels 06037C0805G and 06037C0815G in Zone X, which is defined by FEMA as an area of minimal flood hazard. A portion of the proposed project, construction of The Old Road Bridge, would occur in FEMA's regulatory 100-year base floodplain, within Zone AE (FEMA 2022). Zone AE floodplains indicate areas inundated with a 1% annual chance of flooding (100-year flood). The FEMA flood zones are shown on Figure 9.

Los Angeles County Public Works Capital Flood

The Old Road Bridge also would be constructed within the LACPW capital floodplain and capital floodway. As summarized in the LACPW Hydrology Manual (LACPW 2006), the LA County policy of capital flood-level protection applies to all facilities, including open channels, closed conduits, bridges, dams, and debris basins not under State jurisdiction. The County's capital flood is based on a theoretical 4-day, 50-year frequency design storm occurring after the watershed has been burned by severe fire. The resulting 50-year design flow rate is bulked by a design factor that accounts for the adverse conditions of a burned watershed, specifically decreased soil infiltration capacity and increased debris flows from eroded topsoil and burned vegetation. The probability of occurrence from the theoretical assumptions of the capital flood is extremely small and yields a greater design flow than FEMA's methodology for determining the 100-year base flood. Therefore, LA County's methodology is considered more conservative than the FEMA 100-year base flood. The proposed project would require protection from the capital flood as defined by LA County.

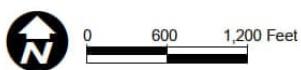
2.3.1.3 Environmental Consequences

Alternative 1: No-Build Alternative

Under the No-Build Alternative, the proposed project would not replace the existing bridge. Therefore, the 100-year flood profile of The Old Road Bridge would remain unchanged from existing conditions.



Source: FEMA, 2022; Prepared By: AECOM, 2023.



100 year - Zone AE
Project Limit

Figure 9
FEMA Flood Zones

The Old Road over the Santa Clara River Bridge currently is not high enough to allow the anticipated volume of water from an LACPW capital flood event (50-year burned and bulked storm) to pass under it. Under this scenario, repairs and improvements to the Santa Clara River Bridge would remain and worsen, because constructing the replacement bridge at a higher elevation would not occur to provide a minimum freeboard of 2.5 feet and meet the County's capital storm floodway requirements.

Alternative 2: Build Alternative

Risk Associated with the Proposed Action

FHWA 23 CFR 650A defines a *significant encroachment* as a highway encroachment or any action to promote base floodplain development that involves one or more of the following construction or flood-related impacts:

- A significant potential for the interruption or termination of a transportation facility that is needed for emergency vehicles or provides a community's only evacuation route
- A significant risk
- A significant adverse impact on the natural and beneficial floodplain values

The potential risk associated with project implementation would include: 1) change in land use, 2) change in impervious surface area, 3) fill inside the floodplain, 4) change in the 100-year base flood elevation (BFE), or 5) potential risk to life and property.

- **Change in Land Use:** The proposed project would not change the overall land use in the project area and within the watershed basin (i.e., it would remain urban/developed).
- **Increase in Impervious Surfaces:** The proposed widening of The Old Road and bridge replacement would increase the impervious surface area within the Santa Clara River watershed. The additional impervious surfaces would result from the increase of two lanes to three lanes in each direction of The Old Road and the widening of Rye Canyon Road. The road widening would occur over a 2.5-mile segment; however, only the roughly 400-foot segment that would consist of The Old Road Bridge replacement would encroach into the base floodplain. The extension of the Multi-Use Trail also would add additional impervious surface area; however, this area is entirely outside the base floodplain. The additional impervious area at the proposed The Old Road Bridge crossing would not substantially increase the impervious surface area within the Santa Clara River watershed. Therefore, the increase of impervious surfaces from the proposed project is not considered a significant risk to the base floodplain.
- **Fill inside of the Floodplain:** Proposed embankments would be constructed for the proposed bridge replacement by backfilling with the associated shoring. The backfill would occur within the base floodplain, but the final proposed grade would not increase significantly from the existing grade. The total fill inside the existing 100-year base floodplain is not considered a significant risk to the base floodplain.
- **Change in FEMA's 100-year Base Flood Elevation:** The Old Road Bridge replacement is anticipated to cause a maximum increase of 6 inches to the FEMA 100-year BFE. The hydraulic analysis results indicated that BFEs would decrease upstream from the proposed bridge, compared to existing conditions. In addition, the results showed no rise in BFEs downstream from river station 8714.1. The corresponding

increase in the horizontal extents of the existing base floodplain would be a maximum of 5 feet in width, occurring predominantly in the floodplains upstream from the I-5 Bridge.

- **Potential Risk to Life and Property:** No residences, buildings, or crops exist in the area of concern; backwater impacts resulting from the proposed project would not be a significant risk to life and property.

Summary of Potential Encroachments

FHWA 23 CFR 650A defines an *encroachment* as any highway construction, reconstruction, rehabilitation, repair, or improvement undertaken with federal or federal-aid highway funds or FHWA approval that is proposed within the limits of the base floodplain. The following sections discuss the potential encroachments and impacts associated with project construction in the FEMA 100-year base floodplain:

- **Potential Traffic Interruptions for the Base Flood:** The Old Road Bridge replacement would be able to pass the FEMA 100-year BFE safely and would not result in any traffic interruptions. In addition, the nearby I-5 Bridge also would pass the FEMA 100-year BFE safely and could be used as an alternative detour route for local access from The Old Road.
- **Potential Impacts on Natural and Beneficial Floodplain Values:** Impacts on natural and beneficial floodplain values in the project vicinity would be minimal. Fill and land disturbance would occur only in areas necessary for construction of the proposed bridge foundations, within the river channel and floodplain. The remaining improvements would be made outside the FEMA 100-year base floodplain and LACPW capital floodplain. To reduce impacts associated with project construction, standard BMPs would be implemented.
- **Support of Probable Incompatible Floodplain Development:** A significant encroachment onto the FEMA 100-year BFE is not anticipated, based on the hydrologic and hydraulic evaluation. As detailed above, the rise occurring over the 100-foot segment would be contained within the existing base floodplain limits. In addition, the proposed project would result in a rise of approximately 10 inches (0.8 foot) immediately downstream from The Old Road Bridge for the LACPW capital flood elevations. Thus, The Old Road Bridge would provide capital-level flood protection and would not require re-analysis of the capital floodway as defined by LA County. The proposed project would support compatible floodplain development as defined by FEMA and LACPW.
- **Longitudinal Encroachments:** With the exception of The Old Road Bridge replacement, the project elements would not encroach onto regulatory floodplains. Significant longitudinal encroachments are not anticipated to occur because of the proposed activities. Minor changes to the longitudinal extents of the FEMA 100-year BFE would occur because of the corresponding rise in BFEs. The resulting changes would occur only in the vicinity of The Old Road Bridge and I-5 Bridge and would be contained entirely within the County-designated capital floodplain and floodway.

The Old Road over the Santa Clara River Bridge currently is not high enough to allow the anticipated volume of water from an LACPW capital flood event (50-year burned and bulked storm) to pass under it. Under this scenario, constructing the replacement bridge at a higher elevation would provide a minimum freeboard of 2.5 feet and meet County capital storm floodway requirements.

2.3.1.4 Avoidance, Minimization, and/or Mitigation Measures

The following AMMs would be implemented to reduce adverse effects on hydrology and floodplains under the Build Alternative:

HYD-1: Any disturbed aquatic or wetland habitat will need to be restored or enhanced from existing conditions, such as revegetation, BMPs, and other applicable actions that meet the requirements of the environmental permitting of the proposed project. Where temporary disturbance areas are unavoidable, the disturbance will be minimized to the maximum extent possible, and the area will be restored or enhanced as compared to existing conditions on completion of the bridge construction. Permanent impact areas will be mitigated by restoring and enhancing nearby degraded areas of wetland/riparian habitat.

HYD-2: The proposed The Old Road Bridge will be designed to maintain current or improved levels of fish passage in the mainstem of the Santa Clara River. The Old Road Bridge also will be designed so that the proposed piles will not encroach into the active channel during the summer construction season, from June through September.

2.3.2 Water Quality and Stormwater Runoff

2.3.2.1 Regulatory Setting

Clean Water Act

In 1972, Congress amended the Federal Water Pollution Control Act, making the addition of pollutants to waters of the U.S. (WOTUS) from any point source¹ unlawful unless the discharge is in compliance with an NPDES Permit. This act and its amendments are known as the Clean Water Act (CWA). Congress has amended the act several times. In the 1987 amendments, Congress directed dischargers of stormwater from municipal and industrial/construction point sources to comply with the NPDES Permit scheme.

The following are important CWA sections:

- **Sections 303 and 304** require states to issue water quality standards, criteria, and guidelines.
- **Section 401** requires an applicant for a federal license or permit to conduct any activity that may result in a discharge to WOTUS to obtain certification from the state that the discharge will comply with other provisions of the act. This certification is most frequently required in tandem with a Section 404 permit request (see below).
- **Section 402** establishes the NPDES, a permitting system for the discharges (except for dredge or fill material) of any pollutant into WOTUS. RWQCBs administer this permitting program in California. Section 402(p) requires permits for discharges of stormwater from industrial/construction and MS4s.

¹ A point source is any discrete conveyance, such as a pipe or a human-made ditch.

- **Section 404** establishes a permit program for the discharge of dredge or fill material into WOTUS. This permit program is administered by the U.S. Army Corps of Engineers (USACE).

The goal of the CWA is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.”

USACE issues two types of 404 permits—General and Individual. General permits include two types—Regional and Nationwide. Regional permits are issued for a general category of activities when they are similar in nature and cause minimal environmental effect. Nationwide permits are issued to allow a variety of minor project activities with no more than minimal effects.

Ordinarily, projects that do not meet the criteria for a Regional or Nationwide permit may be permitted under one of USACE’s Individual permits. Individual permits include two types—Standard permits and Letters of Permission. For Individual permits, USACE’s decision to approve is based on compliance with EPA’s Section 404 (b)(1) guidelines (40 CFR Part 230), and whether the permit approval would be in the public interest. The Section 404(b)(1) guidelines were developed by EPA in conjunction with USACE and allow the discharge of dredged or fill material into the aquatic system (WOTUS) only if no practicable alternative exists that would have less adverse effects. The guidelines state that USACE may not issue a permit if a least environmentally damaging practicable alternative (LEDPA) exists to the proposed discharge that would have lesser effects on WOTUS and not have any other significant adverse environmental consequences. According to the guidelines, documentation is needed that a sequence of avoidance, minimization, and compensation measures has been followed, in that order. The guidelines also restrict permitting activities that violate water quality or toxic effluent² standards, jeopardize the continued existence of listed species, violate marine sanctuary protections, or cause “significant degradation” to WOTUS. In addition, every permit from USACE, even if not subject to the Section 404(b)(1) guidelines, must meet the general requirements (refer to 33 CFR 320.4). A discussion of the LEDPA determination for the document is included in the Section 2.4.2

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne Act), enacted in 1969, provides the legal basis for water quality regulation in California. This act requires a “Report of Waste Discharge” for any discharge of waste (liquid, solid, or gaseous) to land or surface waters that may impair beneficial uses for surface and/or groundwater of the state. It predates the CWA and regulates discharges to waters of the State. Waters of the State (WOTS) include more than just WOTUS (e.g., groundwater and surface waters not considered WOTUS). In addition, it prohibits discharges of “waste” as defined, and this definition is broader than the CWA definition of “pollutant.” Discharges under the Porter-Cologne Act are permitted by Waste Discharge Requirements (WDRs) and may be required even when the discharge already is permitted or exempt under the CWA.

The SWRCB and RWQCBs are responsible for establishing the water quality standards (objectives and beneficial uses) as required by the CWA, and for regulating discharges to ensure compliance with the water quality standards. Details about water quality standards in a

² EPA defines *effluent* as “wastewater, treated or untreated, that flows out of a treatment plant, sewer, or industrial outfall.”

project area are included in the applicable RWQCB Basin Plan. In California, the RWQCBs designate beneficial uses for all water body segments in their jurisdictions, and then set criteria necessary to protect those uses. Therefore, the water quality standards that are developed for particular water segments are based on the designated use and vary depending on that use. Furthermore, the SWRCB identifies waters failing to meet standards for specific pollutants. These waters then are State-listed, in accordance with CWA Section 303(d). If a State determines that waters are impaired for one or more constituents and the standards cannot be met through point source or non-point source controls (NPDES Permits or WDRs), the CWA requires establishing Total Maximum Daily Loads (TMDLs). TMDLs specify allowable pollutant loads from all sources (point, non-point, and natural) for a given watershed.

California State Water Resources Control Board and Regional Water Quality Control Boards

The SWRCB administers water rights, sets water pollution control policy, issues orders on matters of statewide application, and oversees water quality functions throughout the state by approving Basin Plans, TMDLs, and NPDES Permits. The RWQCBs are responsible for protecting beneficial uses of water resources within their regional jurisdictions, using planning, permitting, and enforcement authorities to meet this responsibility.

National Pollutant Discharge Elimination System Program

Municipal Separate Storm Sewer Systems

Section 402(p) of the CWA requires the issuance of NPDES Permits for five categories of stormwater discharges, including MS4s. An MS4 is defined as “any conveyance or system of conveyances (roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, and storm drains) owned or operated by a state, city, town, county, or other public body having jurisdiction over stormwater that is designed or used for collecting or conveying stormwater.” The RWQCB has identified LACPW as an owner/operator of an MS4 under federal regulations. The MS4 permit covers all ROWs, properties, facilities, and activities in the state. The SWRCB issues NPDES Permits for 5 years, and permit requirements remain active until a new permit has been adopted.

Construction General Permit

Construction General Permit, Order No. 2022-0057-DWQ (adopted by the SWRCB on September 8, 2022, and effective on September 1, 2023), supersedes Order No. 2009-009-DWQ, as amended by Order No. 2010-0014-DWQ (effective on February 14, 2011) and Order No. 2012-0006-DWQ (effective on July 17, 2012). The permit regulates stormwater discharges from construction sites that result in a disturbed soil area of 1 acre or greater, and/or are smaller sites that are part of a larger common plan of development. By law, all stormwater discharges associated with construction activity where clearing, grading, and excavation result in soil disturbance of at least 1 acre must comply with the provisions of the General Construction Permit. Operators of regulated construction sites are required to: develop Stormwater Pollution Prevention Plans (SWPPPs); implement sediment, erosion, and pollution prevention control measures; and obtain coverage under the Construction General Permit.

The Construction General Permit separates projects into Risk Levels 1, 2, or 3. Risk levels are determined during the planning and design phases, and are based on potential erosion and transport to receiving waters. Requirements apply according to the risk level determined. For example, a Risk Level 3 (highest risk) project would require compulsory stormwater runoff pH and turbidity monitoring, and before construction and after construction aquatic biological

assessments during specified seasonal windows. For all projects subject to the permit, applicants are required to develop and implement an effective SWPPP.

Section 401 Permitting

Under CWA Section 401, any project requiring a federal license or permit that may result in a discharge to a WOTUS must obtain a Section 401 certification, which certifies that the project will be in compliance with State water quality standards. The most common federal permits triggering Section 401 certification are CWA Section 404 permits issued by USACE. The Section 401 certifications are obtained from the appropriate RWQCB, depending on the project location, and are required before USACE issues a Section 404 permit.

In some cases, the RWQCB may have specific concerns with discharges associated with a project. Thus, the RWQCB may issue a set of requirements known as WDRs under the Porter-Cologne Act that define activities, such as the inclusion of specific features, effluent limitations, monitoring, and plan submittals that are to be implemented for protecting or benefiting water quality. WDRs can be issued to address both permanent and temporary discharges of a project.

2.3.2.2 Affected Environment

The following discussion is based on the Location Hydraulic Study and Floodplain Evaluation Report (AECOM 2023f) and the Water Quality Assessment Report (AECOM 2022).

Regional and Local Hydrology

The project area is in the Los Angeles Region, which encompasses all coastal watersheds and drainages flowing into the Pacific Ocean between Rincon Point and the eastern LA County line. The project area is within the Salt Canyon–Santa Clara River Hydrologic Area, within the Upper Santa Clara River Hydrologic Unit. The Upper Santa Clara River Watershed, generally upstream from or east of the Ventura County/LA County jurisdictional line, drains approximately 1,200 square miles and covers approximately 640 square miles. The project area is adjacent to Santa Clara River, which runs primarily along the southwestern boundary of the project area. An earthen agricultural ditch extends from The Old Road to the river in the middle of the project area. Surface runoff from the project area drains to the agricultural ditch, other existing storm conveyance structures, or directly into the Santa Clara River, which is a direct tributary to the Pacific Ocean.

Surface Waters

Surface water quality in the Santa Clara River has been affected by increasing development in floodplain areas, which has resulted in increased runoff volumes and velocities, erosion, and loss of habitat. The reach of the Santa Clara River within and adjacent to the project area (Reach 5) has multiple channels (braided) and experiences high sediment loads, high bank erodibility, and intense and intermittent runoff conditions. Reach 5 of the river is listed on the SWRCB 303(d) list for indicator bacteria, chloride, iron, and trash. TMDLs Upper Santa Clara River Chloride 2015, Santa Clara River Estuary Toxaphene 2011, and Santa Clara River Coliform Bacteria 2012 are all in effect.

The project area is under the jurisdiction of the Los Angeles RWQCB and is subject to the water quality objectives of the Los Angeles Region Basin Plan (RWQCB 2014). The Los Angeles Region Basin Plan lists beneficial uses of major water bodies in this region. Beneficial uses of Santa Clara Reach 5 include water contact recreation, non-contact water recreation, municipal

and domestic supply, industrial service supply, industrial process supply, agricultural supply, groundwater recharge, freshwater replenishment, warm freshwater habitat, wildlife habitat, rare/threatened/endangered species, and wetland habitat.

Groundwater

The project area is within the Santa Clara River Valley East Groundwater Subbasin, in the central-western portion of LA County. The subbasin is bound on the north by the Piru Mountains, on the east and southeast by the San Gabriel Mountains, on the south by the Santa Susana Mountains, and on the west by the Modelo Formation, the Saugus Formation, and a thinning of the alluvium near the adjoining Piru Subbasin. According to the RWQCB, the area overlying the groundwater basin is drained by the Santa Clara River, Bouquet Creek, and Castaic Creek. The Santa Clara River Valley East Groundwater Subbasin is the main source of all local groundwater supply in Santa Clarita Valley. The underlying groundwater basin in the project area provides municipal supply, industrial service supply, industrial process supply, and agricultural supply.

The SWRCB's online GeoTracker database includes measurements of depth-to-groundwater in groundwater monitoring wells at the 7-Eleven gasoline station (former Arco/Chevron, 28070 The Old Road), adjacent east of the central portion of the project area. From 2016 to 2018 (prior to well destructions), depth-to-groundwater was measured between 29 to 35 feet below ground surface, and the groundwater flow direction was calculated to flow west/northwest toward the Santa Clara River. The groundwater flow direction in the project area is expected to vary and typically to flow toward the Santa Clara River. At the location of the Santa Clara River, when the river is flowing, groundwater is at the elevation of the water surface in the river.

2.3.2.3 Environmental Consequences

Alternative 1: No-Build Alternative

Under the No-Build Alternative, project activities would not take place, and therefore would not have any effects related to water quality and stormwater runoff.

Alternative 2: Build Alternative

Construction

Project implementation would involve temporary soil disturbance during construction (i.e., building the roadways and bike lanes, associated curbs and gutters, sidewalks, wheelchair ramps, driveways, bridges, retaining walls, storm drainage improvements and bioswales, and relocating utilities). Approximately 54 acres of soil would be disturbed for project construction.

Without implementation of construction-phase BMPs, project construction would have the potential to affect water quality through the release of pollutants such as sediment/turbidity, metals, oil and grease, nutrients, organic compounds, and trash and debris. Any type of soil disturbance would expose soil to erosion from wind and water that could result in sedimentation in downgradient surface waters if left uncontrolled. However, implementation of construction-phase BMPs would be a mandatory regulatory component of compliance with the Construction General Permit. With implementation of mitigation measure (MM) WQ-1 (described in Avoidance, Minimization, and/or Mitigation Measures section below), the potential for pollutant transport and erosion would be minimized.

Operation

Project implementation would result in a net increase of approximately 43 acres of impervious area. The increase in impervious area would not be expected to significantly increase erosivity or sediment contribution to the Santa Clara River. The increase in runoff because of an increase in impervious area in the project area would require measures to meet LA County stormwater and hydromodification requirements.

The existing drainage system consists of underground drains and catch basins, and two culverts north of the I-5 ramp. Currently, stormwater runoff flows from the east side of the roadway, through the culverts under The Old Road, and outlets on the west side of the roadway. The proposed drainage system addition would be approximately 1,500 linear feet of 18-inch-diameter reinforced concrete pipe and 1,600 linear feet of 24-inch-diameter reinforced concrete pipe, along with 20 catch basins and the extension of two culverts across The Old Road north of Rye Canyon Road. The new system would connect to the existing drainage system, and all surface runoff would be captured by the catch basins and culverts before being conveyed to stormwater and hydromodification control facilities (bioswales).

Project operation would be subject to the requirements of the LA County Municipal NPDES Permit. Design pollution prevention BMPs (permanent pollution source control BMPs) would target pollutants of concern, including sediment/turbidity, metals, soil stabilization residues, oil and grease, nutrients, organic compounds, and trash and debris. Treatment of runoff would be accomplished through the redesigned drainage facilities (i.e., the catch basins, culverts, and storm drain outlets) and bioswales.

2.3.2.4 Avoidance, Minimization, and/or Mitigation Measures

Stormwater management would include both short-term (construction phase) and long-term (post-construction/maintenance) measures. Short-term measures would focus on implementing construction site BMPs, designed to reduce erosion and subsequent sediment transport. Long-term measures would address factors such as increased stormwater runoff caused by the added impervious surface. Compliance with the standard requirements of the Construction General Permit and the County Municipal Permit for potential short-term and long-term impacts (listed in AMMs WQ-1 and WQ-2) would be required.

WQ-1: In accordance with the Construction General Permit, Order WQ 2022-0057-DWQ, NPDES NO. CAS000002, an SWPPP will be prepared and implemented to address all construction-related activities, equipment, and materials that will have the potential to affect water quality. The SWPPP will identify the sources of pollutants that may affect the quality of stormwater; include construction site BMPs to control pollutants and sediment; and provide for construction materials management and non-stormwater BMPs. All construction site BMPs will follow the latest edition of the LACPW Construction Site BMP Manual, to control and minimize the impacts of construction-related activities, materials, and pollutants on the watershed. These BMPs will include temporary sediment controls, temporary soil stabilization, scheduling management, waste management, materials handling, and other non-stormwater BMPs.

WQ-2: In compliance with Municipal Permit Order No. R4-2021-0105 requirements, a final project-specific Standard Urban Stormwater Mitigation Plan will be prepared.

Bioswales will be constructed in roadway medians to provide water quality treatment in addition to conveying stormwater runoff. The bioswales will provide pollutant removal

through settling and filtration in the vegetation lining the channels, and they also will provide the opportunity for volume reduction through infiltration and evapotranspiration.

Disturbed soil areas, including slopes, will be reseeded using a California native plant seed blend. An erosion control seed mix (hydroseed) will be applied on all select material areas and slopes flatter than 1:1. Erosion control (bonded fiber matrix) will be applied on all cut slopes steeper than 1:1. As vegetation establishes in disturbed areas and cut slopes stabilize, the potential for suspended sediments coming from the project area into receiving waters gradually will be reduced.

2.3.3 Geology/Soils/Seismic/Topography

2.3.3.1 Regulatory Setting

For geologic and topographic features, the key federal law is the Historic Sites Act of 1935, which establishes a national registry of natural landmarks and protects “outstanding examples of major geological features.” Topographic and geologic features also are protected under CEQA.

This section also discusses geology, soils, and seismic concerns related to public safety and project design. Earthquakes are prime considerations in the design and retrofit of structures. Structures would be designed using the Caltrans Seismic Design criteria. This criteria would provide the minimum seismic requirements for highway bridges that are designed in California. A bridge’s category and classification would determine its seismic performance level, and which methods would be used for estimating the seismic demands and structural capabilities (Caltrans 2019a).

Local

Los Angeles County General Plan Conservation and Natural Resources Element

The Conservation and Natural Resources Element of the LA County General Plan addresses the management and use of natural resources, including mineral, scenic, geologic, and biological resources in the unincorporated areas of the county. The General Plan provides guidance on hillside regulations, habitat protection, and management of water and agriculture to conserve geological resources and soils. The County has incorporated goals and policies in the Conservation and Natural Resources Element to manage geological and mineral resources, as listed in Table 2-34 (LACDRP 2015).

The Surface Mining and Reclamation Act of 1975 authorizes local governments to assist the State in issuing mining permits and monitoring site reclamation efforts. The demand for mineral resources is high, and projected growth in the region will continue to strain the mineral supply. In addition, mineral resources include areas that are appropriate for the drilling and production of oil and natural gas. Oil production still occurs in many parts of the unincorporated areas, including the Baldwin Hills and the Santa Clarita Valley. The California Department of Conservation, Division of Oil, Gas, and Geothermal Resources regulates oil production and retains exclusive jurisdiction over all subsurface oil and gas activities statewide. LA County may regulate zoning and land use to mitigate impacts from surface operations on surrounding communities.

Table 2-34. Los Angeles County General Plan Goals and Policies

Goal	Policy
Geological Resources	
Goal C/NR 5: Protected and useable local surface water resources.	Policy C/NR 5.1: Support the LID philosophy, which seeks to plan and design public and private development with hydrologic sensitivity, including limits to straightening and channelizing natural flow paths, removal of vegetative cover, compaction of soils, and distribution of naturalistic BMPs at regional, neighborhood, and parcel-level scales.
Goal C/NR 9: Sustainable agricultural practices.	Policy C/NR 9.1: Support agricultural practices that minimize and reduce soil loss, minimize pesticide use, and prevent water runoff from leaching pesticide and fertilizer into groundwater and affecting water, soil, and air quality.
Mineral Resources	
Goal C/NR 10: Locally available mineral resources to meet the needs of construction, transportation, and industry.	Policy C/NR 10.1: Protect MRZ-2s and access to MRZ-2s from development and discourage incompatible adjacent land uses.
	Policy C/NR 10.2: Prior to permitting a use that threatens the potential to extract minerals in an identified Mineral Resource Zone, the County shall prepare a statement specifying its reasons for permitting the proposed use, and shall forward a copy to the State Geologist and the State Mining and Geology Board for review, in accordance with the Public Resources Code, as applicable.
	Policy C/NR 10.3: Recognize newly identified MRZ-2s within 12 months of transmittal of information by the State Mining and Geology Board.
	Policy C/NR 10.4: Work collaboratively with agencies to identify Mineral Resource Zones and to prioritize mineral land use classifications in regional efforts.
	Policy C/NR 10.5: Manage mineral resources in a manner that effectively plans for access to, development and conservation of, mineral resources for existing and future generations.
Goal C/NR 11: Mineral extraction and production activities that are conducted in a manner that minimizes impacts on the environment.	Policy C/NR 10.6: Require that new non-mining land uses adjacent to existing mining operations be designed to provide a buffer between the new development and the mining operations. The buffer distance shall be based on an evaluation of noise, aesthetics, drainage, operating conditions, biological resources, topography, lighting, traffic, operating hours, and air quality.
	Policy C/NR 11.1: Require mineral resource extraction and production activities and drilling for and production of oil and natural gas to comply with County regulations and state requirements, such as Surface Mining and Reclamation Act and Division of Oil, Gas, and Geothermal Resources regulations.
	Policy C/NR 11.2: Require the reclamation of abandoned surface mines to productive second uses.
	Policy C/NR 11.3: Require appropriate levels of remediation for all publicly owned oil and natural gas production sites based on possible future uses.
	Policy C/NR 11.4: Require that mineral resource extraction and production operations, as well as activities related to the drilling for and production of oil and natural gas, be conducted to protect other natural resources and prevent excessive grading in hillside areas.
	Policy C/NR 11.5: Encourage and support efforts to increase the safety of oil and gas production and processing activities, including state regulations related to well stimulation techniques such as hydraulic fracturing or “fracking.”

Notes:

C/NR = Conservation/Natural Resources; LID = Low Impact Device; MRZ = Mineral Resource Zone

Source: LACDRP 2015

City of Santa Clarita General Plan Conservation and Open Space Element

The Conservation and Open Space Element of the City of Santa Clarita General Plan seeks to protect and conserve open space and natural resources, such as geologic resources and mineral resources. State law requires that the General Plan address the prevention, control, and correction of soil erosion, as well as the location, quantity, and quality of rock, sand, and gravel resources (California Government Code Section 65302). In the Santa Clarita Valley, the primary conservation issues with respect to soils and geologic resources are soil conservation, hillside development and ridgeline protection, and extraction of mineral resources. The City of Santa Clarita General Plan covers the extensive aggregate mineral resources. The policies adopted under the Conservation and Open Space Element regarding the protection of geologic resources and mineral resources are listed in Table 2-35 (City of Santa Clarita 2011).

Table 2-35. City of Santa Clarita General Plan Goals and Policies

Goal/Objective	Policy
Geological Resources Objective CO 2.1: Control soil erosion, waterway sedimentation, and airborne dust generation, and maintain the fertility of topsoil. Objective CO 2.2: Preserve the Santa Clarita Valley's prominent ridgelines and limit hillside development to protect the valuable aesthetic and visual qualities intrinsic to the Santa Clarita Valley landscape.	Policy CO 2.1.1: Review soil erosion and sedimentation control plans for development-related grading activities, where appropriate, to ensure mitigation of potential erosion by water and air.
	Policy CO 2.1.2: Promote conservation of topsoil on development sites by stockpiling for later reuse, where feasible.
	Policy CO 2.1.3: Promote soil enhancement and waste reduction through composting, where appropriate.
	Policy CO 2.2.1: Locate development and designate land uses to minimize the impact on the Santa Clarita Valley's topography, minimizing grading and emphasizing the use of development pads that mimic the natural topography in lieu of repetitive flat pads, to the extent feasible.
	Policy CO 2.2.2: Ensure that graded slopes in hillside areas are revegetated with native drought tolerant plants or other approved vegetation to blend manufactured slopes with adjacent natural hillsides, in consideration of fire safety and slope stability requirements.
	Policy CO 2.2.3: Preserve designated natural ridgelines from development by ensuring a minimum distance for grading and development from these ridgelines of 50 feet or more if determined appropriate by the reviewing authority based on site conditions, to maintain the Santa Clarita Valley's distinctive community character and preserve the scenic setting.
	Policy CO 2.2.4: Identify and preserve significant geological and topographic features through designating these areas as open space or by other means as appropriate.
	Policy CO 2.2.5: Promote the use of adequate erosion control measures for all development in hillside areas, including single family homes and infrastructure improvements, both during and after construction.
	Policy CO 2.2.6: Encourage building and grading designs that conform to the natural grade, avoiding the use of large retaining walls and build-up walls that are visible from off-site, to the extent feasible and practicable.
Mineral Resources Objective CO 2.3: Conserve areas with significant mineral resources and provide for extraction and processing of such resources in accordance with applicable laws and land use policies.	Policy CO 2.3.1: Identify areas with significant mineral resources that are available for extraction through appropriate zoning or overlay designations.
	Policy CO 2.3.2: Consider appropriate buffers near mineral resource areas that are planned for extraction, to provide for land use compatibility and prevent the encroachment of incompatible land uses.

Goal/Objective	Policy
	Policy CO 2.3.3: Through the review process for any mining or mineral extraction proposal, ensure mitigation of impacts from mining and processing of materials on adjacent uses or on the community, including but not limited to air and water pollution, traffic and circulation, noise, and land use incompatibility.
	Policy CO 2.3.4: Ensure that mineral extraction sites are maintained in a safe and secure manner after cessation of extraction activities, which may include the regulated decommissioning of wells, clean-up of any contaminated soils or materials, closing of mine openings, or other measures as deemed appropriate by the agencies having jurisdiction.
	Policy CO 2.3.5: Promote remediation and restoration of mined land to a condition that supports beneficial uses, which may include but are not limited to recreational open space, habitat enhancement, groundwater recharge, or urban development.

Source: City of Santa Clarita General Plan 2011

2.3.3.2 Affected Environment

This section is based on the Initial Site Assessment Report (AECOM 2023g) and the Water Quality Assessment Report (AECOM 2022).

Geologic Setting

The Old Road is in the western Transverse Ranges geomorphic province of Southern California. The Transverse Ranges are about 10 to 15 miles wide and 300 miles long, and they are characterized by a complex series of mountain ranges, intervening valleys, and active faults with dominant east/west trends. According to the Geologic Map of California (CDOC 2015), the geology of the project area is composed of Quaternary deposits, including Pleistocene–Holocene (Q)- and Pleistocene (Qoa)-aged rocks that are made of marine and nonmarine (continental) sedimentary rocks.

Physiography and Topography

The Old Road is within Sections 7, 17, 18, and 20 of Township 4 North, Range 16 West of the San Bernardino Meridian within unincorporated LA County and the city of Santa Clarita. Topographic coverage in the project vicinity is shown on the U.S. Geological Survey (USGS) 7.5-Minute Series “Newhall, California” Quadrangle map.

The project elevation ranges from approximately 1,000 feet above mean sea level near Henry Mayo Drive at the north end of the project area to approximately 1,100 feet above mean sea level near Magic Mountain Parkway at the south end. The local topographic gradient is generally to the northwest.

Soils

According to the NRCS, a number of soil types occur throughout the project area, the two most prominent soil types being Cometa loam and sandy alluvial land. Cometa loam, the dominant soil type in the project area, is composed of moderately deep, moderately well, or well-drained soils with slow to medium runoff potential and very slow permeability. These soils are formed in alluvium from granitic rock sources and are found on gently sloping, slightly dissected older stream terraces. Sandy alluvial land consists of unconsolidated alluvium that is found mainly on floodplains along and in the Santa Clara River. Sandy alluvial land soils are associated with

Hydrologic Soil Group B and are somewhat poorly drained, with very slow runoff potential and moderately slow permeability.

Geologic Hazards

The city of Santa Clarita has or is in the vicinity of several known active and potentially active earthquake faults and fault zones, which may cause strong ground-shaking and fault rupture. Based on the USGS interactive fault map (CDOC 2015), the inactive Holser fault crosses the project area. The San Gabriel fault zone is within approximately 1.25 miles east/northeast of the project area. The Northridge blind thrust fault is within approximately 2.5 miles west/southwest of the project area. According to the California Department of Conservation's Earthquake Hazards Zone Application, the project area is not within an Earthquake Zone of Required Investigation.

Strong ground motions can worsen existing unstable slope conditions, particularly if coupled with saturated ground conditions. Seismically induced landslides can overrun structures, sever utility lines, and block roads, hindering rescue operations after an earthquake. The most widespread type of earthquake-induced landslides consist of generally shallow failures involving surficial soils and the uppermost weathered bedrock in moderate to steep hillside terrain. Rockfalls and rockslides on very steep slopes also are common. A combination of geologic conditions leads to landslide vulnerability. These vulnerabilities include high seismic potential, steep slopes, deeply incised canyons, highly fractured rock, and rock with inherent weaknesses. The project area is not within a landslide zone, based on the California Department of Conservation's Earthquake Hazards Zone Application (CDOC 2023).

Subsidence is the loss of surface elevation because of the removal of subsurface support. Subsidence is caused by the reduction of pore space in the ground that formerly was occupied by a fluid, such as water or oil, cause by activities that contribute to the loss of support materials within the underlying soils, such as agricultural practices or the overdraft of an aquifer. No reports of large-scale problems with ground subsidence exist for the city of Santa Clarita. In addition, the project area is an area of minimal flood hazard, as defined by FEMA. A portion of the project area would be in a location having with a 1% annual chance of flooding (100-year flood). Flooding is discussed further in Section 3.3.6.

Liquefaction refers to a process by which water-saturated granular soils transform from a solid to a liquid state during strong ground-shaking, usually occurring during or after an earthquake. Areas in the Santa Clarita Valley underlain by unconsolidated alluvium, such as along the Santa Clara River and tributary washes, may be prone to liquefaction, and the project area is within a liquefaction zone, based on the California Department of Conservation's Earthquake Hazards Zone Application (CDOC 2023). In addition, lateral spreading can occur when liquefaction transforms a subsurface layer into a fluid-like mass, and gravity causes the earthquake to move the mass downslope or laterally. The potential exists for lateral spreading to occur in the project area, in places potentially subject to liquefaction.

Mineral Resources

The California Division of Mines and Geology has classified land in the greater LA metropolitan area according to the presence or absence of significant sand and gravel deposits. This land classification is categorized into the Mineral Resource Zone (MRZ), described as follows:

- MRZ-1: areas that do not contain significant mineral deposits or low likelihood exists for their presence
- MRZ-2: areas that contain significant mineral deposits or high likelihood exists for their presence
- MRZ-3: areas that contain mineral deposits, but their significance cannot be evaluated from available data

According to the City of Santa Clarita General Plan's Conservation and Open Space Element, the City's planning area contains almost 19,000 acres of MRZ-2 sites. Sand and gravel resources are concentrated primarily along waterways, including the Santa Clara River, the South Fork of Santa Clara River, Castaic Creek, and east of Sand Canyon Road. A significant deposit of construction-grade aggregate extends approximately 15 miles from Agua Dulce Creek in the east to the Ventura County line on the west. Santa Clarita Valley also contains other mineral resources that have been extracted historically, including gold, natural gas, and oil. Many older mines and oil wells have been abandoned, although several oil and natural gas wells still are in production.

Investigations into the MRZ sites have been conducted for areas in the city of Santa Clarita. The project area from The Old Road from Henry Mayo Drive to approximately Sky View Lane is within an MRZ-2 site, and thus an area containing significant mineral deposits or high likelihood exists for their presence. The remainder of The Old Road from approximately Sky View Lane to Magic Mountain Parkway is within an MRZ-3 site, or an area that contains mineral deposits, but their significance cannot be evaluated from available data. As previously discussed, the proposed project component of the Santa Clara River Bridge that crosses over the Santa Clara River, a waterway with sand and gravel resources, will be replaced (CDOC 2021).

Oil Fields

The California Geologic Energy Management Division's (CalGEM's) online Well Statewide Tracking and Reporting (WellSTAR) database provides information regarding oil and gas wells in and near the project area. According to WellSTAR, the project area is within a portion of the Castaic Junction (ABD) Oil and Gas Field. No active oil and gas wells are within the project area this oil and gas field. Two plugged and abandoned oil and gas wells are in or adjacent to the project area, including one plugged and abandoned oil and gas well potentially within the central portion of the project area in the SB lanes of The Old Road near the intersection of The Old Road and the I-5 on- and off-ramps, as well as one plugged and abandoned oil and gas well adjacent to the northern portion of the project area, in the paved parking lot of the Gateway Promenade Shopping Center at 28656 to 28788 The Old Road in Valencia. The oil and gas well potentially in the SB lanes of The Old Road near the intersection of The Old Road and the I-5 on- and off-ramps was not identified in the geophysical survey that was conducted in April 2023 (CalGEM 2023).

2.3.3.3 Environmental Consequences

Alternative 1: No-Build Alternative

Under the No-Build Alternative, The Old Road ROW between Henry Mayo Drive and Magic Mountain Parkway would remain part of the project area under existing conditions. Typical maintenance activities would continue to occur. No construction activities would occur, and

materials would not be excavated in the project area. Therefore, no impact related to geological or mineral resources would occur.

Alternative 2: Build Alternative

Construction

As described above, the project area is not within an Earthquake Zone of Required Investigation. In addition, project construction would improve the structural integrity of the two bridges along The Old Road for earthquake protection. Construction of the new bridges to improve structural integrity would include installing cast-in-drilled-hole piles for new abutment and piles; installing shoring of steel sheet piles; constructing abutment, column pile extensions, and cap beams; and erecting prestressed girders.

The project area is not within a landslide zone; however, the project area is within a liquefaction zone, and the project area has some soil prone to liquefaction. Construction activities involving temporary soil disturbance would include building the roadways and bike lanes, associated curbs and gutters, sidewalks, wheelchair ramps, driveways, bridges, retaining walls, storm drainage improvements and bioswales, and relocating utilities. Any increase in soil erosion could cause an increase in suspended sediments discharged into the Santa Clara River. In addition, increases in stormwater runoff rates and volumes from an increased impervious area would alter existing drainage patterns of stormwater runoff and increase erosion potential, which could influence channel stability.

Although construction activities may increase the potential for soil erosion, implementation of construction-phase BMPs would be a mandatory regulatory component for compliance with the Construction General Permit. The implementation of BMPs and project design features would control runoff rates and amounts to minimize erosion and sediment discharge during construction and while vegetation is established. Increases in runoff rates or volumes would not be anticipated to alter channel stability or change erosion and accretion (deposition) patterns in the downstream reaches of the Santa Clara River. These BMPs and AMMs are discussed further below.

The Old Road from Henry Mayo Drive to approximately Sky View Lane is within an MRZ-2 site. The remainder of The Old Road from approximately Sky View Lane to Magic Mountain Parkway is within an MRZ-3 site. Although a portion of the project area is within an area of mineral resource significance, the amount of excavation needed for the proposed project would be insignificant in relation to the size of the entire MRZ-2 area that encompasses parts of the project area. Construction of the proposed project components would require a maximum roadway excavation of approximately 15 feet, and the maximum depth for piles would be approximately 150 feet.

According to WellSTAR, the proposed project would traverse a 0.64-mile portion of the Castaic Junction (ABD) Oil and Gas Field. No active oil or gas wells were shown within the project area in the ABD oil and gas field. However, two plugged and abandoned oil and gas wells were identified in or adjacent to the project area. Adherence to the goals and policies regarding mineral resources in the LA County General Plan Conservation and Natural Resources Element and the City of Santa Clarita General Plan Conservation and Open Space Element would be followed to reduce impacts on any mineral resources. In addition, the project area is not within or in the immediate vicinity of active mines. Therefore, project construction would not result in the substantial loss of availability of a known mineral resource that would be of value to the

region or State, or result in the loss of availability of a locally important mineral resource recovery site as delineated on a local general plan, specific plan, or other land use plan.

Project construction would not be anticipated to cause visual impacts on the geologic or topographic features in the project vicinity. The proposed improvements would improve safety for wilderness area visitors by adding bike lanes, a pedestrian path, and an equestrian trail, and by enhancing roadway and bridge safety. In addition, the proposed project would be consistent with existing land uses and would not impact natural landmarks or landforms in the project area. Construction temporarily would introduce equipment and materials within the project corridor, but these impacts would be temporary. The proposed project would be fully compatible with the existing visual character of the corridor.

Operation

As previously discussed, the project area is not within an earthquake fault zone or a landslide zone. Project operation would involve the use of two structurally improved bridges, reducing the potential impact of a seismic event. The project area is within a liquefaction zone; however, with implementation of the minimization measures, BMPs, and project design, project operation would not substantially increase the occurrence of liquefaction. In addition, the project area is in an area of minimal flood hazard, as defined by FEMA.

Operation and maintenance of The Old Road improvements, bridge replacements, Multi-Use Trail extension, and Sky View Lane improvements would not require the use of mineral resources, and thus would not result in the loss of availability of mineral resources in the project vicinity. In addition, project operation would be consistent with existing land uses and would not affect geologic and topographic features or natural landmarks and landforms in the project area. Project operation would be similar to existing conditions. However, the Built Alternative would address current and expected (No-Build Alternative) roadway deficiencies on The Old Road and adjacent roadway system, such as structural and operation safety, and inconsistency with jurisdictional plans and policies would improve because this alternative would increase regional roadway capacity, repair bridge structures, and improve safety to accommodate expected future traffic growth projections.

2.3.3.4 Avoidance, Minimization, and/or Mitigation Measures

The AMMs outlined in Section 2.3.2 (WQ-1 and WQ-2) would reduce the potential impacts of geotechnical and soils conditions on proposed project components that would be constructed under the Build Alternative.

2.3.4 Paleontology

2.3.4.1 Regulatory Setting

Paleontology is a natural science that focuses on the study of ancient animal and plant life, preserved in the geologic record as fossils.

Federal

A number of federal statutes specifically address paleontological resources, their treatment, and funding for mitigation as a part of federally authorized projects. The following regulations are included in this section based on the scope and federal funding of the proposed project.

National Environmental Policy Act (16 USC Section 431 et seq.)

NEPA, as amended, requires analysis of potential environmental impacts on important historical, cultural, and natural aspects of our national heritage (USC Section 431 et seq.; 40 CFR, Section 1502.25). NEPA directs federal agencies to use all practicable means to “Preserve important historic, cultural, and natural aspects of our national heritage...” (Section 101[b][4]). Regulations for implementing the procedural provisions of NEPA under 40 CFR 1500–1508.

Antiquities Act of 1906

The Antiquities Act of 1906 (16 USC 431–433) states, in part that:

... any person who shall appropriate, excavate, injure or destroy any historic or prehistoric ruin or monument, or any object of antiquity, situated on lands owned or controlled by the Government of the United States, without the permission of the Secretary of the Department of the Government having jurisdiction over the lands on which said antiquities are situated, shall upon conviction, be fined in a sum of not more than five hundred dollars or be imprisoned for a period of not more than ninety days, or shall suffer both fine and imprisonment, in the discretion of the court.

Although no specific mention of natural or paleontological resources is included in the act or the act’s uniform rules and regulations (43 CFR 3), the term “objects of antiquity” has been interpreted to include fossils by the National Park Service, the Bureau of Land Management, the U.S. Forest Service, and other federal agencies. Permits to collect fossils on lands that are administered by federal agencies are authorized under this act. However, because of the large gray areas left open to interpretation because of the imprecision of the wording, regulatory agencies are hesitant to interpret this act as governing paleontological resources.

Federal Land Policy and Management Act (43 USC 1701)

Federal law, including the Federal Land Policy and Management Act of 1976 (43 USC 1701), covers objectives such as the evaluation, management, protection, and location of fossils on Bureau of Land Management–managed lands, defines fossils, and lays out penalties for the destruction of significant fossils. Also, NEPA requires the preservation of “historic, cultural, and natural aspects of our national heritage.” Most recently, the Omnibus Public Lands Act refines NEPA and Federal Land Policy and Management Act guidelines and structures, as well as outlines minimum punishments for removal or destruction of fossils from federal/public lands (as discussed further below).

Paleontological Resources Preservation Act

Paleontological Resources Preservation, Title VI, Subtitle D states: “The Secretary (Interior and Agriculture) shall manage and protect paleontological resources on federal land using scientific principles and expertise.” With passage of the Paleontological Resources Preservation Act, Congress officially recognized the importance of paleontological resources on federal lands (i.e., U.S. Department of the Interior, U.S. Department of Agriculture) by declaring that fossils from federal lands are federal property that must be preserved and protected using scientific principles and expertise. The act provides:

- Uniform definitions of “paleontological resources” and “casual collecting”

- Uniform minimum requirements for paleontological resource use permit issuance (terms, conditions, and qualifications of applicants)
- Uniform criminal and civil penalties for illegal sale and transport, and theft and vandalism of fossils from federal lands
- Uniform requirements for curation of federal fossils in approved repositories

Code of Federal Regulations, Title 43

Under Title 43, Section 8365.1-5 of the CFR, the collection of scientific and paleontological resources, including vertebrate fossils, on federal land is prohibited. The collection of a “reasonable amount” of common invertebrate or plant fossils for non-commercial purposes is permissible (43 CFR 8365.1-5 [U.S. Printing Office 2014]).

State

California Environmental Quality Act

Under California law, paleontological resources are protected by CEQA. The CEQA Guidelines (Title 14 CCR Chapter 3, Section 15000 et seq.) define the procedures, types of activities, individuals, and public agencies required to comply with CEQA. As part of CEQA’s Initial Study process, one of the questions that must be answered by the lead agency is related to paleontological resources: “Will the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?” (CEQA Guidelines, Appendix G, Section VII, Part f).

The loss of a significant paleontological resources—which includes any identifiable fossil that is unique, unusual, rare, uncommon, diagnostically or stratigraphically important, and/or those that add to an existing body of knowledge in specific areas, stratigraphically, taxonomically, and/or regionally—would be a significant environmental impact. Direct impacts on paleontological resources primarily concern the potential destruction of nonrenewable paleontological resources and the loss of information associated with these resources. This includes the unauthorized collection of fossil remains. If potentially fossiliferous bedrock or surficial sediments are disturbed, the disturbance could result in the destruction of paleontological resources and subsequent loss of information.

The CEQA threshold of significance for a significant impact on paleontological resources is reached when a project is determined to “directly or indirectly destroy a significant paleontological resource or unique geologic feature” (CEQA Guidelines Appendix G, Section VII, Part f). In general, for project sites that are underlain by paleontologically sensitive geologic units, the greater the amount of ground disturbance, the higher the potential for significant impacts on paleontological resources.

Public Resources Code Section 5097.5 and Section 30244

Other State requirements for paleontological resource management are included in Sections 5097.5 and 30244 of the PRC. These statutes prohibit the removal of any paleontological site or feature from public lands without permission of the jurisdictional agency, define the removal of paleontological sites or features as a misdemeanor, and require reasonable mitigation of adverse impacts on paleontological resources from developments on public (State, county, city, district) lands.

Local

Los Angeles County General Plan

The LA County General Plan's Conservation and Open Space Element (2015) contains goals and policies regarding paleontological resources. This element establishes the goals of preserving and protecting sites of historical, archaeological, and scientific value and defines the following policies related to paleontological resources:

- Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
- Support an inter-jurisdictional collaborative system that protects and enhances historical, cultural, and paleontological resources.
- Promote public awareness of historical, cultural, and paleontological resources.
- Ensure proper notification and recovery processes are carried out for development on or near historical, cultural, and paleontological resources.

City of Santa Clarita

The Conservation and Open Space Element of the City of Santa Clarita General Plan (2011) has no provisions for paleontological resources.

Professional Guidelines

Society of Vertebrate Paleontology

The Society for Vertebrate Paleontology (SVP) has established standard guidelines (SVP 1995, 2010) that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. Most practicing professional vertebrate paleontologists adhere closely to the SVP's assessment, mitigation, and monitoring requirements as specifically provided in its standard guidelines. Most State regulatory agencies with paleontological resource-specific laws, ordinances, regulations, and standards accept and use the professional standards set forth by the SVP.

As defined by the SVP (2010:11), significant nonrenewable paleontological resources are:

Fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years).

Based on the significance definitions of the SVP (2010), all identifiable vertebrate fossils are considered to have significant scientific value. This position is adhered to because vertebrate fossils are relatively uncommon and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil that is found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate fossils previously have been found are considered to have high sensitivity. Identifiable plant and

invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

A geologic unit that is known to contain significant fossils is considered to be “sensitive” to adverse impacts if a high probability exists that earth-moving or ground-disturbing activities in that rock unit either will directly or indirectly disturb or destroy fossil remains. Paleontological sites indicate that the containing sedimentary rock unit or formation is fossiliferous. Therefore, the limits of the entire rock formation, both areal and stratigraphic, define the scope of the paleontological potential in each case (SVP 1995).

Fossils are contained within surficial sediments or bedrock, and therefore are not observable or detectable unless exposed by erosion or human activity. In summary, paleontologists cannot know either the quality or quantity of fossils before natural erosion or human-caused exposure. Therefore, even in the absence of surface fossils, assessing the sensitivity of rock units is necessary, based on their known potential to produce significant fossils elsewhere within the same geologic unit (both within and outside a study area), a similar geologic unit, or based on whether the unit in question was deposited in a type of environment that is known to be favorable for fossil preservation. Monitoring by experienced paleontologists greatly increases the probability that fossils will be discovered during ground-disturbing activities and that, if these remains are significant, successful mitigation and salvage efforts may be undertaken to prevent adverse impacts on these resources.

2.3.4.2 Affected Environment

The proposed project is within the Transverse Ranges geomorphic province (Wagner 2002). No known paleontological resources have been identified in the project area or within 1 mile of the project area (Bell 2023). The project footprint would impact three rock units (Figure 10; Dibblee and Ehrenspeck 1996). These are, from youngest to oldest: 1) Qa (Quaternary alluvium), alluvial gravel, sand, and clay of valley areas of Holocene age; 2) Qg (Quaternary gravel), gravel and sand of major stream channels of Holocene age; and 3) Qog (Quaternary older alluvium), low terrace remnants of alluvial gravel and sand of late Pleistocene age. In general, the Qa and Qg sediments are too young to produce significant paleontological resources. Therefore, they would be rated as low according to SVP standard procedures (SVP 2010). However, the Qog is of Pleistocene age and equivalent to Older Alluvium, and it should be rated as high according to those guidelines. Several paleontological finds in Older Alluvium are in the project area (Jefferson 2012). These include horse, bison, ground sloth, mastodon, and mammoth.

2.3.4.3 Environmental Consequences

Alternative 1: No-Build Alternative

Under the No-Build Alternative, no improvements would be made in the project area, to The Old Road, Rye Canyon Road, Sky View Lane, bridge replacements, or trail construction. Thus, no impacts would occur on any paleontological resources.

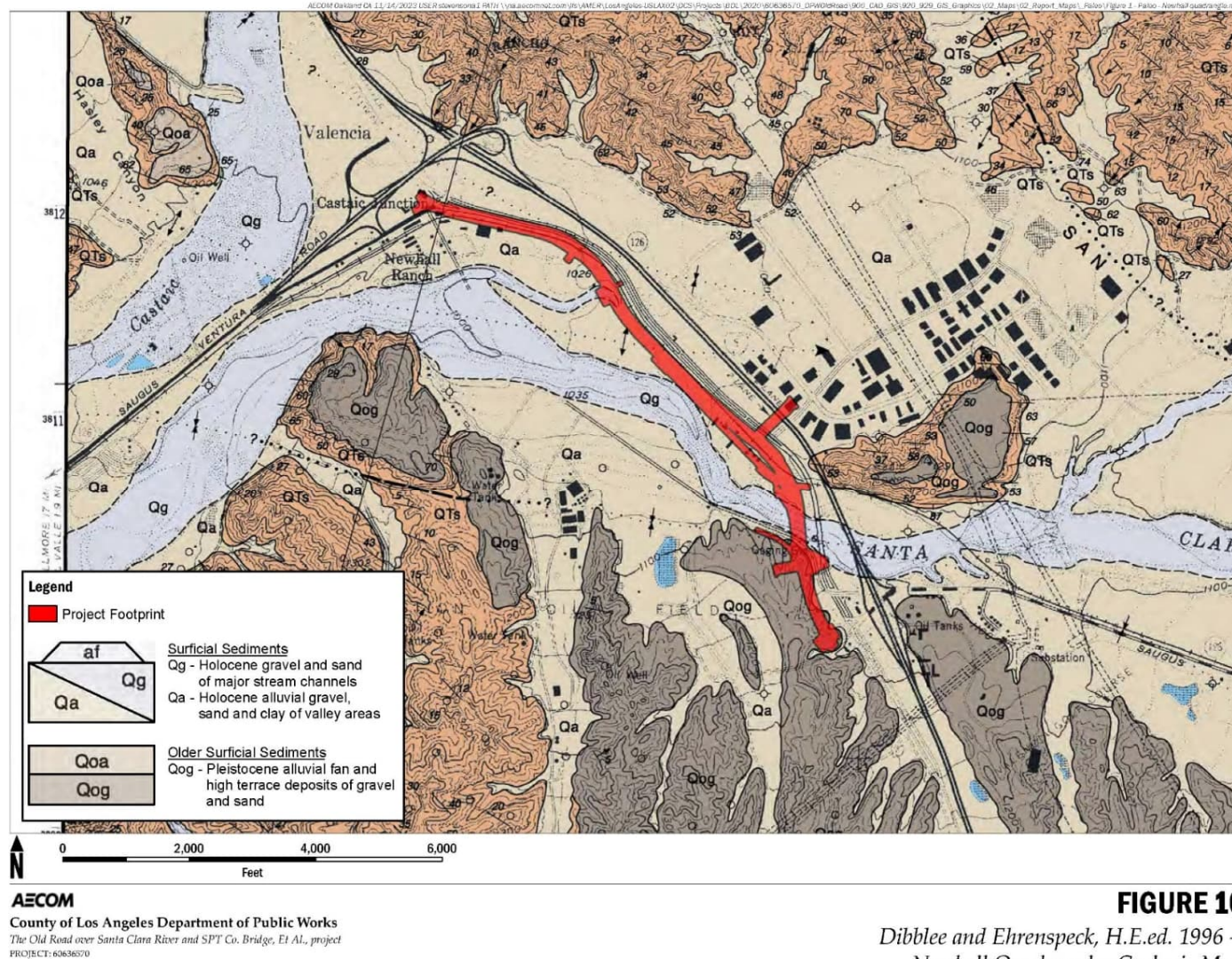


Figure 10: Dibblee and Ehrenspeck (1996) Newhall Quadrangles Geologic Map

Alternative 2: Build Alternative

No known recorded fossil locations are within 1 mile of the project area. However, during construction, the Built Alternative could have direct or indirect impacts on paleontological resources, particularly at depth (where drilling or augering may take place) as well as during any ground disturbance in the old terrace sediments that are mapped as Qog.

In the event that significant paleontological resources would occur in the Qog sediments, they would be recovered by paleontological resource monitors. In the event that microvertebrate fossils are affected by boring for footings, a representative sample would be recovered by wet screening sediment samples. In the event of inadvertent discovery of paleontological resources, PAL-2 would reduce the potential for impacts on unknown, buried paleontological resources because it would require appropriate training for on-site construction crews regarding paleontological resources and paleontological monitoring in locations where the potential exists for paleontological resources. With the implementation of the AMMs, the impacts on paleontological resources would be of low intensity.

2.3.4.4 Avoidance, Minimization, and/or Mitigation Measures

The following AMMs would be implemented to reduce adverse effects on paleontological resources.

PAL-1: Paleontological Resources Monitoring and Mitigation Plan: Before construction-related excavations, a qualified paleontologist meeting the 2010 Society of Vertebrate Paleontology standards will be retained to develop a Paleontological Resources Monitoring and Mitigation Plan (PRIMMP). The plan will address qualifications of paleontological monitors and will stipulate that the qualified paleontologist and the paleontological resource monitors be empowered to stop excavation activity to investigate or safely remove possible fossils. The plan will incorporate the findings of the project's geotechnical report and construction plans to formulate what construction activities will be monitored, and the plan will include wet screening of boring or drilling spoils. Many paleontological mitigation efforts have recovered significant paleontological resources, especially microvertebrate fossils, from screening of such spoils. The plan also will address unexpected discoveries of paleontological resources.

PAL-2: Paleontological Monitoring and Mitigation of Impacts from Construction. A qualified paleontologist will attend the preconstruction meeting and present a Worker Environmental Awareness Program (WEAP) to the project construction personnel. The Worker Environmental Awareness Program training will discuss the types of fossils that potentially may be uncovered during project excavations, laws protecting paleontological resources, and appropriate actions to be taken when fossils are discovered. A qualified paleontologist will oversee that the PRIMMP instructions are implemented. A qualified paleontologist will produce a final paleontological monitoring report that discusses the paleontological monitoring program, any paleontological discoveries, and the preparation, curation, and accessioning of any fossils into a suitable paleontological repository.

2.3.5 Hazardous Wastes and Materials

2.3.5.1 Regulatory Setting

Hazardous materials, including hazardous substances and wastes, are regulated by many State and federal laws. Statutes govern the generation, treatment, storage, and disposal of hazardous materials, substances, and waste, and also the investigation and mitigation of waste releases, air and water quality, human health, and land use.

The primary federal laws regulating hazardous wastes and materials are the Comprehensive Environmental Response, Compensation and Liability Act of 1980, and the Resource Conservation and Recovery Act of 1976 (RCRA). The purpose of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, often referred to as the “Superfund,” is to identify and clean up abandoned, contaminated sites, so that public health and welfare are not compromised. The RCRA provides for “cradle to grave” regulation of hazardous waste that are generated by operating entities.

Other federal laws include:

- Community Environmental Response Facilitation Act of 1992
- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Occupational Safety and Health Act
- Atomic Energy Act
- Toxic Substances Control Act
- Federal Insecticide, Fungicide, and Rodenticide Act

In addition to the acts listed above, EO 12088, Federal Compliance with Pollution Control Standards, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved.

California regulates hazardous materials, waste, and substances under the authority of the State Health and Safety Code. The State also is authorized by the federal government to implement RCRA. California law also addresses specific handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning of hazardous waste. The Porter-Cologne Act also restricts disposal of wastes and requires cleanup of wastes that are below hazardous waste concentrations but could impact ground and surface water quality. California regulations that address waste management and prevention and cleanup of contamination include Title 22, Division 4.5, of the Environmental Health Standards for the Management of Hazardous Waste, Title 23, Waters, and Title 27, Environmental Protection. Worker and public health and safety are key issues when addressing hazardous materials that may affect human health and the environment. Proper management and disposal of hazardous material would be vital if it is found, disturbed, or generated during project construction.

2.3.5.2 Affected Environment

The information in this section is summarized from the Initial Site Assessment (AECOM 2023g), which reflected a focused regulatory agency database records search and a review of reasonably ascertainable historical information sources (e.g., historical aerial photographs, fire insurance maps, historical topographic maps, and oil and gas maps) to evaluate whether previous land uses have used or stored hazardous materials within or adjacent to the project area. A visual survey also was performed from ROWs and other publicly accessible areas to document property conditions and activities.

Evaluating the entire project area and adjacent and surrounding areas over the course of its entire length was not feasible during the site visit and reconnaissance. The evaluation of the existing ROWs and adjacent and surrounding areas focused on areas where hazardous substances were identified to be likely and potentially handled. However, based on site observations and the data collected from the various historical and database sources, this particular site-related limiting condition is not expected to have a significant limitation to the ISA results.

Database Review

During the regulatory agency database review, 12 Environmental Database Report (EDR) listings were identified that were associated with the parcels determined as having a recognized environmental condition (REC) (partial ROW acquisition and temporary easement) by the project area and adjoining The Old Road or Rye Canyon Road. Table 2-36 shows the associated listings.

Table 2-36 Summary of Proposed Project EDR Listings

Facility Name and Address	Description	REC	(APN) Parcel Acquisitions
The Blue Moon Café (Environmental Database Report [EDR] ID H45) 28743 The Old Road	Reportable air emissions in 1990	No	(2826005007) Small partial right-of-way (ROW) acquisition in the southeast corner of parcel, adjacent to The Old Road
LA County Sanitation District-Valencia Water Reclamation Plan (EDR ID 84/O88-O112) 28185 The Old Road	Release of diesel in 1993 during removal of 10,000-gallon underground storage tank (UST); soil removal activities completed in 2009, closure certification issued in 2015	No	(2826006900) Not within an acquired parcel
Jack-in-the-Box #03390 (EDR ID O130-O131) 28144 The Old Road	Chemical storage facility; related to stormwater and industrial wastewater discharges at the site, compliance-related and not indicative of a release	No	(2826121003) Not within an acquired parcel
Moller Retail #6123/Ashdon Development/A Shell of a Place/The Old Road Shell (EDR ID O113-O129, 341) 28120 The Old Road	Gasoline station at this site, compliance-related and not indicative of a release	No	(2826121003) Not within an acquired parcel
Original Tommy's Burgers (EDR ID P132) 28116 The Old Road	Related to stormwater and industrial wastewater discharges at the site, compliance-related and not indicative of a release	No	(2826121005) Not within an acquired parcel
Del Taco #883 (EDR ID P134) 28082 The Old Road	Related to stormwater and industrial wastewater discharges at the site, compliance-related and not indicative of a release	No	(2826121004) Not within an acquired parcel

Facility Name and Address	Description	REC	(APN) Parcel Acquisitions
Valencia Chevron/Flyers #228/Speedway No. 1481/46178/Texaco Star Mart/Tesoro Refining & Marketing Company LLC Site #47300/Fleet Card Fuels/Arco #47300 (EDR ID S171-S195) 28070 The Old Road	Gasoline station since 1996; gasoline release discovered in 2011, groundwater monitoring conducted and case closed in 2018 under the Low-Threat UST Closure Policy; petroleum hydrocarbon impacts not detected in the groundwater monitoring well	No	(2826121001 and -002) Temporary easement. parking lot would be temporarily impacted along The Old Road
Jimmy Dean's Restaurant (EDR ID 204) 28018 The Old Road	Related to stormwater and industrial wastewater discharges at the site, compliance-related and not indicative of a release	No	(2826121006) Partial ROW acquisition and temporary easement; permanent and temporary impacts along Rye Canyon Road
Soapy Suds Car Wash/Brazil Granite & Marble Co. (EDR ID T198-T199) 28038 The Old Road	Related to stormwater and industrial wastewater discharges at the site, compliance-related and not indicative of a release	No	(2826121007) Small partial ROW acquisition in the southeast corner of parcel, adjacent to The Old Road
U.S. Healthworks (EDR IS U200-U203) 25733 Rye Canyon Road	No violations reported	No	(2866009014) Partial ROW acquisition and temporary easement; permanent and temporary impacts along Rye Canyon Road
Newhall Land & Farming Co./HR Textron Inc. Hydraulic Research/XMI Corp./Allied Signal Automotive/Applied Enviro Tech (EDR ID R135-H141) 25709 Rye Canyon Road	No violations reported; related to stormwater and industrial wastewater discharges at the site, compliance-related and not indicative of a release	No	(2866009014) same as above
Semco Instruments Inc. (EDR ID R170) 25700 Rye Canyon Road	No violations reported; related to stormwater and industrial wastewater discharges at the site, compliance-related and not indicative of a release	No	(2866008001) Partial ROW acquisition and temporary easement; permanent and temporary impacts along Rye Canyon Road

Based on the review, none of these EDR listings would represent a REC to the proposed project. A REC is defined by the American Society for Testing and Materials (ASTM) Standard as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) because of any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.” The term includes hazardous substances or petroleum products, even under conditions in compliance with the laws.

Twenty-four accidental spills/incidents were identified along The Old Road, as reported in the California Governor's Office of Emergency Services HazMat Spill Notification database. These incidents are not expected to have created a REC to the proposed project, based on one or more of the following: 1) the incident did not occur in the project area; 2) cleanup was completed; 3) type of material released; 4) quantity of material released; or 5) lack of listing in regulatory databases requiring remedial action, and therefore not considered to represent a REC to the proposed project.

Two plugged and abandoned oil/gas wells were identified in and adjacent to the project area, respectively. One of these wells is within the central portion of the project area, in the SB lanes of The Old Road near the intersection of The Old Road and the I-5 on/off-ramps (Phase 2 portion of the proposed project). This oil/gas well was identified on CalGEM's WellSTAR online

database as API No. 037-16533, Newhall Land & Farming Co. No. 75 well. The other well is north of the project area, in the paved parking lot of the Gateway Promenade Shopping Center, at 28656 to 28788 The Old Road. However, the oil/gas well in the SB lanes of The Old Road was not identified in a geophysical survey that was conducted in April 2023.

Project Site Visit

An aerially deposited lead (ADL) survey was conducted by Leighton Consulting, Inc. (Leighton) for the proposed project between March 27 and April 6, 2023. This survey assessed whether the soil would be suitable to remain on site or if excavation and disposal would be required during project construction, based on the lead concentrations identified in the soil. In addition, the laboratory results of sampling were used to determine how the material should be classified for handling and disposal with respect to lead. The classifications were non-hazardous, non-RCRA hazardous waste (i.e., State hazardous waste), and RCRA hazardous waste (i.e., federal hazardous waste).

Soil samples were collected in laboratory-supplied 8-ounce glass jars with Teflon-lined lids. At least 200 grams of soil were collected per sample. The sample containers were clearly marked with sample identification, depth of the sample, date and time of collection, selected analyses and methods, preservatives (if used), and the sampler's name. The soils that were encountered during this investigation generally were pale to dark brown, dry to moist silty sands, sandy silts, clayey sands, or poorly-graded sands with some gravel. In contrast with the rest of the soil borings that were sampled during this ADL survey, soil boring B108 contained lumber fragments and coarse gravel base material between 1 foot and 2 feet below ground surface. Groundwater was not encountered in any of the borings.

The soil samples were described and classified using the Unified Soil Classification System. No visible evidence of soil contamination (e.g., odor, staining) was encountered during the sampling. Total lead was detected in 38 of the 367 soil samples, at concentrations exceeding the Department of Toxic Substance Control standard limit of 80 milligrams/kilogram for residential settings (unrestricted use). However, statistical analysis of the total lead data set, including non-detections, indicated that the soils were non-hazardous/unrestricted. Overall, soils investigated during this ADL survey were not characterized as RCRA hazardous waste, with the exception of soil in the vicinity of borings B97 and B103. AMM HAZ-4 would be implemented for the excavation and transport of soils to an approved disposal facility. HAZ-4 would include a Lead Compliance Plan under LACPW Special Provisions and would be required during construction when handling lead-contaminated soils. The soil within the remainder of the Phase 2 project limits is considered nonhazardous/unrestricted or suitable for re-use on site.

The following non-ASTM environmental concerns were identified, which are considered Caltrans transportation project hazards:

- ADL may be present in unpaved areas along the project area, which if disturbed would need to be evaluated to protect worker safety. If excavated soils are to be transported from the project area, they would need to be sampled for classification.
- Asbestos-containing material (ACM) may be associated with structures in the project area, including bridges and pipelines.
- Lead-based paint still possibly is used in industrial settings (e.g., for street improvements). In addition, the railings, fencing, metal beams, and other exposed metal

elements associated with the bridges in the proposed project may contain lead-based paint.

- The existing yellow thermoplastic paint and pavement marking originally used for traffic striping may contain lead along The Old Road.
- Abandoned (former) UPRR tracks are in the vicinity of the Multi-Use Trail and the proposed extension to the Multi-Use Trail.
- Treated wood waste (TWW) in the project area could include utility poles, roadside wooden signposts, metal-beam guardrail posts, or former railroad lines.

2.3.5.3 Environmental Consequences

Alternative 1: No-Build Alternative

The No-Build Alternative would generate no earth-moving activities. This alternative would not affect potential hazardous material sites in the project area.

Alternative 2: Build Alternative

Construction

ADL from the historical use of leaded gasoline exists along roadways throughout California. Thus, the likely presence of soils with elevated concentrations of lead exists because of ADL on the State highway system ROWs within the limits of the project alternatives.

As discussed above, one oil well is considered to represent a REC to the proposed project. One plugged oil/gas well (API No. 037-16533, known as Newhall Land & Farming Co., No.75) is within the central portion of the project area, in the SB lanes of The Old Road and the I-5 on/off ramps. This well was advanced in 1962 by Humble Oil & Refining Company, to a total depth of 13,700 feet. This well was plugged and abandoned in 1968, in accordance with applicable Division of Oil, Gas, and Geothermal Resources regulations at that time. Humble Oil & Refining Company later was acquired by ExxonMobil Corporation. If this well is encountered during project construction, it would need to be re-abandoned in accordance with current CalGEM rules and regulations. In addition, because of the informal agreement between CalGEM and Caltrans, a gas mitigation plan would need to be obtained and submitted to CalGEM.

In addition, as noted in the Aerial Deposited Lead Survey (Leighton Consulting Inc. 2023) that was completed for the proposed project, no soils investigated during the survey were characterized as RCRA hazardous waste. Soluble lead concentrations were reported above the non-RCRA hazardous waste value of 5.0 milligrams/liter in two samples collected from the initial assessment at soil borings B97 and B103. The soluble lead concentrations that were reported from the analysis on all other soil samples were below the RCRA-hazardous waste value of 5 milligrams/liter.

Two areas are recommended for soil excavation and transport to an approved disposal facility. However, the soil within the remainder of the project limits is considered nonhazardous/unrestricted or suitable for re-use on site.

Operation

Project operation would not release hazardous materials. However, vehicles travelling on The Old Road would continue to generate pollutants from tire and brake wear, oil and grease leaks,

and exhaust emissions. The release of these pollutants would be similar to existing conditions; therefore, the proposed project would not result in any new adverse effects.

2.3.5.4 Avoidance, Minimization, and/or Mitigation Measures

The Build Alternative would avoid impacts on hazardous wastes or materials to the extent practicable while adhering to design and operational criteria to maintain a safe roadway. However, based on the findings and conclusions of the Initial Site Assessment, the following AMMs would be implemented under the Build Alternative:

HAZ-1: If the plugged oil/gas well within the central portion of the project area is disturbed during project construction, it will be re-abandoned in accordance with current CalGEM regulations. In addition, because of the informal agreement between CalGEM and LACPW's Environmental Programs Division, a gas mitigation plan will be obtained and submitted to CalGEM.

HAZ-2: Crude oil/liquid petroleum pipelines run along The Old Road in the project area. If the pipelines are exposed and/or relocated, impacts on the subsurface may be encountered. Impacts on the subsurface that are discovered from these pipelines and any repairs to the pipelines will be the responsibility of the pipeline owner.

HAZ-3: The proposed project includes upgrades to traffic signal equipment and relocation/installation of traffic pole standards and traffic signal equipment as necessary because of new lane configurations, which may generate universal wastes and electronic wastes (E-wastes). Universal wastes and E-wastes generated as part of the proposed project will be disposed appropriately, in accordance with applicable regulations.

HAZ-4: ADL may be present in the unpaved areas adjacent to roadways, which, if disturbed, will be evaluated to ensure worker safety. If excavated/excess soils are transported from the project area, they will be sampled and handled in accordance with applicable regulations to protect worker safety and for classification. The potential presence of ADL will be addressed during the Plan, Specifications, and Estimates phase and will be handled in accordance with LACPW Special Provisions. A Lead Compliance Plan under LACPW Special Provisions will be required during construction when handling lead-contaminated soils.

HAZ-5: The proposed project includes the replacement of two bridges (over Santa Clara River and the abandoned UPRR tracks). Demolition of the two existing bridges will be subject to the National Emissions Standards for Hazardous Air Pollutants regulations. The regulations require notification to the delegated air district before demolition of concrete structures, regardless of whether asbestos is detected. The regulations require that an ACM Survey be conducted, and that the survey report be part of the notification submittal to the regulatory agency. The ACM survey will be conducted by a Certified Asbestos Consultant (CAC), and samples will be collected from concrete, brown fibrous expansion joint fill material, and other materials that the CAC suspects to contain asbestos.

HAZ-6: Suspect lead-based paint associated with painted curbs, poles, protective bollards, and fire hydrants in the project area, including railings, fencing, metal beams, and other exposed metal elements associated with the bridges will be sampled and handled in accordance with applicable regulations to protect worker safety and for classification. The removal and testing of bridge paint and pavement

markings, including painted curbs, will be managed during construction under specific LACPW Special Provisions. A Lead Compliance Plan under LACPW Special Provisions will be required during construction when removing lead-based paint, thermoplastics, painted traffic stripes, and/or pavement markings.

HAZ-7: Thermoplastic paint and yellow-painted traffic stripes/pavement markings, which typically contain lead chromate, have been used for marking in the project area (roadway and curbs), and these markings will require special removal, handling, and disposal. The removal and testing of all thermoplastic paint and pavement markings will be managed during construction in accordance with LACPW Special Provisions.

HAZ-8: Utility relocations will be performed at several intersections because of widening of The Old Road and for bridge improvements. Reconstruction of drainage facilities and catch basins and construction of new drainage facilities and catch basins will be conducted, as needed. Dewatering activities will not be part of the utility relocations in the project area.

HAZ-9: If soil in the area of the abandoned UPRR railroad tracks and Multi-Use Trail extension is excavated and off-site disposal is necessary, the soil will be sampled and analyzed for the potential presence of petroleum hydrocarbons, volatile organic compounds (VOCs), metals, herbicides, and pesticides. During construction, soil excavations that are conducted on site will be monitored for visible soil staining and odor. Affected soil will be disposed off-site in accordance with applicable local, State, and federal regulatory guidelines.

HAZ-10: TWW (e.g., utility poles, roadside wooden signposts, metal-beam guardrail posts, former railroad ties) will be handled appropriately, in accordance with applicable regulations and may require special removal, handling, and disposal. All TWW will be managed during construction in accordance with LACPW Special Provisions if TWW is generated.

HAZ-11: When contractors are working in the project area and removing soil and/or groundwater, they will be trained to be aware of appropriate handling and disposal methods or options. Higher levels of potential contaminants may be present at some locations; therefore, material to be moved or removed may require individual or specific testing to verify that it is at levels below regulatory action limits.

HAZ-12: Construction of the bridge piles may encounter groundwater, based on the 1997 Seismic Hazard Report for the Newhall Quadrangle. Therefore, the slurry displacement method of construction will be used and will be specified in Section B of the bridge specifications. After groundwater is encountered, drilling slurry will be placed in the hole to an elevation of 10 feet above the groundwater. As drilling progresses, drilling slurry will be added to the hole to maintain the same elevation of 10 feet above the groundwater. The slurry displacement method will contain any debris with concrete barriers and plastic sheeting. Groundwater is not anticipated from the slurry displacement method of construction, and any debris will be placed into Baker tanks.

HAZ-13: Section 4216 of the California Government Code requires that any operator or excavator will call Underground Services Alert of California ("DigAlert") 2 working days before any planned excavation, by dialing 811. Delineation of the proposed excavation area will be mandatory. The area to be excavated will be marked with water-soluble or chalk-based white paint on paved surfaces, or with

other suitable markings such as flags or stakes on unpaved areas, before calling DigAlert.

HAZ-14: A site-specific Health and Safety Plan will be prepared, consistent with LACPW Special Provisions requirements. The Health and Safety Plan will include identification of key personnel; a summary of risk assessment for workers, the community, and the environment; an air monitoring plan; and an emergency response plan.

HAZ-15: As is the case for any project that proposes excavation, the potential exists for unknown hazardous contamination to be revealed during project construction. For any previously unknown hazardous wastes/materials encountered during construction, the procedures outlined in LACPW Special Provisions and Procedures will be followed and implemented during construction activities, as well as SCAQMD Rule 1166 and SCAQMD Rule 1466.

HAZ-16: During construction activities, all relevant BMPs will be implemented, including temporary construction site BMPs and the regulatory permit compliance component for the State's Construction General Permit for applicability of an SWPPP (based in part on the disturbed soil areas, shown on the phased plans) and compliance with the County's MS4 NPDES permit as well as adherence to the County's Construction Site BMP Manual and SWPPP preparation manual.

2.3.6 Air Quality

2.3.6.1 Regulatory Setting

The Federal Clean Air Act (FCAA), as amended, is the primary federal law that governs air quality, while the California Clean Air Act is its companion State law. These laws and related EPA and California Air Resources Board (CARB) regulations set standards for the concentration of pollutants in the air. At the federal level, these standards are called National Ambient Air Quality Standards (NAAQS). NAAQS and State Ambient Air Quality Standards have been established for six criteria pollutants that have been linked to potential health concerns: carbon monoxide (CO); nitrogen dioxide (NO₂); ozone (O₃); particulate matter (PM), which is broken down for regulatory purposes into particles of 10 micrometers or smaller (PM₁₀) and particles of 2.5 micrometers and smaller (PM_{2.5}); lead (Pb); and sulfur dioxide (SO₂). In addition, State standards exist for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. The NAAQS and State standards are set at levels that protect public health with a margin of safety and are subject to periodic review and revision. Both State and federal regulations also cover toxic air contaminants (air toxics); some criteria pollutants are also air toxics or may include certain air toxics in their general definitions.

Federal air quality standards and regulations provide the basis for project-level air quality analysis under NEPA. In addition to this environmental analysis, a parallel "Conformity" requirement would apply under the FCAA.

Conformity

The conformity requirement is based on Section 176(c) of the FCAA, which prohibits DOT and other federal agencies from funding, authorizing, or approving plans, programs, or projects that do not conform to the State Implementation Plan (SIP) for attaining the NAAQS. "Transportation Conformity" applies to highway and transit projects and takes place on two levels: the regional

(or planning and programming) level and the project level. The proposed project must conform at both levels to be approved.

Conformity requirements apply only in nonattainment and “maintenance” (former nonattainment) areas for the NAAQS, and only for the specific NAAQS that are or were violated. U.S. EPA regulations under 40 CFR 93 govern the conformity process. Conformity requirements do not apply in unclassifiable/attainment areas for NAAQS and do not apply at all for State standards, regardless of the status of the area.

Regional conformity is concerned with how well the regional transportation system supports plans for attaining the NAAQS for CO, NO₂, O₃, PM₁₀ and PM_{2.5}, and in some areas (although not in California) SO₂. California has nonattainment or maintenance areas for all of these transportation-related “criteria pollutants” except SO₂ and also has a nonattainment area for Pb. However, Pb currently is not required by the FCAA to be covered in transportation conformity analysis. Regional conformity is based on emission analysis of RTPs and FTIPs that include all transportation projects planned for a region over a period of at least 20 years (for the RTP) and 4 years (for the FTIP). RTP and FTIP conformity uses travel demand and emission models to determine whether or not the implementation of those projects would conform to emission budgets or other tests at various analysis years, showing that the requirements of the FCAA and the SIP would be met. If the conformity analysis is successful, the MPO, FHWA, and Federal Transit Administration (FTA) make the determinations that the RTP and FTIP are in conformity with the SIP for achieving the goals of the FCAA. Otherwise, the projects in the RTP and/or FTIP must be modified until conformity is attained. If the design concept and scope and the “open-to-traffic” schedule of a proposed transportation project are the same as described in the RTP and FTIP, then that project meets regional conformity requirements for project-level analysis.

Project-level conformity is achieved by demonstrating that a project comes from a conforming RTP and FTIP; the project has a design concept and scope³ that has not changed substantially from those in the RTP and FTIP; project analyses have used the latest planning assumptions and EPA-approved emissions models; and in PM areas, the project complies with any control measures in the SIP. Furthermore, additional analyses (known as hot-spot analyses) may be required for projects in CO and PM nonattainment or maintenance areas to examine local air quality impacts.

Mobile Source Air Toxics

Controlling air toxic emissions became a national priority with the passage of the Clean Air Act Amendments of 1990, whereby Congress mandated that EPA regulate 188 air toxics, also known as hazardous air pollutants. EPA has assessed this expansive list in its rule on the Control of Hazardous Air Pollutants from Mobile Sources (Federal Register, Vol. 72, No. 37, page 8430, February 26, 2007), and identified a group of 93 compounds emitted from mobile sources that are part of EPA’s Integrated Risk Information System (available online at <https://www.epa.gov/iris>). In addition, EPA identified nine compounds with significant contributions from mobile sources that are among the national and regional-scale cancer risk drivers or contributors and non-hazard contributors from the 2011 National Air Toxics Assessment (available online at <https://www.epa.gov/national-air-toxics-assessment>). These are 1,3-butadiene, acetaldehyde, acrolein, benzene, diesel particulate matter (diesel PM),

³ “Design concept” refers to the type of facility that is proposed, such as a freeway or arterial highway. “Design scope” refers to those aspects of a project that would clearly affect capacity, and thus any regional emissions analysis, such as the number of lanes and the length of the project.

ethylbenzene, formaldehyde, naphthalene, and polycyclic organic matter. Although FHWA considers these the priority mobile source air toxics (MSATs), the list is subject to change and may be adjusted in consideration of future EPA rules.

The 2007 EPA rule mentioned above requires controls that will decrease MSAT emissions dramatically through cleaner fuels and cleaner engines. According to an FHWA analysis using EPA's MOVES3 model, even if vehicle activity (VMT) increases by 31% from 2020 to 2060 as forecasted, a combined reduction of 76% in the total annual emission rate for the priority MSATs is projected for the same period, as shown in Figure 2-1 of the Air Quality Report. Diesel PM is the dominant component of MSAT emissions, making up 36 to 56% of all priority MSAT pollutants by mass, depending on calendar year.

2.3.6.2 Affected Environment

Information in this section is summarized from the Air Quality Report (TAHA 2023).

Climate Meteorology, and Topography

The project area is in the unincorporated Stevenson Ranch area in LA County, in proximity to the city of Santa Clarita. This area is within the South Coast Air Basin (SCAB), which includes Orange County and portions of LA, Riverside, and San Bernardino counties. Air quality regulations in the SCAB are administered by the SCAQMD.

The project area climate generally is Mediterranean in character, with cool winters (average 55.7 degrees Fahrenheit in January) and warm, dry summers (average 77.2 degrees Fahrenheit in July). Temperature inversions are common, affecting local pollutant concentrations in winter and enhancing O₃ formation in summer. Mountains averaging 4,000 to 6,000 feet in altitude tend to trap pollutants in the region by limiting air flow. The annual average rainfall is 10.6 inches (at Van Nuys Airport), mainly falling during the winter months.

Criteria Pollutants and Attainment Status

Table 2-1 in the Air Quality Report (TAHA 2023) lists the State and federal attainment status for all regulated pollutants for the LA County portion of the SCAB, and Table 2-2 in the Air Quality Report (TAHA 2023) summarizes the sources and health effects of the six criteria pollutants and pollutants that are regulated in California. As shown below, the SCAB portion of LA County is designated as extreme nonattainment of the federal 8-hour average O₃ standard and moderate nonattainment of the 24-hour average PM_{2.5} standard. The SCAB portion of LA County has been in maintenance of the federal 24-hour average PM₁₀ standard since 2013, and has been in maintenance of the federal CO standard since 2007. NO₂ concentrations have been consistently below the NAAQS since the maintenance designation in 1998. The SCAB portion of LA County is in attainment of the federal standard for SO₂ and is in partial nonattainment of the Pb NAAQS.

At the State level, the SCAB portion of LA County and the project area are designated as nonattainment of the California Ambient Air Quality Standards for O₃, PM₁₀, and PM_{2.5}, and are in attainment of all other State air quality standards.

Table 2-2 in the Air Quality Report (TAHA 2023) lists air quality trends in data collected at Santa Clarita Monitoring Station (22224 Placerita Canyon) for the past 5 years. The Santa Clarita Monitoring Station is the closest monitoring site to the project area and provides data that are

most representative of air quality conditions in the project vicinity. As shown in Table 2-39, concentrations of O₃ exceeded the corresponding air quality standards numerous times in each year during the 5-year monitoring period, between 2017 and 2021. Concentrations of PM₁₀ and PM_{2.5} generally remained below the NAAQS, with one exception for PM_{2.5} in 2020. The recorded concentrations in excess of the NAAQS are indicative of the ongoing air quality challenges facing the region and are demonstrative of the designated nonattainment statuses. Table 3-2 in the Air Quality Report (TAHA 2023) summarizes the current status of approved SIPs for the SCAB portion of LA County. The region has been in maintenance of NO₂ since 1998, CO since 2007, and PM₁₀ since 2013. The 2016 Air Quality Management Plan (AQMP) outlined an attainment deadline of 2021 for the 2012 PM_{2.5} standard; however, U.S. EPA extended the deadline for “serious” nonattainment areas from 2021 to 2025. The 2022 AQMP indicates an attainment deadline of 2037 for the 2015 8-hour O₃ standard.

Mobile Source Air Toxics

Sources of MSAT emissions in the project area primarily include mobile source emissions from vehicles traversing The Old Road, I-5, SR-126, and Magic Mountain Parkway. No MSAT monitoring sites were identified in the project vicinity. The Santa Clarita monitoring station does not record MSAT concentrations. The nearest monitoring station is in the city of Simi Valley, approximately 5 miles southwest of the project area. MSAT concentrations in the city of Simi Valley would not be representative of the project area because of differences in traffic conditions, climate, meteorology, and topography.

The Build Alternative is not categorically excluded by 23 CFR 771.117(c), FCAA pursuant to 40 CFR 93.126, and therefore a discussion of MSAT emissions is warranted. FHWA released updated guidance in January 2023 (FHWA 2023) for determining when and how to address MSAT impacts in the NEPA process for transportation projects. FHWA identified three levels of analysis:

- No analysis for projects with no potential for meaningful MSAT effects
- Qualitative analysis for projects with low potential MSAT effects
- Quantitative analysis to differentiate alternatives for projects with higher potential MSAT effects

Projects with no meaningful potential MSAT effects or exempt projects include:

- Projects qualifying as a categorical exclusion under 23 CFR 771.117
- Projects exempt under the Clean Air Act conformity rule under 40 CFR 93.126
- Other projects with no meaningful impacts on traffic volumes or vehicle mix

For projects that are categorically excluded under 23 CFR 771.117 or are exempt from conformity requirements under the Clean Air Act pursuant to 40 CFR 93.126, no analysis or discussion of MSAT is necessary. Documentation sufficient to demonstrate that the project qualifies as a categorical exclusion and/or exempt project is sufficient. For other projects with no or negligible traffic impacts, regardless of the class of NEPA environmental document, no MSAT analysis is recommended. However, the project record needs to document in the EA or Environmental Impact Statement (EIS) the basis for the determination of no meaningful potential impacts, with a brief description of the factors considered. Example language, which needs to

be modified to correspond with local and project-specific circumstances, is provided in Appendix A of the FHWA Updated Interim Guidance on MSAT Analysis in NEPA documents.

Projects that have low potential for MSAT effects are those that serve to improve highway, transit, or freight operations or movement without adding substantial new capacity or creating a facility that is likely to substantially increase emissions. The large majority of projects fall into this category. The types of projects included in this category are those that serve to improve operations of highway, transit, or freight without adding substantial new capacity or without creating a facility that is likely to meaningfully increase MSAT emissions. This category covers a broad range of projects.

Projects with higher potential MSAT effects fall into a category that includes projects that have the potential for meaningful differences in MSAT emissions among project alternatives, such as those that:

- create or significantly alter a major intermodal freight facility that has the potential to concentrate high levels of diesel PM in a single location, involving a significant number of diesel vehicles for new projects, or accommodating with a significant increase in the number of diesel vehicles for expansion projects; or
- Create new capacity or add significant capacity to urban highways, such as interstates, urban arterials, or urban collector-distributor routes with traffic volumes where the AADT is projected to be in the range of 140,000 to 150,000 or greater by the design year; and
- Are proposed to be in the proximity of populated areas.

Projects falling within this category should be more rigorously assessed for impacts. If a project falls within this category, the Office of Natural Environment and the Office of Project Development and Environmental Review at FHWA Headquarters should be contacted for assistance in developing a specific approach for assessing impacts. This approach would include a quantitative analysis to forecast local-specific emission trends of the priority MSAT for each alternative, to use as a basis of comparison. This analysis also may address the potential for cumulative impacts, where appropriate, based on local conditions. How and when cumulative impacts should be considered would be addressed as part of the assistance outlined above.

Based on the CARB Land Use Handbook (Cal/EPA and CARB 2005), projects in California generally are advised to perform an emissions analysis to address CEQA requirements if any of the following criteria are met:

- The project changes capacity or realigns a freeway or urban road with an AADT of 100,000 or more and sensitive land uses are within 500 feet of the roadway.
- The project changes capacity or re-aligns a rural road (non-freeway) with an AADT of 50,000 or more and sensitive land uses are within 500 feet of the roadway.

The maximum AADT on roadways in the study area was forecasted to be 45,368 vehicles in 2028 and 60,657 vehicles in 2048, with implementation of the Build Alternative. The maximum AADT would be well below the 140,000 AADT benchmark for a quantitative analysis in the horizon year of 2048 in the project area.

A qualitative analysis was performed and was derived in part from the study, *A Methodology for Evaluating Mobile Source Air Toxic Emissions among Transportation Project Alternatives* (FHWA), which provided a basis for identifying and comparing the potential differences among MSAT emissions from the Build and No-Build Alternatives.

Sensitive Receptors and Community Health Risks

Under the FCAA, ambient air quality must meet the standards for criteria air pollutants in all locations generally accessible to the public. However, some land uses are considered more sensitive to air pollution than others. Sensitive receptors include residential areas, schools, hospitals, other health care facilities, daycare facilities, parks, and playgrounds. No sensitive receptors are within 500 feet of the project limits. Nearby land uses include commercial properties, hotels, restaurants, gas stations, the Valencia Water Reclamation Plant, and an office park.

2.3.6.3 Environmental Consequences

Alternative 1: No-Build Alternative

This alternative would not result in the construction of any of the proposed improvements, and therefore it would not result in temporary, construction-related impacts or substantial long-term effects associated with air quality. However, deficiencies related to air quality in traffic demand and roadway operations, such as congestion and inconsistency with jurisdictional plans and policies, would remain and continue to worsen under this alternative because regional roadway capacity would not increase and improve safety to accommodate expected future traffic growth projections.

Alternative 2: Build Alternative

Short-Term Effects (Construction Emissions)

The proposed project would result in short-term degradation of air quality during construction, from generating airborne dust related to clearing, grading, hauling, demolition, and excavation for roadway improvements. Emissions from construction equipment powered by gasoline and diesel engines also are anticipated and would include CO, NO_x, VOCs, directly emitted PM₁₀ and PM_{2.5}, and toxic air contaminants such as diesel PM. Construction activities are expected to increase traffic congestion in the project vicinity, resulting in increases in emissions from traffic during the delays. These emissions would be temporary and limited to the immediate project vicinity.

Construction-related emissions for the Build Alternative are shown in Table 2-37. The emissions represent the peak daily construction emissions that would be generated by each alternative, considering combined emissions from overlapping construction activities associated with The Old Road improvements and the bridge replacements.

FHWA's Conformity Determination was received January 4, 2022 and can be found in Chapter 4.

Table 2-37: Construction Emissions for the Build Alternative

Phase/Activity	PM ₁₀ (lb/day)	PM _{2.5} (lb/day)	CO (lb/day)	NO _x (lb/day)	CO ₂ (tons/day)
<i>2024 Construction Activity Emissions</i>					
West Bridge Replacement – Site Prep	11.4	3.2	28.0	33.2	5.0
The Old Road (NB) – Clearing/Grubbing	21.3	5.3	26.0	28.3	3.1
The Old Road (NB) – Excavation/Grading	22.2	5.7	35.3	56.7	10.2
<i>2025 Construction Activity Emissions</i>					
The Old Road (NB) – Excavation/Grading	22.2	5.7	35.3	56.7	10.2
The Old Road (NB) – Utilities/Sub-Grade	21.0	5.0	24.3	21.6	3.2
<i>2026 Construction Activity Emissions</i>					
The Old Road (NB) – Utilities/Sub-Grade	21.0	5.0	24.3	21.6	3.2
The Old Road (NB) – Paving/Restoration	1.1	0.8	24.4	25.2	4.7
West Bridge Replacement – Foundations	11.0	2.9	24.8	21.4	3.3
West Bridge Replacement – Bridge Deck	10.9	2.8	27.4	20.4	3.1
The Old Road (SB) – Clearing/Grubbing	21.2	5.2	25.2	24.8	3.1
<i>2027 Construction Activity Emissions</i>					
West Bridge Replacement – Bridge Deck	10.9	2.8	27.4	20.4	3.1
The Old Road (SB) – Clearing/Grubbing	21.2	5.2	25.2	24.8	3.1
The Old Road (SB) – Excavation/Grading	22.1	5.6	34.3	54.0	10.0
East Bridge Replacement – Site Prep	11.0	2.9	24.5	22.2	3.4
East Bridge Replacement – Foundations	11.0	2.9	29.1	21.8	3.2
The Old Road (SB) – Utilities/Sub-Grade	21.0	5.0	23.9	21.6	3.2
<i>2028 Construction Activity Emissions</i>					
The Old Road (SB) – Utilities/Sub-Grade	21.0	5.0	23.9	21.6	3.2
East Bridge Replacement – Bridge Deck	10.9	2.8	27.1	20.4	3.1
The Old Road (SB) – Paving/Restoration	1.1	0.8	24.1	25.1	4.6
<i>Emissions Analysis</i>					
2024 Maximum Daily Emissions (lb/day)	32.7	8.5	54.0	61.5	8.1
2025 Maximum Daily Emissions (lb/day)	22.2	5.7	35.3	56.7	10.2
2026 Maximum Daily Emissions (lb/day)	32.1	8.0	52.6	46.6	8.0
2027 Maximum Daily Emissions (lb/day)	33.1	8.5	63.4	76.2	13.4
2028 Maximum Daily Emissions (lb/day)	31.9	7.8	51.2	45.5	7.7
All Maximum Daily Emissions (lb/day)	33.1	8.5	63.4	76.2	13.4
Total Build Alternative Emissions (tons)	17.4	4.5	32.9	35.6	11,797.3
Annual Average Emissions (tons)	3.9	1.0	7.3	7.9	2,621.6

Notes:

CO = carbon monoxide; CO₂ = carbon dioxide; lb = pound(s); NB = northbound; NO_x = nitrogen oxides;

PM₁₀ = particles of 10 micrometers or smaller; PM_{2.5} = particles of 2.5 micrometers and smaller; SB = southbound

Source: Air Quality Report, TAHA 2023

Site preparation and roadway construction would involve clearing, cut-and-fill activities, grading, removing or improving existing roadways, and paving roadway surfaces. During construction, short-term degradation of air quality is expected from the release of particulate emissions (airborne dust) that would be generated by excavation, grading, and hauling.

Long-Term Effects (Operational Emissions)

Table 2-38 shows that the Build Alternative would result in lower criteria pollutant (NO_x, CO, and ROG/VOC) emissions than the No-Build Alternative and existing conditions because of improvements in vehicle delay and turnover of the regional vehicle fleet. Slight increases in PM₁₀ and PM_{2.5} emissions are attributed to fugitive dust associated with brake wear, tire wear, and resuspended road dust, which combined constitute over 90% of PM emissions from vehicle travel on roadways.

For project-level analysis, an NO₂ assessment protocol is not available, and emissions are best assessed as NO_x. Table 2-38 shows that the Build Alternative would result in less NO_x

emissions than the No-Build Alternative and existing conditions because of improvements in vehicle delay. No minimization measures have been identified as necessary to reduce long-term emissions.

A qualitative analysis was performed and was derived in part from the study, conducted by the FHWA entitled, "A Methodology for Evaluating Mobile Source Air Toxic Emissions among Transportation Project Alternatives," which provided a basis for identifying and comparing the potential differences among MSAT emissions from the Build and No-Build Alternatives.

For the Build Alternative, the amount of MSATs emitted would be proportional to the VMT and total vehicle delay, assuming that other variables such as fleet mix would be the same for each alternative. The Build Alternative would improve congestion throughout the project corridor, as shown by the increases in forecasted average speeds along The Old Road. In addition, the Build Alternative would reduce congestion and corresponding vehicle delays at study area intersections, thereby reducing MSAT emissions associated with vehicle idling. Furthermore, emissions likely would be lower than present levels in the design year because of EPA's national control programs that are projected to reduce annual MSAT emissions by 76% between 2020 and 2060 (FHWA 2023). Local conditions may differ from these national projections in terms of fleet mix and turnover, VMT growth rates, and local control measures. However, the magnitude of the EPA-projected reductions is so great (even after accounting for VMT growth) that MSAT emissions in the study area are likely to be lower in the future in nearly all cases.

It should be noted, however, that the proposed project would generate minimal air quality impacts for FCAA criteria pollutants and would not be linked to any special MSAT issues. Thus, the proposed project would not result in changes in traffic volumes, vehicle mix, basic project location, or any other factor that would cause an increase in MSAT impacts based on VMT, vehicle mix, and speed. In addition, no sensitive receptors are within 500 feet of the Build Alternative.

Current scientific techniques, tools, and data are not sufficient to accurately estimate human health impacts from transportation projects in a way that is useful to decision-makers. A discussion of incomplete or unavailable information is provided under Title 40, Section 1502.21 of the CFR, as follows:

Sec. 1502.22 Incomplete or Unavailable Information

- (a) When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall make clear that such information is lacking.
- (b) If the incomplete but available information relevant to reasonably foreseeable significant adverse impacts is essential to a reasoned choice among alternatives and the overall costs of obtaining it are not unreasonable, the agency shall include the information in the environmental impact statement.
- (c) If the information relevant to reasonably foreseeable significant adverse impacts cannot be obtained because the overall costs of obtaining it are unreasonable or the means to obtain it are not known, the agency shall include within the environmental impact statement:

1. a statement that such information is incomplete or unavailable;
2. a statement of the relevance of the incomplete or unavailable information to evaluating reasonably foreseeable significant adverse impacts on the human environment;
3. a summary of existing credible scientific evidence that is relevant to evaluating the reasonably foreseeable significant adverse impacts on the human environment; and
4. the agency's evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. For the purposes of this section, "reasonably foreseeable" includes impacts that have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason.

Incomplete or Unavailable Information for Project Specific MSAT Health Impacts Analysis

In FHWA's view, information is incomplete or unavailable to credibly predict the project-specific health impacts because of changes in mobile source air toxic (MSAT) emissions associated with a proposed set of highway alternatives. The outcome of such an assessment, adverse or not, would be influenced more by the uncertainty introduced into the process through assumption and speculation rather than any genuine insight into the actual health impacts directly attributable to MSAT exposure associated with a proposed action.

The U.S. Environmental Protection Agency (EPA) is responsible for protecting the public health and welfare from any known or anticipated effect of an air pollutant. They are the lead authority for administering the Clean Air Act and its amendments and have specific statutory obligations with respect to hazardous air pollutants and MSAT. The EPA is in the continual process of assessing human health effects, exposures, and risks posed by air pollutants. They maintain the Integrated Risk Information System (IRIS), which is "a compilation of electronic reports on specific substances found in the environment and their potential to cause human health effects" (EPA, <https://www.epa.gov/iris/>). Each report contains assessments of non-cancerous and cancerous effects for individual compounds and quantitative estimates of risk levels from lifetime oral and inhalation exposures with uncertainty spanning perhaps an order of magnitude.

Other organizations are also active in the research and analyses of the human health effects of MSAT, including the Health Effects Institute (HEI). A number of HEI studies are summarized in Appendix D of FHWA's Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents. Among the adverse health effects linked to MSAT compounds at high exposures are: cancer in humans in occupational settings; cancer in animals; and irritation to the respiratory tract, including the exacerbation of asthma. Less obvious is the adverse human health effects of MSAT compounds at current environmental concentrations (HEI Special Report 16,

<https://www.healtheffects.org/publication/mobile-source-air-toxics-critical-reviewliterature-exposure-and-health-effects>) or in the future as vehicle emissions substantially decrease.

The methodologies for forecasting health impacts include emissions modeling; dispersion modeling; exposure modeling; and then final determination of health impacts – each step in the process building on the model predictions obtained in the previous step. All are encumbered by technical shortcomings or uncertain science that prevents a more complete differentiation of the MSAT health impacts among a set of project alternatives. These difficulties are magnified for lifetime (i.e., 70 year) assessments, particularly because unsupportable assumptions would have to be made regarding changes in travel patterns and vehicle technology (which affects emissions rates) over that time frame, since such information is unavailable.

It is particularly difficult to reliably forecast 70-year lifetime MSAT concentrations and exposure near roadways; to determine the portion of time that people are actually exposed at a specific location; and to establish the extent attributable to a proposed action, especially given that some of the information needed is unavailable. There are considerable uncertainties associated with the existing estimates of toxicity of the various MSAT, because of factors such as low-dose extrapolation and translation of occupational exposure data to the general population, a concern expressed by HEI (Special Report 16, <https://www.healtheffects.org/publication/mobile-source-air-toxicscritical-review-literature-exposure-and-health-effects>). As a result, there is no national consensus on air dose-response values assumed to protect the public health and welfare for MSAT compounds, and in particular for diesel PM. The EPA states that with respect to diesel engine exhaust, “[t]he absence of adequate data to develop a sufficiently confident dose-response relationship from the epidemiologic studies has prevented the estimation of inhalation carcinogenic risk.” (EPA IRIS database, Diesel Engine Exhaust, Section II.C. https://iris.epa.gov/static/pdfs/0642_summary.pdf).

There is also the lack of a national consensus on an acceptable level of risk. The current context is the process used by the EPA as provided by the Clean Air Act to determine whether more stringent controls are required in order to provide an ample margin of safety to protect public health or to prevent an adverse environmental effect for industrial sources subject to the maximum achievable control technology standards, such as benzene emissions from refineries. The decision framework is a two-step process. The first step requires EPA to determine an “acceptable” level of risk due to emissions from a source, which is generally no greater than approximately 100 in a million. Additional factors are considered in the second step, the goal of which is to maximize the number of people with risks less than 1 in a million due to emissions from a source. The results of this statutory two-step process do not guarantee that cancer risks from exposure to air toxics are less than 1 in a million; in some cases, the residual risk determination could result in maximum individual cancer risks that are as high as approximately 100 in a million. In a June 2008 decision, the U.S. Court of Appeals for the District of Columbia Circuit upheld EPA’s approach to addressing risk in its two-step decision framework. Information is incomplete or unavailable to establish that even the largest of highway projects would result in levels of risk

greater than deemed acceptable.

([https://www.cadc.uscourts.gov/internet/opinions.nsf/284E23FFE079CD59852578000050C9DA/\\$file/07-1053-1120274.pdf](https://www.cadc.uscourts.gov/internet/opinions.nsf/284E23FFE079CD59852578000050C9DA/$file/07-1053-1120274.pdf)).

Because of the limitations in the methodologies for forecasting health impacts described, any predicted difference in health impacts between alternatives is likely to be much smaller than the uncertainties associated with predicting the impacts. Consequently, the results of such assessments would not be useful to decision makers, who would need to weigh this information against project benefits, such as reducing traffic congestion, accident rates, and fatalities plus improved access for emergency response, that are better suited for quantitative analysis.

As such, this proposed project will not result in changes in traffic volumes, vehicle mix, basic project location, or any other factor that would cause an increase in MSAT impacts based on VMT, vehicle mix, and speed. In addition, no sensitive receptors are located within 500 feet of the Build Alternative.

Cumulative Impact Analysis

A cumulative impact analysis is conducted based on a summary of projections of future development and impacts contained in an adopted general planning or related planning document, or in a previous environmental document that has been certified. The proposed project is included in the SCAG Connect SoCal. The associated Air Quality Conformity Analysis verifies that Connect SoCal and the 2023 FTIP conform with the latest U.S. EPA transportation conformity regulations and the Conformity SIP. Therefore, no potential would exist for the proposed project to interfere with air quality plans that are designed to reduce cumulative air quality impacts in the project region. In addition, O₃, secondary PM₁₀, and secondary PM_{2.5} normally are regional issues, because they are formed by photochemical and chemical reactions over time in the atmosphere. Formation of O₃ and secondary PM are a function of ROG/VOC and NO_x emissions. As shown in Table 2-38, the Build Alternative would result in lower ROG/VOC and NO_x emissions than the No-Build Alternative.

Table 2-38: Summary of Comparative Emissions Analysis.

Scenario/Analysis Year	NO _x (lb/day)	CO (lb/day)	PM ₁₀ (lb/day)	PM _{2.5} (lb/day)	ROG/VOC (lb/day)
Baseline (Existing Conditions) 2022	11.5	117.9	6.8	1.5	2.5
No-Build 2028	7.1	92.9	7.4	1.6	1.7
Build Alternative 2028	6.7	88.5	7.4	1.6	1.5
No-Build 2048	6.1	95.3	10.0	2.1	1.8
Build Alternative 2048	4.4	79.8	9.9	2.1	1.1

Notes:

CO = carbon monoxide; lb = pound(s); NO_x = nitrogen oxides; PM₁₀ = particles of 10 micrometers or smaller;

PM_{2.5} = particles of 2.5 micrometers and smaller; ROG/VOC = reactive organic gas/volatile organic gas

Source: TAHA 2023

Transportation Conformity

The proposed project is listed in the 2020–2045 financially constrained RTP/SCS, which was determined to satisfy transportation conformity requirements by FHWA and FTA on June 5,

2020. The Build Alternative also is listed accurately in the 2023 FTIP and 2023 FTIP amendment documents under FTIP ID LAF3136, which was determined to satisfy transportation conformity requirements by FHWA and FTA on December 16, 2022. The design concept and scope of the proposed project is consistent with the project description in the 2020–2045 RTP 2023 FTIP Amendment 23-37.

2.3.6.4 Avoidance, Minimization, and/or Mitigation Measures

The Build Alternative would result in less pollutant emissions than the No-Build Alternative because of improvements in vehicle delay. No minimization measures have been identified as necessary to reduce long-term emissions. Implementation of the following measures, some of which also may be required for other purposes (e.g., stormwater pollution control), would reduce air quality impacts resulting from construction activities:

AQ-1: Construction Emissions. Site preparation and roadway construction will include clearing, cut-and-fill activities, grading, removing or improving existing roadways, and paving roadway surfaces. During construction, short-term degradation of air quality will occur from the release of particulate emissions (airborne dust), generated by excavation, grading, hauling, and other activities related to construction. Implementation of the following avoidance, minimization, and/or mitigation measures will minimize construction emissions:

- The construction contractor will comply with LACPW Special Provisions. Section 14-9-02 specifically will require compliance by the contractor with all applicable laws and regulations related to air quality, including the Air Pollution Control District and Air Quality Management District regulations and local ordinances.
- Construction equipment and vehicles will be properly tuned and maintained. All construction equipment will use low-sulfur fuel, as required under Title 17, Section 93114 of the CCR.
- The construction contractor will comply with SCAQMD rules, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities).
- Diesel-powered off-road equipment will limit idling in accordance with the CARB's Regulation for In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 and approved amendments).
- Diesel-powered on-road vehicles and trucks will limit idling in accordance with the CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (13 CCR 2485).

Climate Change

Neither the EPA nor the FHWA has issued explicit guidance or methods to conduct project-level GHG analysis. FHWA emphasizes concepts of resilience and sustainability in highway planning, project development, design, operations, and maintenance. Because there have been requirements set forth in California legislation and EOs on climate change, the issue is addressed in the CEQA chapter of this document. The CEQA analysis may be used to inform the NEPA determination for the proposed project.

2.3.7 Noise

2.3.7.1 Regulatory Setting

The NEPA of 1969 and CEQA provide the broad basis for analyzing and abating highway traffic noise effects. The intent of these laws is to promote the general welfare and foster a healthy environment. The requirements for noise analysis and consideration of noise abatement and/or mitigation, however, differ between NEPA and CEQA.

California Environmental Quality Act

CEQA requires a strictly baseline versus build analysis to assess whether a project would have a noise impact. If a project is determined to have a significant noise impact under CEQA, then CEQA dictates that mitigation be incorporated into the project, unless the mitigation is not feasible. The rest of this section focuses on the NEPA/Title 23 Part 772 of the CFR noise analysis. Chapter 3 presents further information on noise analysis under CEQA.

National Environmental Policy Act

For highway transportation projects with FHWA involvement (and Caltrans, as assigned), the Federal-Aid Highway Act of 1970 and its implementing regulations (23 CFR 772) govern the analysis and abatement of traffic noise impacts. The regulations require that potential noise impacts in areas of frequent human use be identified during the planning and design of a highway project. The regulations include noise abatement criteria (NAC) that are used to determine when a noise impact would occur. The NAC differ, depending on the type of land use under analysis. For example, the NAC for residences (67 A-weighted decibels [dBA]) is lower than the NAC for commercial areas (72 dBA). Table 2-39 lists the NAC for use in the NEPA/23 CFR 772 analysis.

Table 2-39: Noise Abatement Criteria

Activity Category	NAC, Hourly A-Weighted Noise Level, Leq(h)	Description of Activity Category
A	57 (exterior)	Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose
B1	67 (exterior)	Residential
C ¹	67 (exterior)	Active sport areas, amphitheaters, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings
D	52 (interior)	Auditoriums, day care centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, schools, and television studios
E	72 (exterior)	Hotels, motels, offices, restaurants/bars, and other developed lands, properties, or activities not included in A–D or F
F	No NAC- reporting only	Agriculture, airports, bus yards, emergency services, industrial, logging, maintenance facilities, manufacturing, mining, rail yards, retail facilities, shipyards, utilities (water resources, water treatment, electrical, etc.), and warehousing
G	No NAC - reporting only	Undeveloped lands that are not permitted

Notes:

NAC = Noise Abatement Criteria

1. Includes undeveloped lands permitted for this activity category.

Figure 11 shows the noise levels of common activities, to allow a comparison of the actual and predicted highway noise levels that are discussed in this section.

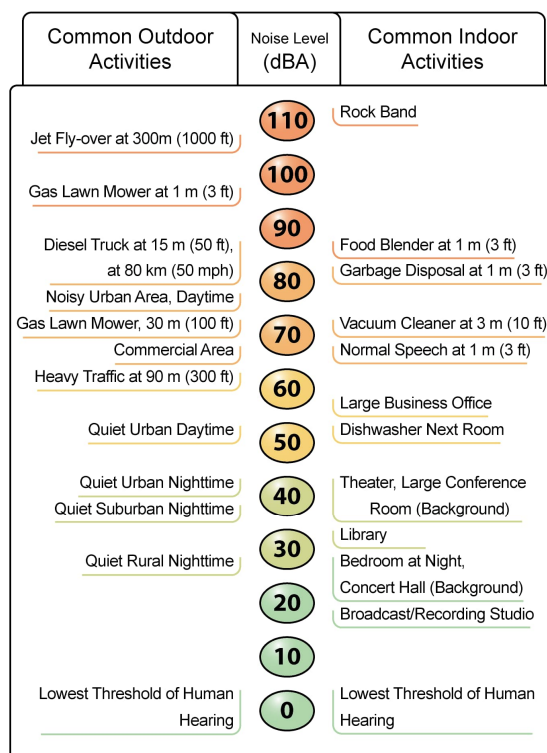


Figure 11: Noise Levels of Common Activities

If it is determined that the project would have potential noise impacts, then potential abatement measures must be considered. Noise abatement measures that are determined to be reasonable and feasible at the time of final design are to be incorporated in the project plans and specifications. This section discusses noise abatement measures that expected to be incorporated in the proposed project.

Caltrans's Traffic Noise Analysis Protocol (Caltrans 2020a) sets forth the criteria for determining when an abatement measure would be reasonable and feasible. Feasibility of noise abatement is basically an engineering concern. Noise abatement must be predicted to reduce noise by at least 5 decibels (dB) at an impacted receptor to be considered feasible from an acoustical perspective. It also must be possible to design and construct the noise abatement measure for it to be considered feasible. Factors that affect the design and constructability of noise abatement include, but are not limited to, safety, barrier height, topography, drainage, access requirements for driveways, presence of local cross streets, underground utilities, other noise sources in the area, and maintenance of the abatement measure. The overall reasonableness of noise abatement is determined by: 1) the noise reduction design goal of 7 dB at one or more impacted receptors; 2) the cost of noise abatement; and 3) the viewpoints of benefited receptors (including property owners and residents of the benefited receptors).

This section is based in part on the Noise Study Report (TAHA 2022).

A field investigation was conducted to identify land uses that could be subject to traffic and construction noise impacts from the proposed project. The following land uses were identified in the project area:

- Places of worship and medical facilities: Activity Category C (exterior)
Activity Category D (interior)
- Future Multi-Use Trail: Activity Category C (exterior)
- Hotel and restaurants: Activity Category E
- Commercial retail uses: Activity Category F

No residential land uses (Activity Category B) are in the project area.

Although all developed land uses are evaluated in this analysis, noise abatement was considered only for areas of frequent human use that would benefit from a lowered noise level. Accordingly, this impact analysis focuses on locations with defined outdoor activity areas, such as outdoor use areas associated with trails, exterior seating area at restaurants, and outdoor activity areas at the hotel.

Land uses in the project area were grouped into a series of numbered Noise Study Areas (NSAs) as follows:

NSA-1 is on the southern end of the project area north of Magic Mountain Parkway and between The Old Road and I-5. This area consists of a Hilton Garden Inn hotel property. Identified receptors areas included the main entrance (which includes a bench), a rear entrance, and two interior courtyards. The courtyards are completely surrounded by the hotel structure but open to the sky above. A coffee shop with outdoor seating and a McDonalds with outdoor seating are south of the Hilton Garden Inn hotel property.

NSA-2 is toward the center of the project area on either side of The Old Road, generally between Rye Canyon Road on the south and a set of I-5 on- and off-ramps to the north. In this area, on the east side of The Old Road is a strip of commercial properties, including three casual restaurants with outdoor seating areas (Activity Category E). On the east side of The Old Road and north of Rye Canyon Road is an urgent care facility with no exterior uses (Activity Category D). On the west side of The Old Road is the Valencia Water Reclamation Plant (Activity Category F). Between the roadway and the plant is a thin strip of land (approximately 150 feet), which would include the future Multi-Use Trail extension (Activity Category C).

NSA-3 is toward the north end of the project area, in-between The Old Road and I-5 by Henry Mayo Road. In this area, on the east side of The Old Road is Higher Vision Church and Beth Ariel LA, with no exterior uses (Activity Category D).

Short-Term Monitoring

Table 2-40 summarizes the results of the short-term (ST) monitoring that was conducted in the project area.

Table 2-40: Summary of Short-Term Measurements

Location Information				Measurement Information			The Old Road Observed Traffic		I-5 Observed Traffic	
Position	Location	NSA	Land Uses	Start Time	Duration (minutes)	Measured L_{eq}	Hourly (NB/SB)	Speed (mph)	Hourly (NB/SB)	Speed (mph)
ST-1	Hilton, front entrance	1	Hotel	14:55	15	69.1	1080/552	55	3024/3336	65
ST-2	Hilton, rear entrance	1	Hotel	10:10	20	60.8	1320/472	55	3612/3480	65
ST-3	Tommy Burger	2	Restaurant	15:55	15	69.9	900/528	40	3612/3948	65
ST-4	Valencia Water Reclamation Plant Parking	2	Future Trail	11:40	20	65.0	900/528	40	3612/3948	65
ST-5	Open Area west of The Old Road	2	Future Trail	16:40	20	61.2	816/828	40	3312/5220	65/60
ST-6	Open Area west of The Old Road	2	Future Trail	16:40	20	61.8	816/828	40	3312/5220	65/60
ST-7	Hotel Courtyard	1	Hotel	9:45	15	58.6	384/744	55	2940/3768	65
ST-8	Hilton Courtyard	1	Hotel	9:45	15	60.7	384/744	55	2940/3768	65

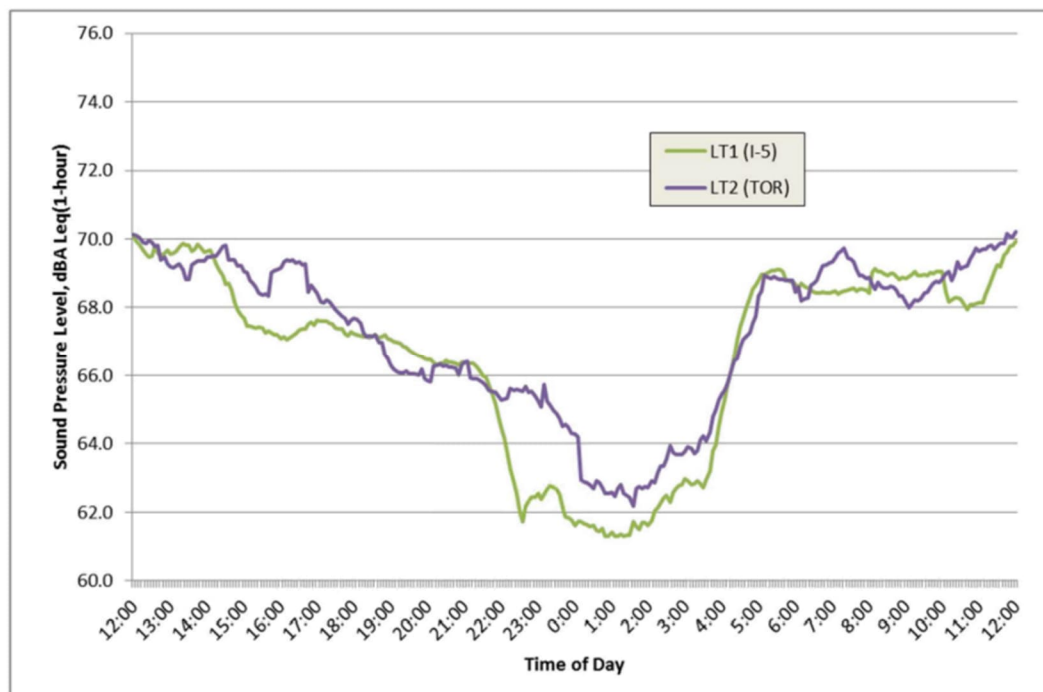
Notes:

I-5 = Interstate 5; mph = miles per hour; NB/SB: northbound/southbound; NSA = Noise Study Area

Source: TAHA 2023

Long-Term Monitoring

The long-term (LT) sound-level data were collected over one consecutive 24-hour monitoring period, beginning midday on May 30, 2018, and ending midday on May 31, 2018. LT-1 was behind a commercial area near the north end of the project area (to measure the isolated diurnal noise level for I-5), about 50 feet from the edge of the pavement. LT-2 was near the SB side of The Old Road in NSA-2, to measure a more isolated diurnal noise level for The Old Road. Figure 12 and Table 2-41 show the hourly levels for both LT-1 and LT-2, along with each hourly level's difference from the loudest hour.



Source: TAHA 2022

Figure 12: Long-Term-Monitoring LT-1 and LT-2, May 30–31, 2018

Traffic Noise Model (TNM) Version 2.5 was used to compare measured traffic noise levels to modeled noise levels at field measurement locations. Table 2-42 compares measured and modeled noise levels at each measurement location. The predicted sound levels are within 2 dB of the measured sound levels, and therefore are considered in reasonable agreement with the measured sound levels. The analysis was restarted in 2022, and the modeling was imported into TNM 3.1. The calculations were run in TNM 3.1 for the future Build Alternative, to verify that the model still was calibrated after import. Noise levels were found to be within 2 dB of the TNM 2.5 results. The slight deviations in noise levels compared to TNM 2.5 are attributed to improved acoustical algorithms in TNM 3.1. Therefore, no further adjustment of the model was necessary.

Table 2-41: Summary of Long-Term Monitoring

Hour Beginning	LT-1 (dBA $L_{eq}[h]$)	Difference from Loudest Hour (dB)	LT-2 (dBA $L_{eq}[h]$)	Difference from Loudest Hour (dB)
12 p.m.	70.1	0.0	70.1	0.0
1 p.m.	69.6	-0.5	69.2	-0.9
2 p.m.	69.6	-0.5	69.5	-0.6
3 p.m.	67.7	-2.4	69.1	-1.0
4 p.m.	67.1	-3.0	69.2	-0.9
5 p.m.	67.6	-2.5	68.4	-1.7
6 p.m.	67.2	-2.9	67.7	-2.4
7 p.m.	67.1	-3.0	66.3	-3.8
8 p.m.	66.5	-3.6	65.8	-4.3
9 p.m.	66.4	-3.7	66.4	-3.7
10 p.m.	64.5	-5.6	65.3	-4.8
11 p.m.	62.5	-7.6	65.2	-4.9
12 a.m.	61.6	-8.5	64.3	-5.8
1 a.m.	61.4	-8.7	62.6	-7.5
2 a.m.	61.6	-8.5	62.7	-7.4
3 a.m.	63.0	-7.1	63.8	-6.3
4 a.m.	64.9	-5.2	65.5	-4.6
5 a.m.	68.8	-1.3	68.3	-1.8
6 a.m.	68.7	-1.4	68.4	-1.7
7 a.m.	68.5	-1.6	69.3	-0.8
8 a.m.	68.4	-1.7	68.9	-1.2
9 a.m.	68.9	-1.2	68.2	-1.9
10 a.m.	69.1	-1.0	68.8	-1.3
11 a.m.	68.1	-2.0	69.6	-0.5

Notes:

dB = decibels; dBA = A-weighted decibels

Worst noise hour noise level is **bolded**.

Source: TAHA 2022

Table 2-42: Comparison of Measured to Predicted Sound Levels in the TNM Model

Measurement Position	Measured Sound Level (dBA)	Predicted Sound Level (dBA)	Measured minus Predicted (dB)
ST-1	69.1	67.4	1.7
ST-2	60.8	60.7	0.1
ST-3	69.9	69.8	0.1
ST-4	65.3	67.4	-2.1
ST-5	61.2	61.6	-0.4
ST-6	61.8	63.4	-1.6
ST-7	58.6	59.4	-0.8
ST-8	60.7	59.3	1.4

Notes:

dB = decibels; dBA = A-weighted decibels

Source: TAHA 2022

2.3.7.3 Environmental Consequences

Alternative 1: No-Build Alternative

The Old Road currently is operating under constrained flow conditions, and this condition is expected to continue under the No-Build Alternative. Although overall average daily traffic volumes may continue to increase under the No-Build Alternative, the conditions that currently are producing the loudest hour noise conditions would not change. Therefore, the loudest hour noise conditions are expected to remain the same for existing and future No-Build Alternatives. The No-Build Alternative would not increase noise or vibration in the project area.

Alternative 2: Build Alternative

Under 23 CFR 772.7, projects are categorized as Type I, Type II, or Type III projects. FHWA defines a Type I project as a proposed federal or federal-aid highway project for construction of a highway at a new location, or the physical alteration of an existing highway that substantially changes either the horizontal or vertical alignment or increases the number of through-traffic lanes. Based on the brief description of the alternatives above, the proposed project has been determined to be a Type I project. Thus, traffic noise analysis was conducted for the proposed project in accordance with the FHWA protocol for Type I projects.

Future Noise Environment

As discussed in the Noise Study Report (TAHA 2022), no interior traffic noise impacts are expected in any noise study areas (NSAs).

Noise Abatement Analysis

As discussed in the Noise Study Report (TAHA 2022), no traffic noise impacts are predicted for NSA-1 or NSA-3, and noise abatement does not need to be considered in these areas. Traffic noise impacts in NSA-2 are predicted at Activity Category E land uses on the northeast side of The Old Road and at Activity Category C land uses on the southwest side of The Old Road.

The affected receptors on the northeast side of The Old Road are two of three fast-food/casual restaurants with outdoor seating/dining areas, Original Tommy's at R2-1 and Jimmy Dean's Charbroiled Burgers at R2-3. A third restaurant in this area, Del Taco at R2-2, also has outdoor seating, but predicted levels at Del Taco are below the impact level because of acoustical shielding. However, noise abatement in the form of a noise barrier at this location would not be feasible for two reasons. First, a barrier in this area would need to have several (at least five) wide openings to provide two-way vehicle access for the restaurants and other businesses in the areas (e.g., gas stations, car washes). These gaps would provide a substantial acoustical flanking path that would prevent the barriers from providing the minimum-required 5-dBA noise reduction at affected receptors. Any barriers in this area also would provide a potential safety risk by reducing driver line-of-sight near the access openings onto the very busy The Old Road. Second, the affected receptors in this area are exposed to The Old Road on the southwest, and to I-5 at a similar distance to the northeast. A barrier designed to provide noise reduction from the project roadway would do nothing to block noise from the non-project roadway, and therefore would be ineffective acoustically. For these reasons, a noise barrier in this area would not be feasible.

The affected receptors on the southwest side of The Old Road are all associated with the planned future extension of the Multi-Use Trail (represented by modeled receivers R2-4, R2-5, and R2-6). This land use would be considered Activity Category C with an impact threshold of

67 dBA, $L_{eq}(h)$ loudest hour. Three out of four modeled receptors in this area (R2-4, R2-5, and R2-6) would be affected under both existing and future Build and No-Build Alternatives. The fourth modeled receiver representing the Multi-Use Trail (R2-7) has predicted levels that would be below the impact level because of acoustical shielding.

A noise barrier in this area would not be feasible for several reasons. A noise barrier would need to include several wide gaps to provide two-way access to the Valencia Water Reclamation Plant (just southwest of the proposed trail extension) and to the trail itself. Currently, two two-way driveways (each approximately 35 feet wide and about 175 feet apart) are providing access to the water plant. In addition to these driveways, if a wall was built, at least one and perhaps more additional access points would need to be provided for trail users to access the trail. These gaps would result in a substantial flanking path that would reduce the wall's ability to provide the minimum-required 5-dBA noise reduction to large sections of the trail. Second, substantial noise is produced by the water reclamation facility, which was noted during short-term noise measurements as an audible noise source in addition to the highway noise. The sound from the plant was quite noticeable and would provide a limit to how much noise reduction the barrier could provide. Furthermore, although not technically a feasibility issue, the cost of this barrier would be extraordinarily expensive because the Caltrans policy states that only one receptor should be used for each formal trail in considering the cost per benefited receptor. Considering these collective issues, a noise barrier in this location would not be feasible.

Construction Noise

During project construction, noise from construction activities may dominate the noise environment intermittently in the immediate construction vicinity. Noise associated with construction is controlled by Caltrans Standard Specification Section 14-8.02, "Noise Control," which states the following:

Do not exceed 86 dBA L_{max} at 50 feet from the job site activities from 9 p.m. to 6 a.m.

Equip an internal combustion engine with the manufacturer-recommended muffler. Do not operate an internal combustion engine on the job site without the appropriate muffler.

Table 2-43 summarizes noise levels produced by construction equipment that commonly is used on roadway construction projects. Project construction equipment is expected to generate noise levels ranging from 70 to 90 dB at a distance of 50 feet, and noise produced by construction equipment would be reduced over distance at a rate of about 6 dB per doubling of distance.

Table 2-43: Construction Equipment Noise

Equipment	Maximum Noise Level (dBA at 50 feet)
Scrapers	89
Bulldozers	85
Heavy Trucks	88
Backhoe	80
Pneumatic Tools	85
Concrete Pump	82

Note:

dBA = A-weighted decibels

Source: FTA 2006 (also refer online to http://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook09.cfm)

No adverse noise impacts are anticipated from construction because it would be conducted in accordance with Caltrans Standard Specifications Section 14.8-02. Construction noise would be short-term, intermittent, and overshadowed by local traffic noise.

2.3.7.4 Avoidance, Minimization, and/or Mitigation Measures

The Build Alternative would not result in adverse effects related to noise. Therefore, no AMMs are required.

2.3.8 Energy

2.3.8.1 Regulatory Setting

NEPA (42 USC 4332) requires identification of all potentially significant impacts on the environment, including energy impacts. Section 15126.2(b) and Appendix F, Energy Conservation, of the CEQA Guidelines require an analysis of a project's energy use to determine whether the project may result in significant environmental effects because of wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources.

2.3.8.2 Affected Environment

Non-renewable energy resources that are used in California include petroleum, natural gas, and nuclear power, while renewable energy resources include hydroelectric, biomass, wind, solar, and geothermal heat (i.e., heat given off by the Earth). According to the U.S. Energy Information Administration, California is rich in energy resources and is second only to Texas in the combined total electricity generation from all renewable sources. California is the third-largest state by land area, and transportation accounts for the largest share of the state's energy consumption. The transportation sector in California consumes more energy than any other sector (residential, commercial, and industrial), representing more than 35% of total statewide energy consumed, as shown in Table 2-44. The state has the most registered motor vehicles and the most VMT of any U.S. state. Consumption by source estimates from the U.S. Energy Information Administration showed motor gasoline being the second largest (EIA 2023).

Table 2-44: California Energy Consumption by End-Use Sector, 2021

End-Use Sector	Energy Consumption (trillion British thermal units)	Percent of Total Energy Consumption
Residential	1,473	20.0
Commercial	1,397	19.0
Industrial	1,704	23.2
Transportation	2,785	37.8
Total	7,359	100.00

Source: EIA 2023

Alternatives to fossil fuels for transportation have helped decrease California's dependence on gasoline and other fossil fuels. In addition to traditional petroleum fuels, California currently uses the following "alternative" fuels and energy sources: compressed natural gas, electricity, ethanol, hydrogen, liquefied natural gas, and liquefied petroleum gas.

As discussed in Section 1.2.2, current traffic demand in the project area meets or exceeds roadway capacity for many arterial roadways. Significant increases in traffic demand are anticipated over the next few years, based on projected growth in the project region. Traffic congestion reduces vehicle fuel economy and increases excess fuel consumption, leading to higher direct energy consumption. The Build Alternative is anticipated to curb these effects by increasing the efficiency of the transportation system in the project area, thus reducing congestion and energy consumption.

2.3.8.3 Environmental Consequences

Alternative 1: No-Build Alternative

Under the No-Build Alternative, no improvements would occur in the project area. The Old Road, Rye Canyon Road, and Sky View Lane would not be reconstructed and widened, and The Old Road over Santa Clara River would not be replaced. The No-Build Alternative would not have any effects related to construction energy consumption.

Alternative 2: Build Alternative

Direct energy consumption was quantified by leveraging data from the VMT Analysis Memorandum (AECOM 2023c) and the Air Quality Study (TAHA 2023). The study area for both reports encompass portions of I-5 and SR-126 (i.e., mainline segment, on- and off-ramps) and local street facilities (i.e., The Old Road, Henry Mayo Drive, Gateway Drive, Rye Canyon Road, Sky View Lane, and Magic Mountain Parkway).

The future forecast volumes for the study area were developed using the SCAG model. Forecasts were developed for the opening year (2028) and design year (2048) for the No-Build and Build Alternatives.

Construction

Construction of the Build Alternative would consume primarily diesel and gasoline through operation of heavy-duty construction equipment, material deliveries, and debris hauling. Project construction would occur for 12 hours a day, 7 days per week, over the span of approximately 4.5 years.

Project construction would require a temporary commitment of energy, necessary for any infrastructure improvement project. Energy consumption during construction would be conserved and minimized to the maximum extent feasible. Energy conservation in construction activities is assumed, because the construction contractor would have a financial incentive and statutory mandate to minimize waste and externalities, respectively. Regulations that stipulate the reduction of energy-related externalities include Title 13, Section 2485 of the CCR. This regulation limits the idling time of diesel construction equipment to 5 minutes.⁴

Direct energy from construction sources is the energy that is consumed during construction activities by vehicles and equipment. The proposed project would require a one-time energy commitment for construction, which is an unavoidable energy investment for any major infrastructure project. However, the proposed project is not expected to increase direct energy

⁴ For the proposed project, this restriction would be superseded by the AMMs for air quality, which would limit idling to 2 minutes.

consumption substantially in the project area. Therefore, the proposed project would not cause adverse direct energy impacts during construction.

Operation

Energy consumption based on VMT is anticipated to increase over time because of increased travel demand in the project area, as shown in Table 2-45. However, better energy efficiency and standards are anticipated to apply over time, as older vehicles are replaced by increasingly more fuel-efficient cars and trucks.

Table 2-45: Total VMT Changes for Regional Area

Area	Opening Year (2028)				Design Year (2048)			
	No-Build VMT (vehicle miles)	Build VMT (vehicle miles)	VMT Change (vehicle miles)	VMT Change (%)	No-Build (vehicle miles)	Build (vehicle miles)	VMT Change (vehicle miles)	VMT Change (%)
Regional Area	217,849,258	217,729,337	-119,921	-0.06%	225,893,139	224,856,168	-1,036,971	-0.46%

Note:

VMT = vehicle miles traveled

Source: AECOM 2023c

The SCAG model was used for the No-Build Alternative and Build Alternative conditions to analyze the opening year (2028) and design year (2048). When compared to the No-Build Alternative, daily VMT would decrease for the Build Alternative by 0.06% in opening year and 0.46% in the design year.

Operational improvements would improve existing traffic operations, accommodate future traffic projections, and eliminate choke points. Operational improvements also would decrease traffic congestion (e.g., the proposed project improvements), would improve traffic operations to be consistent with LACPW highway design speed safety standards, and would decrease travel time on the congested roadway system, resulting in a more efficient use of energy. The proposed project would enable The Old Road corridor to maximize productivity through improvements to the capacity of the roadway lanes, allowing for more flexibility in traffic movement and higher efficiencies. In addition, the proposed project would construct a Class IV bikeway, which would improve safety for cyclists and provide additional options for non-motorized travel. Therefore, the proposed project is not anticipated to result in adverse direct energy impacts during operation.

Indirect Energy

Indirect energy use is associated primarily with project maintenance (i.e., fuel used by equipment for periodic maintenance of the system). Many other sources contribute indirectly to the energy consumption of a transportation system, but they can be difficult to quantify reliably at the project level. Project maintenance and landscaping activities are anticipated to be minimal but would be necessary to maintain the integrity of the system. Therefore, the proposed project is not anticipated to result in adverse indirect energy impacts.

2.3.8.4 Avoidance, Minimization, and/or Mitigation Measures

The Build Alternative would not result in adverse effects related to energy. Therefore, no AMMs are required.

2.4 Biological Environment

2.4.1 Natural Communities

This section discusses vegetation communities, natural communities of concern, and wildlife corridors. The focus of this section is on biological communities, not individual plant or animal species. This section also includes information on fish passage, wildlife corridors, and habitat fragmentation. Wildlife corridors are areas of habitat used by wildlife for seasonal or daily migration. Habitat fragmentation involves the potential for dividing sensitive habitat and thereby lessening its biological value.

Habitat areas that have been designated as critical habitat under the Federal Endangered Species Act (FESA) are discussed in Section 2.4.5. Wetlands and other waters are discussed in Section 2.4.2.

2.4.1.1 Regulatory Setting

CDFW inventories sensitive vegetation alliances (natural communities) for tracking in the California Natural Diversity Database (CNDDDB). A vegetation alliance assigned with global ranking codes of G1 through G3 indicates that all the vegetation associations within that alliance are considered high inventory priority by CDFW. Vegetation alliances identified in the CNDDDB as sensitive are considered by CDFW to be significant resources; these alliances are to be avoided to the maximum extent possible.

2.4.1.2 Affected Environment

The following analysis is based on the 2024 Natural Environment Study (NES) that was prepared for the proposed project (AECOM 2024h). Technical surveys were performed within the biological study area (BSA). The BSA is defined as the project limits of disturbance (LOD) and the surrounding 500-foot-radius buffer. The BSA was established to encompass all areas that may be directly or indirectly affected by project construction, including staging and laydown. The BSA is the same for both the No-Build and Build Alternatives. A portion of the BSA coincides with an LA County SEA along the Santa Clara River. The BSA covers The Old Road improvements, from its intersection with Henry Mayo Drive in the north to its intersection with Magic Mountain Parkway in the south, and the study area buffer to account for the potential indirect effects of noise, light, glare, and the deposit of fill material.

Biological surveys were conducted within the BSA in 2018, 2023, and 2024, as shown in Table 2-46. Additional survey data from 2017 through 2022, and 2024, conducted by Woodstar Biological LLC/Compliance Biology, Inc. (hereafter Woodstar and Compliance Biology) were reviewed for the proposed project on behalf of Five Points as part of their Natural River Management Plan and included riparian bird surveys.

Table 2-46: Biological Surveys Conducted for the Proposed Project

Survey Personnel	Date	Survey Activity	Survey Report Reference
2018 Surveys			
Julie Niceswanger Hickman, Chris Hargreaves, Wynter Dawson	June 5 and 18, 2018	Vegetation mapping and rare plant surveys	AECOM 2019a
Arthur Popp, Chris Hargreaves	July 13, 27, and October 8, 2018	Oak tree survey	AECOM 2019b
Erik Larsen, Chris Hargreaves	July 26 and 27, 2018	General reconnaissance of survey area, field survey, and sampling to perform formal jurisdictional delineation	AECOM 2019c
Woodstar and Compliance Biology	Eight site visits between April 11 and July 25, 2018	Least Bell's vireo (LBVI) protocol survey	AECOM 2018
Woodstar and Compliance Biology	Five site visits between May 18 and July 17, 2018	Southwestern willow flycatcher (SWFL) survey	AECOM 2018
Woodstar and Compliance Biology, James McMorran, Tom Sullivan, Vanessa Tucker, John Parent	Four site visits between June 26 and August 8, 2018	Western yellow-billed cuckoo (YBCU) survey	AECOM 2018
John Parent, Vanessa Tucker, Arthur Popp	July 12 and 23, 2018	Bat surveys	AECOM 2019d
John Parent, Vanessa Tucker, Shannon Mueller	October 8 and 30, 2018	General reconnaissance of survey area to follow-up on and confirm existing conditions	Not applicable
2023 Surveys			
Jonathan Dunn, Claire Jorgensen	May 1 and 2, 2023; June 21, 2023	Vegetation mapping and rare plant surveys	AECOM 2023
Andrew Borchert, Madeline Bailey, Billy Splittstoesser, Vanessa Tucker, Rob Conohan, Aubrey Mathews	Six site visits between April 25 and June 26, 2023	Arroyo toad protocol surveys	AECOM 2023
Vanessa Tucker, Brianna Quirarte, Aubrey Mathews	May 25, June 21, and July 6, 2023	Bat surveys	AECOM 2023
Erik Larsen, Natasha Foti	July 10 and 11, 2023	Updated aquatic resources delineation	AECOM 2024a
Vanessa Tucker, Brianna Quirarte	June 22 and July 6, 2023	Southwestern pond turtle surveys	AECOM 2023
Merkel & Associates, Inc., U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife	October 26, 2023	Unarmored threespine stickleback surveys	Merkel & Associates, Inc. 2023; Appendix G-4
2024 Surveys			
Michelle Treadwell; Woodstar Biological and Compliance Biology	Eight site visits between April 26 and July 27, 2024	LBVI surveys east of Interstate 5; LBVI surveys west of Interstate 5 along the Santa Clara River and Northern Drainage	AECOM 2024b, Woodstar Biological 2024
Michelle Treadwell; Woodstar Biological and Compliance Biology	Five site visits between May 24 and July 17, 2024	SWFL surveys east of Interstate 5; SWFL surveys west of Interstate 5 along the Santa Clara River and Northern Drainage	AECOM 2024b, Woodstar Biological 2024
Korey Klutz	June 2, 16, 30, and July 14, 2024	Crotch's bumble bee surveys	AECOM 2024c

The BSA supports three natural communities of special concern in addition to other natural communities. Collectively, these communities provide important habitat for special-status plant species, nesting/foraging habitats for migratory birds, habitat for CDFW species of special concern, and habitat for State and federally listed wildlife species. These species are discussed in subsequent sections below.

Natural communities within the BSA also connect adjacent habitats and support wildlife movement. The Santa Clara River is a major wildlife movement corridor as it provides natural habitat for many species within an urban context. Specific wildlife use of these communities is noted in the individual sections, as applicable.

Vegetation Communities and Land Cover Types

Vegetation and other land cover types within the BSA were mapped based on field reconnaissance and recent aerial photographs. Updated field investigations were conducted by AECOM in June 2018 and again in May and June 2023 (AECOM 2024h).

The BSA has experienced varying levels of historical and ongoing anthropogenic disturbance. Therefore, deviation from the published standards were expected and encountered. The vegetation classifications are subdivided below into shrubland, herbaceous, and riparian alliances. Other cover types also are noted.

Three shrubland, two herbaceous, six riparian, and five other cover types were mapped within the BSA. The extent of communities within the BSA is shown on Figures 13a through 13c, and acreages of each are shown in Table 2-47.

California Buckwheat Scrub, Fremont Cottonwood Forest and Woodland, and Elderberry Stand are considered sensitive vegetation communities by CDFW (CDFW 2020). Sensitive vegetation communities are plant associations in California that are on the decline, considered rare or locally important, or support special-status plants and animals. These vegetation communities usually require mitigation for any acreage impacted, and the requirements for mitigation are finalized in conjunction with CDFW.

Migration Corridors

In an urban context, a *wildlife migration corridor* can be defined as a linear landscape feature of sufficient width and buffer to allow animal movement between two patches of comparatively undisturbed habitat, or between a patch of habitat and some vital resources. *Regional corridors* are defined as those corridors linking two or more large patches of habitat, and *local corridors* are defined as those corridors allowing resident animals to access critical resources (i.e., food, cover, and water) in a smaller area that otherwise may be isolated by urban development.

The BSA spans the Santa Clara River, which functions as both a local and regional corridor. The Santa Clara River corridor is considered an SEA by LA County. The SEA program was developed to help conserve the genetic and physical diversity within the county by designating biological resource areas capable of sustaining themselves into the future (LADRP 2018). Historically, the riparian corridor along the Santa Clara River has served as the primary east/west linkage between the Pacific coastline, coast ranges, interior ranges, high desert, and southern Sierra Mountain Range (via the Transverse and Tehachapi ranges). Animals moving through the Santa Clara River at one time had unobstructed passage along the river and within its tributaries. The present configuration of the tributary drainages has reduced connectivity from the Santa Clarita Valley to the north, but the Santa Clara River remains relatively intact and open.

**Table 2-47: Vegetation Communities and Land Cover Types
within the BSA**

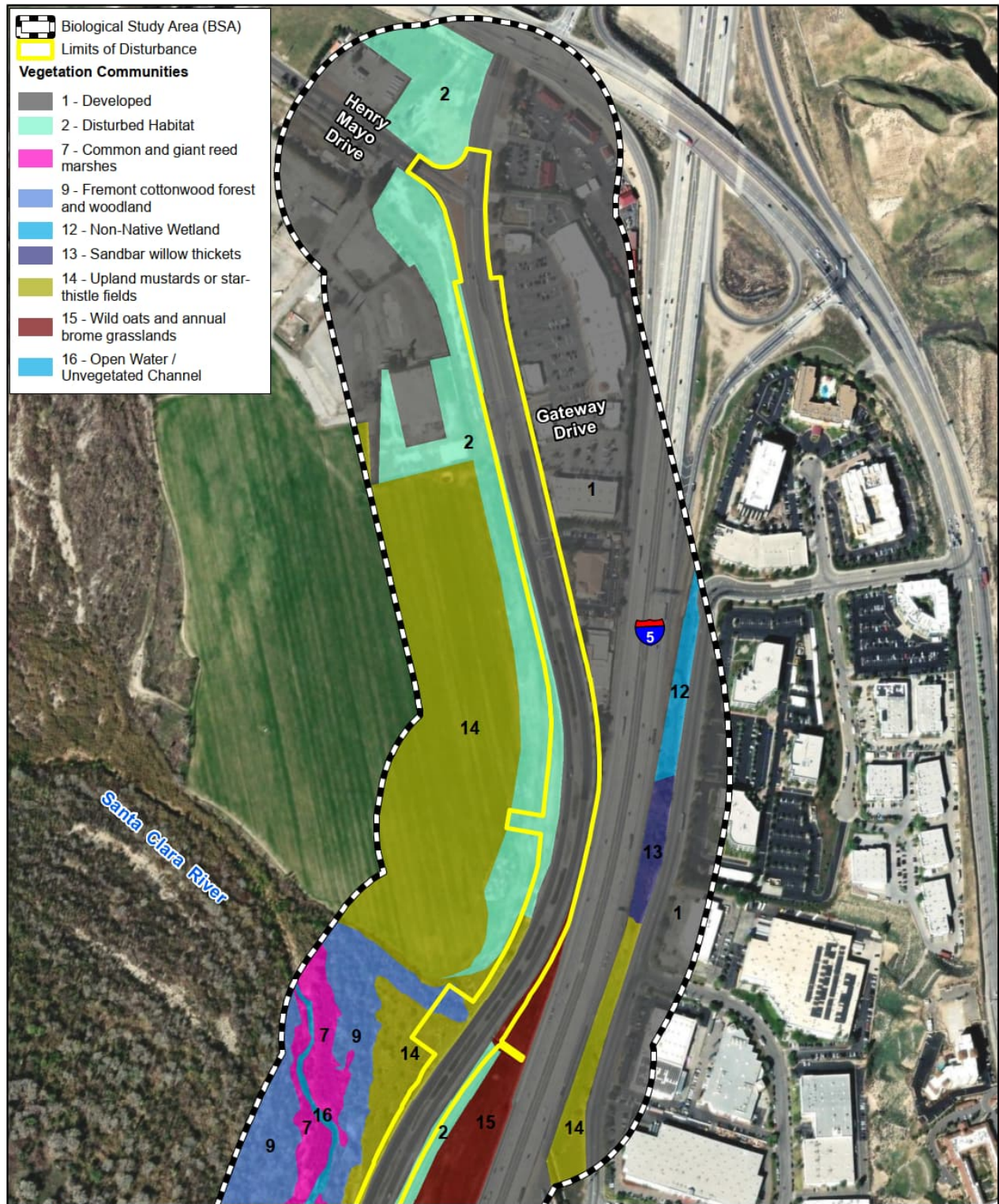
Vegetation Community/Land Cover Type	Permanent Impact		Temporary Impact (acre)	Total (acre)
	Ground Disturbance (acre)	Bridge Span ¹ (acre)		
Shrubland Alliances				
Artemisia tridentata Shrubland Alliance big sagebrush scrub	0.2	0	0.6	4.0
Baccharis pilularis Shrubland Alliance coyote brush scrub	0.1	0	0.4	0.7
Eriogonum fasciculatum Shrubland Alliance California buckwheat scrub*	0.7	0	0.1	7.2
Shrubland Subtotal	1.0	0	1.1	11.9
Herbaceous Alliances				
Avena spp.–Bromus spp. Herbaceous Semi-Natural Alliance wild oats and annual brome grasslands	0.4	0	0.5	17.4
Brassica nigra–Centaurea (solstitialis, melitensis) Herbaceous Semi-Natural Alliance upland mustards or star-thistle fields	1.5	0.3	0.8	37.6
Herbaceous Subtotal	1.9	0.3	1.3	55.0
Riparian Alliance				
Baccharis salicifolia Shrubland Alliance/ Baccharis salicifolia–Sambucus nigra Association elderberry stands*	0.5	0	0.2	4.2
Non-native Wetland (nonconforming MCV type)	0	0	0	1.1
Open Water/Unvegetated Channel (nonconforming MCV type)	0	0.1	0	2.6
Phragmites australis–Arundo donax Herbaceous Semi-Natural Alliance common and giant reed marshes	0	0	0	4.5
Populus fremontii–Fraxinus velutina–Salix gooddingii Forest and Woodland Alliance Fremont cottonwood forest and woodland*	0.2	0.6	0.5	34.1
Salix exigua Shrubland Alliance sandbar willow thickets	0	0	0	1.0
Riparian Subtotal	0.7	0.7	0.7	47.5
Other Cover Types				
Agriculture	0	0	0	3.3
Bare Ground/Graded	0.03	0	0.1	1.0
Developed	8.4	0.3	5.3	217.1
Disturbed Habitat	1.4	0	1.4	20.8
Unpaved Roads	0.4	0.2	0.3	2.4
Other Cover Types Subtotal	10.23	0.4	7.1	244.6
Total	13.83	1.6	9.8	359.0

Notes:

MCV = Manual of California Vegetation

* = Considered a sensitive vegetation community on the current list of California Sensitive Natural Communities (CDFW 2022c)

¹ = Permanent impacts on vegetation beneath the bridge because of shading, potentially affecting habitat quality, are accounted for under the Bridge Span column.



Source: AECOM, 2023; Esri, 2023; Prepared By: AECOM, 2023.

Figure 13a
Vegetation Communities and Land Cover Types

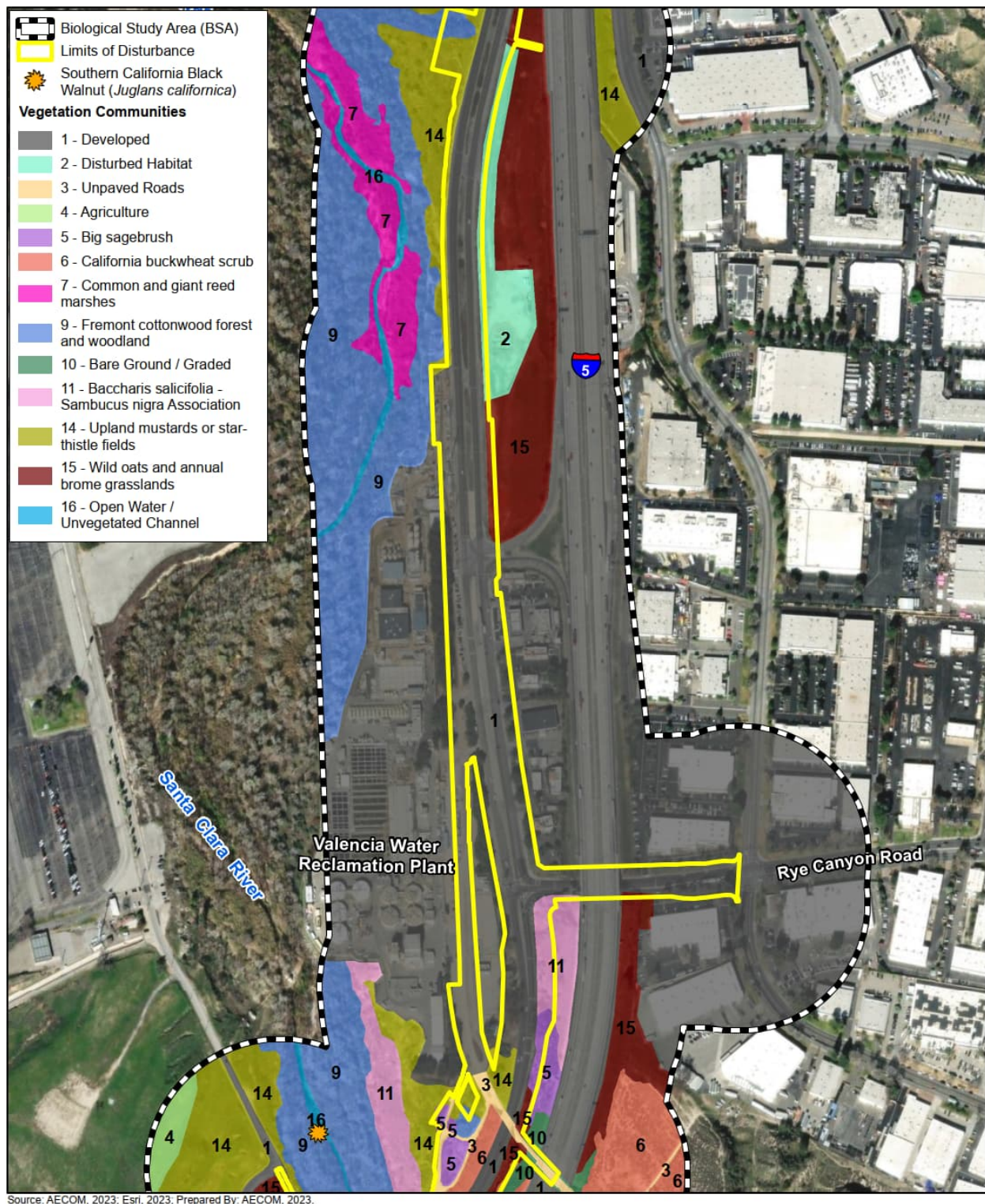
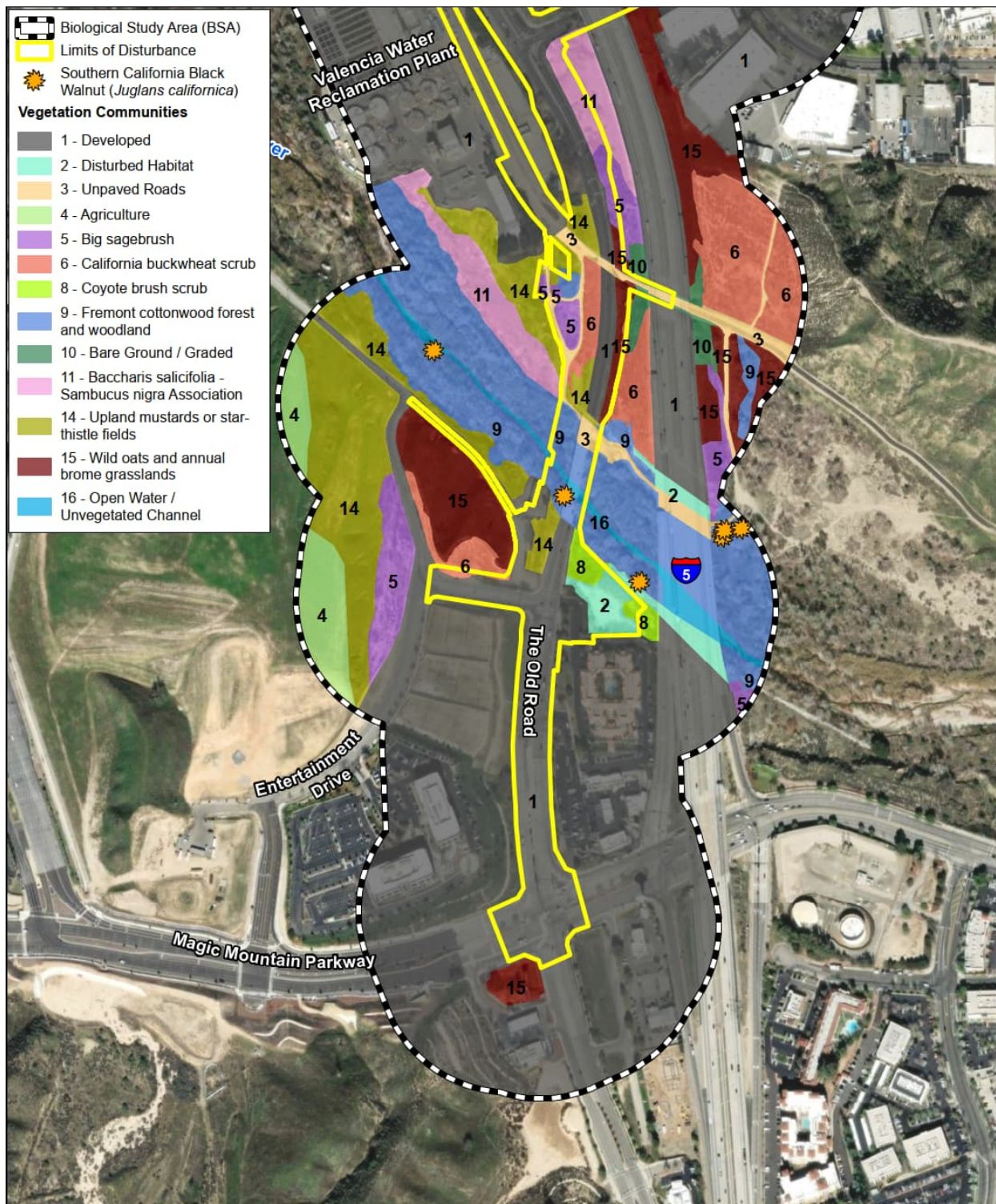


Figure 13b
Vegetation Communities and Land Cover Types



Source: AECOM, 2023; Esri, 2023; Prepared By: AECOM, 2023.

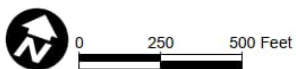


Figure 13c
Vegetation Communities and Land Cover Types

Within and adjacent to the BSA, the Santa Clara River corridor supports dense and mature southern riparian scrub and riparian woodland formations, along with small areas of freshwater marsh, providing essential wintering areas and resident habitat for waterfowl, wading birds, marshland birds, and a variety of other vertebrate species. It provides habitat and serves as a major local corridor supporting numerous species and providing multi-layered riparian habitat for a wide diversity of wildlife species, particularly birds of prey and riparian-obligate songbirds. The river also provides important connectivity for various mammal species, including the mountain lion (*Puma concolor*; State candidate species for the Southern California/Central Coast evolutionary significant unit). Based on e-mail dialogue with biologists at the National Park Service (Santa Monica Mountains National Recreation Area), the agency has global positioning system collars on multiple mountain lions to track their movements, and several mountain lions have been recorded along the Santa Clara River in the project vicinity (AECOM 2024d). According to the National Park Service, the crossing under I-5 and The Old Road Bridge currently are functional (but have not been monitored by a wildlife camera) because multiple mountain lions have been tracked along the Santa Clara River east of I-5, but in most cases, they turn around and head back west. In one instance, a GPS-collared mountain lion went east all the way up San Francisquito Canyon to the San Gabriel Mountains in the Angeles National Forest (AECOM 2024d). The movements of mountain lions along the Santa Clara River indicate that the riparian corridor is relatively intact, and that the bridges allow for movement beneath them. However, much of the adjacent upland habitat along the river has been developed, further restricting wildlife to the river drainage. Also, the fringes of the river have been clogged with the nonnative giant reed (*Arundo donax*), which has created dense stands of nearly impenetrable vegetation, thereby further constricting movement along the corridor.

2.4.1.3 Environmental Consequences

This subsection discusses the potential direct, indirect, temporary, and permanent effects of the proposed project on natural communities and wildlife corridors within the BSA. Direct effects would occur at the same time and place as the action. Indirect effects would be caused by the project at a later in time or farther removed in distance but still would be reasonably foreseeable. Temporary effects would be short in duration and the locations of such effects could be restored to their pre-project condition or better. Permanent effects are those that would result in a permanent change in natural communities or otherwise permanently alter the natural environment when compared to pre-disturbance conditions.

Alternative 1: No-Build Alternative

The No-Build Alternative would not affect natural communities because no construction activities would occur. Under the No-Build Alternative, there would be no improvements to the project area. The Old Road, Rye Canyon Road, and Sky View Lane would not be reconstructed and widened, and The Old Road over Santa Clara River would not be replaced. Therefore, no natural communities would be disturbed, and wildlife corridors and migration routes would not be affected.

Alternative 2: Build Alternative

Vegetation

Implementation of the Build Alternative would result in permanent and temporary direct impacts on California Buckwheat Scrub, Fremont Cottonwood Forest and Woodland, and Elderberry Stand, which are summarized by acreage in Table 2-48.

Table 2-48: Permanent and Temporary Direct Impacts on Sensitive Vegetation Communities

Sensitive Vegetation Community	Permanent (ground-disturbing) Impacts (acres and percent of the total sensitive vegetation community within the BSA)	Permanent (bridge span) Impacts (acres and percent of the total sensitive vegetation community within the BSA)¹	Temporary Direct Impacts (acres)
California Buckwheat Scrub	(0.7 [9.7])	0.0	0.1
Elderberry Stands	(0.5 [11.9])	0.0	0.2
Fremont Cottonwood Forest and Woodland	(0.2 [0.6])	(0.6 [1.8])	0.5

Notes:

BSA = biological study area

1. Permanent impacts on vegetation beneath the bridge because of shading, potentially affecting habitat quality, are accounted for under the Bridge Span column.

Approximately 7.2 acres of California Buckwheat Scrub are within the BSA. The proposed project would result in temporary impacts on 0.1 acre of California Buckwheat Scrub, associated with project construction access routes and temporary work areas. The proposed project would result in permanent ground-disturbing impacts on 0.7 acre of California Buckwheat Scrub, because of sidewalk and retaining wall construction and expansion. No permanent impacts would occur because of the proposed bridge expansion.

Approximately 4.2 acres of Elderberry Stand are within the BSA. The proposed project would result in temporary impacts on 0.2 acre of Elderberry Stand associated with construction access routes and temporary work areas. The proposed project also would result in permanent ground-disturbing impacts on 0.5 acre of Elderberry Stand associated with the Multi-Use Trail extension, sidewalk and retaining wall construction, and the expansion of The Old Road. No permanent impacts would occur because of the proposed bridge expansion.

Approximately 34.1 acres of Fremont Cottonwood Forest and Woodland are within the BSA. The proposed project would result in temporary impacts on 0.5 acre of Fremont Cottonwood Forest and Woodland associated with expansion of The Old Road Bridge construction access routes and temporary work areas. The proposed project would result in permanent ground-disturbing impacts on 0.2 acre of California Fremont Cottonwood Forest and Woodland associated with the culvert, riprap, retaining wall, sidewalk construction, and the expansion of The Old Road, as well as additional permanent non-ground-disturbing impacts on 0.6 acre of California Fremont Cottonwood Forest and Woodland because of the proposed bridge expansion.

Indirect impacts on sensitive vegetation communities also may occur from project construction and use. Temporary indirect impacts, such as construction fugitive dust (which can coat vegetation and reduce photosynthesis), sedimentation and erosion, and construction-generated trash/debris and unauthorized trespass could all have adverse effects on vegetation. The proposed project also would have the potential for longer term impacts, such as the proliferation of invasive species through ground disturbing activities, which may indirectly degrade adjacent native vegetation communities. Indirect impacts also may occur in the form of increased potential for wildland fire and pollution in the Santa Clara River. The potential for disturbance to the root zones of adjacent native trees also would occur.

Migration Corridors

Approximately 52.92 acres of the BSA intersect the Santa Clara River SEA (Table 2-49). The project would result in temporary impacts on 1.0 acre of the Santa Clara River SEA, associated with the bridge expansion temporary work area. Project construction would result in permanent ground-disturbing impacts on 0.7 acre of the Santa Clara River SEA associated with pile and riprap installation, as well as additional permanent non-ground-disturbing impacts on 1.0 acre of the Santa Clara River SEA because of the proposed bridge expansion.

Table 2-49: Temporary and Permanent Impacts within the Santa Clara River SEA

SEA	BSA (acres)	Temporary Impacts (acres)	Permanent Impact (ground disturbance) (acres)	Permanent Impact (bridge span¹) (acres)
Santa Clara River SEA	52.92	1.0	0.7	1.0

Notes:

SEA = Significant Ecological Area

¹ = Permanent impacts on vegetation beneath the bridge deck because of shading, potentially affecting habitat quality, are accounted for under the Bridge Span column.

The proposed project would result in permanent and temporary direct impacts on the following plant communities within the Santa Clara River SEA: Annual Brome Grassland and Upland Mustard; California Bulrush Marsh, Big Sage Brush Scrub; Fremont Cottonwood Forest (Upland and Riparian); and California Buckwheat Scrub. Table 2-50 summarizes the potential impacts within the BSA to each of the plant community equivalents associated with the Santa Clara SEA, as well as the acreage associated with the proposed project's potential temporary and permanent impacts.

Table 2-50: Temporary and Permanent Impacts Associated with Plant Community Equivalents Santa Clara River SEA Plant Communities

Plant Communities Associated with the Santa Clara River SEA within the BSA	Total Acres within SEA that occur in BSA (acres)	Temporary Impact (acres)	Permanent Impact (ground disturbance) (acres)	Permanent Impact (bridge span¹) (acres)
Baccharis salicifolia - Sambucus nigra Association	2.15	0.00	0.01	0.00
Big sagebrush scrub	0.25	0.00	0.01	0.00
Common and giant reed marshes	4.54	0.00	0.00	0.00
Coyote brush scrub	0.07	0.03	0.00	0.0003
Fremont cottonwood forest and woodland	33.27	0.40	0.14	0.63

Plant Communities Associated with the Santa Clara River SEA within the BSA	Total Acres within SEA that occur in BSA (acres)	Temporary Impact (acres)	Permanent Impact (ground disturbance) (acres)	Permanent Impact (bridge span¹) (acres)
Upland mustards or star-thistle fields	6.22	0.35	0.44	0.12
Wild oats and annual brome grasslands	0.63	0.00	0.00	0.00
Disturbed Habitat	0.80		0.00	
Unpaved Roads	0.81	0.04	0.02	0.08
Developed	1.59	0.17	0.05	0.12
Open Water/ Unvegetated Channel	2.55	0.02	0.00	0.05
Total ²	52.88	1.01	0.67	1.00

Notes:

BSA = biological study area; SEA = Significant Ecological Area

1. Permanent impacts on vegetation beneath the bridge because of shading, potentially affecting habitat quality, are accounted for under the Bridge Span column.

2. Total acreages may not sum completely compared with Table 2-49 because of minor differences in rounding.

During construction of the Build Alternative, incremental increases in night lighting, noise, human activity, and impacts on water quality could impact the Santa Clara River SEA temporarily. However, BMPs would be implemented during construction, and the proposed project would be subject to typical restrictions and requirements that address dust control, erosion, and runoff, including the federal CWA and NPDES Permit. Therefore, construction of the Build Alternative is not anticipated to result in substantial adverse temporary impacts on wildlife movement.

Permanent impacts on the Santa Clara River SEA would occur because of increased habitat loss and fragmentation. Although The Old Road Bridge would be 9 feet higher on the north end and 15 feet higher on the south end than the existing bridge, vegetation underneath the expanded bridge is not anticipated to regrow to the same extent as preconstruction levels because of shading. The adjacent I-5 Bridge does not have dense riparian vegetation undergrowth, and the reconstructed The Old Road Bridge would be a similar height but not quite as wide as the existing I-5 Bridge. Thus, a large gap in vegetation cover may occur along the river as it flows underneath The Old Road Bridge. This gap may cause some wildlife species that require cover for movement to be hesitant to cross under the bridge. Some species of small mammals, reptiles, and amphibians may be exposed to increased predation (from raccoons, striped skunks, and coyotes) because of lack of vegetated cover under the bridge. Also, avian species may be more hesitant to fly under the bridge because of the lack of vegetation. The Santa Clara River SEA is an important linear migration corridor through an urban context, and birds often move along the tree canopy while foraging during migration. The expansion of The Old Road Bridge would fragment the canopy of the river further and expose birds to increased potential for injury and mortality from vehicle collisions. Habitat fragmentation and potential for injury and mortality would cause a permanent impact on wildlife.

Furthermore, the expanded and slightly elevated The Old Road Bridge may cause increased noise and potential night lighting into the Santa Clara River SEA. In a recent study of mountain lions in the Coastal mountain ranges of Southern California, researched looked at the effects of nearby night lighting on habitat selection by mountain lions and found that they avoided directly lit zones on the landscape (AECOM 2024d). Noise also has been linked as a potential cause of avoidance by wildlife to otherwise suitable crossing locations. In particular, sensitive species are less common at underpasses with greater maximum noise levels and higher traffic volumes. Species considered sensitive to disturbance in urban environments include coyotes, bobcats, mountain lions, among others. One study that assessed traffic disturbance and wildlife presence in Southern California found that bobcats were sensitive to elevated traffic noise levels, while other species seemed unconcerned (Shilling et al. 2020). The expanded Old Road Bridge may increase the level of noise (because of increased traffic volumes) within the Santa Clara River SEA, thereby disturbing wildlife movement under the bridge for certain sensitive species. As discussed in Section 3.1.1, new permanent lighting will be installed on the bridge and along the roadway as part of the proposed project. Therefore, to reduce potential impacts, LION-1 would be implemented to ensure that lighting is directed downward and shielded to prevent light trespass into the river.

2.4.1.4 Avoidance, Minimization, and/or Mitigation Measures

Vegetation

To minimize potential impacts on sensitive vegetation communities, the following measures will be incorporated into project design:

VEG-1: Bridge construction activities will occur during dry portions of the year, to reduce impacts on the low-flow channel. The limits of grading and temporary work areas will be demarked with high-visibility construction exclusion fencing adjacent to areas with sensitive vegetation communities, to avoid unintentional encroachment into these sensitive areas. Signage will be posted, identifying the excluded areas as Environmentally Sensitive Areas.

VEG-2: The project will incorporate storm drain systems to facilitate meeting water quality requirements and for stormwater management, which will minimize erosion and degradation of habitat around the bridge.

VEG-3: Standard fugitive dust BMPs, and those required by a SWPPP (e.g., a water truck), will be utilized to reduce impacts of construction-generated erosion and sedimentation into the adjacent Environmentally Sensitive Areas.

VEG-4: BMPs will be implemented so that invasive plant material is not spread from the project area to other areas, during disposal off-site or from tracking seed on equipment, clothing, and shoes. Equipment/material imported from an area of invasive plants will be identified, and measures will be implemented to prevent importation and spreading of non-native plant material within the project area. All construction equipment will be cleaned thoroughly to remove dirt, seeds, vegetative material, or other debris that may contain or hold seeds of noxious weeds before arriving at and when leaving the project area. Weeds that are removed will be bagged and disposed in an authorized sanitary landfill.

Permanent and temporary impacts on sensitive vegetation communities would be compensated follows:

VEG-5: Permanent and temporary impacts on sensitive vegetation communities will be replaced by creating or restoring habitats of similar functions and values in the BSA, or credits will be purchased through an applicable mitigation bank. Restoration will be in-kind and at a minimum 1:1 replacement ratio or other ratio, determined in consultation with the regulatory agencies. All mitigation activities will be conducted in accordance with a Habitat Mitigation and Monitoring Plan and in consultation with USACE, RWQCB, and CDFW before the issuance of permits. The Habitat Mitigation and Monitoring Plan will outline the identification and location of areas that can be used for creation, restoration, or habitat enhancement. The plan will include a list of native plant species by habitat type, and this list may be used for on-site revegetation efforts (e.g., planting and seeding). In addition, if necessary to meet mitigation needs, the plan will identify opportunities for additional enhancements of habitats in temporary impact areas, such as supplemental tree planting, weeding adjacent buffer habitat, or other opportunities. The enhancement opportunities will include acreage estimates of treated areas, acreage of invasive removal, and figures to show the treatment area and mapped invasive species. A habitat restoration specialist will determine the optimal areas for habitat establishment and restoration, and will prepare the Habitat Mitigation and Monitoring Plan with details on the concept. The plan will discuss habitat restoration implementation specifically, including plant establishment methods, performance standards, the maintenance and monitoring period, and reporting. In addition, the plan will include LA County Planning in the list of regulatory agencies to consult, to determine adequate replacement ratios, to mitigate temporary and permanent impacts on sensitive vegetation communities. The minimum 1:1 replacement ratio may not be appropriate for more sensitive SEA resources.

VEG-6: As an alternative to the restoration of habitats to compensate for temporary and/or permanent removal of riparian habitats, the applicant (at the discretion of USACE and CDFW) may remove exotic plant species from the BSA in the following locations: (1) where an infestation of exotics such as giant reed occurs, so that the natural habitat functions and values are substantially degraded and at risk, and where the cover of exotics is equal to or exceeds 25% of the ground; or (2) in other areas where exotics removal will be strategic in a watershed approach to weed management, as determined by USACE and CDFW. The weed removal sites will be selected in a logical manner, so that the eradication of weeds from specific sites will contribute to the overall control of exotics in the watercourses. Removal areas will be kept free of exotic plant species for 5 years after initial treatment. In addition, native riparian vegetation will need to become established through natural colonization and, after 5 years, will need to meet the revegetation plant cover goals, established by USACE and CDFW. In addition, LA County Planning will be included among the agencies listed to consult for the removal of exotic plant species, for potential compensation for temporary and/or permanent removal of riparian habitats.

Migration Corridors

Avoidance and minimization measures described previously under VEG-1 through VEG-4, will be implemented. These measures will include the use of BMPs and water trucks to minimize fugitive dust and other impacts.

Compensation mitigation described under VEG-5 and VEG-6, and GEN-15 (detailed further below) will be implemented. Additional measures may be incorporated based on input from LA County's internal SEA impact review. Additional measures may include the use of light shields to prevent light intrusion into adjacent natural habitats (especially along The Old Road Bridge over the Santa Clara River).

2.4.2 Wetlands and Other Waters

Wetlands and other waters provide valuable habitat to fish and wildlife. Wetlands also attenuate flooding, collect sediment, and filter nutrients and contaminants. This section analyzes the potential impacts on jurisdictional wetlands and WOTUS regulated by USACE, WOTS regulated by RWQCB, and streambed and riparian areas under the jurisdiction of CDFW.

2.4.2.1 Regulatory Setting

Wetlands and other waters are protected under a number of laws and regulations. At the federal level, the Federal Water Pollution Control Act, more commonly referred to as the CWA (33 USC 1344), is the primary law regulating wetlands and surface waters. One purpose of the CWA is to regulate the discharge of dredged or fill material into WOTUS, including wetlands. WOTUS includes navigable waters, interstate waters, territorial seas, and other waters that may be used in interstate or foreign commerce. The lateral limits of jurisdiction over non-tidal water bodies extend to the ordinary high-water mark (OHWM), in the absence of adjacent wetlands. When adjacent wetlands are present, CWA jurisdiction extends beyond the OHWM to the limits of the adjacent wetlands. To classify wetlands for the purposes of CWA, a three-parameter approach is used that includes the presence of hydrophytic (water-loving) vegetation, wetland hydrology, and hydric soils (soils formed during saturation/inundation). All three parameters must be present, under normal circumstances, for an area to be designated as a jurisdictional wetland under the CWA.

Section 404 of the CWA established a regulatory program, that provides that discharge of dredged or fill material cannot be permitted if a practicable alternative exists which is less damaging to the aquatic environment or would cause significant degradation. The Section 404 permit program is run by USACE with oversight by U.S. EPA. In general, the two main types of Section 404 permits are a Nationwide Permit (NWP) and an Individual Permit (IP). A Nationwide Permit is for a project with minimal impacts, while an Individual Permit is for a project with impacts over particular thresholds (i.e., more than minimal).

For an Individual Permit, USACE's decision to approve is based on compliance with EPA's Section 404(b)(1) guidelines (40 CFR Part 230), and whether permit approval is in the public interest. The guidelines were developed by U.S. EPA in conjunction with USACE, and allow the discharge of dredged or fill material into the aquatic system (WOTUS) only if there is no practicable alternative which would have less adverse effects. The guidelines state that USACE may not issue a permit if a LEDPA exists to the proposed discharge that would have lesser effects on WOTUS and not have any other significant adverse environmental consequences.

EO 11990 for the protection of wetlands also regulates the activities of federal agencies with regard to wetlands. Essentially, EO 11990 states that a federal agency, such as FHWA and/or Caltrans, as assigned, cannot undertake or provide assistance for new construction in wetlands unless the head of the agency finds: (1) that no practicable alternative exists to the construction; and (2) the project includes all practicable measures to minimize harm. A Wetlands Only Practicable Alternative Finding must be made.

In California at the State level, wetlands and waters are regulated primarily by the SWRCB, the RWQCBs, and CDFW. In certain circumstances, the Coastal Commission (or Bay Conservation and Development Commission or the Tahoe Regional Planning Agency) also may be involved. Sections 1600–1607 of the California Fish and Game Code require any agency that proposes a project that will substantially divert or obstruct the natural flow of or substantially change the bed or bank of a river, stream, or lake to notify CDFW before beginning construction. If CDFW determines that a project may substantially and adversely affect fish or wildlife resources, a Lake or Streambed Alteration Agreement will be required. CDFW jurisdictional limits usually are defined by the tops of the stream or lake banks, or the outer edge of riparian vegetation, whichever is wider. Wetlands under the jurisdiction of USACE may or may not be included in the area covered by a Streambed Alteration Agreement that is obtained from CDFW.

The RWQCBs were established under the Porter-Cologne Act to oversee water quality. Discharges under the Porter-Cologne Act are permitted by WDRs and may be required even when the discharge already is permitted or exempt under the CWA. In compliance with Section 401 of the CWA, the RWQCBs also issue water quality certifications for activities that may result in a discharge to WOTUS. This certification most frequently is required in tandem with a Section 404 permit (refer also to Section 2.3.2).

2.4.2.2 Affected Environment

The following analysis is based on the NES (AECOM 2024h) and the Jurisdictional Delineation and Wetland Assessment (AECOM 2024a) that were prepared for the proposed project. A jurisdictional delineation was conducted by AECOM in 2018, and later was updated in summer 2023, in accordance with current USACE and CDFW criteria.

The Jurisdictional Delineation (AECOM 2024a) surveyed areas of the BSA along the reaches of the Santa Clara River and an associated tributary drainage to determine the limits of (1) USACE and RWQCB jurisdiction pursuant to Sections 404 and 401 of the CWA, and (2) CDFW jurisdiction pursuant to Division 2, Chapter 6, Section 1600 of the California Fish and Game Code.

Survey Results

Areas in the BSA under the jurisdiction of USACE, the LA RWQCB, and CDFW include:

- 5.78 acres of jurisdictional non-wetland WOTUS and WOTS in the Santa Clara River
- 0.76 acre of wetland WOTUS and WOTS in the Santa Clara River
- 28.67 acres of CDFW-only (riparian) streambeds in the Santa Clara River
- 0.30 acre of jurisdictional non-wetland WOTUS and WOTS in the Northern Drainage
- 0.98 acre of CDFW-only (riparian) streambeds in the Northern Drainage
- 0.01 acre of jurisdictional non-wetland WOTUS and WOTS in Drainage A

- 0.08 acre of CDFW-only (riparian) streambeds in Drainage A
- 0.01 acre of jurisdictional non-wetland WOTUS and WOTS in Drainage B
- 0.05 acre of CDFW-only (riparian) streambeds in Drainage B
- 0.07 acre of isolated wetland (WOTS, CDFW riparian) and 1.29 acres of riparian habitat (CDFW) within two isolated features along the northern edge of the BSA

The extent of these mapped waters and wetlands are shown in Table 2-51. A total of 5.78 acres and 0.76 acre of USACE and RWQCB jurisdictional waters and wetlands (respectively) and an additional 28.67 acres of CDFW-only jurisdictional waters were mapped within the BSA (the Santa Clara River). The Northern Drainage to the Santa Clara River along the northern portion of the project area includes 0.30 acre of non-wetland waters and 0.98 acre of CDFW streambed. Drainages A and B include 0.02 acre of non-wetland waters and 0.13 acre of CDFW streambeds. Isolated riparian areas include 0.07 acre (RWQCB, CDFW) and 1.29 acres (CDFW). In total, 38 acres of CDFW jurisdictional (inclusive of USACE jurisdiction) waters were mapped within the subject reach of the Santa Clara River and associated tributary drainage, as shown in Figures 14, 14a, and 14b.

2.4.2.3 Environmental Consequences

Alternative 1: No-Build Alternative

None of the improvements to The Old Road, Rye Canyon Road, and Sky View Lane that are proposed under the Build Alternative would be constructed under the No-Build Alternative. Therefore, the No-Build Alternative would not result in adverse impacts on USACE, CDFW, or RWQCB jurisdictional areas in the BSA.

Alternative 2: Build Alternative

As indicated in the Jurisdictional Delineation and Wetland Assessment prepared by AECOM (2019, 2024), 5.78 acres and 0.76 acre of USACE and RWQCB jurisdictional waters and wetlands, respectively, and an additional 28.67 acres of CDFW-only jurisdictional waters within the BSA (the Santa Clara River). An unnamed tributary to the Santa Clara River along the northern portion of the project area includes 0.30 acre of non-wetland waters and 0.98 acre of CDFW streambed (and adjacent riparian habitat). Drainages A and B include 0.02 acre of non-wetland waters and 0.13 acre of CDFW streambeds. Isolated riparian areas include 0.07 acre (RWQCB, CDFW) and 1.29 acres (CDFW).

The project area is adjacent to portions of the Santa Clara River. Thus, remaining jurisdictional areas may be affected by project-related runoff from the road and increased trash and litter. In addition, the river may be indirectly affected by non-native species (e.g., roadside weeds), exposure to urban pollutants (e.g., fertilizers, pesticides, herbicides, and other hazardous materials), soil erosion, and hydrological changes (e.g., surface and groundwater level and water quality).

Table 2-51: Jurisdictional Waters of the U.S./State within The Old Road BSA

Location	USACE/RWQCB/ CDFW (acres)	RWQCB-Only (acres)	CDFW-Only (acres)	Total CDFW (acres)	Linear Feet
Santa Clara River					
Non-wetland waters (OHWM)	5.78	-	-	5.78	4,312
Wetland waters	0.76	-	-	0.76	4,312
Riparian habitat	-	-	28.67	28.67	n/a
<i>Sub-total</i>	<i>6.54</i>	<i>0.00</i>	<i>28.67</i>	<i>35.21</i>	<i>12,936</i>
Northern Drainage					
Non-wetland waters (OHWM)	0.30	-	-	0.30	639
Streambed-TOB-Riparian habitat	-	-	0.98	0.98	n/a
<i>Sub-total</i>	<i>0.30</i>	<i>0.00</i>	<i>0.98</i>	<i>1.28</i>	<i>639</i>
Drainage A					
Non-wetland waters (OHWM)	0.01	-	-	0.01	285
Streambed-TOB	-	-	0.08	0.08	n/a
<i>Sub-total</i>	<i>0.01</i>	<i>0.00</i>	<i>0.08</i>	<i>0.09</i>	<i>285</i>
Drainage B					
Non-wetland waters (OHWM)	0.01	-	-	0.01	97
Streambed-TOB	-	-	0.05	0.05	n/a
<i>Sub-total</i>	<i>0.01</i>	<i>0.00</i>	<i>0.05</i>	<i>0.06</i>	<i>97</i>
Isolated Features					
Isolated Wetland (RWQCB, CDFW)	-	0.07	-	0.07	n/a
Isolated Riparian (CDFW)	-	-	1.29	1.29	n/a
<i>Sub-total</i>	<i>n/a</i>	<i>0.07</i>	<i>1.29</i>	<i>1.36</i>	<i>n/a</i>
TOTAL	6.86	0.07	31.07	38.00	13,957

Notes:

BSA = biological study area; CDFW = California Department of Fish and Wildlife; OHWM = Ordinary High-Water Mark;
RWQCB = Regional Water Quality Control Board; TOB = Top of Bank; USACE = U.S. Army Corps of Engineers



Source: AECOM, 2023; Prepared By: AECOM, 2023.

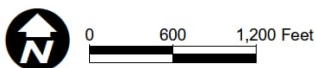
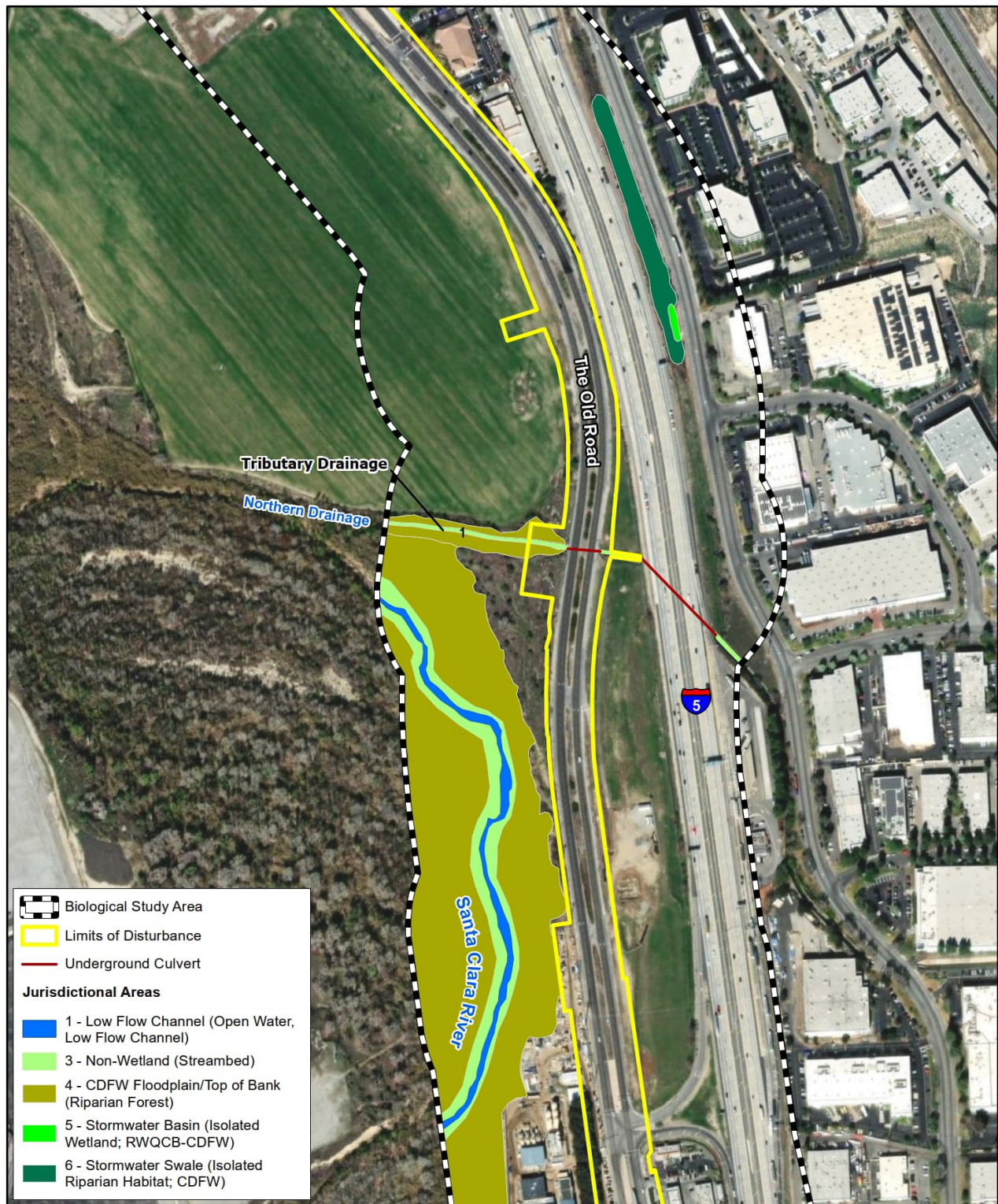


Figure 14
Jurisdictional Delineation Map

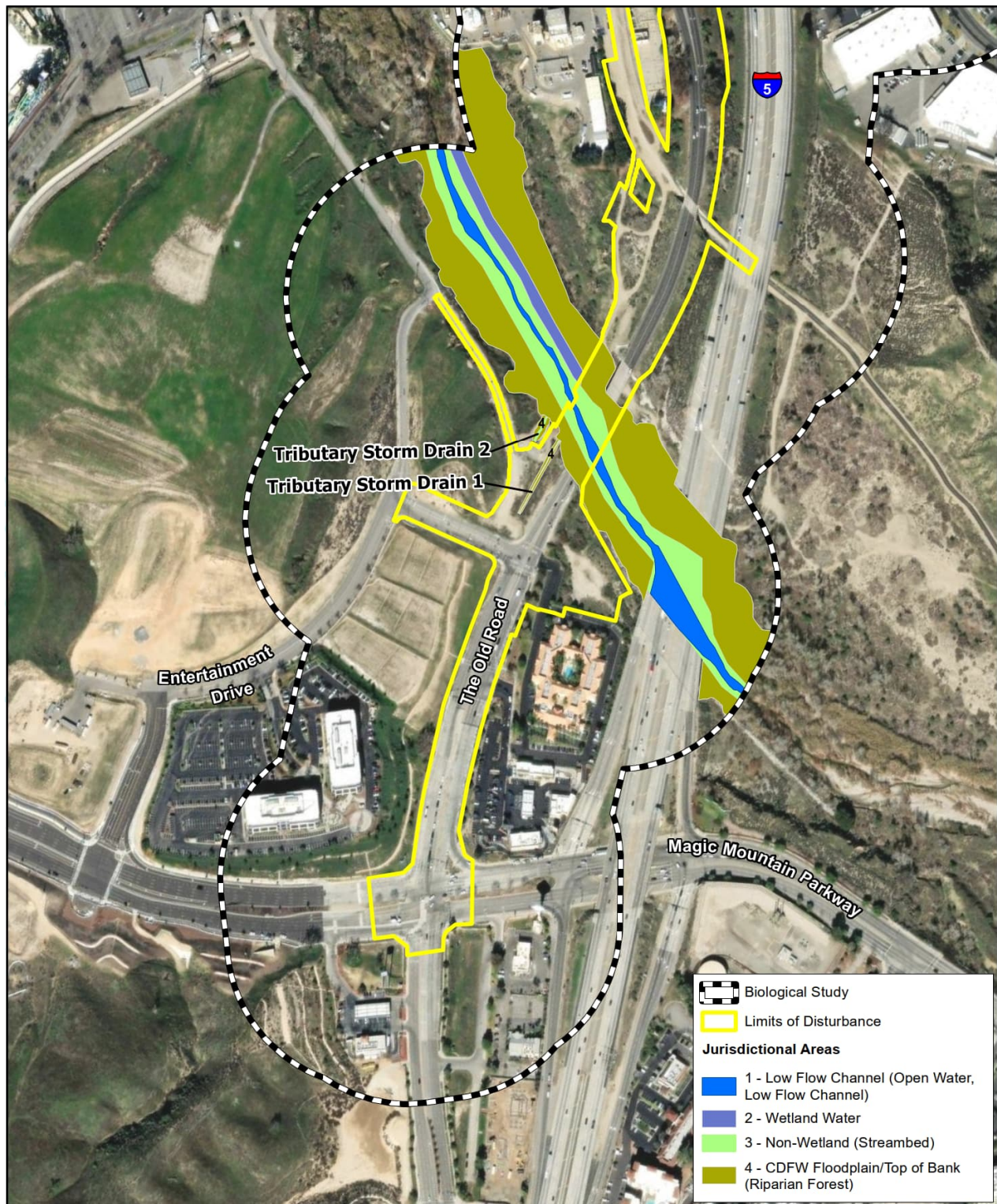


Source: AECOM, 2023; Esri, 2023; Prepared By: AECOM, 2023.



0 250 500 Feet

Figure 14a
Jurisdictional Delineation Map



Source: AECOM, 2023; Esri, 2023; Prepared By: AECOM, 2023.



0 250 500 Feet

Figure 14b
Jurisdictional Delineation Map

Permanent impacts would occur at three features—the Santa Clara River, the Northern Drainage, and Drainage A. The project may permanently impact up to 0.33 acre and temporarily impact 0.15 acre of WOTUS. The indirect impact from expanded bridge shading would affect 0.26 acre of WOTUS. The total impacts on CDFW-jurisdictional streambeds and riparian habitat would include approximately 1.07 acres of permanent impacts and 0.43 acre of temporary impacts, as well as 0.68 acre (project bridge shading) and 0.02 acre (project bridge columns). These impacts are shown in Table 2-52.

Table 2-52: Permanent and Temporary Impacts on Jurisdictional Waters of the U.S./State within The Old Road BSA

Jurisdictional Feature	Impact Type	Permanent (acres)	Temporary (acres)
Northern Tributary			
Non-wetland Waters	Riprap	0.03	-
	Temp Construction Access	-	0.01
	Concrete Structure (riprap transition)	0.01	-
	Road Widening	0.01	0.02
<i>Non-wetland Waters Subtotal</i>		0.05	0.03
CDFW-only	Riprap	0.10	-
	Temporary Construction Access	-	0.06
	Access Ramp	0.01	-
	Concrete Structural (riprap transition)	0.01	-
	Culvert Extension	0.01	-
	Road Widening	-	0.01
<i>CDFW-only Subtotal</i>		0.13	0.07
<i>Northern Tributary Subtotal</i>		0.05 (USACE) 0.05 (RWQCB) 0.18 (CDFW)	0.03 (USACE) 0.03 (RWQCB) 0.10 (CDFW)
Santa Clara River			
Non-wetland Waters	Shading ¹	0 (USACE); 0.26 (RWQCB)	-
	Bridge Piles	0.005 (USACE)	-
	Access (not under bridge)	-	0.12
	Access (under new bridge ²)	-	[0.26]
<i>Non-wetland Waters Subtotal</i>		0.005 (USACE) 0.27 (RWQCB)	0.12 (USACE) 0.12 (RWQCB)
CDFW-only	Shading ¹	0.42	-
	Bridge Piles	0.007	-
	Access (not under bridge)	-	0.21
	Access (under new bridge ²)	-	[0.09]
<i>CDFW-only Subtotal</i>		0.43	0.21
<i>Santa Clara River Subtotal</i>		0.005 (USACE) 0.27 (RWQCB) 0.70 (CDFW)	0.12 (USACE) 0.12 (RWQCB) 0.33 (CDFW)
Drainage A			
Non-wetland Waters	Road/Bridge Widening	0.01	-
<i>Non-wetland Waters Subtotal</i>		0.01	0
CDFW-Only Streambed	Road/Bridge Widening	0.08	-
<i>CDFW-only subtotal</i>		0.08	0
<i>Drainage A Subtotal</i>		0.01 (USACE) 0.01 (RWQCB) 0.09 (CDFW)	0 (USACE) 0 (RWQCB) 0 (CDFW)

Jurisdictional Feature	Impact Type	Permanent (acres)	Temporary (acres)
Total Impact Summaries			
Northern Tributary Subtotal		0.05 (USACE) 0.05 (RWQCB) 0.18 (CDFW)	0.03 (USACE) 0.03 (RWQCB) 0.10 (CDFW)
Santa Clara River & Drainage A		0.02 (USACE) 0.28 (RWQCB) 0.79 (Total CDFW)	0.12 (USACE) 0.12 (RWQCB) 0.33 (Total CDFW)
TOTAL IMPACT SUMMARY³		0.07 (USACE) 0.33 (RWQCB) 1.07 (Total CDFW)	0.15 (USACE) 0.15 (RWQCB) 0.43 (Total CDFW)

Notes:

BSA = biological study area; CDFW = California Department of Fish and Wildlife; OHWM = Ordinary High-Water Mark; RWQCB = Regional Water Quality Control Board; TOB = Top of Bank; USACE = U.S. Army Corps of Engineers

- Regarding shading, the two State agencies have decided to consider such impacts to be permanent. However, because no fill material specifically would exist with such shading (other than bridge piles), USACE may not concur with the permanent impact assumption. Work under the bridge would be considered temporary by USACE.
- Already accounted under permanent impacts for State agencies. For USACE specifically, the work under the new bridge (referred to shaded area above) would be considered temporary as access must occur for bridge construction. The 0.09 acre in the temporary column is not counted twice, because it already is taken into account as shading (permanent), and this area is outside the USACE and RWQCB jurisdictional area. Thus, acreage within brackets [] is not included for impact/mitigation purposes. Additional refinement of mitigation requirements would be completed in the permitting process.
- Calculation of mitigation would be driven by impacts considered by the LA RWQCB and CDFW.

For The Old Road Bridge over the Santa Clara River, the only permanent features are the bridge pilings (0.012 acre across both WOTUS and CDFW jurisdiction). Otherwise, the current and proposed bridge span areas (shading impacts) would result in 0.68 acre (i.e., 0.026-acre over WOTUS; 0.42-acre over adjacent CDFW-only streambed and riparian habitat).

The shading impacts would be considered temporary with respect to aquatic resources. The riparian vegetation impact analysis considered the new shading impacts to be permanent, but because the waters still would exist under the bridge, they would be considered to still be present (and thus not permanently affected).

As discussed in Section 2.3.2, the potential also would exist for temporary indirect water quality impacts through sediment introduction and transport downstream. BMPs would be implemented, and all project-related grading would be subject to the typical restrictions and requirements that address dust control, erosion, and runoff, including those in the CWA and NPDES Permit, to avoid or minimize indirect impacts on jurisdictional areas during construction.

2.4.2.4 Avoidance, Minimization, and/or Mitigation Measures

With implementation of VEG-1 through VEG-5 and GEN-15, the potential impacts on jurisdictional areas would not be adverse. Extensive AMMs and BMPs would be implemented on the banks of the Santa Clara River. The avoidance and minimization measures described previously under VEG-1 through VEG-4 would also be implemented. These measures would include use of BMPs and water trucks to minimize fugitive dust.

The compensation mitigation described previously for VEG-5, VEG-6, and GEN-15 would be implemented and provide the necessary compensation for impacts on the Santa Clara River. All mitigation activities would be conducted in accordance with the Habitat Mitigation and Monitoring Plan, because of USACE, the LA RWQCB, and CDFW would be part of the regulatory permitting process. Additional mitigation measures for impacts on waters would include the following:

WATERS-1: LACPW will notify CDFW pursuant to Section 1602 of the Fish and Game Code. LACPW will comply with the mitigation measures detailed in the Lake and Streambed Alteration Agreement issued by CDFW. LACPW also will provide compensatory mitigation for any affected stream and associated natural community.

WATERS-2: LACPW will mitigate for project impacts on streams and riparian habitat by replacing habitat at no less than a 3:1 ratio for impacts on jurisdictional features as shown in Table 2-52, except for concrete-lined Drainage A. Drainage A will be mitigated at a 1:1 ratio. CDFW considers all project impacts from sediment removal and sediment placement to be permanent. Mitigated land will support streams and riparian habitat of similar vegetation composition, density, coverage, and species richness and abundance.

2.4.3 Plant Species

2.4.3.1 Regulatory Setting

The U.S. Fish and Wildlife Service (USFWS) and CDFW have regulatory responsibility for the protection of special-status plant species. Special-status species are selected for protection because they are rare and/or subject to population and habitat declines. Special-status is a general term for species that are provided varying levels of regulatory protection. The highest level of protection is given to threatened and endangered species; these are species that are formally listed or proposed for listing as endangered or threatened under the FESA and/or the California Endangered Species Act (CESA).

This section discusses all other special-status plant species, including CDFW species of special concern and California Native Plant Society (CNPS) rare and endangered plant species.

The regulatory requirements for FESA are under Title 16, Section 1531, et seq. of the USC (also refer to 50 CFR Part 402). The regulatory requirements for CESA are in Section 2050, et seq. of the California Fish and Game Code. Caltrans projects also are subject to the Native Plant Protection Act, in Sections 1900–1913 of the California Fish and Game Code, and under CEQA, in Sections 21000–21177 of the PRC.

2.4.3.2 Affected Environment

The following analysis is based on the NES (AECOM 2024h) that was prepared for the proposed project and is supported by several plant surveys that were conducted specifically for the proposed project. A literature review and records search were conducted to identify the existence or potential occurrence of sensitive or special-status plant species within or in the vicinity of the BSA. A total of 42 non-listed special-status plant species were identified on the USFWS (2022) species list as well as from the review of the CNDDDB and California Native Plant Society database. Based on an evaluation of the habitat types present relative to the habitat requirements of the special-status plant species known to occur within the BSA, a previous botanical survey in 2006, and 2018 and 2023 surveys (AECOM 2018), one special-status plant species, Southern California black walnut (*Juglans californica*) was confirmed present within the LOD and BSA (Figure 13c). The additional seven species that are shown in Table 2-53 with some potential to occur were not detected and are not expected to occur.

Table 2-53: Regional Special-Status Plant Species with Potential to Occur within the Biological Study Area

Scientific Name	Common Name	Status ¹			Peak Blooming Period	Preferred General Habitat Types and Elevation Range (feet amsl)	Associated Micro Habitat	Potential to Occur within BSA ²
		Federal	State	CRPR				
<i>Calystegia peirsonii</i>	Peirson's morning-glory	—	—	4.2	Apr-Jun	Chaparral, Chenopod scrub, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Valley and foothill grassland. 95 to 4,920 feet amsl	—	Not Detected
<i>Chorizanthe parryi</i> var. <i>fernandina</i>	San Fernando Valley spineflower	FC	CE	1B.1	Apr-Jul	Coastal scrub (sandy), Valley and foothill grassland. 490 to 4,005 feet amsl	—	Not Detected
<i>Deinandra paniculata</i>	paniculate tarplant	—	—	4.2	(Mar) April-Nov	Coastal scrub, Valley and foothill grassland, Vernal pools. 80-3,085 feet amsl	Usually vernal mesic, sometimes sandy	Not Detected
<i>Harpagonella palmeri</i>	Palmer's grapplinghook	—	—	4.2	Mar-May	Chaparral, Coastal scrub, Valley and foothill grassland. 65 to 3,135 feet amsl	Clay; open grassy areas within shrubland	Not Detected
<i>Helianthus inexpectatus</i>	Newhall sunflower	—	—	1B.1	Aug-Oct	Marshes and swamps, Riparian woodland. 1,000 feet amsl	Freshwater, seeps	Not Detected
<i>Juglans californica</i>	Southern California black walnut	—	—	4.2	Mar-Aug	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland. 160 to 2,955 feet amsl	Alluvial	Present: Seven individuals were observed adjacent to the Santa Clara River within the BSA
<i>Malacothamnus davidsonii</i>	Davidson's bush-mallow	—	—	1B.2	Jun-Jan	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland. 605 to 3,740 feet amsl	—	Not Detected
<i>Pseudognaphalium leucocephalum</i>	white rabbit-tobacco	—	—	2B.2	(Jul) Aug-Nov (Dec)	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland. 0 to 6,890 feet amsl	Sandy, gravelly	Not Detected

Notes:

amsl = above mean sea level; BSA = biological study area; CRPR = California Rare Plant Rank

1. Status:

Federal

FE = Species listed as Endangered under the Federal Endangered Species Act (FESA)

FT = Species listed as Threatened under FESA

FC = Species considered a candidate for listing under FESA

California

CE = Species listed as Endangered under CESA

CT = Species listed as Threatened under CESA

CR = Species listed as Rare under the Native Plant Protection Act (plants only)

Additional special-status plant surveys were conducted across the BSA in spring and summer 2023 to provide updated survey results. Of the eight special-status plant species that had potential to occur, only Southern California black walnut was encountered within the BSA in 2023, despite abundant rainfall in the preceding winter. Southern California black walnut also was observed in a survey in 2018, outside the LOD and 500-foot buffer area. Seven individuals, ranging from approximately 2 to 7 meters in height, were observed in 2023 botanical surveys in the vicinity of The Old Road Bridge adjacent to the Santa Clara River. One Southern California black walnut was observed within the LOD near The Old Road and would be directly affected by the proposed project. The other observations were outside the LOD and would not be directly affected.

As required by LA County and pursuant to Sections 22.56.2050–2260 of the LA County Code, AECOM prepared an Oak Tree Report (AECOM 2019b) to provide information to LA County on oak trees that may be removed or affected by the proposed project. AECOM surveyed 59 native oak trees (56 valley oak [*Quercus lobata*] and three coast live oak [*Quercus agrifolia*] within the BSA, which would be subject to the LA County Oak Tree Ordinance, including the LOD and all areas within 500 feet of the LOD. Most of the oak trees recorded within the BSA were documented in the LOD along both sides of The Old Road just south of the intersection of The Old Road and Rye Canyon Road. Of the 59 native oak trees surveyed, 15 valley oak trees would be removed permanently by the proposed project. The trees proposed for removal are valley oak trees, two of which are heritage trees under the LA County Oak Tree Ordinance (i.e., 36 inches in diameter or greater). Fourteen oak trees are within temporary impact areas associated with construction access and temporary work areas and would be avoided to the greatest extent possible during project construction. Thirty native oak trees occur within 500 feet of the LOD, but none of them would be removed or encroached on by construction-related activities.

2.4.3.3 Environmental Consequences

Alternative 1: No-Build Alternative

No construction or operational impacts would occur on plant species from the No-Build Alternative.

Alternative 2: Build Alternative

The potential would exist for temporary or permanent impacts on several Southern California black walnut trees in the vicinity of The Old Road Bridge (Figure 13c). One Southern California black walnut tree would be removed or totally shaded by the expansion of The Old Road bridge. One additional Southern California black walnut tree is in close proximity to the LOD between The Old Road and I-5, but it likely could be avoided by installation of environmental protective fencing. The five other Southern California black walnut trees are far enough from the LOD (which is on the east side of I-5) that they would be unlikely to be affected by the proposed project.

As indicated above, 15 valley oak trees would be removed by project implementation and would be subject to the LA County Oak Tree Ordinance. Thus, obtaining an oak tree permit for the permanent removal of these trees may be necessary.

2.4.3.4 Avoidance, Minimization, and/or Mitigation Measures

The following avoidance and minimization measure would be implemented for potential impacts on the two Southern California black walnut trees in and around The Old Road Bridge:

WALNUT-1: The proposed project will directly impact one Southern California black walnut tree and indirectly impact one additional tree. A preconstruction survey will be conducted to identify the exact LOD, during which protective fencing will be placed around the tree that may be indirectly affected. If feasible, the Southern California black walnut tree within the direct footprint of the expanded bridge will be transplanted outside the LOD along the bank of the Santa Clara River. In addition, because transplanting is not always successful, any Southern California black walnut tree that may be directly affected by the proposed project will be mitigated a 2:1 ratio (as individuals, not acreage). The mitigated trees will be planted nearby at an acceptable location for this species. Ideally, any replacement may be grown in a nursery and replanted before project implementation. Otherwise, purchasing walnut trees from a native plant nursery will be acceptable, preferably from stock originating in LA County. In addition, the LA County Department of Regional Planning will be included on the list of regulatory agencies to consult for the replacement ratio of 2:1 for removal of the one Southern California black walnut tree.

The following would be implemented to minimize impacts on oak trees that would not be removed but occur within proximity of construction activities. These measures are intended to preserve and protect the remaining oak trees in the project area⁵:

OAK-1: A plan will be developed for protecting oak trees during project construction. The intent will be to install high-visibility protective fencing along the boundary of The Old Road ROW in areas adjacent to oak trees. For any oak trees outside The Old Road ROW, this plan will be prior-approved by the LA County Fire Department's Forestry Division. For any oak trees within The Old Road ROW, this plan will be prior-approved by LACPW.

Equipment damage to limbs, trunks, and roots of all remaining trees will be avoided during project construction. Even slight trunk injuries can result in susceptibility to long-term pathogenic maladies.

High-visibility protective fencing not less than 4 feet in height will be placed at the limits of The Old Road ROW, where the protective zone of any individual oak tree or dense stand of oak trees are within 200 feet of the grading limits. Oak tree high-visibility protective fencing will be in accordance with Chapter 22.176 of the LA County Code. The protective zone is defined as within the dripline of an oak tree and extending to a point at least 5 feet outside the dripline, or 15 feet from the trunk of a tree, whichever distance is greater. This fencing will be inspected before the start of project construction in the area and will remain in place until construction is completed.

⁵ Any oaks in The Old Road ROW would not be subject to the oak tree ordinance and replacement ratios.

OAK-2: Care will be taken to limit grade changes near the protective zone of an oak tree. Grade changes can lead to plant stress from oxygen deprivation or oak root fungus at the root collar of oaks. Minor grade changes farther from the trunk are not as critical but can negatively affect the health of the tree if not carefully monitored by a County-approved certified arborist.

- The grade will not be lowered or raised around the trunk (i.e., within the protective zone) of any oak tree without the approval of an LA County forester or LACPW (as applicable), or an LA County-certified arborist as specified in an approved oak tree permit. A certified arborist will supervise all excavation or grading within the protective zone of an oak tree.
- Trenching, excavation, or clearance of vegetation within the protective zone of an oak tree will be accomplished by use of hand tools or small handheld power tools. Any major roots encountered will be conserved to the greatest extent possible and treated as recommended by the certified arborist.
- No utility trenches will be routed within the protective zone of an oak tree unless no feasible alternative locations are available, and such action will be prior-approved by an LA County forester or LACPW, as determined appropriate.

OAK-3: The following items will guide equipment storage:

- No storage of equipment, supplies, vehicles, or debris will be permitted within the protective zone of an oak tree.
- No dumping of construction wastewater, paint, stucco, concrete, or any other cleanup waste will occur within the protective zone of an oak tree.
- No temporary structures will be placed within the protective zone of any remaining oak tree.

OAK-4: Healthy trees, if not maintained, often grow beyond their ability to support themselves and fail at their naturally occurring weakest point. This point typically is at a branch union or near the main crotch of the tree. Weight-reduction pruning and/or cabling will be part of tree maintenance and preservation program, and specifically:⁶

- Pruning of replacement oak trees and preserved oak trees will include the removal of dead wood and stubs, and medium pruning of branches measuring 2 inches in diameter or less.
- Pruning of replacement oak trees and preserved oak trees will be in accordance with the guidelines published by the National Arborist Association. In no case will more than 25% of the overall tree canopy and 10% of the overall root mass of any oak tree be removed. After pruning, installation of support cables to prevent future main crotch failures may be necessary, based on a County-certified arborist's determination.

⁶ If LACPW replaces oaks and/or otherwise plant oaks, this will occur at a designated mitigation site, and maintenance will be conducted per the agreement for the site. As a general rule, LACPW does not maintain oaks in natural areas.

- All replacement oak trees will be maintained in accordance with the principles set forth in the publication, Oak Trees: Care and Maintenance (LA County Fire Department, Forestry Division 2022).
- A 5-year maintenance period will begin on the start replacement tree planting. All replacement trees failing to survive within this period will be replaced.

OAK-5: Care will be taken to avoid placing any irrigation devices within watering distance of the protected zone of oak trees. Oak trees survive and thrive on annual rainfall alone and generally do not require supplemental irrigation, except during periods of extreme drought or for establishment of newly planted trees (i.e., replacement trees):

- Irrigation water will not reach within 15 feet of any oak trunk.
- Grass and ground covers will not be planted under the canopy of any oak trees.

OAK-6: An LA County-approved arborist will evaluate the effects of mistletoe, pathogens, and insect pests on the preserved and planted oak trees within the 5-year maintenance period, in addition to the overall health and structural integrity of the trees, to ensure the longevity of the remaining oak trees.

OAK-7: Damage to remaining trees will be avoided by workers and equipment during construction activities:

- A qualified biologist or LA County-certified arborist will monitor on-site construction and grading activities occurring near all identified oak tree protection zones, to ensure that damage to oak trees does not occur.
- Before the start of construction, a qualified biologist or LA County-certified arborist will schedule a field meeting to inform construction workers where all protective zones are located and the importance of avoiding encroachment within the protective zones.

Compensatory Mitigation

As detailed previously under WALNUT-1, any Southern California black walnut trees that would be directly impacted by the proposed project would be mitigated at a 2:1 ratio (as individuals, not acreage). Pursuant to Sections 22.56.2050–2260 of the LA County Oak Tree Ordinance, the following compensatory mitigation would be implemented to compensate for the 15 valley oak trees that would be removed permanently by the proposed project:

OAK-8: All oak trees that are removed will be replaced by a tree of the same species at a ratio of 2:1. All heritage trees that will be removed will be replaced at a 10:1 ratio. All replacement trees will be at least 24-inch-tall box trees and measure 1 inch or more in diameter, as measured from 1 foot above the base. Free-form trees with multiple stems will be permissible; the combined diameter of the two largest stems of such trees will measure a minimum of 1 inch in diameter, as measured from 1 foot above the base. Replacement trees will consist exclusively of indigenous oak trees and be certified as being grown from a seed source collected in LA County or Ventura County. In addition, the LA County Department of Regional Planning will be included on the list of

regulatory agencies to consult for the 2:1 ratio replacement for the removal of 15 valley oak trees.

2.4.4 Wildlife Species

2.4.4.1 Regulatory Setting

Many State and federal laws regulate impacts on wildlife species. USFWS, the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS), and CDFW are responsible for implementing these laws. This section discusses potential impacts and permit requirements associated with wildlife not listed or proposed for listing under the FESA or CESA. Species listed or proposed for listing as threatened or endangered are discussed in Section 2.4.5. All other special-status wildlife species are discussed herein, including CDFW fully protected species and species of special concern. Federal laws and regulations relevant to non-federally listed wildlife include the following:

- NEPA
- Migratory Bird Treaty Act
- Bald and Golden Eagle Protection Act
- Fish and Wildlife Coordination Act

State laws and regulations relevant to wildlife include the following:

- CEQA
- Sections 1600–1603, 2000, 2002, 2014, 3503, 3503.3, 3511, 4150 4152, 4700, 5050, and 5515 of the California Fish and Game Code.

2.4.4.2 Affected Environment

The following analysis is based on the NES (AECOM 2024h) that was prepared for the proposed project, which is supported by several species-specific focused biological surveys. Biological surveys in support of the proposed project were conducted in 2018, with additional and updated surveys conducted in 2023. Table 2-46 lists the biological surveys that have been conducted to-date for the proposed project.

The list of special-status wildlife species occurring in the project region was evaluated for their potential to occur within the BSA, which consists of the footprint of the proposed project and areas that may be affected directly or indirectly by the proposed project. Six fish, four amphibian, six reptile, 41 bird, and seven mammal species have been documented within the BSA.

The Santa Clara River has a perennial flow, maintaining moist soil throughout the year that provides habitat for fish, amphibian, reptile, avian, and mammalian species. Common fish species that have been detected include arroyo chub (*Gila orcuttii*), mosquito fish (*Gambusia affinis*), largemouth bass (*Micropterus salmoides*), common carp (*Cyprinus carpio*), California killifish (*Fundulus parvipinnis*), and Santa Ana sucker (*Catostomus santaanae*). Common amphibian species that have been detected within the BSA include western toad (*Anaxyrus boreas*), Baja California treefrog (*Pseudacris hypochondriaca*), American bullfrog (*Lithobates catesbeiana*), and African clawed frog (*Xenopus laevis*). Reptile species that have detected

include western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), two-striped garter snake (*Thamnophis hammondi*), red racer (*Coluber flagellum piceus*), and red-eared slider (*Trachemys scripta elegans*).

The riparian vegetation communities and adjacent upland vegetation provide high-quality habitat for common bird species, including mallard (*Anas platyrhynchos*), turkey vulture (*Cathartes aura*), red-tailed hawk (*Buteo jamaicensis*), Cooper's hawk (*Accipiter cooperii*), green heron (*Butorides virescens*), common yellowthroat (*Geothlypis trichas*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), northern flicker (*Colaptes auratus*), western scrub jay (*Aphelocoma californica*), black phoebe (*Sayornis nigricans*), American crow (*Corvus brachyrhynchos*), bushtit (*Psaltiriparus minimus*), ruby-crowned kinglet (*Regulus calendula*), spotted towhee (*Pipilo maculata*), California towhee (*Pipilo crissalis*), song sparrow (*Melospiza melodia*), white-crowned sparrow (*Zonotrichia leucophrys*), and house finch (*Carpodacus mexicanus*).

The BSA provides foraging and cover habitat for the following common mammal species: coyote (*Canis latrans*), Virginia opossum (*Didelphis virginianus*), bobcat (*Lynx rufus*), striped skunk (*Mephitis mephitis*), dusky-foot woodrat (*Neotoma fuscipes*), mule deer (*Odocoileus hemionus*), deer mouse (*Peromyscus californicus*), raccoon (*Procyon lotor*), California ground squirrel (*Otospermophilus beecheyi*), Botta's pocket gopher (*Thomomys bottae*), Mexican free-tailed bat (*Tadarida brasiliensis*), big brown bat (*Eptesicus fuscus*), silver haired bat (*Lasionycteris noctivagans*), western pipistrelle (*Pipistrellus hesperus*), and California myotis (*Myotis californicus*).

Non-Listed Special-Status Wildlife Species

This section discusses non-listed special-status wildlife species that have been detected within the BSA or are likely to occur within the BSA and be affected by the proposed project. Species that do not occur or are unlikely to occur are listed in Table 2-54 but are not described below. This section includes fish, reptiles and amphibians, birds (species protected by the Migratory Bird Treaty Act), and mammals.

Fish

Arroyo chub is a CDFW species of special concern in its native range, which includes the Los Angeles, San Gabriel, San Luis Rey, Santa Ana, and Santa Margarita rivers, and Malibu and San Juan creeks (CDFW 2024). It prefers slow-moving or backwater sections of warm to cool streams with muddy or sandy bottoms, but sometimes tolerates fairly fast-moving sections of stream with coarse substrate. This species was introduced to many river systems in Southern California outside its native range and is a dominant fish species in the Santa Clara River and its tributaries, where perennial aquatic habitat is present. During the most recent fish surveys that were conducted in the Northern Drainage (Merkel & Associates 2023), arroyo chub were commonly observed, and it is known throughout the Santa Clara River within the BSA.

Table 2-54: Regional Special-Status Wildlife Species with Potential to Occur within the Biological Survey Area

Common Name Scientific Name	Sensitivity Status ¹	General Habitat Description ²	Potentially Suitable Habitat Present/Absent	Potential to Occur in the BSA ^{3, 4}
INVERTEBRATES				
Crotch's bumble bee <i>Bombus crotchii</i>	California Department of Fish and Wildlife (CDFW): CE	Occurs at relatively warm and dry sites, including the inner Coast Range of California and the margins of the Mojave Desert. Requires large patches of nectar source flowers.	Absent	Unlikely. Based on 2023 botanical surveys after a wet winter/spring, large patches of nectar source flowers are absent from the biological study area (BSA). The habitat is primarily urban/developed and disturbed followed by riparian vegetation, with patches of nonnative grassland. This habitat is generally not conducive for native bee species. Furthermore, focused Crotch's bumble bee surveys were conducted throughout the BSA in 2024, and none were detected (AECOM 2024c). Most habitat within the BSA has been disturbed historically, is fragmented, and does not contain large patches of consistent high quality nectar sources. The habitat is low-quality, and therefore the species is unlikely to occur within the BSA.
Vernal pool fairy shrimp <i>Branchinecta lynchi</i>	U.S. Fish and Wildlife Service (USFWS): FT	Occurs primarily in vernal pools, seasonal wetlands that fill with water during fall and winter rains and dry up in spring and summer. The majority of pools in any vernal pool complex are not inhabited by the species at any one time. Different pools within or between complexes may provide habitat for the fairy shrimp in alternative years, as climatic conditions vary.	Absent	Does not occur. No suitable vernal pool habitat is present within the BSA.
Monarch- California overwintering population <i>Danaus plexippus</i> pop. 1 (California overwintering population)	USFWS: FC	Overwinters in coastal California, generally in large eucalyptus or other tree groves. Life-cycle relies on milkweed host plant to be present.	Present	Unlikely. Based on 2023 botanical surveys, an isolated occurrence of narrow-leaf milkweed was detected within the BSA, which was a larval host plant. The occurrence was in a weedy patch along the road edge and is unlikely to support breeding monarch butterflies. Furthermore, no forest groves (usually eucalyptus) exist where the species can

Common Name Scientific Name	Sensitivity Status ¹	General Habitat Description ²	Potentially Suitable Habitat Present/Absent	Potential to Occur in the BSA ^{3,4}
				overwinter within or around the BSA. The species generally prefers coastal sites for overwintering.
Quino checkerspot butterfly <i>Euphydryas editha quino</i>	USFWS: FE	Occurs in coastal sage scrub habitats in Southern California and northern Baja California. Larvae rely on host plants <i>Plantago erecta</i> or <i>Castilleja exserta</i> , found in meadows and upland sage scrub/chaparral.	Absent	Does not occur. This species is considered extirpated from LA County, and the BSA is outside the species range.
FISH				
Santa Ana sucker <i>Catostomus santaanae</i>	USFWS: FT (however, this designation does not apply to the population in the Santa Clara River)	Typically found in pools and runs of small to medium size, shallow, permanent streams with cool, unpolluted water and coarse substrates of boulder, rubble, and sand. Sometimes occurs on sand/mud bottom. Can inhabit reservoirs. Prefers areas with riparian vegetation that provides cover and refuge from floods.	Present	Occurs. Suitable habitat in the Santa Clara River occurs within the BSA. Santa Ana sucker was detected in 2023 fish surveys for the Northern Drainage. However, the population is considered transplanted in the Santa Clara River and not considered FT.
Unarmored threespine stickleback <i>Gasterosteus aculeatus williamsoni</i>	USFWS: FE CDFW: SE, FP	Slow-moving sections of freshwater or brackish water stream habitat with protective cover. Optimal cover may include vegetation and filamentous algae, but any natural shelter (e.g., rocks, logs, stream banks) is sufficient.	Present	Occurs. Suitable habitat in the Santa Clara River occurs within the BSA. Unarmored threespine stickleback historically has been observed in the stretch of the river within the BSA (Caltrans 2008). Although 2023 fish surveys failed to detect the species in the Northern Drainage, CDFW assumes that the species is present throughout the river within the BSA, including the Northern Drainage.
Arroyo chub <i>Gila orcuttii</i>	CDFW: SSC	Required habitat includes slow-moving or backwater sections of warm to cool (10 to 24 degrees Celsius) streams with mud or sand substrates. Depths of streams typically are greater than 16 inches.	Present	Occurs. Suitable habitat in the Santa Clara River occurs within the BSA. The species was detected during 2023 fish surveys in the Northern Drainage.
Southern California Steelhead Distinct Population Segment <i>Oncorhynchus mykiss</i>	National Marine Fisheries Service (NMFS): FE CDFW: SSC	Found in Pacific Ocean tributaries, from the Aleutian Islands in Alaska south to Southern California. Anadromous forms are known as steelhead, and freshwater forms as rainbow trout.	Absent	Unlikely. Although potentially suitable habitat for this species occurs within the BSA, upstream migration from the ocean to the BSA is restricted 10 miles from the coast by the Freeman Diversion Dam (the BSA is roughly 40 miles upstream from the coast). Counts of adults above the dam have been variable, but generally have been low since the late 1990s. The species is known primarily

Common Name <i>Scientific Name</i>	Sensitivity Status ¹	General Habitat Description ²	Potentially Suitable Habitat Present/Absent	Potential to Occur in the BSA ^{3, 4}
				from lower reaches of the Santa Clara River and Santa Paula, Sespe, Hopper, and Piru creeks. Recent drought years have further restricted upstream migration (NMFS 2016).
Santa Ana speckled dace <i>Rhinichthys osculus</i> ssp. 3 (Santa Ana speckled dace)	CDFW: SSC	Found primarily in shallow perennial streams fed by cool springs with water temperatures below 20 degrees Celsius.	Present	Unlikely. Attempts to establish additional populations of Santa Ana speckled dace have been made through introductions into the Santa Clara and Cuyama rivers. The introduction into the Santa Clara River is thought to have failed; the species was not detected during the 2023 fish surveys of the Northern Drainage.
AMPHIBIANS				
Arroyo toad <i>Anaxyrus californicus</i>	USFWS: FE CDFW: SSC	Gravelly or sandy washes, stream and riverbanks, and arroyos. Also upland habitat near washes and streams, such as sage scrub, mixed chaparral, Joshua tree woodland, and sagebrush habitats.	Present	Unlikely. Suitable habitat is present within the BSA and federally designated critical habitat is within the BSA. A single individual was captured and released in the Santa Clara River, just east of I-5 in 1994. Tadpoles historically were found just west of The Old Road Bridge. Focused surveys that were conducted in 2023 did not detect the species, and it likely is extirpated from the BSA.
Foothill yellow-legged frog-south coast Distinct Population Segment <i>Rana boylei</i> pop. 6	USFWS: PE CDFW: SE, SSC	Inhabits partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Requires some cobble-sized substrate for egg-laying.	Absent	Does not occur. Although potentially suitable habitat is present within the BSA, historical records of this species are from 1966 and 1977 from Piru Creek, approximately 10 miles west of the BSA. The species is assumed extirpated.
California red-legged frog <i>Rana draytonii</i>	USFWS: FT CDFW: SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11 to 20 weeks of permanent water for larval development and must have access to aestivation habitat. Endemic to California and Baja California, at elevations ranging from sea level to 5,000 feet amsl. Has a distinct aquatic and upland habitat requirement that includes	Absent	Does not occur. Although riparian habitat is present, other distinct aquatic and upland features are not present within the BSA.

Common Name Scientific Name	Sensitivity Status ¹	General Habitat Description ²	Potentially Suitable Habitat Present/Absent	Potential to Occur in the BSA ^{3, 4}
		pools of slow-moving streams, perennial or ephemeral ponds, and upland sheltering habitats.		
Southern mountain yellow-legged frog <i>Rana muscosa</i>	USFWS: FE CDFW: SE, WL	Found in the southern Sierra Nevada in lakes, ponds, and streams. Requires breeding habitat that does not dry out year-round.	Absent	Does not occur. Suitable mountain streams do not occur within the BSA.
Western spadefoot <i>Spea hammondi</i>	USFWS: proposed threatened CDFW: SSC	Occurs in grasslands, oak woodlands, coastal sage scrub, and chaparral habitats. Vernal pools or other ephemeral ponded waters that are relatively still are essential for breeding and egg-laying.	Absent	Unlikely. Marginal upland aestivation habitat is present within the BSA, but temporary ponded areas that are required for breeding are absent. Several old records exist outside the BSA along San Francisquito Creek at the confluence of the Santa Clara River in 2001. The species was not detected during the focused arroyo toad surveys in 2023.
Coast Range newt <i>Taricha torosa</i>	CDFW: SSC	Found in the coast ranges from Mendocino County to northern San Diego County. Occurs primarily in valley foothill hardwood, valley foothill hardwood conifer, coastal scrub, and mixed chaparral, but also is known from annual grassland and mixed conifer types. Elevation range extends from near sea level to about 6,000 feet amsl.	Absent	Does not occur.
REPTILES				
Southern California legless lizard <i>Anniella stebbinsi</i>	CDFW: SSC	Occurs in loose sand, loam, or humus substrates. Frequently found in leaf litter. Burrows in washes, dune sand, and loose soils near slopes and streams.	Present	Likely. Suitable sandy soils and riparian woodland are present in the project area. The species was detected recently along the banks of the Santa Clara River just west by Commerce Center Drive.
California glossy snake <i>Arizona elegans occidentalis</i>	CDFW: SSC	Occurs in deserts and semi-arid habitats but also can be found in coastal sage scrub or chaparral habitats. Frequently found in sandy soils or leaf litter, in elevations from below sea level to 6,000 feet amsl.	Present	Likely. Sage scrub habitat and suitable sandy soils and leaf litter are present within the BSA. Several historical occurrences have been in the Santa Clara River and tributaries, between I-5 and I-14. The population is presumed extant.
Coastal whiptail <i>Aspidoscelis tigris stejnegeri</i>	CDFW: SSC	Occurs in deserts and semi-arid habitats. Soils may be firm, sandy, or rocky. Found in areas with sparse vegetation.	Present	Occurs. This species was encountered in an incidental observation during the 2018 surveys.

Common Name Scientific Name	Sensitivity Status ¹	General Habitat Description ²	Potentially Suitable Habitat Present/Absent	Potential to Occur in the BSA ^{3,4}
Southwestern pond turtle <i>Actinemys pallida</i>	USFWS: proposed threatened CDFW: SSC	Inhabits permanent or nearly permanent water bodies and requires basking sites, such as partially submerged logs, vegetation mats, or open mud banks.	Present	Occurs. Suitable riparian habitat is present within the BSA, and this species has been detected historically in the Santa Clara River. Multiple occurrences were reported in the Santa Clara River in 2015, between The Old Road and Castaic Junction and within the BSA. In addition, this species was detected during the 2023 survey within the BSA, in the Northern Drainage.
Coast horned lizard <i>Phrynosoma blainvillii</i>	CDFW: SSC	Found in scrubland, grassland, coniferous forests, and broadleaf woodland. Prefers sandy washes with scattered cover. Needs areas of loose soil for concealment.	Present	Likely. Suitable sandy soils are present within the BSA. A single occurrence in 2015 was between I-5 and SR-126, within the BSA.
Two-striped garter snake <i>Thamnophis hammondi</i>	CDFW: SSC	Permanent or semi-permanent water bodies in a variety of habitats.	Present	Occurs. Historical survey data from 2008 confirmed the species presence. However, it was not detected more recently in 2023, during the focused surveys for other reptile and amphibian species.
BIRDS				
Cooper's hawk <i>Accipiter cooperii</i>	CDFW: WL	Found in woodlands, chiefly of open, interrupted or marginal type. Nest sites are mainly in riparian growths of deciduous trees, such as canyon bottoms on river floodplains. Also known to nest in live oaks.	Present	Occurs. Suitable nesting habitat is present throughout the BSA. Species was observed regularly along the Santa Clara River during surveys in 2006 (Caltrans 2008), and historic occurrences have been recorded upstream and downstream from the BSA. In addition, the species most recently was detected incidentally during the 2023 survey.
Southern California rufous-crowned sparrow <i>Aimophila ruficeps canescens</i>	CDFW: WL	Resident in Southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.	Present	Likely. Marginal suitable habitat occurs in the BSA scrub habitat. In 2006, one individual was observed along Castaic Creek, west of the BSA (Caltrans 2008).
Grasshopper sparrow <i>Ammodramus savannarum</i>	CDFW: SSC	Associated with dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Prefers native grasslands with a mix of grasses, forbs, and scattered shrubs. This species is loosely colonial when nesting.	Absent	Does not occur. Suitable grassland habitat is absent from the BSA.

Common Name <i>Scientific Name</i>	Sensitivity Status ¹	General Habitat Description ²	Potentially Suitable Habitat Present/Absent	Potential to Occur in the BSA ^{3, 4}
Western burrowing owl <i>Athene cunicularia</i>	CDFW: SSC	Burrow sites are open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester dependent on burrowing mammals, including the California ground squirrel.	Present	Likely. Agricultural and grassland areas of the BSA potentially could support nesting or overwintering individuals. Known to occur (2007) within 2 miles of the BSA. Several recent records exist from the Six Flags Magic Mountain vicinity, but all from the winter/migration period. Species is unlikely to occur within the BSA as a breeding bird. It may occasionally be detected in winter or during migration.
Swainson's hawk <i>Buteo swainsonii</i>	CDFW: ST	Large, open grasslands with abundant prey in association with suitable nest trees. Foraging habitat includes native grasslands or lightly grazed pastures, alfalfa and other hay crops, and certain grain and row croplands. Nesting areas may be found in mature riparian forest.	Absent	Does not occur. This species is not known to nest or breed in the Los Angeles area and possibly is extirpated. The closest breeding locations are in the Antelope Valley. The species is known to migrate through the Santa Clara River but does not breed in the area.
Western yellow-billed cuckoo <i>Coccyzus americanus occidentalis</i>	USFWS: FT CDFW: SE	Summer resident of valley foothill and desert riparian habitats in California. Found along broad, lower flood bottoms of larger river systems, including the Colorado River, Sacramento and Owens valleys, South Fork of the Kern River, Santa Ana River, Armargosa River, and possibly San Luis Rey River.	Absent	Unlikely. Large, dense stands of mature riparian vegetation generally are lacking within the BSA. The species is a rare breeder in Southern California, mainly restricted to the Colorado River basin. A YBCU was detected in unsuitable habitat east of the BSA in the Santa Clara River in 2018. It was assumed to be a migrant.
White-tailed kite <i>Elanus leucurus</i>	CDFW: FP	Associated with rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Prefers open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	Present	Likely. The BSA contains suitable nesting habitat in the form of riparian vegetation. Foraging habitat is near the south end of the BSA. The nearest previously recorded CNDDDB occurrence was an active nest approximately 1 mile upstream from the BSA along the Santa Clara River in 2005.
Southwestern willow flycatcher <i>Empidonax traillii extimus</i>	USFWS: FE CDFW: SE	Typically nests in riparian woodlands that are marshy or at the water's edge.	Present	Unlikely. Although suitable habitat for this species occurs within the BSA, no confirmed SWFL has been detected in the Santa Clara River in the vicinity of the BSA, despite annual surveys conducted from 2017 to 2022, and in

Common Name <i>Scientific Name</i>	Sensitivity Status ¹	General Habitat Description ²	Potentially Suitable Habitat Present/Absent	Potential to Occur in the BSA ^{3, 4}
				2024 (Woodstar and Compliance Biology 2017, 2018, 2019, 2020, 2021, and 2022; AECOM 2024b). However, the potential exists for SWFL to use areas within the BSA as stop-over habitat during migration, and designated critical habitat for this species is within the BSA.
California horned lark <i>Eremophila alpestris actia</i>	CDFW: WL	Associated with short-grass prairie, "bald" hills, mountain meadows, open coastal plains, fallow grain fields, and alkali flats within coastal regions from Sonoma County to San Diego County and within the San Joaquin Valley.	Present	Likely. Suitable foraging habitat is within the grasslands associated with the BSA. This species was observed within proximity of the project area during 2006 avian surveys (Caltrans 2008).
Yellow-breasted chat <i>Icteria virens</i>	CDFW: SSC	Found in valley foothill riparian and desert riparian habitats in coastal areas and the foothills of the Sierra Nevada.	Present	Occurs. This species was encountered in an incidental observation within the BSA during 2018 surveys and was detected regularly during surveys from 2017 to 2022 (Woodstar and Compliance Biology 2017, 2018, 2019, 2020, 2021, and 2022).
Loggerhead shrike <i>Lanius ludovicianus</i>	CDFW: SSC	Associated with broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub, and washes. Prefers open country for hunting, with perches for scanning and fairly dense shrubs and brush for nesting.	Present	Likely. Suitable nesting habitat is present throughout the BSA.
Coastal California gnatcatcher <i>Poliophtila californica californica</i>	USFWS: FT CDFW: SSC	A permanent resident of coastal sage scrub, dominated by California sagebrush (<i>Artemesia californica</i>) and flat-topped buckwheat (<i>Eriogonum fasciculatum</i>), in arid washes, mesas, and slopes, generally below 1,500 feet in elevation. When nesting, typically avoids tall dense vegetation or slopes greater than 25%.	Absent.	Unlikely. The BSA does not contain suitable coastal sage scrub habitat for this species. Potentially suitable coastal sage scrub habitat is present in the vicinity of the BSA; however, slopes are steeper than 25%, and the elevation of the suitable habitat is over 1,500 feet. The nearest previously recorded CNDDB occurrence in 2001 was approximately 3.5 miles southwest of the BSA.
Bank swallow <i>Riparia</i>	CDFW: ST	Relies on riparian habitat for breeding. Typically nests in vertical eroded banks, cliffs, bluffs, or roadcuts. Nesting site must have fine-textured, sandy or loamy soil that is suitable for burrowing.	Absent	Does not occur. Species may migrate through the BSA, but no suitable breeding habitat is present.

Common Name <i>Scientific Name</i>	Sensitivity Status ¹	General Habitat Description ²	Potentially Suitable Habitat Present/Absent	Potential to Occur in the BSA ^{3, 4}
Yellow warbler <i>Setophaga petechia</i>	CDFW: SSC	Habitat preference includes the edges of marshes and swamps, willow-lined streams, and leafy bogs. Also will inhabit dry areas, such as farmlands, orchards, gardens, and suburban edges. Prefers to nest in areas of dense shrubs with scattered trees.	Present	Occurs. This species was encountered in an incidental observation within the BSA during the 2018 LBVI protocol surveys and was detected regularly during surveys from 2017 to 2022 (Woodstar and Compliance Biology 2017, 2018, 2019, 2020, 2021, and 2022). It was detected again incidentally during the 2023 surveys.
Least Bell's vireo <i>Vireo bellii pusillus</i>	USFWS: FE CDFW: SE	Summer resident of low riparian growth in the vicinity of water or in dry river bottoms. Nests are placed along the margins of bushes, usually <i>Salix</i> , <i>Baccharis</i> , or <i>Prosopis</i> .	Present	Occurs. This species was encountered within the BSA during the 2018 protocol surveys and was detected again during the 2023 and 2024 surveys. Designated critical habitat for this species is adjacent to and within the BSA. The species also was detected annually throughout the BSA from 2017 to 2022 and in 2024 (Woodstar and Compliance Biology 2017, 2018, 2019, 2020, 2021, and 2022; AECOM 2024b).
MAMMALS				
Pallid bat <i>Antrozous pallidus</i>	CDFW: SSC Western Bat Working Group (WBWG): H	Inhabits grasslands, shrublands, woodlands, and forests from sea level up through mixed conifer forests. Most common in open, dry habitats with rocky areas for roosting.	Present	Likely. The BSA and vicinity contain areas of potentially suitable shrublands, woodlands, and rocky areas for roosting and foraging.
Townsend's big-eared bat <i>Corynorhinus townsendii</i>	CDFW: SSC WBWG: H	Lives in a variety of communities, including coastal conifer and broad-leaved forests, oak and conifer woodlands, arid grasslands and deserts, and high-elevation forests and meadows. Throughout most of its geographic range, it is most common in mesic sites. Habitat must include appropriate roosting, maternity, and hibernacula sites, such as caves and cave-like formations, free from human disturbance.	Present	Likely. The BSA and vicinity provide potentially suitable roosting and foraging habitat.
Spotted bat <i>Euderma maculatum</i>	CDFW: SSC WBWG: H	Prefers arid areas, ranging from lowland deserts to ponderosa pines at higher elevations. Roosts in crevices in cliffs and canyon walls in summer. Feeds over water and along washes. Feeds almost entirely on moths.	Present	Likely. The BSA and vicinity provide potentially suitable roosting and foraging habitat.

Common Name <i>Scientific Name</i>	Sensitivity Status ¹	General Habitat Description ²	Potentially Suitable Habitat Present/Absent	Potential to Occur in the BSA ^{3, 4}
Western mastiff bat <i>Eumops perotis californicus</i>	CDFW: SSC WBWG: H	Found in Southern California, from the Colorado River to the coast. Requires significant rock features that offer suitable roosting habitat. Found in a variety of habitats ranging from chaparral to oak woodland and ponderosa pine.	Present	Likely. The BSA and vicinity provide potentially suitable roosting and foraging habitat. A western mastiff bat was detected acoustically 3 miles southwest of The Old Road Bridge on August 7, 2006 (Caltrans 2008).
Western red bat <i>Lasiurus blossevillii</i>	CDFW: SSC WBWG: H	Found over a variety of habitats and locally common in Southern California. Not found in desert areas. Typically roosts in trees adjacent to streams, fields, or urban areas that are used for foraging.	Present	Occurs. This species was detected during focused bat surveys that were conducted in 2018 (AECOM 2019c).
California leaf-nosed bat <i>Macrotus californicus</i>	CDFW: SSC WBWG: H	Prefers habitats with caves, mines, and rock shelters in Sonoran desert scrub.	Absent	Does not occur. Suitable roosting habitat is not present within the BSA.
Yuma myotis <i>Myotis yumanensis</i>	WBWG: LM	Occurs from sea level to 11,000 feet (3,300 meters), although uncommon above 8,000 feet (2,560 meters). Inhabits open forests and woodlands with water sources. Roosts in buildings, caves, mines, bridges, and abandoned swallow nests during the day. Roosts in more open areas at night.	Present	Occurs. This species was detected during focused bat surveys that were conducted in 2018 (AECOM 2019c).
San Diego desert woodrat <i>Neotoma lepida intermedia</i>	CDFW: SSC	Common in coastal scrub in Southern California, from San Diego to San Luis Obispo County. Moderate to dense canopies preferred. Species is particularly abundant in rock outcrops, rock cliffs, and slopes.	Present	Unlikely. Marginal suitable habitat occurs within the BSA scrub habitat. Incidental observations of woodrat middens (debris piles used as nests) were encountered during biological surveys. The woodrat middens were similar construction to those of the common non-sensitive dusky-footed woodrat (<i>Neotoma fuscipes</i>).
American badger <i>Taxidea taxus</i>	CDFW: SSC	This species is most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils, and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Present	Likely. Suitable habitat is present within the BSA. A single occurrence was recorded between I-5 and SR-126, south of Castaic Junction in proximity of the BSA.
Mountain lion <i>Puma concolor</i>	CDFW: candidate species for Southern California/ Central Coast evolutionary significant unit	This species ranges widely across a variety of habitats, from coastal sage scrub to chaparral, forests, riparian, and mountainous communities. The species preys on a wide variety of species, including mule deer and others. The species requires vast areas of intact habitat to persist on the landscape.	Present	Likely. Although the species has not been detected during any recent biological surveys, it is wide ranging, uncommon, and difficult to detect. The species likely occurs in the adjacent foothills and along the Santa Clara River.

Notes:

¹ Sensitivity Status Codes

<u>Federal</u>	USFWS/NMFS: Federally Threatened (FT), Federally Endangered (FE), Proposed Endangered (PE)
<u>State</u>	CDFW: State Threatened (ST), State Endangered (SE), Species of Special Concern (SSC), Rare (R), Fully-Protected (FP), Candidate Endangered (CE).
<u>Other</u>	Western Bat Working Group (WBWG 2007) High Priority (H) – These species are imperiled or are at high risk of imperilment. Medium Priority (M) – Indicates a level of concern that should warrant closer evaluation, more research, and conservation actions of both species and possible threats.

² General Habitat Descriptions

The potential for occurrence ranking criteria are as follows:

Occurs – The species was observed during surveys of the BSA.

Likely – This species has potential to occur within the BSA based on presence of suitable habitat, and/or based on professional expertise specific to the site or species, and nearby, recent (in the last decade) recorded occurrences for the species.

Unlikely – This species may have been recorded in the project vicinity, but the project area is on the periphery of the species range, or older records (greater than 10 years) are on/near the project area, and currently marginal suitable habitat is on site (habitat is highly disturbed, degraded, or limited).

Does Not Occur – This species is not expected to occur within the BSA. Suitable habitat was not observed within the BSA during surveys. The BSA is outside the currently known range of the species.

³ Historical data from CDFW 2020a, unless otherwise referenced.

Amphibians and Reptiles

Southern California legless lizard (*Anniella stebbinsi*) is identified as a CDFW species of special concern (CDFW 2024). The species is typically associated with deserts and semi-arid habitat but also can be found in coastal sage scrub habitats. It is frequently found in sandy soils or leaf litter. As shown in Table 2-54, suitable sandy soils and leaf litter are present within the BSA. The species was detected just west of the BSA at the south end of Commerce Center Drive during construction of the interchange with SR-126. Therefore, the species is known to occur along the Santa Clara River, and a high potential exists for the species to be present in riparian vegetation within the BSA.

California glossy snake (*Arizona elegans occidentalis*) is identified as a CDFW species of special concern (CDFW 2024). The species typically is associated with sparse vegetation and sandy or loose, loamy soils, and it inhabits stabilized dunes, beaches, dry washes, chaparral, and pine, oak, and riparian woodlands. Although the species has not been detected within the BSA, as shown in Table 2-54, suitable sandy soils and riparian woodland are present there.

Coastal whiptail (*Aspidoscelis tigris stejnegeri*) is identified as a CDFW species of special concern (CDFW 2024). The species inhabits open areas in semi-arid grasslands, scrublands, and woodlands. As shown in Table 2-54, this species was encountered during an incidental observation in the 2018 surveys (AECOM 2023g). The species also was detected regularly during riparian bird surveys from 2017 through 2022 (Woodstar and Compliance Biology 2017, 2018, 2019, 2020, 2021, 2022).

Coast horned lizard (*Phrynosoma blainvillii*) is identified as a CDFW species of special concern (CDFW 2024). The species prefers exposed gravelly sandy soils with minimal shrubs, riparian woodland clearings, dry chamise chaparral, and annual grasslands with scattered seepweed or saltbush. Although the species has not been detected within the BSA, as shown in Table 2-54, suitable sandy soils are present there.

The two-striped garter snake (*Thamnophis hammondi*) is identified as a CDFW species of special concern that can be found in perennial and intermittent streams with rocky or sandy beds and artificially-created aquatic habitats (i.e., human-made lakes and stock ponds); it requires dense riparian vegetation (CDFW 2022). The two-striped garter snake is considered likely to occur near freshwater and riparian habitats throughout the BSA, where water is present most of the year. A report that was prepared by Impact Sciences in 2001 states that during surveys conducted in the survey area, two-striped garter snake was observed numerous times at unspecified sites. In addition, Ecological Sciences reported observing two-striped garter snake during various focused arroyo toad surveys in the survey area (Caltrans 2008).

Birds

The white-tailed kite (*Elanus leucurus*) is designated by CDFW as a fully protected species. White-tailed kites forage and breed in lowland grasslands, agricultural, wetlands, oak-woodland and savannah habitats, and riparian areas associated with open areas. In February 2007, a small roost of eight white-tailed kites was observed in Castaic Creek, between the confluence with the Santa Clara River and SR-126, approximately 2 miles west of The Old Road. In March 2007, six pairs of white-tailed kites were within the river channel between I-5 and the Las Brisas Bridge. Three of the six pairs stayed and ultimately nested, one of which was near the project area west of the LA County Sanitation District No. 32 Treatment Plant. Of those, only one nest near the county line successfully fledged young (CDFW 2024).

Cooper's hawk (*Accipiter cooperii*) is a CDFW watch list species. Cooper's hawk breeds primarily in riparian areas and oak woodlands. It frequents landscapes where wooded areas occur in patches and often uses patchy woodlands and edges with snags for perching. Seven Cooper's hawk territories were found within the river channel and tributaries of the survey area. Four territories occurred on the west side of I-5. Active nests were in three of these territories, with one nest approximately 1,500 feet south of the intersection of The Old Road and Henry Mayo Drive. Three nests were on the east side of I-5, with the closest nest approximately 2 miles east of The Old Road Bridge. In addition, this species was detected incidentally within the BSA during the 2023 survey (CDFW 2024).

California horned lark (*Eremophila alpestris actia*) is a CDFW watch list species. It is a common resident in a variety of open habitats, usually where trees and large shrubs are absent. California horned larks breed primarily in open fields, short grasslands, and rangelands. Several horned larks were observed foraging on bare fields along Castaic Creek and near the Santa Clara River at Castaic Junction in the project vicinity. None were observed nesting during the bird surveys that were conducted in spring/summer 2006 (CDFW 2024).

Yellow warbler (*Setophaga petechia*) is listed as a CDFW species of special concern. Yellow warbler prefers wet riparian habitat but also is found in large cottonwoods in drier riparian areas. Yellow warbler breeds in lowland and foothill riparian woodlands, dominated by cottonwoods, alders, willows, and other small trees and shrubs typical of low, open-canopy riparian woodland. The species was abundant in the Santa Clara River during the 2007 surveys, with 98 territories identified along a 13-mile segment, from Bouquet Canyon Road Bridge west to Las Brisas Bridge, with several territories adjacent to The Old Road to the west (CDFW 2024). Yellow warbler was observed incidentally during the 2018 least Bell's vireo (LBVI) and southwestern willow flycatcher (SWFL) focused surveys (AECOM 2018b). Furthermore, yellow warbler commonly was detected during riparian bird surveys from 2017 through 2022 in the BSA and surrounding habitats (Woodstar and Compliance Biology 2017–2022). In addition, this species was detected incidentally within the BSA during the 2023 and 2024 surveys (AECOM 2024b).

Yellow-breasted chat (*Icteria virens*) is a CDFW species of special concern. Yellow-breasted chat in Southern California is found primarily in dense, relatively wide riparian woodlands and thickets of willows, vine tangles, and dense brush with a well-developed understory. Nesting areas are associated with streams, swampy ground, and the borders of small ponds (CDFW 2024). The species chat was common along most of the river on the west side of I-5 during the 2007 surveys. Thirty-five territories were detected within a 12-mile segment of the Santa Clara River watershed, from McBean Parkway bridge west to Las Brisas Bridge, with several territories adjacent to The Old Road to the west. This species also was encountered as an incidental observation within the BSA during the 2018 surveys (AECOM 2024e). Furthermore, yellow-breasted chat was detected commonly during riparian bird surveys from 2017 through 2022 within the BSA and surrounding habitats (Woodstar and Compliance Biology 2017–2022).

Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) is a CDFW watch list species. Optimal habitat consists of sparse, low brush or grass and hilly slopes preferably interspersed with boulders and outcrops. This species has a preference for south-facing slopes and has an affinity for California sagebrush over other vegetative types. One individual was observed along Castaic Creek, west of the BSA during the bird surveys in spring/summer 2006, and one individual was observed approximately 2.6 miles southwest of the BSA during the 2007 surveys (CDFW 2008).

Loggerhead shrike (*Lanius ludovicianus*) is a CDFW species of special concern. This species prefers open ground, including grassland, coastal scrub, broken chaparral, agriculture, and riparian and open woodland (CDFW 2024). As shown in Table 2-54, suitable nesting habitat for this species is present throughout the BSA.

Western burrowing owl (*Athene cunicularia*) is a CDFW species of special concern. Optimal habitat consists of grasslands, fallow agricultural fields, and open scrub, particularly with ground squirrel burrows (CDFW 2024). As shown in Table 2-54, agricultural and grassland areas in the project area potentially could support nesting or overwintering individuals, and this species is known to occur regionally. However, the species has not been detected within the BSA despite many biological surveys in the BSA and surrounding vicinity.

Mammals

Pallid bat (*Antrozous pallidus*) is widely distributed across the southwestern U.S., usually in arid desert habitat near rocky outcrops and water. This species typically day roosts in crevices in rock cliffs or buildings. The pallid bat is a CDFW species of special concern and a Western Bat Working Group high-priority species (CDFW 2024). Based on identifiable guano present under the I-5 bridge over the Santa Clara River on May 3, 2006, pallid bats day roost in a crevice under the bridge deck. No sign of pallid bats was observed in or beneath The Old Road Bridge over Santa Clara River in 2008 (Caltrans 2008). Furthermore, this species was not detected during the 2018 or 2023 focused bat surveys (AECOM 2019d).

Townsend's big-eared bat (*Corynorhinus townsendii*) prefer scrub deserts, pine forests, as well as pinyon-juniper forests and generally roosts in nearby caves, mineshafts, other human-made structures. This species is a CDFW species of special concern and a Western Bat Working Group high-priority species (CDFW 2024). This species was not detected acoustically during bat surveys in 2018 or 2023 (AECOM 2019d). However, as shown in Table 2-54, suitable roosting and foraging habitat is present within the BSA.

The spotted bat (*Euderma maculatum*) is a cave and crevice dweller in many habitats, from desert to forest, and typically consumes noctuid moths and terrestrial insects. This species is a CDFW species of special concern and a Western Bat Working Group high-priority species (CDFW 2024). This species was not detected acoustically during bat surveys in 2018 or 2023 (AECOM 2019d). However, as shown in Table 2-54, suitable roosting and foraging habitat are present within the BSA.

Western mastiff bat (*Eumops perotis californicus*) occurs in low elevations in the coastal basins of Southern California. The preferred habitat is rugged rocky areas, and day roosts typically are in large crevices in granite or sandstone rock or buildings. This species is a CDFW species of special concern and a Western Bat Working Group high-priority species (CDFW 2024). A western mastiff bat was detected acoustically 3 miles southwest of The Old Road Bridge on August 7, 2006. This species was not detected acoustically during bat surveys in 2018 or 2023 (AECOM 2019d).

The western red bat (*Lasiurus blossevillei*) is found in a variety of habitats and locally is common in Southern California. Roosting occurs in forests and woodlands adjacent to streams, fields, or urban areas that are used for foraging. This species ranges from Central to Southern California and is tracked by CDFW in the CNDDb, and it is a Western Bat Working Group high-priority species (CDFW 2024). A western red bat was detected acoustically in the Santa Clara River

corridor, foraging under The Old Road Bridge in 2006 and during 2018 focused bat surveys (AECOM 2019d).

The hoary bat (*Lasiurus cinereus*) prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding, and it requires water. It roosts in dense foliage of medium to large trees and feeds primarily on moths. This species is a Western Bat Working Group medium-priority species (CDFW 2024). Suitable habitat occurs within the BSA. This species was not detected acoustically during bat surveys in 2018 or 2023 (AECOM 2019d).

The Yuma myotis (*Myotis yumanensis*) typically forages in open forests and woodlands over water and roosts in buildings, crevices, and caves. This species is common throughout California, except in the Mojave and Colorado deserts. This species is a Western Bat Working Group low-medium priority species (CDFW 2024). A Yuma myotis was observed flying under The Old Road Bridge at night in 2006. During the daytime survey in 2006, a Yuma myotis was observed roosting in an expansion joint of the culvert underneath the I-5 Bridge (Caltrans 2008). This species also was detected during the 2018 focused bat surveys (AECOM 2019d).

American badger (*Taxidea taxus*), a CDFW species of special concern, prefers drier, open stages of most shrub, forest, and herbaceous habitats (including fallow agricultural fields) with friable soils (CDFW 2024). This species was not observed during the general wildlife surveys conducted within the BSA (Caltrans 2008). However, as shown in Table 2-54, suitable habitat occurs within the BSA.

2.4.4.3 Environmental Consequences

Alternative 1: No-Build Alternative

No construction or operational impacts would occur on non-listed wildlife species from the No-Build Alternative.

Alternative 2: Build Alternative

Temporary, direct impacts would result from the use of upland and aquatic habitat for equipment and materials staging, grading, as well as from clearing and tree removal for construction activities and access to construction sites. Permanent impacts would result from direct removal of occupied habitat for multiple species. Project operation would have minor effects on special-status wildlife species within the BSA.

Fish

Arroyo chub would have the potential to be directly and indirectly affected by the proposed project. Increases or decreases in flows because of increased runoff or water impoundments, respectively, could affect habitat quality for this species, especially during the breeding season. Erosion or increased polluted runoff from roads during storm events could degrade water quality. Removal of shade-providing vegetation could alter solar exposures and the thermal regime of water, which potentially would adversely affect species distribution, physiology, and behavior.

The proposed project would use the cast-in-drilled-hole pile method, which would reduce the potential for vibration impacts. Thus, the potential for impacts on the arroyo chub would be

reduced because no vibratory pile driving or dewatering would occur that would impact the species.

Amphibians and Reptiles

Numerous non-listed reptile and amphibian species would have the potential to be directly and indirectly affected by the proposed project, including direct injury and mortality during construction, loss of suitable aestivation and breeding habitat, increases or decreases in flows because of increased runoff or water impoundments, erosion and pollution from road runoff (which could reduce the water quality), and removal of shade-providing vegetation, which could alter solar exposures and the thermal regime. Construction equipment within close proximity to the Santa Clara River would have the potential to introduce pollutants (from spills, fuel, grease, and other lubricants), which could degrade the habitat quality. Demolition/removal of the existing bridge and construction of the bridge abutments would have the potential to cause bank/slope erosion/destabilization and further degrade the habitat.

Some of the more terrestrial reptiles that do not have an aquatic life stage would be more likely to be affected by the proposed project, from the permanent removal of upland vegetation communities, including annual brome grassland and ruderal areas along the edge of the current The Old Road that would be lost from expanding the highway. Some reptile and amphibian species may suffer injury and/or mortality during the construction phase (especially fossorial species, such as the silvery legless lizard). Vegetation communities that support habitat for non-listed special-status reptile species would include wild oats and annual brome grassland, ruderal, native upland vegetation communities, and aquatic and riparian vegetation communities. Project impacts on these vegetation communities and land cover types would equate to 4.10 acres of temporary impacts and 4.80 acres of permanent impacts.

Birds

Habitat loss from the proposed project would result in removal of vegetation that currently is used for migrating, foraging, breeding, and wintering habitat by a variety of avian species. A permanent loss of habitat would occur along the edge of The Old Road, and most of the habitat would be lost around The Old Road Bridge over the Santa Clara River. The proposed project would result in the permanent loss of 2.6 acres of native upland and aquatic and riparian vegetation communities and the temporary loss of 2.5 acres of the same vegetation communities. The disturbed land cover types generally are not considered suitable nesting habitat for many bird species, while some may use ornamental and ruderal vegetation.

The direct and indirect impacts on birds protected by the Migratory Bird Treaty Act would include the potential for injury and/or mortality to nesting birds if not adequately buffered during construction activities or during clearing and grubbing. The potential would exist for increased noise, visual, and pedestrian disturbance from the roadway expanding into the Santa Clara River. By expanding the road closer to the river, roadway pollution and disturbance would be moved closer to the center of the river, and the vegetation buffer along the edge of the river would be reduced. The expanded road and bridge would contribute to increased habitat fragmentation. As the habitat was fragmented, it would become less resilient, and local species' populations may decline from a variety of edge-induced impacts. These edge-induced impacts would include increased potential for fire, spread of nonnative, invasive plant species, unauthorized trespass into the river, increased predation, habitat avoidance because of increased noise and night-time lighting, and additional roadway edge effects. The potential also would exist for increased avian roadkill, along The Old Road as well as over the bridge because

the bridge is wider and has more lanes, and vehicles are traveling faster. Birds would be likely to experience mortality while flying along the Santa Clara River, and if they would fly over the bridge, the potential would exist for a vehicle strike.

Mammals

Similar to many of the direct and indirect impacts previously described for other non-listed special-status wildlife species, mammals would be affected negatively by the proposed project. The proposed project would result in temporary loss of bat roosting habitat under the current Old Road Bridge (during construction, while it is being expanded) and permanent loss of roosting and foraging habitat from expansion of The Old Road Bridge (from tree removal). However, the expanded bridge may provide additional roosting habitat, pending the final design of the underside of the bridge.

Another direct impact would be the potential for increased roadkill from the proposed project, because a wider road would be created for wildlife to cross.

Temporary and permanent habitat impacts on mammal species would encompass 4.10 acres of temporary and 4.80 acres of permanent land in the project area.

2.4.4.4 Avoidance, Minimization, and/or Mitigation Measures

Fish

Arroyo chub would have the potential to be directly and indirectly affected by the proposed project, in similar ways to those for the unarmored threespine stickleback (UTS) because they occupy the same habitat in the Santa Clara River and Northern Drainage. Avoidance and minimization measures UTS-1 and UTS-2 would be implemented for arroyo chub, restricting contact with surface water in the Northern Drainage and the Santa Clara River. Therefore, no impacts on arroyo chub would occur.

Amphibians and Reptiles

The general measures GEN-1 through GEN-15, and the southwestern pond turtle-specific (WPT) measures WPT-1 and WPT-2 would be implemented. These measures would reduce potential impacts on non-listed special-status reptile and amphibian species.

Birds

The avoidance and minimization measures presented in Section 2.4.5 (GEN-1 to GEN-15 and RIP-1 to RIP-3) would be implemented and provide impact avoidance for non-listed birds, including those protected by the Migratory Bird Treaty Act. In particular, to remain in compliance with the Migratory Bird Treaty Act, preconstruction nesting bird surveys before vegetation clearing or grubbing during the avian breeding season would reduce the potential for injury or mortality to nesting birds. Furthermore, conducting ground-disturbing activities outside the avian nesting season or noise monitoring for loud construction activities may be necessary if done during the avian nesting season.

Mammals

The avoidance and minimization measures presented in Section 2.4.5 (GEN-1 to GEN-15) would be implemented by proposed project and reduce potential impacts on special-status bat species. In addition, implementation of AMMs BAT-1 through BAT-3 would reduce potential impacts on special-status bat species further, as follows:

BAT-1: No earlier than 7 days before the start of construction around the two bridge locations, a field survey will be conducted by a qualified biologist to determine whether active bat roosts are present on or within 300 feet of the project boundaries. If an active roost is identified, a determination will be made regarding whether the roost is used as a night roost, a day roost, or a maternity roost. If an active roost is removed, MM BAT-2 (below) will be implemented. Alternatively, if an active roost is identified within 300 feet of the disturbance boundary but will not be removed, MM BAT-3 (below) will be implemented. Trees and/or structures determined to be maternity roosts will be left in place until the end of the maternity season. Because the ambient noise levels already exceed acceptable noise levels from non-project-related surrounding construction activities and traffic noise, additional noise mitigation will not be implemented. Consequently, no interference will take place with bat echolocation and insect foraging.

BAT-2: If a night-roost is identified within the LOD, the roost structure will be removed during the daylight hours while the roost is not in use. If an active day roost is identified, roosting bats will be evicted by using humane exclusionary devices. Before project implementation, the proposed methods for bat exclusion will be approved by CDFW. The roost will not be removed until it has been confirmed by a qualified biologist that all bats have been successfully excluded. If an active maternity roost is identified (the breeding season of native bat species in California generally occurs from April 1 through August 31), the roost will not be disturbed and construction within 300 feet will be postponed or halted, at the discretion of the biological monitor, until the roost is vacated and juveniles have fledged, as determined by the biologist. CDFW will be consulted regarding the necessity to construct replacement roosting habitat or to modify the proposed project (as appropriate), to include features conducive to roosting. This determination will be based on the bat species to be displaced, the abundance of other roost sites in the area, and the size of the roost removed. All CDFW recommendations for roost replacement will be implemented.

BAT-3: If a night roost is identified within the 300-foot buffer of the LOD, construction-related activities will be conducted during daylight hours while the roost is not in use. If an active day roost is identified, a determination (in consultation with CDFW or a qualified bat expert) will be made regarding whether construction-related activities (i.e., noise and vibrations) can disturb roosting bats substantially. This determination will be based on baseline noise/vibrations levels, anticipated noise-levels associated with project construction, and the sensitivity to noise-disturbances of the bat species that are present. If noise is determined to result in the temporary abandonment of a day roost, construction-related activities will be scheduled to minimize the period that the roost will be subject to noise-related disturbances. If an active maternity roost is identified (the breeding season of native bat species in California generally occurs from April 1

through August 31), construction within 300 feet of the roost will be postponed or halted, at the discretion of the biological monitor, until the roost is vacated and juveniles have fledged, as determined by the biologist.

Compensatory Mitigation

Compensatory mitigation for temporary and permanent loss of habitat occupied by non-listed special-status reptile, amphibian, bird, and mammal species would be provided in compensatory mitigation as required for federally listed species' impacts, as presented in Section 2.4.5.

Additional compensatory mitigation may be necessary if bat roosts or maternity colonies are detected under The Old Road Bridge and need to be removed. However, additional bat roosting habitat would be in the surrounding vicinity in human-made bridges, including the adjacent I-5 overpass, that could provide roosting opportunities in the event that bat dispersal occurs. In addition, after construction of the new bridge is completed, it would have the potential to provide roosting options or other features considered suitable for bats.

2.4.5 Threatened and Endangered Species

2.4.5.1 Regulatory Setting

The primary federal law protecting threatened and endangered species is FESA (16 USC Section 1531 et seq., and 50 CFR Part 402 also can be referenced). This act and later amendments provide for the conservation of endangered and threatened species and the ecosystems on which they depend. Under Section 7 of this act, federal agencies (e.g., FHWA and Caltrans, as assigned) are required to consult with USFWS and NMFS, so that they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species or destroy or adversely modify federally designated critical habitat. *Critical habitat* is defined as geographic locations that contain the physical and biological features necessary for the existence of a threatened or endangered species.

Caltrans conducted formal Section 7 consultation with USFWS for the proposed project by sending a Biological Assessment to USFWS on March 19, 2024. The USFWS issued a Biological Opinion (2024-0031581-S7-001) for the proposed project on August 30, 2024. The analysis and avoidance and minimization measures detailed in the Biological Opinion are reflected herein.

Caltrans is currently conducting informal Section 7 consultation with NMFS for the proposed project by sending a Biological Assessment to NMFS in June 2025. It is strongly believed the outcome will be that the project may affect, but is not likely to adversely affect, southern steelhead. In the Santa Clara River, adult steelhead were last reported in 2012, though no data were reported by the CDFW after 2014. Steelhead are unlikely to occur within the reach of the Santa Clara River that coincides with the proposed action area.

An updated official species list of federally-listed species known or with the potential to occur within the proposed project was queried in June 2025 and is provided in Table 2-55. The list of federally-listed species was evaluated based on historical occurrences, suitable habitat within the proposed project area, connectivity to known populations, and an effects determination is provided that is consistent with the effects determination of the USFWS Biological Opinion (2024-0031581-S7-001) and the NMFS informal consultation.

**Table 2-55: Summary of Federally Listed Species and
Critical Habitats Evaluated for the Proposed Project**

Common Name	Scientific Name	Status ¹	Effects Determination
Plants			
California orcutt grass	<i>Orcuttia californica</i>	FE	No Effect. Suitable habitat is not present within the proposed project area.
Gambel's watercress	<i>Rorippa gambellii</i>	FE	No Effect. Species has not been detected within the proposed project area despite multiple surveys.
Nevin's barberry	<i>Berberis nevinii</i>	FE	No Effect. Species has not been detected within the proposed project area despite multiple surveys.
slender-horned spineflower	<i>Dodecahema leptoceras</i>	FE	No Effect. Species has not been detected within the proposed project area despite multiple surveys.
spreading navarretia	<i>Navarretia fossalis</i>	FT	No Effect. Suitable habitat is not present within the proposed project area.
Invertebrates			
vernal pool fairy shrimp	<i>Branchinecta lynchi</i>	FT	No Effect. Suitable habitat is not present within the proposed project area.
Riverside fairy shrimp	<i>Streptocephalus woottoni</i>	FE	No Effect. Suitable habitat is not present within the proposed project area.
monarch butterfly	<i>Danaus plexippus</i>	PT	No Effect. Suitable overwintering habitat is not present within the proposed project area.
Fish			
Southern California steelhead DPS (population 10)	<i>Oncorhynchus mykiss irideus</i>	FE	May Affect, Not Likely to Adversely Affect. Species is not known to occur within the proposed project area, but due to hydrological connectivity to existing occurrences, the species may rarely transit through the proposed project during high flows/flood events.
unarmored threespine stickleback	<i>Gasterosteus aculeatus williamsoni</i>	FE	May Affect, Likely to Adversely Affect. Species is known to occur within the Santa Clara River in the vicinity of the proposed project area.
Amphibians			
arroyo toad	<i>Anaxyrus californicus</i>	FE	No Effect. Species is historically known to occur within the Santa Clara River in the vicinity of the proposed project area.
western spadefoot	<i>Spea hammondi</i>	PT	No Effect. Suitable habitat is not present within the proposed project area.
Reptiles			
southwestern pond turtle	<i>Actinemys pallida</i>	PT	May Affect, Likely to Adversely Affect. Species was incidentally detected within the proposed project area during survey efforts.
Birds			
western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	FT	No Effect. Suitable habitat is not present within the proposed project area.

Common Name	Scientific Name	Status ¹	Effects Determination
California condor	<i>Gymnogyps californianus</i>	FE	No Effect. Suitable habitat is not present within the proposed project area.
coastal California gnatcatcher	<i>Poliophtila californica californica</i>	FT	No Effect. Suitable habitat is not present within the proposed project area.
southwestern willow flycatcher	<i>Empidonax traillii extimus</i>	FE	No Effect. Suitable habitat is present within the proposed project area.
least Bell's vireo	<i>Vireo bellii pusillus</i>	FE	May Affect, Likely to Adversely Affect. Species is present within suitable habitat in the proposed project area.
Critical Habitat			
arroyo toad			May Affect, Likely to Adversely Affect. Federally designated critical habitat occurs within and would be removed by the proposed project.
southwestern willow flycatcher			May Affect, Likely to Adversely Affect. Federally designated critical habitat occurs within and would be removed by the proposed project.
least Bell's vireo			May Affect, Likely to Adversely Affect. Federally designated critical habitat occurs within and would be removed by the proposed project.

¹ Status: federally listed as endangered (FE); federally listed as threatened (FT); proposed threatened (PT)

California has enacted a similar law at the State level, the CESA (California Fish and Game Code Section 2050, et seq.). The CESA emphasizes early consultation to avoid potential impacts on rare, endangered, and threatened species, and to develop appropriate planning to offset project-caused losses of listed species populations and their essential habitats. CDFW is the agency responsible for implementing the CESA. Section 2080 of the California Fish and Game Code prohibits “take” of any species determined to be an endangered species or a threatened species. *Take* is defined in Section 86 of the California Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” CESA allows for take incidental to otherwise lawful development projects; for these actions, an incidental take permit is issued by CDFW. For species listed under both the FESA and CESA requiring a Biological Opinion under Section 7 of the FESA, CDFW also may authorize impacts on CESA species by issuing a Consistency Determination under Section 2080.1 of the California Fish and Game Code.

2.4.5.2 Affected Environment

The following analysis is based on the NES (AECOM 2024h) that was prepared for the proposed project and the species-specific surveys shown in Table 2-52 in Section 2.4.1. The results of federally listed species surveys are discussed in the following sections. This section describes federally and State threatened and endangered species as well as species being considered for federal or State listing that are known or likely to occur within the BSA.

Southern Steelhead

Southern California steelhead (*Oncorhynchus mykiss irideus*; steelhead; population 10) occur in the Santa Clara River from the Pacific Ocean east up to Piru Creek. Federally-designated critical habitat for steelhead is designated in the same reach, approximately 13 river miles west of the proposed project area (NMFS 2025). Steelhead are not known to migrate to the upper

Santa Clara River, beyond Piru Creek and have not historically been documented within the portion of the Santa Clara River that coincides with the proposed project area (Entrix 2007). Upstream migration of steelhead from the Pacific Ocean to the proposed project area, is restricted 10 miles from the Pacific Ocean by the Freeman Diversion Dam (the proposed project area occurs roughly 40 miles upstream of the Pacific Ocean). Despite the Freeman Diversion Dam, some steelhead are able to get past and continue upstream in the Santa Clara River. Counts of adults above the dam have been variable, but generally low since the late 1990s. The species is known primarily from the lower reaches of Santa Clara River and Santa Paula, Sespe, Hopper, and Piru Creeks; although recent drought years have further restricted upstream migration (NMFS 2016). In the Santa Clara River, adult steelhead were last reported in 2012, though no data were reported by the CDFW after 2014 (NMFS 2023). Steelhead are unlikely to occur within the reach of the Santa Clara River that coincides with the proposed project area (NMFS 2016).

A focused survey for special-status fish species was conducted for Santa Clara River and tributary drainages in August 2006 and no steelhead were detected (Entrix 2007). An additional fish survey was conducted in October 2023 to look for the present of UTS in the northern drainage and steelhead where not incidentally detected (Merkel & Associates, Inc. 2023).

The proposed project area is unsuitable for steelhead during a majority of their life cycle because it lacks deep cold water refugia, is shallow, sandy-bottomed, contains a variety of nonnative aquatic species, and does not connect to higher quality habitat upstream. Despite the lack of known historical occurrences in the proposed project area, during winter high flow/flood events there is a very small potential that steelhead may transit through the proposed project area.

Unarmored Threespine Stickleback

A focused survey for special-status fish species was conducted for the Santa Clara River and tributary drainages in August 2006. The survey results revealed the presence of the federally endangered UTS along the reach of the Santa Clara River that runs through the west side of the BSA (Caltrans 2008). Therefore, UTS is considered present in the Santa Clara River within the BSA. An additional fish survey was conducted in October 2023, to look for UTS in the Northern Drainage (Merkel & Associates 2023). Although no UTS were found in the surveyed areas, USFWS and CDFW consider the Northern Drainage suitable habitat that retains the potential to be occupied by UTS.

UTS is listed by the federal and State governments as endangered and is considered fully protected by CDFW (CDFW 2024). Populations of UTS are restricted to three sections of the upper Santa Clara River, including the Newhall Ranch reach that represents the downstream demarcation of the unarmored subspecies. UTS are small fish that require shallow, slow, marginal stream flows with abundant aquatic vegetation for cover. The male guards territories and builds a small nest of decaying vegetation, where he guards the eggs until they hatch. Large numbers of UTS can exist in summer and fall because of the long breeding season in Southern California, and breeding can occur almost all year in dry years, when a stream is minimally disrupted by storm flows. Under optimum conditions, up to a few hundred UTS can exist within approximately 10 meters of a stream. Strong storm flows can severely reduce local populations until the streams stabilize in spring, and the numbers can build up again. Backwater habitats in the Santa Clara River are used by UTS as refugia during storm events (Entrix 2007).

Arroyo Toad

The federally endangered arroyo toad is restricted to rivers with shallow, gravelly pools adjacent to sandy terraces that have a nearly complete closure of cottonwoods, oaks, or willows, and almost no herbaceous cover. Arroyo toad requires shallow pools with minimal current, little to no emergent vegetation, and a sand or pea gravel substrate overlain with flocculent silt for egg deposition.

CNDDDB records for arroyo toad exist for the Santa Clara River, just east of I-5 approximately 2 miles east of the project area, and for Bear Canyon at the Santa Clara River, approximately 11 miles east of the project area (CDFW 2022a). Arroyo toad also was found at the confluence of San Francisquito Creek and the Santa Clara River. The Aquatic Consulting Services surveys that were conducted in 2000 reported arroyo toad tadpoles from pools adjacent to the Valencia Water Treatment Plant and from a pool just upstream from the project area (AECOM 2024d, AECOM 2024e). Therefore, based on the presence of arroyo toad tadpoles, the species was documented historically within the BSA.

A Special-Status Aquatic Vertebrate Species Habitat Assessment was prepared for the proposed project on September 18, 2007 (Entrix 2007). The report assessed the potential impacts of the proposed project on threatened and/or endangered aquatic species inhabiting the Newhall Ranch reach of the Santa Clara River. This reach extends from the bluff at the northwest corner of the Magic Mountain parking lot at the downstream end to The Old Road Bridge at the upstream end (Caltrans 2008).

The existence of tributary records upstream and downstream from the BSA, as well as the in-channel Santa Clara River records west of I-5, place the BSA within the probable distribution of arroyo toad in the Santa Clara River channel. The origin of many of the records indicates that arroyo toad still inhabits suitable habitat within the Santa Clara River basin, including the main channel. However, a focused arroyo toad protocol survey that was conducted on Newhall Land and Farming Company property in 2007 did not detect any arroyo toad adults, juveniles, eggs, or tadpoles. Focused surveys that were conducted on portions of Newhall Land and Farming Company property by Bloom Biological, Inc. occurred from April 19 through July 15, 2007. The surveys were conducted according to USFWS survey protocol for this species. The survey area consisted of approximately 25 miles of the Santa Clara River in LA County. The survey area encompassed all habitats within the river channel and up to 700 meters from the river in some areas. Furthermore, focused protocol surveys for arroyo toad were conducted in spring and summer 2023, to determine the presence/absence of arroyo toad within the BSA. All suitable aquatic habitat within the BSA was included in the survey area, and the methodology was consistent with the latest USFWS protocol dated May 1999. Six total surveys (including both daytime and nighttime components) were conducted from April 25 through June 26, 2023 (AECOM 2023i).

The standardized USFWS protocol surveys that were conducted both within and adjacent to the BSA, including the most recent 2023 survey noted above, showed that the components of arroyo toad habitat exist in the project area but failed to document the occurrence of arroyo toad. The areas surveyed within the river channel provided sufficient low-gradient segments to support shallow pools with suitable substrates for arroyo toad (AECOM 2023i). Some suitable upland terrace habitats also were between the riverbanks to support foraging and over-wintering arroyo toad. No human-made barriers were present in this reach that could completely or substantially impede upland movement of arroyo toad. However, some stretches of the riverbank in the survey area are near vertical (e.g., southern cliff areas) and are a height that

would significantly impede migration out of the stream channel. Furthermore, a prevalence of nonnative species was observed, which are known to prey on arroyo toad. Therefore, although the species historically is documented within the BSA, the species is considered unlikely to occur within the BSA and LOD because of the lack of confirmed sightings over many years. The longest adult arroyo toads have been documented to survive is between 7 and 8 years (Hitchcock et al. 2022), and because no breeding has been documented since 2000, the species may be extirpated from the BSA. Causation is difficult to ascertain, but years of historical drought and the prevalence of nonnative species that consume all life stages of arroyo toad may be contributing factors.

In 2010, portions of the Santa Clara River were designated as critical habitat for arroyo toad. The portion of the Santa Clara River that intersects the project area falls within critical habitat subunit 6b (of the Upper Santa Clara River Basin). Subunit 6b allows for natural population expansion and fluctuation of the Santa Clara River population by connecting arroyo toad habitat in Castaic Creek with San Francisquito Creek and the occupied reach of the Santa Clara River. Subunit 6b contains the physical and biological features that are essential to the conservation of the species, including breeding pools in low-gradient stream segments with sandy substrates, seasonal flood flows, and riparian habitat and upland benches for foraging and dispersal (USFWS 2011). A total of 52.73 acres of arroyo toad critical habitat is within the BSA.

Southwestern Pond Turtle

The southwestern pond turtle is a CDFW species of special concern and is proposed for listing as threatened under the FESA. The species inhabits streams (with pools), ponds, freshwater marshes, and lakes with growth of aquatic vegetation (CDFW 2024). The species generally is more abundant in habitats that have basking sites (including rocks, sand, mud, downed logs, submerged branches, and emergent or submerged aquatic vegetation) and spends a considerable amount of time basking. In addition, southwestern pond turtle will move onto land for nesting, aestivation, dispersal, and overwintering. Southwestern pond turtle currently is under evaluation for potential future federal listing in response to a number of threats contributing to a decline in population. Major factors limiting populations include loss and degradation of aquatic habitat, reduced availability of nest habitat, elevated predation, and the spread of disease. No critical habitat is designated for southwestern pond turtle, as this species is not formally federally listed at this time (USFWS 2024).

Suitable habitat is present for southwestern pond turtle within portions of the BSA where ponded or flowing water is present. Thus, predictions that the length of the river within the BSA may contain southwestern pond turtles at any given time are reasonable, as well as some of the moist canyons leading away from the river. The CNDDDB includes multiple Santa Clara River records of southwestern pond turtle from 2015, between The Old Road and Castaic Junction (CDFW 2022b). The Impact Sciences Report states that during surveys conducted within the BSA, pond turtle was observed numerous times at unspecified sites, presumably where sufficient water existed to satisfy the aquatic habitat requirements discussed previously (Caltrans 2008).

Surveys were conducted for southwestern pond turtle throughout all suitable aquatic habitat within the BSA on June 22, 2023, and again on July 6, 2023, following the 2006 USGS Visual Survey Protocol. Professionally qualified biologists surveyed throughout suitable habitat, including the Santa Clara River and adjacent tributaries, focusing on select areas with high basking potential and low-flow pools as often preferred by the species. One individual was detected incidentally on June 26, 2023, during a daytime arroyo toad survey, and two additional

individuals were detected later, during the second focused southwestern pond turtle survey on July 6, 2023. All detections occurred in the Northern Drainage.

The survey results for southwestern pond turtle provided evidence that the BSA includes suitable habitat for this species. Therefore, aquatic habitat throughout the BSA is considered occupied by the species, with the upland areas immediately adjacent potentially suitable for nesting, aestivation, overwintering, and dispersal.

Least Bell's Vireo and Southwestern Willow Flycatcher

The federally and State endangered LBVI and the federally and State endangered SWFL have the potential to occur in the riparian habitat along the Santa Clara River within the BSA. These two species are grouped together because of their similarity in riparian breeding habitat and are discussed in detail in the following sections.

One additional species, the federally threatened and State endangered yellow-billed cuckoo was determined unlikely to occur within the BSA. It has not been detected within or adjacent to the BSA for the past several years, despite surveys from 2017 through 2022 (Woodstar and Compliance Biology 2017, 2018, 2019, 2020, 2021, 2022). The species is assumed to not occur within the BSA and is not discussed further.

Least Bell's Vireo

LBVI was listed as endangered by USFWS on May 2, 1986, with designated critical habitat in 1994 (USFWS 1986). A draft recovery plan was written by USFWS and circulated for review in 1998. CDFW listed this subspecies as endangered on October 2, 1980. Critical habitat for this species includes areas along the Santa Clara River that coincide with the BSA.

Historically, this subspecies was a common summer visitor to riparian habitat throughout much of California. Currently, LBVI is found only in riparian woodlands in Southern California, with the majority of breeding pairs in San Diego, Santa Barbara, and Riverside counties.

LBVI is migratory and generally arrives in Southern California in late March/early April and leaves for its wintering grounds in September. LBVI primarily occupies riparian woodlands that include dense cover within 3 to 7 feet of the ground and a dense, stratified canopy. The subspecies inhabits low, dense riparian growth along water or along dry parts of intermittent streams. The understory typically is dominated by willow species (*Salix* sp.) and mulefat. Overstory species typically include cottonwood (*Populus* sp.), western sycamore (*Platanus racemosa*), and mature willows. The subspecies typically builds nests in vegetation 3 to 4 feet above the ground, where moderately open midstory cover exists with an overstory of willows, cottonwoods, sycamores, or coast live oaks (Salata 1984). Nests also often are placed along internal or external edges of riparian thickets, at an average of 3.3 feet above the ground (Unitt 2004). Riparian plant succession is an important factor in maintaining LBVI habitat.

The decline of LBVI is attributed to loss, degradation, and fragmentation of riparian habitat, combined with brood/nest parasitism by brown-headed cowbird (*Molothrus ater*; BHCO). LBVI is known to be sensitive to many forms of disturbance, including noise, night-lighting, and consistent human presence. Because of concerted programs focused on preserving, enhancing, and creating suitable nesting habitat, the LBVI population has increased steadily in size along several of its breeding drainages in Southern California.

Project-specific surveys were conducted in 2018 within suitable habitat in the BSA. Two survey areas associated with the Santa Clara River were identified as potentially suitable riparian habitat for LBVI and SWFL. Included were a “north” survey area that occurred along the west side of The Old Road, just north of the water reclamation plant; and a “south” survey area that occurred at The Old Road Bridge over Santa Clara River (shown on Figures 15 through 17). These survey areas were composed of willow-cottonwood woodland habitats and adjacent upland areas. Areas surrounding the survey areas generally were composed of roadways, commercial development, and agriculture.

Within the survey areas, eight LBVI territories were detected during surveys in 2018. Five of these territories were in the north survey area, and three were in the south survey area. The locations of where LBVI was detected are shown on Figures 15 and 16. Additional focused LBVI survey data from 2017 through 2022 within the BSA confirmed that LBVI is present throughout suitable riparian habitat within the BSA, on the west side of The Old Road (around the Santa Clara River) and on both sides of The Old Road Bridge over Santa Clara River (AECOM 2023g). LBVI also was detected incidentally in 2023, within riparian vegetation along the Santa Clara River and Northern Drainage during the course of other biological surveys.

Focused LBVI surveys also were conducted in spring and summer 2024. The survey areas were split between Woodstar Biological and AECOM. Because Woodstar Biological already was conducting surveys throughout the mainstem Santa Clara River, its survey area encompassed the entire BSA up to the west side of the I-5 Bridge, including the Northern Drainage. AECOM conducted surveys east of I-5 within the 500-foot buffer. Woodstar Biological documented multiple LBVI territories throughout the BSA west of I-5 (Woodstar Biological 2024). AECOM documented one LBVI territory east of I-5 within the BSA (AECOM 2024b).

LBVI was detected throughout the BSA in all areas except the habitat between The Old Road Bridge and west of I-5. This area previously was occupied by LBVI in 2018. Heavy rainfall in winter 2022–2023 and 2023–2024 likely caused vegetation scour, shifting LBVI territories slightly downstream to the west. However, LBVI is expected to move back into the formerly occupied habitat between The Old Road Bridge and west of I-5. The combined data between 2018 and 2024 indicate that LBVI is present throughout suitable habitat within the BSA.

Southwestern Willow Flycatcher

Southwestern willow flycatcher (SWFL), a subspecies of willow flycatcher (*Empidonax traillii*), was listed by CDFW as endangered in California in 1991, as part of the State endangered listing of the full species (willow flycatcher). SWFL also was federally listed as endangered in 1995 (USFWS 1995). This subspecies can be separated from other willow flycatcher subspecies in the field only geographically by breeding range. SWFL breeds in New Mexico, Arizona, Southern California, Nevada, Utah, and possibly West Texas. In 2013, USFWS issued a revised rule, designating critical habitat for SWFL, which includes the portion of the Santa Clara River within the BSA (USFWS 2013). The last remaining breeding populations of SWFL in Southern California occur around Lake Henshaw and the upper San Luis Rey River in San Diego County. Scattered individuals occur in a few other river drainages, but the species is a very rare breeder in Southern California outside the Lake Henshaw Valley in northern San Diego County.

Because the breeding range of willow flycatcher encompasses a broad geographic area with much site variation, the Recovery Plan divides willow flycatcher's range into six Recovery Units, each of which is subdivided further into four to seven Management Units. The portion of the Santa Clara River that intersects the project area falls within the Santa Clara Management Unit (USFWS 2013). This Management Unit has been identified as containing one or more of the

required essential physical or biological features for SWFL. A total of 38.60 acres of SWFL critical habitat is within the BSA.

SWFL protocol surveys were conducted by Woodstar Biological between May 18 and July 17, 2018. The areas that were surveyed included the same areas surveys for LBVI (Figures 15 through 17). No SWFL was observed during any survey (AECOM 2018). Although no SWFL was observed, a single willow flycatcher was detected during survey 1; it was considered a migrant of the northern subspecies (AECOM 2018).

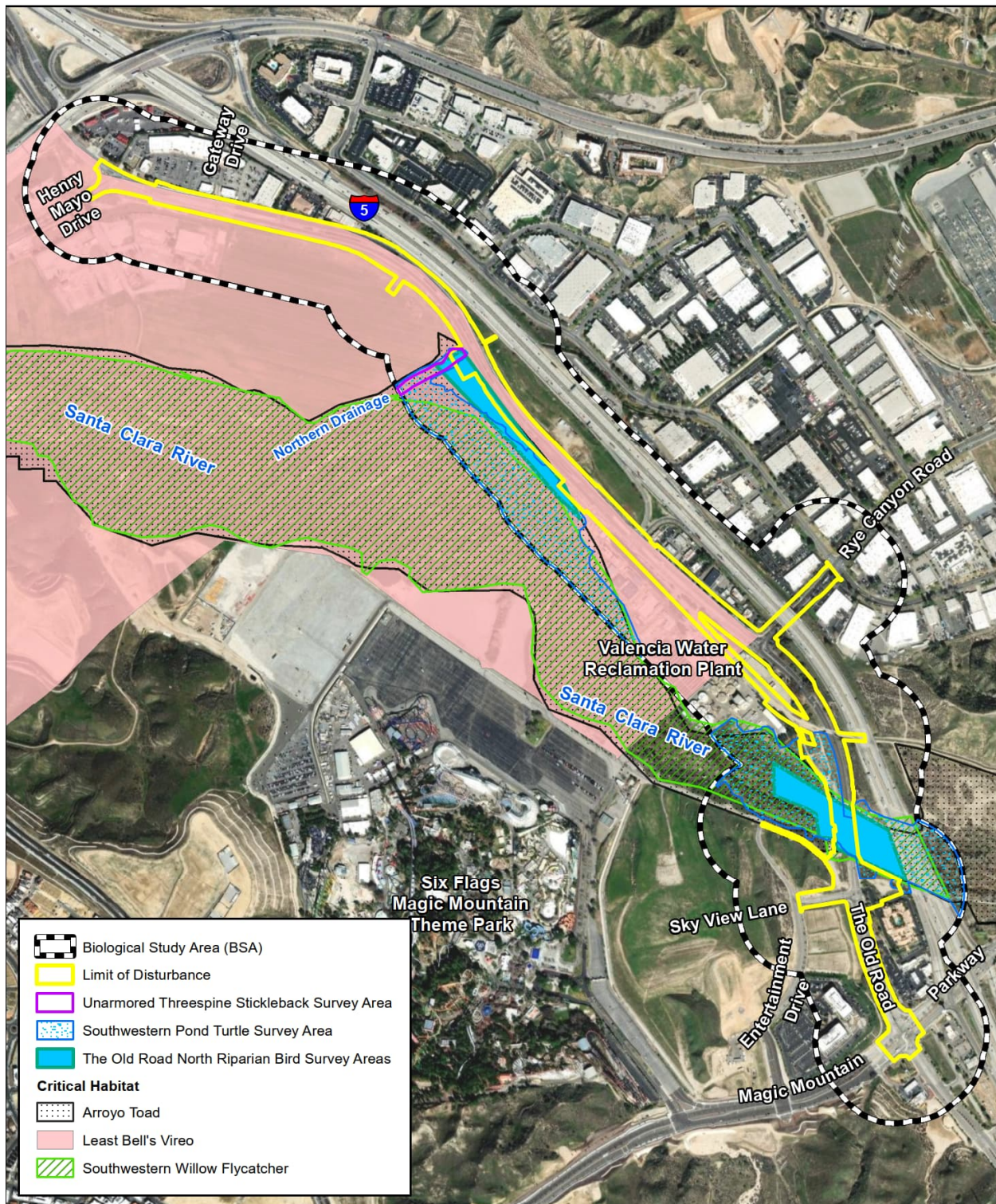
Furthermore, surveys for LBVI and SWFL by Five Points failed to detect any SWFL within the BSA between 2017 and 2022. Those surveys encompassed all potentially suitable flycatcher habitat within the BSA. Although several migrant willow flycatchers were detected in May and early June in several years, no birds remained in the area to breed. Therefore, they were determined to be migrant willow flycatchers. Thus, the species is unlikely to breed within the BSA.

Focused SWFL surveys also were conducted in spring and summer 2024. The survey areas were identical to those detailed above for LBVI and were split between Woodstar Biological and AECOM. Because Woodstar Biological already was conducting surveys throughout the mainstem Santa Clara River, its survey area encompassed the entire BSA up to the west side of the I-5 Bridge, including the Northern Drainage. AECOM conducted surveys east of I-5 within the 500-foot buffer. Although migrant willow flycatcher was detected in the Northern Drainage and other areas within the BSA, no SWFL was detected. Thus, the 2024 surveys indicated that SWFL does not breed within the BSA. Furthermore, the recent Biological Opinion from USFWS (USFWS 2024) for the proposed project did not include an analysis of potential effects on SWFL (only on SWFL critical habitat), and therefore USFWS is likely to conclude that the species is absent from the BSA.

Mountain Lion

In July 2019, the Southern California/Central Coast Evolutionary Significant Unit of mountain lion (*Puma concolor*) was proposed for listing as threatened under CESA. In April 2020, the California Fish and Game Commission found the listing may be warranted and designated the Evolutionary Significant Unit as a candidate species. While the species is under review, it is considered a State candidate species and is afforded the full protection of a listed species.

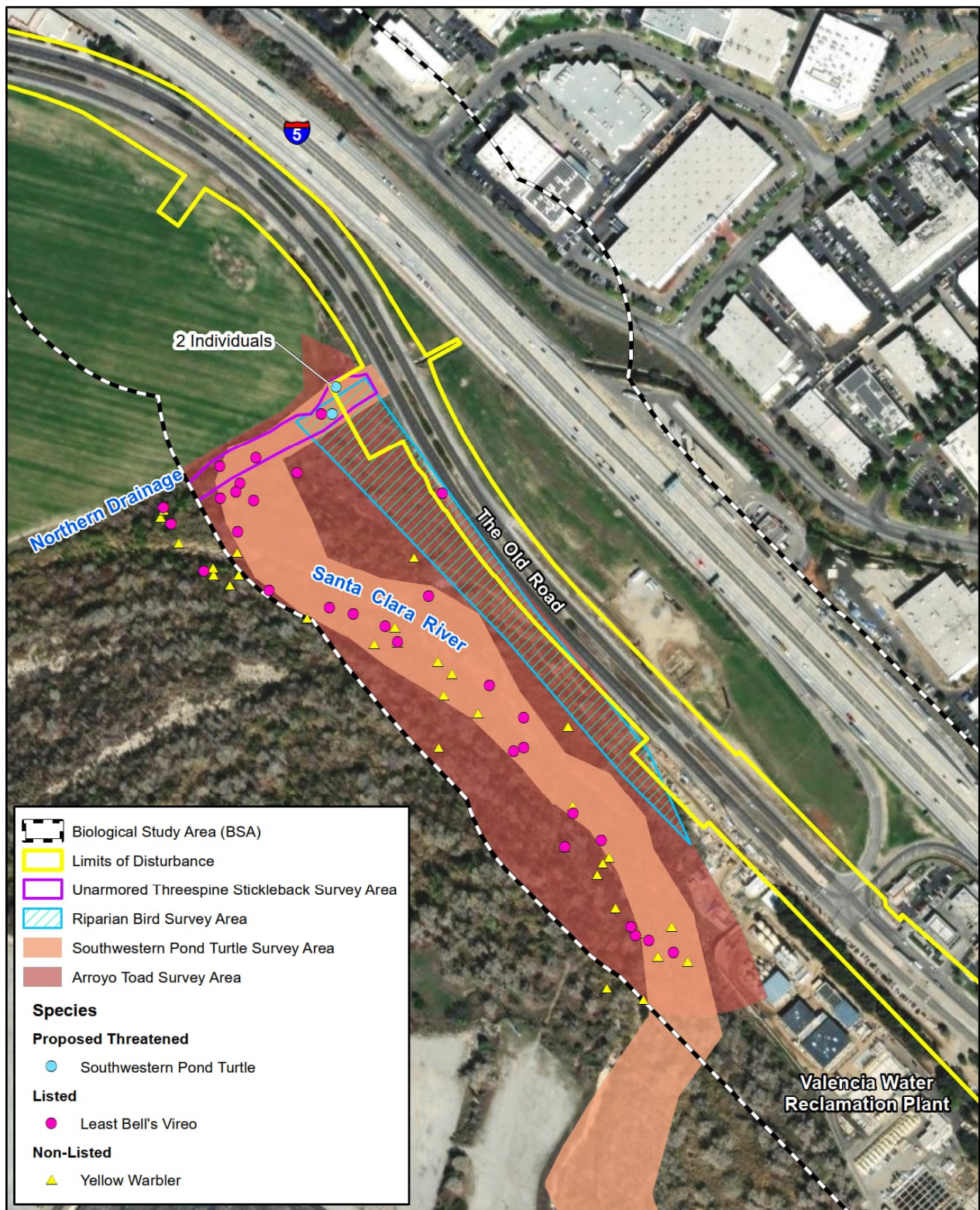
Mountain lion is a wide-ranging species that feeds primarily on mule deer (*Odocoileus hemionus*) but it also will eat smaller mammals, including coyotes. It requires vast areas of connected lands for its long-term persistence in the landscape. Currently in Southern California, the species is constrained by urban development, and roadkill mortality is the leading cause of its death. Lack of connectivity, inbreeding depression, lack of recruitment from nearby populations, and urbanization all threaten the continued existence of mountain lion in Southern California. Although no mountain lion has been detected directly within the BSA during project-specific surveys, the National Park Service has documented several mountain lions crossing I-5 (likely under the bridge) at the Santa Clara River, based on global positioning system collared data (AECOM 2024d).



Source: AECOM, 2023; Prepared By: AECOM, 2023.



Figure 15
Species Survey Areas and
Critical Habitats



Source: Old Road Project YBCU, SWFL, and LBVI 45 Day Report; Esri Maps & Data, 2023; Prepared By: AECOM, 2023.

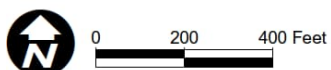
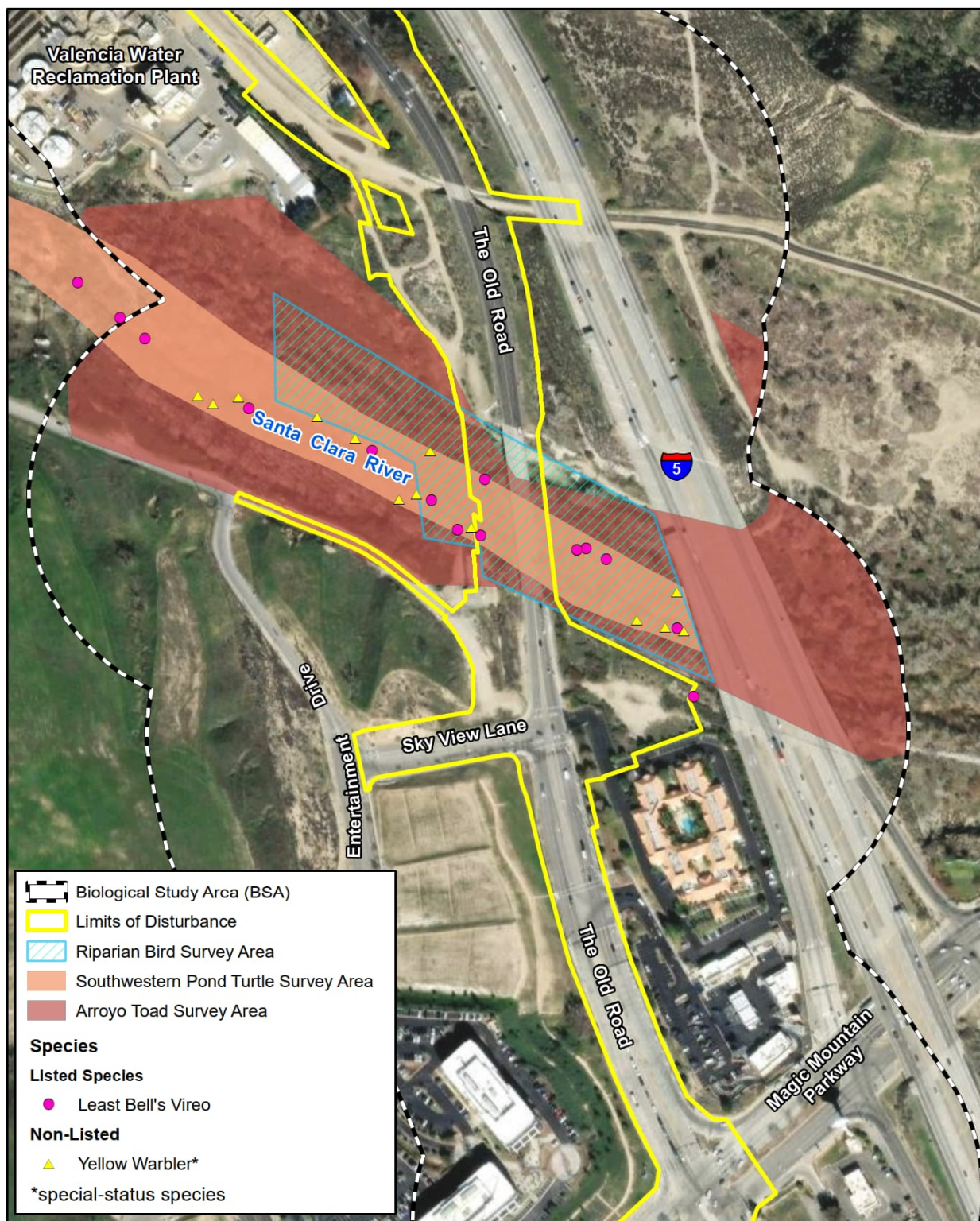


Figure 16
North Survey Area and Sensitive Species Observations



Source: Old Road Project YBCU, SWFL, and LBVI 45 Day Report; Esri Maps & Data, 2023; Prepared By: AECOM, 2023.



Figure 17

South Survey Area and Sensitive Species Observations

2.4.5.3 Environmental Consequences

Alternative 1: No-Build Alternative

No construction or operational impacts would occur on threatened or endangered species from the No-Build Alternative.

Alternative 2: Build Alternative

Temporary, direct impacts would result from the use of upland and aquatic habitat for equipment and materials staging, grading, as well as from clearing and tree removal for construction activities and access to construction sites. Permanent direct impacts would include the removal of habitat during expansion of The Old Road and shading of the Santa Clara River from the expanded Old Road Bridge. Project operation would cause minimal change to the habitat of threatened and endangered animals.

The following section discusses potential project impacts on federally listed wildlife species. Steelhead, UTS, arroyo toad, and southwestern pond turtle are discussed first, following by a combined discussion on LBVI and SWFL. The section concludes with a discussion of potential impacts on mountain lion.

Southern Steelhead

While steelhead have not been detected within the proposed project area, they have a very low potential to transition through the mainstem Santa Clara River, especially during winter high flow/flood events, and be exposed to proposed project impacts to hydrology and water quality during construction. There is the potential for impacts during bridge demolition and concrete deck casting of the expanded bridge over the Santa Clara River. During construction, changes in flow rates such as increased runoff, can affect habitat quality for this species. Erosion or increased pollution from runoff from roads (from various fuel/oils/hydrocarbon sources, tire particulate material, etc.) during rain events can degrade water quality and affect steelhead (French et al. 2022). To reduce impacts from stormwater runoff and ensure compliance with local and state regulations, the proposed project includes the installation of bioswales to capture and filter a portion of the runoff. Furthermore, urban roadway runoff that originates from the proposed project is unlikely to be detectable 13 river miles downstream when the proposed project area is surrounded by urban development and there are multiple other point sources that flow into the Santa Clara River.

Potential impacts to steelhead could occur from noise, vibration, and sedimentation during construction of piles and demolition of the existing bridge structures. These impacts are expected to be minimal, because no in-water work or pile driving would occur as part of the proposed action. Stream scour from the bridge piles is expected to be minimal because the sediment around the piles consists of fine, sandy substrate, and current piles under I-5 (which are similar in shape and size with the piles proposed for the proposed project) show minimal scour. Furthermore, scour around the base of the piles or changes in sediment distribution in the stream channel would not be detectable 13-miles downstream where steelhead are known to occur. In addition, temporary sediment plumes, fugitive dust, or any other construction-related debris is not expected to enter the Santa Clara River due to the implementation of BMPs.

Vegetation removal under and adjacent to The Old Road Bridge would be conducted in a manner to prevent impacts to surface water. The piles for the expanded bridge would be installed when Santa Clara River is at its low flow levels and a biological monitor would be

present during pile installation to ensure that BMPs remain in place. Additionally, the avoidance and minimization GEN-1 through GEN-16 and FISH-1 and FISH-2, detailed below, would be implemented to further minimize the potential for take of steelhead.

Unarmored Threespine Stickleback

UTS is assumed present within the mainstem Santa Clara River year-round, and therefore would be subject to effects on hydrology and water quality. If the species is present in the Northern Drainage, the potential would exist for species take (including injury and mortality) during construction of the culvert extension and riprap placement within Northern Drainage waters. Furthermore, the potential would exist for take if the species is present within the Santa Clara River during construction of the piles in the riverbed. During construction, increases or decreases in flows because of increased runoff or water impoundments, respectively, could impact habitat quality for this species, especially during the breeding season. Erosion or increased pollution from runoff from roads (e.g., from various fuel/oils/hydrocarbon sources, tire particulate material) during rain events could degrade the water quality. Removal of shade-providing vegetation (i.e., riparian vegetation removal along the banks of the Santa Clara River and permanent bridge shading) could alter solar exposures and the thermal regime of water, with potentially adversely effects on species distribution, physiology, and behavior. Removal of shade-providing vegetation would cause an adverse effect on UTS.

To quantify potential impacts on UTS, acreages were estimated during the Jurisdictional Delineation and Wetland Assessment (AECOM 2024), for both the Northern Drainage and The Old Road Bridge over the Santa Clara River. According to the assessment, the proposed project may temporarily impact 0.01 acre and permanently impact up to 0.03 acre of suitable UTS habitat in the Northern Drainage (listed as non-wetland waters in AECOM 2024a), as shown in Table 2-56. These acreages represent direct impacts on waters in the Northern Drainage and do not include the adjacent steam bank/riparian vegetation, which are an essential component of UTS habitat. Temporary impacts would occur on the top-of-bank riparian habitat of 0.05 acre and permanent impacts would occur on the top-of-bank riparian habitat of 0.09 acres. For The Old Road Bridge over the Santa Clara River, the new bridge piles would permanently impact 0.005 acre of habitat (non-wetland waters). Furthermore, permanent impacts from bridge shading of the Santa Clara River would equate to 0.26 acre of non-wetland waters. In addition to impacts on the Santa Clara riverbed (non-wetland waters), impacts would occur on adjacent riparian vegetation, which is an important component of UTS habitat. Impacts on adjacent riparian vegetation from the Old Road Bridge expansion would equate to 0.007 acre from the bridge piles and 0.42 acre from bridge shading. These acreages would represent both suitable habitat that could be occupied (at the Northern Drainage) and habitat that likely would be occupied along the mainstem Santa Clara River.

Vegetation removal under and adjacent to The Old Road Bridge would be conducted in a manner to prevent impacts on surface water. The piles for the expanded bridge would be installed when the Santa Clara River is at its low-flow levels, and a biological monitor would be present during pile installation, so that the BMPs would remain in place and vibration impacts would not affect fish species in the Santa Clara River during pile installation. UTS-specific measures (UTS-1 through UTS-2) would be implemented to further minimize the potential for take of UTS.

Table 2-56: Temporary and Permanent Impacts on Unarmored Threespine Stickleback Habitat in the Project Area

Jurisdictional Feature	Temporary Impact (acres)	Permanent Impact		
		Ground Disturbance (acres)	Bridge Piles ¹ (acres)	Bridge Deck Shading ² (acres)
Northern Drainage				
Non-wetland waters	0.01	0.03	-	-
Adjacent riparian habitat	0.05	0.09	-	-
Santa Clara River				
Non-wetland waters	0.12	-	0.005	0.26
Adjacent riparian habitat	0.21	-	0.007	0.42
Total	0.39	0.12	0.012	0.68

Notes:

1. This acreage represents the permanent footprint of the new bridge piles within the Santa Clara River. These acres are included in the acreage under bridge deck shading.

Arroyo Toad

Arroyo toad likely is extirpated from the BSA; however, critical habitat still is present within the BSA. Approximately 52.73 acres of the BSA intersect arroyo toad critical habitat (refer to Table 2-57). The proposed project would result in approximately 0.8 acre of temporary impacts on arroyo toad critical habitat, associated with The Old Road Bridge expansion temporary work area. The proposed project would result in approximately 0.62 acre of permanent ground-disturbing impact on arroyo toad critical habitat, associated with pile and riprap installation, and 0.70 acre of permanent non-ground-disturbing impact, associated with The Old Road Bridge expansion.

Table 2-57: Temporary and Permanent Impacts on Designated Arroyo Toad Critical Habitat

Designated Critical Habitat	Total BSA (acres)	Temporary Impact (acres)	Permanent Impact (ground disturbance) (acres)	Permanent Impact (Bridge Span ¹) (acres)
Arroyo Toad	52.73	0.8	0.62	0.70

Notes:

¹ Permanent impacts on vegetation beneath the bridge because of shading, potentially affecting habitat quality, are accounted in the Bridge Span column.

Because no arroyo toad has been detected directly within the BSA, as confirmed most recently by the results of the 2023 protocol surveys, the potential for direct take of an individual arroyo toad would be unlikely.

Southwestern Pond Turtle

Southwestern pond turtle uses the Santa Clara River for movement, foraging, dispersal, and breeding. It may be affected by the proposed action in several ways, including direct injury and mortality during construction, loss of suitable aestivation and breeding habitat, increases or decreases in flows because of increased runoff or water impoundments, erosion and pollution from road runoff (which could reduce the water quality), and the removal of shade-providing

vegetation, which could alter solar exposures and the thermal regime. Construction equipment within close proximity to the Santa Clara River would have the potential to introduce pollutants (from spills, fuel, grease, and other lubricants) and nonnative plant species, which could degrade the habitat quality relied on by this species. Removal of shade-providing vegetation could alter solar exposures and the thermal regime of water, and potentially could have an adverse effect on species distribution, physiology, and behavior. Temporary and permanent impacts on southwestern pond turtle habitat are shown in Table 2-58. Construction of the bridge abutments and demolition/removal of the existing bridge would have the potential to cause bank/slope erosion/destabilization and further degrade the habitat.

**Table 2-58: Temporary and Permanent Impacts on
Southwestern Pond Turtle Habitat**

Suitable Habitat	Total Biological Study Area (acres)	Temporary Impact (acres)	Permanent Impact (ground disturbance) (acres)	Permanent Impact (bridge span¹) (acres)
Southwestern pond turtle	49.43	1.69	1.38	0.88

Notes:

¹ Permanent impacts on vegetation beneath the bridge because of shading, potentially affecting habitat quality, are accounted in the Bridge Span column.

Potential direct impacts on this species could be avoided by the general avoidance and minimization measures (GEN-1 through GEN-15) and southwestern pond turtle-specific measures (WPT-1 and WPT 2), presented at the end of this section.

Least Bell's Vireo and Southwest Willow Flycatcher

This section discusses the combined impacts on the two federally listed riparian bird species. The habitat is assumed to be occupied by LBVI and is considered to be suitable habitat for migrant SWFL (but not suitable breeding habitat).

During the 2018 surveys, eight LBVI territories were identified within the BSA in riparian habitat associated with the Santa Clara River (AECOM 2018). The surveys from 2017 through 2022, plus incidental detections from 2023, confirmed that the riparian vegetation within the BSA remains occupied by multiple pairs of LBVI. The proposed project would impact LBVI habitat, including designated critical habitat plus additional occupied habitat under The Old Road Bridge. Removal of riparian vegetation would eliminate potential breeding and migrating habitat for LBVI. Nesting LBVI may be affected by construction-related impacts (e.g., from noise, dust, human presence adjacent to occupied habitat), which would result in temporary decreased reproductive success or abandonment of nesting habitat. Noise and/or lighting along the roadway also may adversely affect the distribution and behavior of LBVI. This species uses vocalizations during breeding activities, which could be disrupted by construction noise and increased traffic noise. By expanding The Old Road, effects such as trash (which could attract aerial and mammalian predators), the potential for increased wildfire (from vehicles and cigarettes), runoff from the road, increase noise, and additional highway effects would be moved spatially closer to occupied riparian habitat. These effects may cause habitat avoidance in areas close to the highway, thereby reducing the overall amount of suitable habitat for breeding along the Santa Clara River. The potential also would exist for injury and mortality to LBVI from vehicle strike if the species would fly across The Old Road Bridge expansion while migrating, dispersing, foraging, or during other life processes.

Furthermore, the potential would exist for direct injury or mortality to nesting LBVI (including nests with eggs, young, and recently fledged young) if a nest in dense riparian vegetation is missed during preconstruction clearance surveys (if vegetation removal is conducted during the nesting season).

Approximately 113.30 acres of the BSA intersects LBVI critical habitat within the Santa Clara River Critical Habitat Unit (USFWS 1994; Table 2-59). Much of the designated critical habitat does not represent suitable LBVI habitat because the mapping is broad and includes non-habitat types (i.e., developed, disturbed, and agriculture). The proposed project would result in approximately 3.58 acres of temporary impacts on LBVI critical habitat associated with The Old Road widening and Multi-Use Trail construction temporary work areas. The proposed project would result in approximately 7.36 acres of permanent ground-disturbing impact on LBVI critical habitat associated with The Old Road widening and Multi-Use Trail construction. Therefore, the proposed project would result in impacts on designated LBVI critical habitat.

Because the extent of critical habitat stops at the Valencia Water Reclamation Plant (Figure 15) and does not extend east to The Old Road Bridge, additional occupied LBVI habitat would be temporarily and permanently affected from bridge expansion that is not included as critical habitat. Impacts on LBVI habitat from the bridge expansion and shading would be similar to those for arroyo toad critical habitat, shown in Table 2-57. Arroyo toad critical habitat abuts the eastern edge of LBVI critical habitat by the Valencia Water Reclamation Plant and continues east, including the area under and adjacent to The Old Road Bridge, which also is suitable and occupied LBVI habitat. Therefore, to estimate the acreage of LBVI-occupied habitat that would be temporarily and permanently removed by the proposed project, the acreage of vegetation communities that represent LBVI habitat (Open Water and Fremont Cottonwood Forest and Woodland) is a more accurate estimator of impacts. As shown in Table 2-47, temporary and permanent impacts on LBVI habitat would be similar to that of impacts on riparian alliances (Fremont Cottonwood Forest and Woodland and Open Water), which occur in the Northern Drainage and under The Old Road Bridge. Approximately 0.9 acre of these vegetation alliances would be removed permanently from ground disturbance and The Old Road Bridge expansion. Approximately 0.5 acre of Fremont Cottonwood Forest and Woodland and Open Water also would be temporarily affected by the proposed project and may impact LBVI.

Although no SWFL have been detected historically within the BSA, based on the surveys from 2017–2022 and in 2024, migrant willow flycatchers (which are State-listed as endangered) are known to use the Santa Clara River during migration. Based on the lack of breeding within the BSA, the proposed project would not affect SWFL through construction activities. However, federally designated critical habitat for SWFL, which contain some of the physical and biological features necessary to support the species, would be removed (Table 2-59).

Approximately 38.60 acres of the BSA intersects SWFL critical habitat (Table 2-59). The proposed project would result in temporary impacts on 0.65 acre of SWFL critical habitat, associated with The Old Road Bridge expansion temporary work area. The proposed project would result in permanent ground-disturbing impacts on 0.18 acre of SWFL critical habitat, associated with pile and riprap installation, as well as permanent non-ground-disturbing impacts on 1.05 acres of SWFL critical habitat, associated with The Old Road Bridge expansion. This critical habitat is primarily mature riparian forest that supports an insect prey base, cover, and important migratory stop-over habitat for migrant willow flycatchers. Therefore, the proposed project would result in impacts on designated SWFL critical habitat.

Table 2-59: Temporary and Permanent Impacts on Least Bell's Vireo and Southwestern Willow Flycatcher Designated Critical Habitat

Designated Critical Habitat	Total Biological Study Area (Acres)	Temporary Impact (Acres)	Permanent Impact (Ground Disturbance) (Acres)	Permanent Impact (Bridge Span ¹) (Acres)
Least Bell's Vireo	113.30	3.58	7.36	0.0
Southwestern Willow Flycatcher	38.60	0.65	0.18	1.05

Notes:

¹ Permanent impacts on vegetation beneath the bridge because of shading, potentially affecting habitat quality, are accounted in the Bridge Span column. No designated critical habitat for least Bell's vireo would be under the proposed Bridge Span.

Mountain Lion

Temporary and permanent impacts on mountain lion may occur through habitat loss and removal and disturbance during project construction. Mountain lion is not restricted to any particular vegetation community, and therefore could use many of the vegetation communities shown in Table 2-53. It most likely would use habitat adjacent to the Santa Clara River and would be less likely to use other cover types (e.g., agriculture, bare ground, developed, disturbed habitats, and unpaved roads). Therefore, the proposed project would temporarily impact 4.1 acres and permanently impact 4.8 acres of shrubland, herbaceous, and riparian alliances. Mountain lion may avoid using the area during construction; however, the proposed project would be conducted in two phases, and during phase 2 construction of The Old Road Bridge, the underside of the bridge would not be blocked off. Mountain lion would be able to pass under The Old Road Bridge as it is expanded but still may avoid the area because of the presence of equipment and temporary security fencing. Furthermore, the presence of streetlights on The Old Road Bridge (currently no lights exist) where it passes over the Santa Clara River may cause this species to be more hesitant to cross under the bridge. However, to reduce potential impacts during project construction and operations, LION-1 and LION-2 would be implemented to ensure that lighting is directed downward and shielded, to prevent light trespass into the Santa Clara River. Furthermore, per LION-3, pending the State listing status of mountain lion, impacts would be assessed by CDFW during the permitting process, and any necessary avoidance and minimization measures would be implemented.

2.4.5.4 Avoidance, Minimization, and/or Mitigation Measures

General Measures

To reduce potential impacts from the proposed project on biological resources, the following measures would be applied:

GEN-1: The contractor(s) will be informed, before the bidding process, regarding the biological constraints of the proposed project (which will be included in Section EC of the Special Provisions). The project limits will be clearly marked on the project plans that are provided to the contractor(s), and areas outside the project limits will be designated as "no construction" zones. A construction manager will be present during all construction activities, to oversee that work is limited to the designated project limits.

GEN-2: High-visibility environmentally sensitive area fencing and silt fencing with appropriate signs will be installed by the contractor before the start of work, to prevent habitat impacts and the spread of silt from the construction zone into adjacent habitats. The fencing will be installed along the outer edge of work limits, in a manner that does not impact habitats to be avoided.

GEN-3: Project personnel will strictly limit their activities, vehicles, equipment, and construction materials to within the fenced construction limits, staging areas, and routes between the construction limits and staging areas. The temporary construction fencing will be removed on completion of the construction.

GEN-4: All workers will participate in a Worker Environmental Awareness Program for sensitive biological resources. Sign-in sheets will be maintained to document completion of the program by each worker. This training can be administered in person by a qualified biologist or through screening of a video/slide presentation, prepared by a qualified biologist and overseen by an on-site manager. Contractor education training will include a review of special-status species and protected habitats occurring/potentially occurring on site. Identification of these resources and all biological avoidance and minimization measures relevant to the contractors' work will be reviewed. Stop work and notification procedures will be outlined. The training program will include a section specific to UTS, southwestern pond turtle, arroyo toad, LBVI, and SWFL. Training handouts will be provided and posted at the staging areas in the project area.

In addition to a qualified biologist being available for species surveys, monitoring, and relocation activities, biological monitors will be present on a daily basis throughout the construction phase, when construction activities are adjacent to federally listed species habitat or have the potential to impact listed species. Biological monitors will be qualified for the monitoring activities and species in the area. A biological monitor will monitor the status of BMPs to ensure that they continue to be implemented after installation and prevent species that are in proximity to construction activities from being affected. In particular, construction monitoring will occur daily when ground-disturbing activities occur in/near the Santa Clara River. The biological monitors will ensure that BMPs are operating effectively, will conduct daily sweeps of the active construction areas to ensure that no listed species are impacted, and will conduct pre-activity clearance surveys ahead of vegetation/ground disturbance when in listed species habitat or critical habitat. Repeat pre-activity clearance surveys will be conducted when a lapse in occurs activities in suitable listed species habitat longer than 3 days after vegetation removal or a previous survey.

GEN-5: A qualified biologist, defined as an individual with the appropriate federal and State certifications to conduct the specified activities, will be available to relocate any listed species out of harm's way if detected within the project limits. The biologist will have verified previous experience with the species for which surveys are being conducted and will have been approved by USFWS as qualified to conduct species surveys, monitoring, and relocation activities.

GEN-6: All equipment maintenance; staging; and dispensing of fuel, oil, coolant, or any other such activities will occur in designated areas outside jurisdictional wetlands or waters and within the fenced project limits. These designated areas

will be in previously compacted and disturbed areas to the maximum extent practicable, so as to prevent any runoff from entering jurisdictional wetlands or waters. Fueling of equipment will take place within existing paved areas, if feasible, greater than 100 feet from jurisdictional wetlands or waters. Contractor equipment will be checked for leaks before operation and will be repaired as necessary. "Fueling zones" will be designated on construction plans and located away from the Santa Clara River and Northern Drainage.

GEN-7: In areas that do not require excavation or grading, native vegetation will be trampled instead of completely removed, to allow regrowth and invasive plant species to be avoided to the extent practical, to reduce the potential for their spread.

GEN-8: To reduce impacts on listed species' critical and occupied habitat, before entering the project area, all personnel will remove invasive species materials, propagules, seeds, and individuals from project equipment, materials, and clothing to reduce the proliferation of invasive species. This will include checking to see that construction equipment has been thoroughly power-washed or cleaned, to remove any dirt/mud/sediment from tires and tracks.

GEN-9: The project area will be kept as clean of construction-related trash and debris as possible, to avoid attracting predators of sensitive wildlife. All food-related trash items will be enclosed in sealed containers and removed regularly from the project area.

GEN-10: Project personnel will be prohibited from bringing pets into the project area.

GEN-11: Disposal or temporary placement of excess fill, brush, or other debris will not be allowed in WOTUS or their banks along the Santa Clara River.

GEN-12: The majority of construction is expected to be undertaken during daylight; however, when nighttime construction is necessary, lighting will be of the lowest illumination necessary for human safety, will be diverted away from any native vegetation communities, and will consist of low-sodium or similar lighting, equipped with shields to focus light downward onto the appropriate subject area.

GEN-13: Exclusionary devices will be installed underneath The Old Road Bridge over Santa Clara River to prevent birds and bats from nesting during construction. Installation of these devices will be completed before February 1 (the beginning of bird breeding season) and will remain until construction is completed. A qualified biologist will inspect the area before installation for nests and evidence of breeding activity. If breeding activity is not detected, inactive nests will be destroyed to prevent birds from establishing breeding. If breeding activity is confirmed, exclusionary devices will be installed in all other areas lacking active nests. Active nests will be monitored by the biologist until breeding is completed. After breeding is completed, exclusionary devices will be installed in these areas.

GEN-14: Best efforts will be implemented (within the control of LA County, taking into consideration land ownership) to restrict public access into the Santa Clara

River that can adversely affect listed fish and wildlife resources. These actions will include posting signs along the Multi-Use Trail and where sidewalks about the Santa Clara River, promoting public education and awareness of such ecological sensitivities, and maintaining fences and barricades to prevent unauthorized or unrestricted access to the river bottom, as applicable.

GEN-15: Compensatory mitigation for impacts on sensitive natural communities (jurisdictional wetlands and waters) will consist of a combination of in-place and in-kind restoration (at a minimum a 1:1 ratio) and enhancement. A Vegetation Management and Restoration Plan will be prepared for agency review and approval before initiating project impacts. Only native plant species will be included in the plans. Final plans will include the following information and conditions:

- a. All habitat restoration/enhancement sites will be prepared for planting in a way that mimics natural habitat to the maximum extent practicable. All planting will be installed in a way that mimics natural plant distribution and not in rows.
- b. Planting will be accomplished through planting palettes of container plants (and plan will specify plant species, size, and number/acre) and planting seed mix (the Vegetation Management and Restoration Plan will specify plant species and pounds/acre). The upland plant palette will include native species specifically associated with existing habitat types. The source and proof of local native status of plant material and seeds will be provided.
- c. Container plant survival will be 80% of the initial plantings for the first 5 years. At the first and second anniversaries of plant installation, all dead plants will be replaced unless their function has been replaced by natural recruitment.
- d. The final Restoration/Enhancement Plan will outline the irrigation schedule to the extent practical, to prevent overwatering, runoff, and plants that are artificially robust (in comparison with nearby native vegetation). Irrigation will cease after year 2 or 3, except in cases of extreme drought.
- e. The final implementation schedule will indicate when all habitat effects, as well as on-site and off-site restoration/enhancement planting and irrigation, will begin and end. Off-site restoration/enhancement planting and irrigation will be completed during the concurrent or next planting season (i.e., late fall to early spring) after beginning project impacts. On-site habitat restoration/enhancement planting and irrigation (if required) will be completed during the concurrent or next planting season (i.e., late fall to early spring), after finishing each phase of project impacts in the restoration/enhancement area. Any temporal loss of habitat caused by delays in restoration/enhancement will be mitigated through habitat preservation or restoration/enhancement at a 0.5:1 ratio for every 6 months of delay (e.g., 1:1 for 12 months of delay, 1.5:1 for 18 months of delay). If LA County is wholly or partly prevented from performing its obligations under the final plans (causing temporal loss from delays)

because of unforeseeable circumstances of causes beyond reasonable control, and without the fault or negligence of LA County, they will be excused by such unforeseeable cause(s).

- f. The 5 years of success criteria for restoration/enhancement areas will include a 40 to 65% absolute native cover (in comparison with adjacent native vegetation communities) or greater, depending on the native vegetation community being restored/enhanced; evidence of the natural recruitment of multiple species; 0% coverage for Cal-IPC's "Invasive Plant Inventory" species that are rated "High," and no more than 10% coverage of other exotic/weed species. Each vegetation community that is restored/enhanced will have a separate percent absolute native cover, as appropriate for the specific vegetation community. For example, this will vary with riparian woodland and marsh vegetation communities having a higher native coverage percent. The final restoration/enhancement plan will detail the specific success criteria with the target percent absolute native cover for each vegetation community.
- g. A qualitative and quantitative vegetation monitoring plan with a map of proposed sampling locations will be included. Photo points will be used for qualitative monitoring, and stratified random sampling will be used for all quantitative monitoring.
- h. Annual mitigation and monitoring reports will be submitted to the appropriate regulatory agency after the monitoring period, no later than December 1 of each year.
- i. If maintenance of the habitat/restoration enhancement area is necessary between February 1 and September 1, a qualified biologist will survey for nesting birds within the restoration/enhancement area, access paths to it, and other areas susceptible to disturbances by site maintenance. Surveys will consist of three visits separated by 2 weeks, starting March 1 of each maintenance/monitoring year. Work will be allowed to continue on site during the survey period. However, if sensitive avian species are found during any of the visits, LACPW will notify and coordinate with the regulatory agencies to identify measures to avoid and/or minimize effects on the sensitive species (e.g., nests and an appropriate buffer will be flagged by a biological monitor and avoided by maintenance workers).
- j. LACPW will mitigate at a 1:1 ratio for temporary impacts on listed species and a ratio of 3:1 for permanent impacts on listed species. In addition, the plan will include LA County Planning in the list of regulatory agencies to consult, to determine adequate replacement ratios, to mitigate temporary and permanent impacts on sensitive vegetation communities. In addition, the plan will include LA County Planning in the list of regulatory agencies to consult, to determine adequate replacement ratios, to mitigate temporary and permanent impacts on sensitive vegetation communities.

GEN-16. LACPW will conclude Section 7 informal consultation with NMFS during the Plans Specifications and Estimates (PS&E) phase.

Species-Specific Avoidance and Minimization Measures

The following measures may be refined, removed, or added to during consultation with USFWS and NMFS. Any measures issued in the Biological Opinion (USFWS 2024) will supersede these species-specific avoidance and minimization measures. No species-specific measures are included for arroyo toad because the species is extirpated from the BSA.

Steelhead

The following steelhead-specific avoidance and minimization measure will be implemented during project construction to reduce impacts:

FISH-1: Prior to the start of construction, surveys for steelhead would be conducted by a qualified biologist highly knowledgeable and experienced with identifying the species. Immediately prior to the start of construction, the qualified biologist would conduct no-take visual-only surveys for steelhead throughout the northern drainage (e.g., from the existing The Old Road culvert down to the stream's confluence with the mainstem of the Santa Clara River) and the mainstem Santa Clara River to confirm absence.

Immediately following the steelhead survey, a fish-excluding device would be installed and maintained in the northern drainage. No fish exclusion device is proposed for the mainstem Santa Clara River. This device would be designed, installed, monitored, and maintained to: (a) completely exclude steelhead and other aquatic life from the proposed action in the northern drainage during the entire term of work in or near surface waters; and (b) avoid stranding, entrapment, or entanglement of wildlife. The fish-exclusion device would be regularly monitored by a qualified biologist to ensure it is functional.

A surface water diversion would also be designed, installed, monitored, and maintained in a manner that ensures that sufficient water flow continues to maintain aquatic life downstream from the proposed project area in the northern drainage.

Additional BMPs would be implemented to avoid and minimize proposed action effects to steelhead. BMPs would be placed around the periphery of work areas to ensure no inadvertent spills, erosion, sedimentation, or construction-related effects occur.

If steelhead are detected within the proposed project area, work would be halted, and NMFS would be contacted immediately.

FISH-2: For the mainstem of the Santa Clara River, work activities would be conducted in a way to ensure no surface water contact, and a biological monitor would be present during all ground disturbing activities when near the Santa Clara River. Vegetation trimming and removal would be conducted in a way to prevent contact with surface water, and BMPs would be placed along the length of the Santa Clara River to ensure no inadvertent spills, erosion, or sedimentation occurs. A biological monitor would ensure that materials from concrete decking installation and concrete pouring do not fall into the Santa Clara River, and all construction personnel and equipment remain outside of the active channel. Construction of the piles within the Santa Clara River would occur during summer months, to coincide with periods of low flow for the Santa Clara River, to minimize the potential for effects to surface water in the Santa Clara River. The cast-in-drilled-hole pile with slurry displacement installation method was specifically selected to avoid the need for dewatering and potential effects to steelhead. A biological monitor would be present during cast-in-drilled-hole pile installation when in proximity to the Santa Clara River, to ensure that vibration effects are

not negatively affecting aquatic species. If unforeseen circumstances arise during construction of the bridge piles that may result in effects to steelhead, the NMFS would be contacted to discuss additional potential measures to avoid effects.

Any additional measures developed in consultation with NMFS would be incorporated.

Unarmored Threespine Stickleback

The following UTS-specific avoidance and minimization measure will be implemented during project construction to reduce impacts:

UTS-1: Before the start of construction, thorough surveys for UTS will be conducted by a qualified biologist who is highly knowledgeable and experienced in identifying UTS. The qualified biologist and survey methodology will be approved by USFWS before the survey begins.

1. Immediately before the start of construction, the qualified biologist (in close coordination with USFWS) will conduct no-take visual-only surveys for UTS throughout the Northern Drainage, to confirm absence.
 - a. If UTS are detected during either survey, the Northern Drainage will be considered occupied by UTS. If this is the case, the project culvert extension option will not be considered, and an alternative design will be necessary.
 - b. If UTS are not detected, the project potentially can begin.
2. Immediately following the UTS survey, a fish-excluding device will be installed and maintained. This device will be designed, installed, monitored, and maintained to (a) completely exclude UTS and other aquatic life from the project area in the Northern Drainage during the entire term of work in or near surface waters, and to (b) avoid stranding, entrapment, or entanglement of wildlife. The fish-exclusion device will be monitored regularly by a qualified biologist to verify that it is functional.
3. A surface water diversion also will be designed, installed, monitored, and maintained in a manner to verify that sufficient water flow continues to maintain aquatic life downstream from the project area in the Northern Drainage.
4. Additional BMPs will be implemented to avoid and minimize project impacts on water quality, aquatic life, nesting birds, and other natural resources. BMPs will be implemented around the periphery of work areas so that no inadvertent spills, erosion, sedimentation, or construction-related effects occur.
5. If UTS are detected within the project area or Northern Drainage, work will be halted and USFWS and CDFW will be contacted immediately.

UTS-2: For the mainstem of the Santa Clara River where UTS are assumed present, work activities will be conducted so that no surface water contact will occur, and a biological monitor will be present during all ground-disturbing activities when near the Santa Clara River. Vegetation trimming and removal will

be conducted in a way to prevent contact with surface water, and BMPs will be implemented along the length of the Santa Clara River so that no inadvertent spills, erosion, or sedimentation occurs. A biological monitor will ensure that materials from concrete decking installation and concrete pouring do not fall into the Santa Clara River, and that all construction personnel and equipment remain outside the active channel. Construction of the piles within the Santa Clara River will occur during summer months to coincide with periods of low flow for the Santa Clara River, to minimize the potential for impacts on surface water in the river. The cast-in-drilled-hole pile with slurry displacement installation method has been selected specifically to avoid the need for dewatering and potential impacts on UTS. A biological monitor will be present during cast-in-drilled-hole pile installation when in proximity to the Santa Clara River, to ensure that vibration impacts do not negatively affect any aquatic species. If unforeseen circumstances arise during construction of the bridge piles that may result in impacts on UTS, USFWS will be contacted to discuss additional potential measures to avoid impacts.

Southwestern Pond Turtle

WPT-1: A qualified biologist will survey the work site no more than 48 hours before the onset of activities, to monitor for southwestern pond turtle and/or southwestern pond turtle nesting activity (i.e., recently excavated nests, nest plugs) or nest depredation (partially to fully excavated nest chambers, nest plugs, scattered eggshell remains, and eggshell fragments). Preconstruction surveys to detect western pond turtle nesting activity will be concentrated within suitable upland habitat in the project area and will focus on areas along south- or west-facing slopes with bare hard-packed clay or silt soils or a sparse vegetation of short grasses or forbs. Survey efforts will focus on suitable aerial and aquatic basking habitat, such as logs, branches, root wads, and riprap, as well as the shoreline and adjacent warm, shallow waters where southwestern pond turtle may be present below the water surface, beneath algal mats or other surface vegetation.

WPT-2: If southwestern pond turtle is observed during the preconstruction survey, the species will be avoided to the greatest extent practicable. If avoidance is not feasible, LACPW will confer with USFWS to determine the best approach so that no take of the species occurs, including additional measures such as implementation of exclusion buffers, nest enclosures, silt fencing, screening, and additional BMP implementation, as appropriate.

Least Bell's Vireo and Southwestern Willow Flycatcher

The following avoidance and minimization measures will be implemented during project construction to reduce impacts on LBVI and SWFL.

RIP-1: To the greatest extent possible, construction activities (such as vegetation removal) will be timed to avoid the nesting season for riparian avian species (February 1 through September 1).

RIP-2: If work is scheduled during the riparian avian breeding season (February 1 through September 1), and within LBVI or SWFL-occupied and critical habitat, a qualified biologist will conduct a preconstruction nesting survey to verify that no active bird nests are present within 500 feet of construction activities. If no nests are detected, then vegetation removal will be permitted during the nesting season. The biologist will establish and maintain a minimum 300-foot no-disturbance buffer around all active bird

nests. For raptors and special-status species, this buffer will be expanded to a minimum of 500 feet.

RIP-3: If an active LBVI or SWFL nest is detected, no construction activities will be permitted within 500 feet of the nest. Work within nest buffers may not resume until the young fledge and disperse, or the nest has been determined to fail by a qualified biologist. Limits of construction to avoid a nest site will be established in the field with flagging and stakes or construction fencing.

Mountain Lion

The following avoidance and minimization measures will be implemented during project construction to reduce impacts on mountain lion.

LION-1: During construction of The Old Road Bridge, any nighttime lighting necessary for work or placed around temporary work areas/laydown yards will be shielded away from the Santa Clara River. Security lights around temporarily fenced areas under or adjacent to the Santa Clara River will have motion-activated sensors, so that they are not continually on throughout the night but only trigger if someone enters the fenced work area.

LION-2: Any permanent streetlights installed on The Old Road Bridge or along the west side of The Old Road adjacent to the Santa Clara River will be shielded, so that the light does not glare directly into native habitat in the river.

LION-3: Pending the State-listing status of mountain lion, impacts will be assessed by CDFW during the permitting process, and any necessary avoidance and minimization measures will be implemented.

Compensatory Mitigation

Based on the Biological Opinion (USFWS 2024), no species-specific habitat-based compensatory mitigation will be required for UTS, ARTO, southwestern pond turtle, or SWFL. No species-specific habitat-based compensatory mitigation is anticipated for southern steelhead. This is because no permanent loss of occupied UTS habitat is anticipated (only shading from expansion of The Old Road Bridge over the Santa Clara River). Impacts on waters in the Northern Drainage will be mitigated per GEN-15, WATERS-1, and WATERS-2. Both ARTO and SWFL do not breed within the BSA, and therefore project implementation will not result in loss of occupied habitat for either species. For southwestern pond turtle, because the species is not formally listed under the FESA, no compensatory mitigation will be required. For all four species, mitigation will be based on GEN-15 (LACPW will mitigate at a 1:1 ratio for temporary impacts on listed species and a ratio of 3:1 for permanent impacts on listed species). This will apply to LBVI, which breed throughout riparian vegetation within the BSA. Thus, species-specific habitat-based compensatory mitigation will be proposed only for LBVI, following the ratios specified in GEN-15. In addition, WATERS-1 and WATERS-2 provide additional mitigation for impacts on waters and the species they contain. Furthermore, no compensatory mitigation will be required for mountain lion.

2.4.6 Invasive Species

2.4.6.1 Regulatory Setting

On February 3, 1999, President William J. Clinton signed EO 13112, requiring federal agencies to combat the introduction or spread of invasive species in the U.S. The order defines invasive species as “any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem whose introduction does or is likely to cause economic or environmental harm or harm to human health.” FHWA guidance that was issued on August 10, 1999, directs the use of the State’s invasive species list, maintained by the Invasive Species Council of California, to define the invasive species that must be considered as part of the NEPA analysis for a proposed project.

2.4.6.2 Affected Environment

The following analysis is based on the NES (AECOM 2024h) that was prepared for the proposed project.

Several non-native species of plants and wildlife within the BSA would have the potential to be invasive, displacing native species and altering native habitat. These species would include several exotic grass species, including giant reed, several exotic herbaceous annual species, tamarisk (*Tamarix sp.*), largemouth bass, common carp, American bullfrog, red-eared slider, and African clawed frog, which have been detected within the BSA.

Areas of ruderal, annual brome grassland, and upland mustard vegetation communities support the majority of invasive species within the BSA. Several species of exotic grasses and herbaceous annuals have established themselves along the roadside in high concentrations (AECOM 2023g). Some of the invasive species that have been observed include tocalote (*Centaurea melitensis*), yellow star thistle (*Centaurea solstitialis*), red brome, wild oats, foxtail barley (*Hordeum murinum*), black mustard, short-podded mustard, and Russian thistle.

Within the aquatic and riparian vegetation communities mapped within the BSA are two species that may pose a threat to the riparian environment—giant reed and tamarisk. Both of these species have proliferated in Southern California’s waterways, choking out native species and using valuable water resources. Within the BSA, giant reed occurs in high densities along the edges of the Santa Clara River, often forming impenetrable walls of vegetation.

In addition to the aforementioned plant species, largemouth bass, common carp, American bullfrog, red-eared slider, and African clawed frog are non-native species that prey on native species, including arroyo chub, UTS, and arroyo toad, and they were detected within the BSA during biological surveys in 2023 (AECOM 2024).

2.4.6.3 Environmental Consequences

Alternative 1: No-Build Alternative

The No-Build Alternative would not include construction or operation of any of the improvements proposed under the Build Alternative. However, the invasive species already present within the BSA would remain.

Alternative 2: Build Alternative

Implementation of the Build Alternative also would have the potential to spread invasive species to adjacent native habitats within the BSA through the entering and exiting of contaminated construction equipment, the inclusion of invasive species in seed mixtures and mulch, and the improper removal and disposal of invasive species causing seed to be spread along the highway. With implementation of VEG-4 through VEG-6, potential permanent impacts under the Build Alternative related to invasive species would be avoided.

2.4.6.4 Avoidance, Minimization, and/or Mitigation Measures

Avoidance and minimization measures described previously under VEG-4 and VEG-5 and GEN-15 will be implemented. These measures will include implementation of BMPs so that invasive plant material is not spread from the project area to other locations by disposal off-site or by tracking seed on equipment, clothing, and shoes. Furthermore, the compensation mitigation described previously for VEG-6 will be implemented to provide the necessary compensation for project impacts.

2.4.7 Cumulative Impacts

Cumulative impacts are those impacts that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of a proposed project. A cumulative effect assessment looks at the collective impacts posed by individual land use plans and projects. Cumulative impacts can result from individually minor but collectively substantial impacts taking place over a certain period.

Cumulative impacts on resources in the project vicinity may result from residential, commercial, industrial, and highway development, as well as from agricultural development and the conversion to more intensive agricultural cultivation. These land use activities could degrade habitat and species diversity through consequences such as displacement and fragmentation of habitats and populations, alteration of hydrology, contamination, erosion, sedimentation, disruption of migration corridors, changes in water quality, and introduction or promotion of predators. They also could contribute to potential community impacts, as identified for a proposed project, such as changes in community character, traffic patterns, housing availability, and employment.

Section 15130 of the CEQA Guidelines describes when a cumulative impact analysis is necessary and what elements are required for an adequate discussion of cumulative impacts. The definition of cumulative impacts under CEQA is in Section 15355 of the CEQA Guidelines. A definition of cumulative impacts under NEPA is under Title 40, in Section 1508.7 of the CFR.

2.4.8 Cumulative Impact Analysis

This cumulative impact analysis has determined whether the Build Alternative, in combination with other past, present, or reasonably foreseeable projects, would result in a cumulative effect and, if so, whether the Build Alternative's contribution to the cumulative impact would be considerable. Present and reasonably foreseeable future projects would include land use developments, infrastructure, and other transportation improvements that are planned and funded and would be near the proposed Build Alternative improvements.

Table 2-60 lists the development projects in the project vicinity that were used to analyze the cumulative impacts of the proposed project. These projects are in various stages of development, from early conceptual planning and feasibility study to those projects planned for approval.

Table 2-60: Cumulative Projects

Name	Jurisdiction	Proposed Uses	Status
Interstate 5 (I-5) Rye Canyon Ramps Project	Los Angeles County	I-5 Ramps (connect The Old Road to I-5)	95% plans
Newhall Ranch Specific Plan	Los Angeles County	15,000-acre master planned community	Under construction
I-5 North County Enhancements Project	Los Angeles County	Widen I-5 to include high-occupancy lanes, truck-climbing lanes, and additional auxiliary lanes	Under construction

2.4.8.1 Resource Areas with No Contribution to Cumulative Effects

The resources considered in the cumulative effects analysis follow Caltrans's Eight Step Guidance for identifying and assessing cumulative impacts (Caltrans 2016). If a proposed project would not result in a direct or indirect adverse effect on a resource, then it would not contribute to a cumulative impact on that resource and does not need to be further evaluated.

In the initial phases of the proposed project, the following resources were determined not to result in an adverse effect:

- Coastal Zone
- Section 4(f)
- Timberlands
- Wild and Scenic Rivers

Therefore, these resources would not contribute to a cumulative impact. Through the evaluation presented in Chapter 2, the proposed project would result in no impacts or less-than-significant impacts with incorporation of AMMs, and thus no cumulative impacts would occur on the following resources:

- Existing and Future Land Use
- Consistency with State, Regional, and Local Plans and Programs
- Parks and Recreational Facilities
- Farmlands
- Growth
- Community Character and Cohesion
- Environmental Justice
- Utilities/Emergency Services
- Transportation and Traffic/Pedestrian and Bicycle Facilities
- Visual/Aesthetics
- Cultural Resources
- Hydrology and Floodplain
- Water Quality and Stormwater
- Geology/Soils/Seismic/Topography
- Hazardous Wastes/Materials
- Air Quality
- Noise

- Energy
- Natural Communities
- Wetlands and Other Waters
- Plant Species
- Wildlife Species
- Threatened and Endangered Species
- Invasive Species

Certain resources are not vulnerable to incremental/cumulative impacts. Examples include geologic and seismic hazards related to future developments in a project resource study area. Geologic and seismic hazards are site-specific and relate to the type of building or structure proposed and the soil composition and slope of a given site. No other planned projects in the vicinity would interact with the proposed project to increase the risk of geologic or seismic hazards. Therefore, no further cumulative impact analysis is warranted.

2.4.8.2 Resources Considered for Contribution to Cumulative Effects

Relocations and Real Property Acquisition

A cumulative analysis is required for any resource significantly impacted by a proposed project. Based on the analysis presented in this EIR/EA, the proposed project would not significantly impact the resource areas listed in Section 2.4.7. No project cumulative impacts would be likely to occur in conjunction with the projects listed in Table 2-60 and with the proper implementation of the AMMs.

However, as stated in Section 2.2.5, at this preliminary stage of project design, the Build Alternative is anticipated to require one full property acquisition, partial property acquisitions from 13 properties, and 20 temporary construction easements to accommodate roadway widening. All property owners and tenants would be made aware of any potential impacts on businesses, and all businesses would be able to remain open during project construction. The actual impacts on properties would be determined during the final design phase.

The Build Alternative would require the full acquisition of one vacant parcel and partial acquisitions from vacant, public utility, and commercial/industrial properties. Adverse impacts from relocations and property acquisition are anticipated, and the property owners would be compensated for loss of the property under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

Although the acquisitions that are anticipated as part of the Build Alternative would represent adverse effects, they are not anticipated to contribute to cumulative impacts. The proposed full property acquisition and partial acquisitions would occur primarily to vacant or public utility and commercial/industrial properties, as discussed above. The project area is anticipated to undergo notable changes with the proposed developments, but no adverse cumulative impacts from relocations and real property acquisition would occur.

Therefore, no cumulative impacts would occur, because other current and reasonably foreseeable projects in the project vicinity are distant from the project area or would not interact with the project schedule. Therefore, the Build Alternative would not have a cumulatively significant impact on any resources. All potential impacts would be minimized through implementation of the proposed AMMs. Based on this cumulative impact analysis, no further AMMs are proposed.

Chapter 3 California Environmental Quality Act Evaluation

The proposed project would be subject to federal as well as LACPW and State environmental review requirements because LACPW proposes the use of federal funds from FHWA and/or the project requires an approval from FHWA. Therefore, project documentation has been prepared in compliance with both CEQA and NEPA. LACPW is the project proponent and the lead agency under CEQA. FHWA's responsibility for environmental review, consultation, and any other actions required by applicable federal environmental laws for the proposed project are being, or have been, carried out by Caltrans pursuant to Title 23, Section 327 of the U.S. Code and the Memorandum of Understanding executed by FHWA and Caltrans on May 27, 2022.

One of the primary differences between NEPA and CEQA is the way significance is determined. Under NEPA, significance is used to determine whether an EIS, or a lower level of documentation, will be required. NEPA requires that an EIS be prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA. Under NEPA, after a decision is made regarding the need for an EIS, the magnitude of the impact is evaluated and no judgment of its individual significance is deemed important for the text. NEPA does not require that a determination of significant impacts be stated in the environmental documents.

CEQA, on the other hand, requires identifying each "significant effect on the environment" resulting from the proposed project and ways to mitigate each significant effect. If the proposed project may have a significant effect on any environmental resource, then an EIR must be prepared. Each and every significant effect on the environment must be disclosed in the EIR and mitigated if feasible. In addition, the CEQA Guidelines list a number of "mandatory findings of significance," which also require preparation of an EIR. No types of actions under NEPA parallel the findings of mandatory significance in a CEQA document. This chapter discusses the effects of the proposed project and CEQA significance.

3.1 CEQA Environmental Checklist and Significance Determinations

The CEQA Environmental checklist identifies physical, biological, social, and economic factors that may be affected by the proposed project. In many cases, background studies that have been performed for the proposed project indicate that no impacts would occur on a particular resource. A "No Impact" response in the last column of the checklist reflects this determination. The words "significant" and "significance" that are used throughout the following checklist are related to CEQA, not NEPA, impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

Project features, which can include both design elements of the proposed project as well as standardized measures that are applied to all or most Caltrans projects (e.g., BMPs and measures included in the Standard Plans and Specifications or as Standard Special Provisions) are considered an integral part of the proposed project and have been considered before any significance determinations that are documented herein. Chapters 1 and 2 present a detailed discussion of these features. The annotations to this checklist are summaries of information included in Chapter 2, to provide the reader with the rationale for the significance determinations. Chapter 2 gives a more detailed discussion of the nature and extent of impacts. This checklist incorporates by reference the information contained in Chapters 1 and 2.

3.1.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:	Significant and Unavoidable Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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 a 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?	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

CEQA Significance Determinations for Aesthetics**a, b) No Impact**

The proposed project would not have a substantial adverse impact on a scenic vista or scenic resources because the project area does not include any scenic vistas or resources. No impacts would occur.

c, d) Less than Significant with Mitigation Incorporated

As discussed in Section 2.2.9, the proposed project would be compatible with existing views, with the exception of the raised elevation of the I-5 SB on-ramp. The additional proposed lanes would not expand the scale of the roadway substantially and would maintain the visual character of the roadway. Furthermore, corridor views would maintain continuity because the proposed project would introduce only compatible elements that already exist in some form in the project area.

Construction views temporarily would include introduction of staging areas, equipment, and materials within the project corridor, but these impacts would be limited in duration. In addition, project construction would introduce construction lighting that potentially could increase temporary lighting in the area. Implementation of AMM VIS-1 would ensure that directional lighting would be aimed downward during construction, where appropriate within the project area, so that the proposed project would comply with the Santa Clarita Valley Area Plan.

Operationally, new permanent lighting would be installed along The Old Road and the proposed overcrossing structure, which would be finalized during the Plan, Specifications, and Estimates phase. However, these elements are not anticipated to be a notable change to the existing lighting in the area, because the project area is urban and has a moderate level of existing ambient lighting.

The project area would be consistent with existing vividness, intactness, and unity after construction. In addition, commercial and industrial viewers would be closer to the project area than local residents and would be less likely to notice compatible uses. Viewer sensitivity in the project area would remain moderately low. Implementation of AMM VIS-2 would include a textured finish on the proposed retaining wall on Rye Canyon Road at I-5, to discourage graffiti and maintain the visual quality of the area.

Therefore, the proposed project as designed would not substantially degrade the visual character and quality of the project area. The impacts would be less than significant with mitigation incorporated.

3.1.2 Agriculture and Forestry Resources

In determining whether impacts on 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 Caltrans of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts on forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Caltrans 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 the forest carbon measurement methodology provided in Forest Protocols adopted by the CARB.				
Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact 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 nonagricultural use, to non-agricultural use?	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by California Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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 conversion of forest land to non-forest use?	☐	☐	☐	☒

CEQA Significance Determinations for Agriculture and Forestry Resources

a, b) Less than Significant

As discussed in Section 2.2.3, the proposed project would convert approximately 1.08 acres of Prime and Unique Farmland. However, the new ROW associated with the proposed project would not require acquisition of the entire parcel. Form AD-1006 was completed for the proposed project and submitted to the NRCS local field office to determine the farmland conversion impact rating.

The NRCS determined that the proposed project would traverse areas currently being devoted to a variety of agricultural uses, including hay, vegetables, and fruit and nut trees. However, the proposed project rated a combined score of 125 points on Form AD-1006, which is below the threshold of 160. According to the instructions for completing Form AD-1006, sites receiving a total score of less than 160 points do not need to “consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites, Modifications, or Mitigation).”

Therefore, according to the results of Form AD-1006, no further analysis is needed for farmland issues under the Farmland Protection Policy Act. In addition, these areas are not used currently for agricultural, and the surrounding area is highly urban. Therefore, the acquisition of Farmland of Statewide Importance would not be adverse because of the zoning of the project area and the combined score of 125 on the Farmland Conversion Impact Rating Form. The impacts would be less than significant, and no mitigation is required.

c, d, e) No Impact

No parcels are under a Williamson Act contract within the project limits, and no forests or timberlands are within the project limits. Furthermore, no other changes are anticipated to farmland or forest land. Therefore, no impacts would occur.

3.1.3 Air Quality

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:	Significant and Unavoidable Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

CEQA Significance Determinations for Air Quality

a, b, c) Less than Significant

As discussed in Section 2.3.6, the project area is in Attainment–Maintenance (Serious) for CO, Attainment–Maintenance (Serious) for PM₁₀, and Nonattainment (Serious–24-hour) for PM_{2.5}. The proposed project would not cause or contribute to any new localized CO, PM_{2.5}, or PM₁₀ violations or delay timely attainment of any NAAQS or any required interim emission reductions or other milestones during the time frame of the transportation plan (or regional emissions analysis). The proposed project is included in the SCAG's most recent RTP/SCS and FTIP, both of which were determined to be conforming. In addition, no sensitive receptors are within 500 feet of the project limits.

The proposed project would address current and expected roadway deficiencies of The Old Road and adjacent roadway system, such as congestion, and inconsistency with jurisdictional plans and policies would improve because the proposed project would increase regional roadway capacity to accommodate expected future traffic growth projections.

The proposed project would result in less or similar to existing criteria pollutant emissions because of improvements in vehicle delay. Thus, the proposed project would not conflict with the AQMP, violate any air quality standards, result in a net increase of any criteria pollutant, or expose sensitive receptors to substantial pollutant concentrations. Therefore, the impacts would be less than significant, and no mitigation is required.

d) Less than Significant

Temporary construction activities could generate fugitive dust from the operation of construction equipment. The proposed project would comply with construction standards adopted by the SCAQMD as well as with Caltrans standardized procedures for minimizing air pollutants during construction. Therefore, the impact would be less than significant, and no mitigation is required.

3.1.4 Biological Resources

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact 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 CDFW, USFWS, or NOAA Fisheries?	☐	☒	☐	☐
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 CDFW or USFWS?	☐	☒	☐	☐
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?	☐	☒	☐	☐
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?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
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?	☐	☐	☐	☒

CEQA Significance Determinations for Biological Resources**a) Less than Significant with Mitigation Incorporated**

Project implementation would not impact any federally or State-listed threatened, endangered, or candidate plant species that would have the potential to occur within the BSA. Special-status plant surveys in 2023 were negative for listed plants. One non-listed special-status plant species, Southern California black walnut, was detected within the LOD and BSA. One Southern California black walnut tree would be removed by construction, and a second tree may be affected because of its close proximity to the LOD. Implementation of AMM WALNUT-1 would reduce the impact to a less-than-significant level.

For non-listed special-status wildlife species, multiple species have been detected within the BSA that have the potential to be affected by the proposed project (refer to Table 2-54 and Section 2.4.4). The following non-listed special-status wildlife species are known to occur or would have the potential to occur within the LOD and be affected by the proposed project: arroyo chub, Southern California legless lizard, California glossy snake, coastal whiptail, coast horned lizard, two-striped garter snake, white-tailed kite, Cooper's hawk, California horned lark, yellow warbler, yellow-breasted chat, Southern California rufous-crowned sparrow, loggerhead shrike, western burrowing owl, pallid bat, Townsend's big-eared bat, spotted bat, western mastiff bat, western red bat, hoary bat, Yuma myotis, and American badger.

Temporary, direct impacts would result from the use of upland and aquatic habitat for equipment and materials staging and grading, as well as from clearing and tree removal for construction activities and access to construction sites. Permanent impacts would result from removal of occupied habitat for multiple species. Project operation would have minor effects on non-listed special-status wildlife species within the BSA.

Impacts on non-listed special-status wildlife species would be avoided and minimized by implementation of several AMMs, GEN-1 through GEN-15, and species-specific measures UTS-1 and UTS-2, WPT-1 and WPT-2, RIP-1 through RIP-3, and BAT-1 through BAT-3. By implementing these measures, the impact on non-listed special-status wildlife species would be reduced to a less-than-significant level.

For federally and State-listed wildlife species, including candidate species, the proposed project would have the potential to impact steelhead, UTS, arroyo toad, southwestern pond turtle, LBVI, SWFL, and mountain lion. Steelhead are not known from the proposed project area, but have a very rare chance of migrating through the Santa Clara River under The Old Road Bridge during high flows/flood events. UTS is assumed to occur in the mainstem of the Santa Clara River and may occur in the Northern Drainage. Arroyo toad historically has occurred in the area; however, after years of historical droughts and the proliferation of nonnative invasive species, it has not been documented within the BSA in several decades and likely is extirpated. Southwestern pond turtle is known to occur throughout the BSA, in both the mainstem of the Santa Clara River and the Northern Drainage. LBVI are common summer breeders throughout riparian vegetation within the BSA, and eight territories were identified during focused surveys in 2018. Federally designated critical habitat for arroyo toad, LBVI and SWFL also would be permanently removed by the proposed project.

Both temporary and permanent impacts would result from habitat loss (including critical habitat for arroyo toad, LBVI, and SWFL) during project construction. Acreages of impacts per listed species are detailed in Section 2.4.1. The impact on listed species would be similar to the impact previously discussed for non-listed special-status wildlife species and would include a temporary direct impact during construction and a permanent impact from removal of occupied habitat.

The impact on listed wildlife species would be avoided and minimized by implementation of several AMMs, including GEN-1 through GEN-16, and species-specific measures: FISH-1 and FISH-2, UTS-1 and UTS-2, WPT-1 and WPT-2, RIP-1 through RIP-3, BAT-1 through BAT-3, and LION-1 through LION-3. Therefore, the impact on listed wildlife species would be reduced to a less-than significant level with mitigation incorporated.

b) Less than Significant with Mitigation Incorporated

The proposed project would result in temporary and permanent impacts on riparian habitat and other sensitive natural communities. Project implementation would result in temporary and permanent direct impacts on California Buckwheat Scrub, Fremont Cottonwood Forest and Woodland, and Elderberry Stand, which are summarized by acreage in Table 2-53. Indirect impacts on sensitive vegetation communities also may occur from construction and use of the project area. Temporary indirect impacts, such as construction fugitive dust (which can coat vegetation and reduce photosynthesis), sedimentation and erosion, construction-generated trash/debris, and unauthorized trespass could all adversely affect vegetation. The proposed project also would have the potential for longer term impacts, such as the proliferation of invasive species through ground-disturbing activities, which may indirectly degrade adjacent native vegetation communities. Indirect impacts also may occur in the form of increased potential for wildland fires and pollution in the Santa Clara River. With implementation of AMMs VEG-5, VEG-6, and GEN-15, both temporary and permanent impacts would be reduced to a less-than-significant level with mitigation incorporated.

c) Less than Significant with Mitigation Incorporated

As discussed in the NES (AECOM 2024h), the proposed project would include bank stabilization and bridge replacement over Santa Clara River, requiring permits from USACE, the RWQCB, and CDFW for the impacts on jurisdictional waters (WOTUS), wetlands, and riparian habitat.

A jurisdictional delineation was completed for the project area (initially in 2018, and updated in 2023; AECOM 2023k), which determined that the Santa Clara River is considered WOTUS, and therefore subject to regulation by USACE and the RWQCB under Sections 404 and 401 of the CWA, respectively. Overall, 5.78 acres and 0.76 acre of USACE and RWQCB jurisdictional waters and wetlands, respectively, and an additional 28.67 acres of CDFW-only jurisdictional waters are within the BSA (the Santa Clara River). An unnamed tributary to the river along the northern portion of the project area includes 0.30 acre of non-wetland waters and 0.98 acre of CDFW streambed. Stormwater drainages A and B include 0.02 acre of non-wetland waters and 0.13 acre of CDFW streambeds. Isolated riparian areas include 0.07 acre (RWQCB, CDFW) and 1.29 acres (CDFW).

Permanent impacts are proposed to occur at three project features—the Santa Clara River, the Northern Tributary, and Drainage A. The proposed project may temporarily impact 0.15 acre and permanently impact up to 0.33 acre of WOTUS. The indirect impact from expanded bridge shading would be on 0.26 acre of WOTUS. The total impacts on CDFW-jurisdictional streambeds and riparian habitat would include approximately 1.07 acre of permanent impacts and 0.43 acre of temporary impacts, as well as 0.68 acre of new bridge shading and 0.02 acre because of the new bridge columns.

The project area is adjacent to portions of the Santa Clara River, and thus the remaining jurisdictional areas may be affected by runoff from the road and increased trash and litter. In addition, the river may be indirectly impacted by nonnative species (e.g., roadside weeds), exposure to urban pollutants (e.g., fertilizers, pesticides, herbicides, other hazardous materials), soil erosion, and hydrological changes (e.g., surface and groundwater level and quality).

Extensive AMMs and BMPs will be implemented for the Santa Clara River and its tributaries. Because the proposed project would impact USACE, RWQCB, and CDFW jurisdictional areas,

the avoidance and minimization measures that are discussed in Section 2.4.1 would be applicable (i.e., AMMs VEG-1 through VEG-4). These measures would be incorporated into the project design, and therefore would minimize potential impacts on areas under USACE and CDFW jurisdiction. Compensatory mitigation as detailed in AMMs WATERS-1 and WATERS-2 would consist of the restoration and compensation of wetland and riparian vegetation communities, and would be refined further in the regulatory permitting process. Therefore, the impact would be reduced to a less-than-significant level with mitigation incorporated.

d) Less than Significant with Mitigation Incorporated

The proposed project would span areas of open water within the Santa Clara River and Northern Drainage, thereby eliminating any impact on surface water that is occupied by steelhead, UTS, and other aquatic species. Therefore, the proposed project would not substantially interfere with the movement of any native resident or migratory fish. However, the expanded road and The Old Road Bridge would have the potential to increase the noise and artificial nighttime light over the Santa Clara River, which is a wildlife corridor. This would have the potential to interfere with the movement of local wildlife along the Santa Clara River. With implementation of AMMs LION-1 through LION-3, the impact would be reduced to a less-than-significant level with mitigation incorporated.

e) Less than Significant with Mitigation Incorporated

A detailed oak tree survey was conducted by AECOM in June 2019 (AECOM 2019b), in accordance with the LA County Oak Tree Ordinance (Sections 22.56.2050–2260 of the LA County Code), to provide information to LACWP on oak trees that may be removed or damaged by development of the proposed project.

LACWP recognizes the historical, aesthetic, and ecological qualities of oak trees and seeks to preserve and propagate this unique, threatened plant community, especially those trees that may be classified as heritage oaks. Heritage oaks are oak trees with a diameter at breast height greater than 36 inches. LA County's Oak Tree Ordinance requires an oak tree permit for any impacts on oak trees within its jurisdiction that meet certain requirements (e.g., size, age). Impacts would include cutting, destroying, removing, relocating, inflicting damage, or encroaching into the protected zone of any oak tree. The protected zone is defined as the area within the canopy of an oak tree extending to a point at least 5 feet outside the dripline or 25 feet from the trunk of a tree.

AECOM surveyed 59 native oak trees (56 *Q. lobata* and three *Q. agrifolia*) that would be subject to the LA County Oak Tree Ordinance within the BSA, which would include the proposed grading limit line and all areas within 500 feet of the grading limit line. Approximately 50% of the BSA already has been developed. Most of the oak trees that have been recorded within the BSA occur within the limit of disturbance along both sides of The Old Road, just south of the intersection of The Old Road and Rye Canyon Road. Of the 59 native oak trees surveyed, 15 oak trees (*Q. lobata*) are planned for permanent removal because of The Old Road expansion. The oak trees planned for removal are valley oaks, two of which are heritage trees under the LA County Oak Tree Ordinance (36 inches in diameter or greater). Fourteen oak trees are within temporary impact areas associated with project construction access and temporary work areas. These areas would be avoided to the greatest extent possible during project construction-related activities.

Thirty native oak trees are within 500 feet of the limit of disturbance, none of which would be removed or encroached on. Thus, no specific avoidance efforts are feasible. However, AMMs OAK-1 through OAK-7 would be implemented to minimize the potential impact on trees that would not be removed but would be in close proximity of construction activities. Therefore, the impact would be reduced to a less-than-significant level with mitigation incorporated.

f) No Impact

The proposed project is not anticipated to conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plans (NCCP), or other applicable habitat conservation plan. Although the project area is within the Santa Clara River SEA, the SEA designation is not part of an adopted Habitat Conservation Plan or NCCP. The proposed project would be conducted in a manner consistent with the stipulations for working in an SEA. No impact would occur.

3.1.5 Cultural Resources

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

CEQA Significance Determinations for Cultural Resources

a) Less than Significant with Mitigation Incorporated

As discussed in Section 2.2.10, based on the results of the HRER (AECOM 2023e) and the HPSR (AECOM 2023f), eight built-environment resources were identified within the APE. Of these eight resources, three were previously determined ineligible for the NRHP (i.e., The Old Road over Santa Clara River Bridge [P-19-190315], The Old Road Bridge over the SPT Co. [CA53C0328], and the Route 5/SR-126 Separation Bridge [CA532928]), and four resources (P-19-186567, PD-1 concrete culvert, P-19-186541, Valencia Water Reclamation Plant) were determined ineligible for listing in the NRHP based on the current studies. One resource, the SPRR SBL/SPB is assumed eligible for the proposed project; however, the section of the SPRR SBL/SPB that is within the APE is not eligible as a contributing element. Therefore, no previously recorded historic properties will be affected by the proposed project.

The ASR (AECOM 2023g), XPI investigation (AECOM 2024c), and the Supplemental ASR/XPI (AECOM 2024a, 2024c) determined that the project area exhibits archaeological sensitivity, but the potential to encounter intact archaeological deposits would be low. With implementation of the AMMs discussed in Section 2.2.10, the impact on unanticipated discoveries would be reduced to a less-than-significant level with mitigation incorporated.

b) Less than Significant with Mitigation Incorporated

As discussed in Section 2.2.10, the ASR (AECOM 2023g) determined that no significant unique archaeological resources have been previously recorded in the APE. Although a low potential would exist to encounter previously unrecorded archaeological resources, implementation of AMMs CR-1, CR-2, and CR-3 would further reduce the potential for impacts on archaeological resources during construction. Therefore, the impact would be reduced to a less-than-significant level with mitigation incorporated.

c) Less than Significant with Mitigation Incorporated

The interested parties outreach conducted in 2018 and reported in the 2023 HPSR (AECOM 2023f) indicated that the possible remains of a 1928 St. Francis Dam Disaster victim were identified near the river in proximity to Castaic Junction. However, there are no formal cemeteries or known burial sites in the proposed project area and the proposed project construction is not expected to disturb any human remains. AMM CR-3 would further reduce the potential for the disturbance of human remains and provides guidance in the event that any human remains are discovered during construction. Therefore, impacts would be less than significant with mitigation incorporated.

3.1.6 Energy

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact 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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

CEQA Significance Determinations for Energy**a) Less than Significant**

Construction activities would result in short-term energy consumption from the use of petroleum fuels by off-road construction equipment, from on-road vehicles used by construction workers to travel to and from the project area during construction and for delivery of construction materials. The proposed project is anticipated to improve existing traffic operations and accommodate future traffic projections, eliminate choke points, and decrease traffic congestion. These improvements would improve traffic operations to be consistent with LACPW highway design speed safety standards and decrease travel time on the congested roadway system. The proposed project would enable The Old Road corridor to maximize productivity through improvements to the capacity of the roadway lanes, allowing for more flexibility in traffic movement and higher efficiencies to accommodate expected future traffic growth. Therefore, the proposed project would not result in an inefficient, wasteful, and unnecessary consumption of energy. The impact would be less than significant, and no mitigation is required.

b) No Impact

This proposed project would not conflict with State or local plans for renewable energy and energy efficiency. The proposed project would address current and expected inconsistencies with jurisdictional plans and policies because it would increase regional roadway capacity to accommodate expected future traffic growth projections. No impact would occur.

3.1.7 Geology and Soils

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact 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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

CEQA Significance Determinations for Geology and Soils

ai, aii, aiii, b, c) Less than Significant

Although several active and potentially active earthquake faults and fault zones are in the project area, the project area does not cross any of these faults and zones, and it is not within an Earthquake Zone of Required Investigation. In addition, the proposed project would improve the bridges along The Old Road for earthquake protection. The project area is within a Liquefaction Zone, and project construction may increase the potential of soil erosion. However,

implementation of avoidance measures, construction-phase BMPs, and project design features would minimize potential soil erosion and the occurrence of liquefaction (as discussed in Section 2.3.3). The impacts would be less than significant, and no mitigation is required.

a iv, d, e) No Impact

The project area is not in any areas susceptible to expansive soil or in a landslide area. In addition, the proposed project would not construct or modify a septic system or alternative wastewater system. Therefore, no impacts would occur.

f) Less than Significant With Mitigation Incorporated

As discussed in Section 2.3.4, no known recorded fossil locations are within 1 mile of the project area. However, project construction could have direct or indirect effects on paleontological resources, particularly at a depth where drilling or augering takes place, as well as from any ground disturbance in old terrace sediments that are mapped as Qog.

However, AMM PAL-1 would be implemented to reduce the impact, which would require implementation of a Paleontological Resources Monitoring and Mitigation Plan before construction-related excavations. In addition, in the event of an inadvertent discovery of paleontological resources, AMM PAL-2 would be implemented to reduce the potential for an impact on unknown, buried paleontological resources. AMM PAL-2 would require appropriate training for on-site construction crews regarding discovery or observations of paleontological resources in locations where the potential exists for them. Therefore, the impact would be reduced to a less-than-significant level with mitigation incorporated.

3.1.8 Greenhouse Gas Emissions

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG?	☐	☐	☒	☐

CEQA Significance Determinations for Greenhouse Gas Emissions

a, b) Less than Significant

The proposed project would result in GHG emissions during construction; however, that would be offset by the long-term improvements in operational GHG emissions compared with existing conditions. As discussed in Section 3.3.3, the Build Alternative would result in less emissions than the No-Build Alternative and existing conditions in the opening year (2028) because of improvements in average vehicle speed and reductions in vehicle delay. In addition, in the design year (2048), ambient regional growth would result in higher GHG emissions for the Build Alternative than existing conditions in 2018, but the magnitude of emissions would be substantially lower than the No-Build Alternative in the same year. The proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, the impacts would be less than significant, and no mitigation is required.

3.1.9 Hazards and Hazardous Materials

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact 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?	☐	☒	☐	☐
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?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) Would the project result in a safety hazard or excessive noise for people residing or working in the project area (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)?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

CEQA Significance Determinations for Hazards and Hazardous Materials

a, b, d) Less than Significant With Mitigation Incorporated

The proposed project would involve the transport, use, and disposal of hazardous materials for construction of the proposed project (e.g., fuels, paints, asphalt, and lubricants). Per Section 2.3.5, the proposed project would comply with all applicable federal, State, and local regulations, and this would reduce the potential for incidents involving hazardous materials. The project area is not in a location that is included on the list of hazardous materials sites, compiled pursuant to Section 65962 of the California Government Code. However, 24 accidental spills/incidents were identified along the project corridor, but they have not been identified as RECs. In addition, two plugged and abandoned oil/gas wells were identified in and adjacent to

the project area, one of them being within the SB lanes of The Old Road. This well was plugged and abandoned in 1968 and was not identified in an April 2023 geophysical survey.

In addition, as noted in the Aerial Deposited Lead Survey (Leighton Consulting 2023) that was completed for the proposed project, no soils investigated during the survey were characterized as RCRA hazardous waste, with the exception of soil in the vicinity of borings B97 and B103. AMMs would be implemented for the excavation and transport of soils to an approved disposal facility, and the soil within the remainder of the phase 2 project limits would be considered nonhazardous/unrestricted or suitable for re-use onsite.

The recommendations outlined in the Initial Site Assessment (AECOM 2023g) would be followed to avoid and/or minimize impacts associated with hazardous materials, as listed as AMMs HAZ-1 through HAZ-15. Therefore, the impacts would be reduced to a less-than-significant level with mitigation incorporated.

c, e, f, g) No Impact

No schools are within a 0.25-mile radius of the project area. The project area is not within an airport land use plan or within 2 miles of a public airport. Outreach would occur to inform local jurisdictions, agencies, and the public of the times and locations of upcoming project construction, to avoid traffic disruptions especially for emergency response vehicles. In addition, the project improvements would enhance safety and increase capacity on roadways, to provide for emergency overflow. The widening of The Old Road would be critical for the passage of traffic and emergency vehicles in the area. The proposed project would expand existing facilities and land uses and would not expose people or structures to significant risks involving wildland fires. Therefore, no impacts would occur.

3.1.10 Hydrology and Water Quality

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact 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?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☒	☐	☐
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:				
(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 of polluted runoff; or	☐	☒	☐	☐
(iv) impede or redirect flood flows?	☐	☒	☐	☐
d) Risk release of pollutants because of project inundation (in flood hazard, tsunami, or seiche zones)?	☐	☒	☐	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☒	☐	☐

CEQA Significance Determinations for Hydrology and Water Quality

a, b, ci through civ, d, e) Less than Significant With Mitigation Incorporated

The proposed project would have the potential to affect water quality during construction, through soil disturbance, exposing it to erosion and the release of pollutants, such as sediment/turbidity, metals, oil and grease, and debris. As discussed in Section 2.3.2, with implementation of construction-phase BMPs in compliance with the Construction General Permit, the potential for degradation of surface or groundwater quality would be reduced.

The approximately 43.1-acre increase in impervious surface as part of the proposed project would not be anticipated to reduce groundwater recharge in the project area. The increase in

impervious surface area would be insignificant in comparison to the watershed area of the Santa Clara River at The Old Road Bridge crossing. In addition, implementation of design measures and BMPs (e.g., bioswales) would minimize potential effects from the increase in impervious surface.

The proposed project would not significantly impact existing drainage patterns or exceed the capacity of existing stormwater drainage systems. The proposed drainage system would connect to the existing drainage system and would improve stormwater drainage and runoff treatment. Compliance with the standard requirements of the Construction General Permit and LA County's Municipal Permit for potential short-term and long-term impacts would be required. AMMs WQ-1 and WQ-2 would be implemented to minimize impacts on hydrology and water quality. The impacts would be reduced to a less-than-significant level with mitigation incorporated.

3.1.11 Land Use and Planning

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact because of a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

CEQA Significance Determinations for Land Use and Planning**a, b) Less than Significant**

The proposed project would not physically divide an established community. The proposed project would establish temporary detour routes for traffic, which would allow local roadways to remain accessible throughout the duration of project construction. Access to local driveways along The Old Road and Henry Mayo Drive would be maintained. After construction is completed, the new bridge would be wider, with an increased number of lanes (6 lanes).

However, the proposed project would not provide new access to an undeveloped area, nor would it influence development opportunities by expanding capacity. Although minority and low-income populations exist in and around the study area, the proposed project would benefit most area residents, including minority and low-income populations, by improving mobility and circulation throughout the area. Overall, the proposed project would be built along an existing transportation corridor and would not divide existing neighborhoods/communities. Therefore, the impacts related to the physical division of an established community would be less than significant.

In addition, as stated in Section 2.2.1 above, the proposed project would be consistent with all applicable State, regional, and local plans and programs. The proposed project would address current and expected roadway deficiencies on The Old Road and adjacent roadway system, such as inconsistency with jurisdictional plans and policies, because roadway capacity would increase in the regional and improve safety to accommodate expected future traffic growth projections to meet jurisdictional plans and policies. Furthermore, the proposed project would not conflict with the existing or planned land uses in the area.

The impacts would be less than significant, and no mitigation is required.

3.1.12 Mineral Resources

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

CEQA Significance Determinations for Mineral Resources

a, b) Less than Significant

As discussed in Section 2.3.3, a portion of the project area is within an MRZ-2 site, and the remainder of The Old Road is within an MRZ-3 site. Although a portion of the project area is within an area of mineral resource significance, the amount of excavation needed for the proposed project would be insignificant in relation to the size of the entire MRZ-2 area that encompasses parts of the project region. Adherence to the goals and policies regarding mineral resources in the LA County General Plan's Conservation and Natural Resources Element and the City of Santa Clarita General Plan's Conservation and Open Space Element would be followed to reduce impacts on any mineral resources. In addition, the 0.64-mile portion of The Old Road within the Castaic Junction Oil and Gas Field contains only plugged wells, and the closest active well in this field is approximately 0.54 mile from The Old Road. Therefore, the proposed project would not result in the substantial loss of availability of a known mineral resource that would be of value to the region or State or of a locally important mineral resource recovery site. The impacts would be less than significant, and no mitigation is required.

3.1.13 Noise

Would the project result in:	Significant and Unavoidable Impact	Less Than Significant Impact 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?	☐	☐	☒	☐
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
c) Exposing people residing or working in the project area to excessive noise levels (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 2 miles of a public airport or public use airport)?	☐	☐	☐	☒

CEQA Significance Determinations for Noise

a, b) Less than Significant

CEQA requires a baseline versus build analysis to assess whether a project would have a noise impact. If a project is determined to have a significant noise impact under CEQA, then CEQA dictates that mitigation must be incorporated into the project unless the mitigation is not feasible. As shown in Table 2-42, the measured sound levels were compared to the predicted sound levels at measurement locations ST-1 through ST-8. The largest predicted difference was 2.1 dBA at ST-4, which would not be considered a significant impact. Furthermore, as discussed in Section 2.3.7, land uses in the project area were grouped into a series of Noise Study Areas, and a preliminary noise abatement analysis was conducted. Only one potential barrier location, in NSA-2, was identified and studied for noise abatement. However, a barrier was determined not be reasonable to construct because it would be acoustically ineffective. The final decision on this determination would be subject to change until the final design phase, following public review and consideration of comments. For any nighttime or weekend work, a variance from LA County would be sought to permit that work. Short-term noise levels would result from construction methods, such as pile-driving, which would be temporarily higher than existing ambient noise levels. Similarly, generation of ground-borne noise levels would have the potential only to be exceeded during construction. Construction would be conducted in accordance with Caltrans Standard Specifications Section 14.8-02. Activities would be short-term, intermittent, and overshadowed by local traffic noise. Therefore, the impacts would be less than significant, and no mitigation is required.

c) No Impact

The project area is not in the vicinity of a private airstrip or within 2 miles of a public airport. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels. No impact would occur.

3.1.14 Population and Housing

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact 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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

CEQA Significance Determinations for Population and Housing**a, b) Less than Significant**

As discussed in Section 2.2.6, the proposed project would require temporary construction, permanent drainage, and roadway ROW easements on portions of several properties within the project boundaries. However, the proposed project would not provide any access to previously inaccessible parcels or remove access to any properties. It also would provide additional bicycle and pedestrian access along The Old Road from surrounding communities.

Furthermore, the proposed project would not require changes to land use designations or contain elements that would influence the type or location of growth beyond what already is planned. None of the above changes would induce unplanned population growth in the area.

The proposed project would not change the distribution of existing or planned housing. No housing is in the project area. Project construction would not displace any residential units or nonresidential properties. Therefore, the proposed project would not displace substantial numbers of people or housing that would necessitate construction of replacement housing. The impacts would be less than significant, and no mitigation is required.

3.1.15 Public Services

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:	Significant and Unavoidable Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Fire protection?	☐	☒	☐	☐
ii. Police protection?	☐	☒	☐	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

CEQA Significance Determinations for Public Services**A i., ii.) Less than Significant with Mitigation Incorporated**

During construction, temporary impacts on traffic are anticipated because of possible lane closures and detours. However, as discussed in Section 2.2.7, avoidance and minimization COM-2 through COM-4 would be implemented to reduce or eliminate temporary effects on emergency services. In addition, as stated in AMM COM-5, coordination would occur with utility service providers, and a public outreach program would be implemented to minimize impacts on surrounding communities. Thus, impacts on public services, including police and fire protection, would be minimal. Therefore, the proposed project would not cause existing public services to provide additional services or create new associated facilities. The impacts would be reduced to a less-than-significant level with mitigation incorporated.

A iii., iv., v.) Less than Significant

The proposed project would not construct any infrastructure or developments that would increase the local population, thereby necessitating the provision of new or physically altered government facilities. The impact would be less than significant, and no mitigation is required.

3.1.16 Recreation

	Significant and Unavoidable Impact	Less Than Significant Impact 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

CEQA Significance Determinations for Recreation

a, b) No Impact

As discussed in Section 2.2.2, the public use of parks and recreational facilities would not be affected by the proposed project because no recreational activities occurring at these locations. The Build Alternative would construct bike lanes, pedestrian pathways, an equestrian trail, as well as an extension of the Multi-Use Trail, which would improve connectivity and increase recreational opportunities in the area. No park or recreation areas exist in the project area. Therefore, no impacts would occur.

3.1.17 Transportation

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☒	☐	☐

CEQA Significance Determinations for Transportation**a, b, c) Less than Significant**

As discussed in Section 2.2.8, the proposed project is expected to be positive for roadway circulation, decreasing congestion and delays and improving traffic flow. There would not be an increase in hazards due to geometric design features or incompatible uses. The roadway capacity analysis determined that traffic demand on The Old Road justifies a six-lane facility to operate more efficiently. Bicycle and pedestrian facilities also would be improved as part of the proposed project. Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy addressing circulation.

As discussed in the VMT Analysis Memorandum (AECOM 2023c), the total regional VMT would decrease by 93,346 VMT in the opening year (2028) and decreases by 1,010,396 VMT in the design year (2048). Based on the results of the analysis presented in Section 2.2.8, the proposed project would have a less than significant project level and cumulative level VMT impact on the regional area. Therefore, the impacts would be less than significant, and no mitigation is required.

d) Less than Significant with Mitigation Incorporated

The proposed project would not alter the alignment of The Old Road or any other roadways. However, temporary impacts on traffic would occur during project construction. As discussed in Section 2.2.7, AMMs COM-2 through COM-4 would be implemented to reduce or eliminate the temporary effects on traffic and emergency services. Current traffic demand in the project area meets or exceeds roadway capacity for many arterial roadways. The Old Road and adjacent roadway system in the project area are used heavily and are characterized by roadway congestion. After it becomes operational, the proposed project would improve traffic flow, and therefore would enhance emergency access in the area. Thus, the impacts would be reduced to a less-than-significant level with mitigation incorporated.

3.1.18 Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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:	Significant and Unavoidable Impact	Less Than Significant Impact 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 PRC Section 5020.1(k), or	☐	☒	☐	☐
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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

CEQA Significance Determinations for Tribal Cultural Resources

In 2014, Assembly Bill (AB) 52 amended CEQA to require that lead agencies assess the potential impacts of projects on tribal cultural resources and consider the significance of those resources in the environmental review process. Tribal cultural resources, which have particular significance to Native American tribes, are distinguished from other cultural resources, such as historical or archaeological sites. As defined in Section 21074(a) of the PRC, tribal cultural resources include sites, features, places, and objects with cultural significance to Native American tribes, as well as those identified in tribal cultural resource studies.

AB 52 sets forth specific requirements for analyzing tribal cultural resources under CEQA. Lead agencies must consult with California Native American tribes who are traditionally and culturally affiliated with a project location and formally have requested consultation. If impacts on tribal cultural resources are identified, agencies must work with tribes to develop appropriate mitigation measures and document consultation outcomes in the environmental document prepared for the project. AB 52's requirements are intended to enhance the protection of tribal cultural resources and ensure meaningful involvement of Native American tribes in the CEQA process.

AB 52 Native American Consultation

On July 9, 2020, LACPW mailed an invitation to consult to two tribes, Fernandeño Tataviam Band of Mission Indians (FTBMI) and Gabrieleno Tongva Tribe San Gabriel Band of Mission Indians (GTSGBMI), who previously had requested to be notified by LA County under AB 52 requirements. FTBMI responded and requested formal consultation under AB 52 on July 30, 2020. No response was received from GTSGBMI.

The Santa Ynez Band of Chumash Indians (Santa Ynez) reached out to LACPW to request a consultation meeting following notice of filing on the project on July 3, 2024. A consultation meeting was scheduled on August 14, 2024. As a result of the meeting, the Santa Ynez wanted to ensure that the FTBMI were being consulted and requested that the Santa Ynez be informed of any future project changes. Consultation with LACPW was closed with the Santa Ynez on August 14, 2024.

AB 52 consultation between LACPW and the FTBMI occurred between August 2020 and September 2024, and consisted of written email communications, phone calls, and a virtual meeting. The FTBMI were provided with project updates as project planning and assessments progressed. The tribe also was given project documents, including preliminary project plans with proposed excavation information, cultural resource studies, and environmental documents as requested. Through consultation, the FTBMI participated in monitoring XPI testing for the cultural resource studies in August and September 2023.

An AB 52 consultation meeting was held on September 3, 2024 between the FTBMI and LACPW, and a second call was held that day for Section 106 consultation, which included Caltrans, LACPW, and the FTBMI. Because of the AB 52 consultation, the FTBMI provided confidential information indicating that the vicinity of the APE exhibits sensitivity for tribal cultural resources and recommended mitigation measures. AB 52 consultation was closed on September 12, 2024, following incorporation of the agreed mitigation measures in the environmental document, including Native American monitoring of specific parts of the project area.

a, b) Less than Significant with Mitigation Incorporated

Tribal cultural resources may include, but are not limited to, archaeological resources. As discussed in Section 2.2.10, the ASR (AECOM 2023g) determined that no precontact archaeological resources have been recorded previously in the APE. In addition, the ASR (AECOM 2023g) and XPI investigation (AECOM 2023) determined that the proposed project does exhibit archaeological sensitivity and would have a low potential to encounter intact archaeological deposits. These findings were supported by the Supplemental ASR/XPI (AECOM 2024b, 2024c).

Based on AB 52 consultation results, the proposed project would have the potential to impact previously unknown tribal cultural resources. Implementation of AMMs TCR-1, TCR-2, TCR-3, and TCR-4, developed through AB 52 consultation, would reduce the potential for impacts on tribal cultural resources during project construction. In addition, TCR-4 would further reduce the potential for the disturbance of human remains and provides guidance in the event that any human remains are discovered during construction. Based on the consultation and research listed above, as well as the AMMs, impacts would be reduced to a less-than-significant level with the following mitigation measures incorporated:

TCR-1: Any and all archaeological documents created as a part of the project (e.g., isolate records, site records, survey reports, testing reports, monitoring reports) shall be provided to consulting tribes upon request.

TCR-2: The project applicant shall retain a professional Tribal Monitor, procured by the Fernandeano Tataviam Band of Mission Indians to observe the following ground-disturbing activities from the project limits at Henry Mayo Drive to the northernmost drainage improvement: grading, excavating, digging, or similar activity. Tribal monitoring services will continue until

confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are complete. If the project's scheduled ground-disturbing activities require intermittent Tribal Monitoring, notification shall be submitted to the consulting Tribe in writing with 5 days' notice (if possible) prior to the start of scheduled ground disturbing activities. If TCRs are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of the discovery, and an SOI-qualified archaeologist retained by the project applicant as well as the Tribal Monitor shall assess the find.

TCR-3: The Lead Agency and/or project applicant shall, in good faith, consult with consulting tribes on the disposition and treatment of any TCRs encountered during all ground-disturbing activities.

TCR-4: If human remains and/or funerary object(s) are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to Section 7050.5 of the Health and Safety Code, which shall be enforced for the duration of the project. In accordance with Public Resources Code, Section 5097.98, the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant, as determined by the NAHC, should those discoveries be determined as Native American in origin.

3.1.19 Utilities and Service Systems

Would the project:	Significant and Unavoidable Impact	Less Than Significant Impact 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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

CEQA Significance Determinations for Utilities and Service Systems**a) Less than Significant**

As discussed in Section 2.2.7, the proposed project would require the relocation of several utilities in the project area. Relocation of utilities would include telecommunication, natural gas, wastewater, electricity, and oil facilities. In addition, stormwater systems would be added and extended to accommodate for the roadway widening. The utility relocations would not exceed a maximum depth of 30 feet and would not go outside the footprint of the existing ROW. The utilities relocations would result in a local construction impact. However, the impact would be less than significant, and no mitigation is required.

b, c, d, e) Less than Significant

The proposed project would not include new development or uses beyond what currently exists or that would require water supplies. The proposed project would add additional impervious area, which could contribute to added runoff and intensity, as discussed in Section 2.3.2. The proposed drainage system would be designed to collect the runoff and connect to the existing drainage system. The proposed project would not generate solid waste, other than during construction. Implementation of construction BMPs would ensure that this waste generation would not exceed State or local standards, the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The proposed project also would comply with all federal, State, and local statutes and regulations related to solid waste. Therefore, the impacts would be less than significant, and no mitigation is required.

3.1.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Significant and Unavoidable Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
b) Because of 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?	☐	☐	☐	☒
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 on the environment?	☐	☐	☐	☒
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?	☐	☐	☐	☒

CEQA Significance Determinations for Wildfire**a) Less than Significant with Mitigation Incorporated**

Current traffic demand in the project area meets or exceeds roadway capacity for many arterial roadways. The Old Road and adjacent roadway system in the project area is heavily used and characterized by roadway congestion. The proposed improvements would enhance safety and increase capacity on these roadways and would provide for emergency overflow.

The proposed project would not cause any permanent road closures but would cause temporary lane closures during construction. However, as discussed in Section 2.2.7, AMMs COM-2 through COM-4 would be implemented to reduce or eliminate the temporary effects on traffic and emergency services. In addition, although the project area is susceptible to wildfire risks, standard construction practices and regulatory safety compliance measures would reduce the risks. The impact would be reduced to a less-than-significant level with mitigation incorporated.

b, c, d) No Impact

The project area consists of an existing roadway that would remain a roadway post-implementation, with improved multimodal facilities. The improvements would not result in installation or maintenance of associated infrastructure that may exacerbate fire risk because the none of the improvements would require use of flammable materials. The project area is not in a landslide area or adjacent to hillside areas that would be subject to instability or increased runoff after a wildfire. No impacts would occur.

3.1.21 Mandatory Findings of Significance

Does the project have:	Significant and Unavoidable Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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) 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) Environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

CEQA Significance Determinations for Mandatory Findings of Significance**a) Less than Significant with Mitigation Incorporated**

As stated in all of the CEQA Checklist items, project impacts would be avoided and minimized through implementation of several measures. Impacts on special-status wildlife species would be avoided and minimized through implementation of AMMs GEN-1 through GEN-15, and species-specific AMMs: UTS-1, WPT-1 and WPT-2, RIP-1 through RIP-3, and BAT-1 through BAT-3. Impacts on listed wildlife species would be avoided and minimized through implementation of AMMs GEN-1 through GEN-15, and species-specific through implementation of AMMs: UTS-1, WPT-1 and WPT-2, RIP-1 through RIP-3, BAT-1 through BAT-3, and LION-1 through LION-2. In addition, impacts on plant species and USACE, RWQCB, and CDFW jurisdictional areas would be avoided and minimized with implementation of AMMs VEG-1 through VEG-4 and OAK-1 through OAK-7. Thus, the impact would be reduced to a less-than-significant level with mitigation incorporated.

Furthermore, the ASR (AECOM 2023g) determined that no archaeological resources have been recorded previously in the APE. Implementation of AMMs CR-1 and CR-2 would further reduce the potential for any impact on archaeological resources during project construction. In addition, AMM CR-3 would be implemented to further reduce the potential for disturbance of human remains and would provide guidance in the event that any human remains are discovered during construction. Thus, the impact on important examples of the major periods of California

history or prehistory would be reduced to a less-than-significant level with mitigation incorporated.

b) Less than Significant

The proposed project has been evaluated for cumulative impacts and would not contribute to a cumulatively considerable impact, as discussed in Section 2.4.7. Potential cumulative impacts on relocations and real property acquisition were considered; however, the project would not lead to cumulatively considerable impacts in conjunction with the related projects listed in Table 2-60. Therefore, the impact would be less than significant, and no mitigation is required.

c) Less than Significant with Mitigation Incorporated

Project construction could cause temporary effects on people, from traffic delays and local noise. However, these impacts would be of short duration and the AMMs discussed above would be implemented to reduce their effects. Therefore, the impacts would be reduced to a less-than-significant level with mitigation incorporated.

3.2 Wildfire

3.2.1 Regulatory Setting

Senate Bill 1241 required the Office of Planning and Research, the Natural Resources Agency, and the California Department of Forestry and Fire Protection to develop amendments to the CEQA Checklist for inclusion of questions related to fire hazard impacts for projects on lands classified as very high-fire hazard severity zones (VHFHSZs). The 2018 updates to the CEQA Guidelines expanded the thresholds to include projects near these VHFHSZs.

3.2.2 Affected Environment

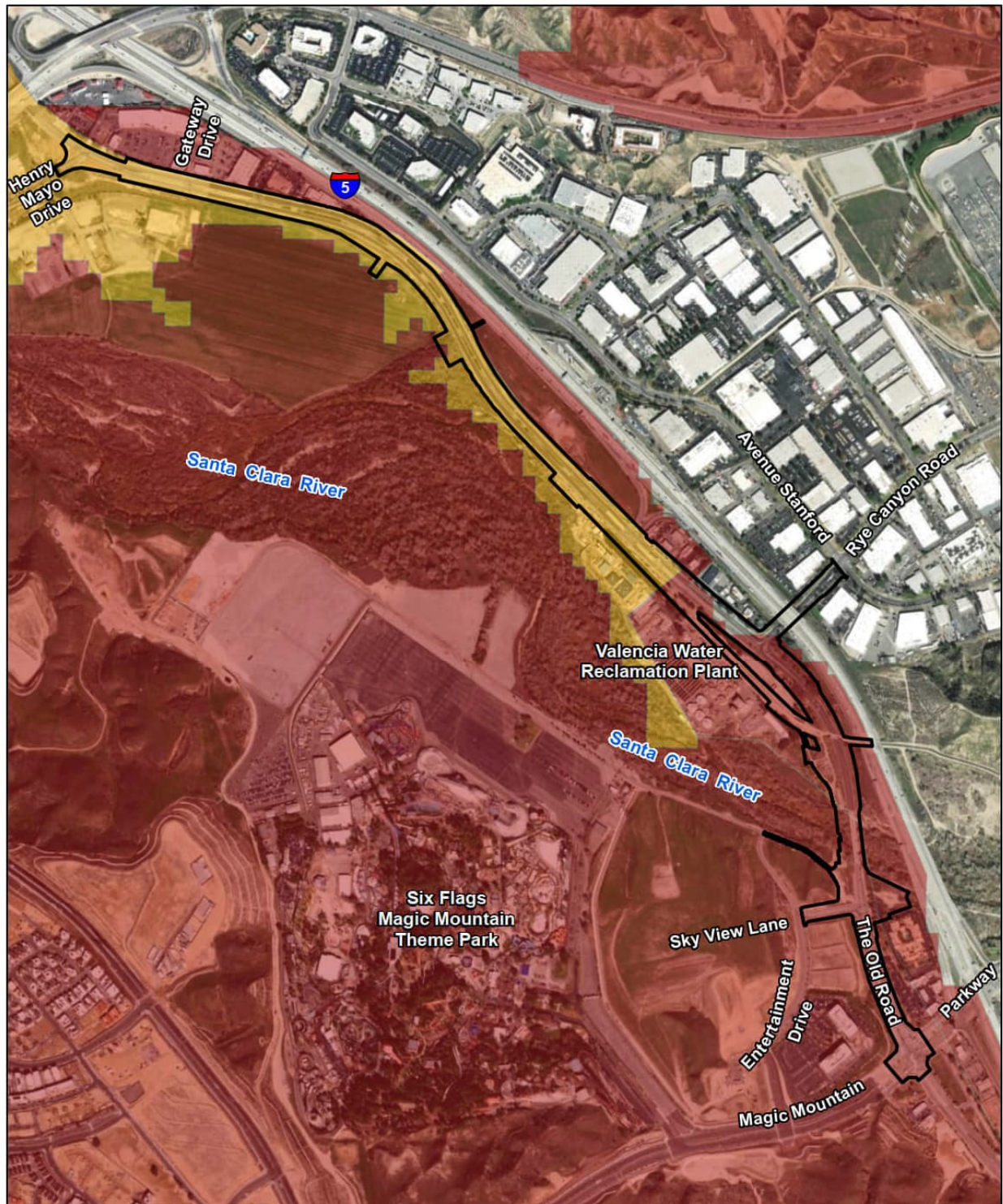
Fire protection in Santa Clarita Valley is provided by the LA County Fire Department and the U.S. Forest Service. The Fire Department has classified 80 to 90% of the planning area as a VHFHSZ. Portions of Newhall and Canyon Country, areas surrounding San Canyon, portions of Pico Canyon, Placerita Canyon, Hasley Canyon, Whites Canyon, Bouquet Canyon, and all areas at the interface between native vegetation with urban development are prone to wildland fire. The project area on the south side of The Old Road is characterized primarily by undeveloped land. The surrounding areas include Six Flags Magic Mountain Amusement Park, I-5 to the north, Valencia Water Reclamation Plant, and commercial use areas. The developed land around the project area has a low potential to provide fuel for wildfires. However, the undeveloped land adjacent to the project area contains vegetation and fuel sources that would have some potential to result in wildfire ignitions and the uncontrolled spread of wildfires. The majority of project area is within a VHFHSZ in a State Responsibility Area in LA County (CAL FIRE 2020). Only the southernmost portion of the project area, near the intersection of The Old Road and Rye Canyon Road, is in Local Responsibility Area. Figure 18 shows the location of the project area within the VHFHSZ.

LA County designates disaster routes in the County, including within the City. In the event of an emergency during project implementation, these routes would be used for evacuations. In the project area, The Old Road and Henry Mayo Drive are designated as primary disaster routes.

3.2.3 Environmental Consequences

No-Build Alternative

This alternative would not result in construction of any of the proposed improvements, and therefore would not result in an increase in regional roadway capacity and enhancement of safety through the provision of emergency overflow. Therefore, conditions would remain the same. No impact would occur.



Source: Los Angeles County GIS Data Hub, 2023; Prepared By: AECOM, 2023.



- Very High Severity Zone
- High Severity Zone
- Project Limit

Figure 18
Fire Hazard Severity Zone Map

Build Alternative

Construction

The proposed project would not cause any permanent road closures; however, temporary lane closures would occur during construction. LACPW and Caltrans would work together to prepare a traffic notification procedure for the proposed project and would coordinate with local jurisdictions and public transportation providers through the final project design phase to identify emergency service routes to be maintained during construction. Project construction would not impair an adopted emergency response plan or emergency evacuation plan. Certain construction activities, such as the use of equipment, would have the potential to accidentally ignite fire. This risk would be managed by implementation of standard construction practices and regulatory compliance measures related to safeguards for construction, alteration, and demolition activities, to provide reasonable safety to life and property from fire during such activities. These practices would include prohibiting smoking unless in approved areas, requiring permits and implementing a fire watch for hot work construction activities, and implementing partitions to prevent the passage of sparks, slag, and heat from any hot work area.

Operation

The proposed project would not include any change in land use, development of new habitable structures, or modifications to landscaping that would increase fire risk. The widening of roadways would benefit mobility and evacuation abilities in the project area. In addition, the project area is not in a landslide area or adjacent to hillside areas that would be subject to instability or increased runoff after a wildfire. Current traffic demand in the project area meets or exceeds roadway capacity for many arterial roadways. The Old Road and adjacent roadway system are used heavily and are characterized by roadway congestion. The proposed project improvements would enhance safety and increase capacity on the roadways to provide for emergency overflow.

The urban nature of the project area and the type of proposed construction activities would not present a significant risk of increasing wildfires. Furthermore, the proposed project would comply with the regulatory standards in the California Fire Code, California Building Code, and as required by LA County Fire Department for project construction and operations within VHFSZs, where applicable. These regulatory requirements are some of the most strenuous fire protection standards in the U.S. and are designed to avoid and minimize increased fire risks. Therefore, project operation would not exacerbate wildfire risks or result in temporary or ongoing impacts on the environment.

3.2.4 Avoidance, Minimization, and/or Mitigation Measures

The Build Alternative would not result in adverse effects related to wildfire; therefore, no AMMs are required.

3.3 Climate Change

Climate change refers to long-term changes in temperature, precipitation, wind patterns, and other elements of the Earth's climate system. The Intergovernmental Panel on Climate Change, established by the United Nations and World Meteorological Organization in 1988, is devoted to GHG emissions reduction and climate change research and policy. Climate change in the past generally has occurred gradually over millennia, or more suddenly in response to cataclysmic natural disruptions. However, the research of the Intergovernmental Panel on Climate Change and other scientists in recent decades has attributed unequivocally an accelerated rate of climatological changes over the past 150 years to GHG emissions generated from the production and use of fossil fuels.

Human activities generate GHGs, consisting primarily of CO₂, methane (CH₄), nitrous oxide (N₂O), tetrafluoromethane, hexafluoroethane, sulfur hexafluoride, and various hydrofluorocarbons (HFCs). CO₂ is the most abundant GHG; while it is a naturally occurring and necessary component of Earth's atmosphere, fossil-fuel combustion is the main source of additional, human-generated CO₂ that is the main driver of climate change. In the U.S. and specifically California, transportation is the largest source of GHG emissions, mostly CO₂.

The impacts of climate change already are being observed in the form of sea-level rise, drought, more intense heat, extended and severe fire seasons, and historic flooding from changing storm patterns. Both mitigation and adaptation strategies are necessary to address these impacts. The most important mitigation strategy is to reduce GHG emissions. In the context of climate change (as distinct from CEQA and NEPA), "mitigation" involves actions to reduce GHG emissions or to enhance the "sinks" that store them (such as forests and soils), to lessen adverse impacts. "Adaptation" is planning for and responding to impacts by reducing vulnerability to harm, such as by adjusting transportation design standards to withstand more intense storms, heat, and higher sea levels. This analysis discusses both in the context of the proposed transportation project.

3.3.1 Regulatory Setting

This section outlines federal and State efforts toward a comprehensive reduction in GHG emissions from transportation sources.

Federal

To date, no national standards have been established for nationwide mobile-source GHG emissions reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level.

NEPA (42 USC Part 4332) requires federal agencies to assess the environmental effects of their proposed actions before making a decision on the action or project.

FHWA recognizes the threats that extreme weather, sea-level change, and other changes in environmental conditions pose to valuable transportation infrastructure and those who depend on it. Therefore, FHWA supports a sustainability approach that assesses vulnerability to climate risks and incorporates resilience into planning, asset management, project development and design, and operations and maintenance practices (FHWA 2022). This approach encourages planning for sustainable highways by addressing climate risks while balancing environmental,

economic, and social values—“the triple bottom line of sustainability” (FHWA 2022). Program and project elements that foster sustainability and resilience also support economic vitality and global efficiency, increase safety and mobility, enhance the environment, promote energy conservation, and improve the quality of life.

The federal government has taken steps to improve fuel economy and energy efficiency, to address climate change and its associated effects. The most important of these has been the Energy Policy and Conservation Act of 1975 (42 USC Section 6201) as amended by the Energy Independence and Security Act of 2007, as well as the Corporate Average Fuel Economy (CAFE) Standards. This legislation and standards have led to fuel economy standards for on-road motor vehicles sold in the U.S. The National Highway Traffic and Safety Administration sets and enforces the CAFE standards, based on each manufacturer's average fuel economy for the portion of its vehicles produced for sale in the U.S. EPA calculates average fuel economy levels for manufacturers and also sets related GHG emissions standards under the Clean Air Act. Raising the CAFE standards had led automakers to create more fuel-efficient fleets, improving our nation's energy security, saving consumers money at the pump, and reducing GHG emissions (DOT 2014).

EPA published a final rulemaking on December 30, 2021, which raised federal GHG emissions standards for passenger cars and light trucks for model years 2023 through 2026, increasing in stringency each year. The updated GHG emissions standards will avoid more than 3 billion tons of GHG emissions through 2050. In April 2022, the National Highway Traffic and Safety Administration announced corresponding new fuel economy standards for model years 2024 through 2026, which will reduce fuel use by more than 200 billion gallons through 2050 compared to the old standards and reduce fuel costs for drivers (EPA 2022a; NHTSA 2022).

State

California has been innovative and proactive in addressing GHG emissions and climate change by passing multiple Senate and Assembly bills and EOs, including the following:

- **EO S-3-05 (June 1, 2005):** The goal of this EO is to reduce California's GHG emissions to: (1) 2000 levels by 2010, (2) 1990 levels by 2020, and (3) 80% below 1990 levels by 2050. This goal was further reinforced with the passage of AB 32 in 2006 and Senate Bill 32 in 2016.
- **AB 32, Chapter 488, 2006, Núñez and Pavley, The Global Warming Solutions Act of 2006:** This bill codified the 2020 GHG emissions reduction goals, outlined in EO S-3-05, while further mandating that the CARB create a scoping plan and implement rules to achieve “real, quantifiable, cost-effective reductions of greenhouse gases.” The legislature also intended that the statewide GHG emissions limit continue in existence and be used to maintain and continue GHG emissions reductions beyond 2020 (State Health and Safety Code Section 38551[b]). The law requires the CARB to adopt rules and regulations in an open public process, to achieve the maximum technologically feasible and cost-effective GHG emissions reductions.
- **Senate Bill 375, Chapter 728, 2008, Sustainable Communities and Climate Protection:** This bill requires the CARB to set regional GHG emissions reduction targets for passenger vehicles. MPO for each region then must develop an SCS that integrates transportation, land use, and housing policies to plan how it will achieve the GHG emissions reduction targets for its region.

- **EO B-30-15 (April 2015):** This order establishes an interim statewide GHG emissions reduction target of 40% below 1990 levels by 2030, so that California meets its target of reducing GHG emissions to 80% below 1990 levels by 2050. It further orders all state agencies with jurisdiction over sources of GHG emissions to implement measures, pursuant to statutory authority, to achieve reductions of GHG emissions to meet the 2030 and 2050 GHG emissions reductions targets. It also directs the CARB to update the Climate Change Scoping Plan, to express the 2030 target in terms of million metric tons (MMT) of CO₂ equivalent (CO₂e) (MMTCO₂e). GHGs differ in how much heat each traps in the atmosphere, called global warming potential. CO₂ is the most important GHG, so amounts of other gases are expressed relative to CO₂, using the metric CO₂e. The global warming potential of CO₂ is assigned a value of 1, and the global warming potential of other gases is assessed as multiples of CO₂. Furthermore, it requires the Natural Resources Agency to update the State's climate adaptation strategy, Safeguarding California, every 3 years, and to oversee that its provisions are fully implemented.
- **Senate Bill 32, Chapter 249, 2016:** This bill codifies the GHG emissions reduction targets established in EO B-30-15, to achieve a mid-range goal of 40% below 1990 levels by 2030.
- **Senate Bill 1386, Chapter 545, 2016:** This bill declares "it to be the policy of the state that the protection and management of natural and working lands ... is an important strategy in meeting the state's greenhouse gas reduction goals, and would require all state agencies, Caltrans, boards, and commissions to consider this policy when revising, adopting, or establishing policies, regulations, expenditures, or grant criteria relating to the protection and management of natural and working lands."
- **Senate Bill 743, Chapter 386 (September 2013):** This bill changes the metric of consideration for transportation impacts pursuant to CEQA, from a focus on automobile delay to alternative methods focused on VMT, to promote the State's goals of reducing GHG emissions and traffic-related air pollution, and promoting multimodal transportation while balancing the needs of congestion management and safety.
- **Senate Bill 150, Chapter 150, 2017, Regional Transportation Plans:** This bill requires the CARB to prepare a report that assesses progress made by each MPO in meeting their established regional GHG emissions reduction targets.
- **EO B-55-18 (September 2018):** This order sets a new statewide goal to achieve and maintain carbon neutrality no later than 2045. This goal is in addition to existing statewide targets of reducing GHG emissions.
- **AB 1279, Chapter 337, 2022, The California Climate Crisis Act:** This bill mandates carbon neutrality by 2045 and establishes an emissions reduction target of 85% below the 1990 level as part of that goal. This bill solidifies a goal included in EO B-55-18. It requires the CARB to work with relevant State agencies to ensure that updates to the scoping plan identify and recommend measures to achieve these policy goals, and to identify and implement a variety of policies and strategies that enable CO₂ removal solutions and carbon capture, utilization, and storage technologies in California, as specified.

3.3.2 Environmental Setting

The project area lies within the western portion of LA County, with a well-developed road and street network. The project area is characterized by commercial buildings, the LA County

Sanitation District No. 32 Treatment Plant, and rolling terrain. Land use within the project corridor primarily is urban commercial, with urban residential areas northwest and southwest of the project area. The Old Road and adjacent roadway system in the project area is used heavily and is characterized by roadway congestion. The Metropolitan Transportation Plan by the LA County Metropolitan Transportation Authority guides transportation development in the project area. The Unincorporated LA County Community Climate Action Plan 2020 addresses GHG emissions in the project area.

GHG Emissions Inventories

A GHG emissions inventory estimates the amount of GHG emissions discharged into the atmosphere by specific sources over a certain period. Tracking annual GHG emissions allows countries, states, and smaller jurisdictions to understand how these emissions are changing and what actions may be needed to attain GHG emissions reduction goals. EPA is responsible for documenting GHG emissions nationwide, and the CARB does so for the State, as required by Section 39607 of the State Health and Safety Code.⁴ Cities and other local jurisdictions also may conduct local GHG inventories, to inform their GHG emissions reduction or climate action plans.

National GHG Inventory

The annual GHG emissions inventory that was submitted by EPA to the United Nations provides a comprehensive accounting of all human-produced sources of GHG emissions in the U.S. Total GHG emissions from all sectors in 2020 were 5,222 MMT, factoring in deductions for carbon sequestration in the land sector. Of these, 79% were CO₂, 11% were CH₄, and 7% were N₂O; and the balance consisted of fluorinated gases. Total GHG emissions in 2020 decreased by 21% from 2005 levels and 11% from 2019 levels. The change from 2019 resulted primarily from less demand in the transportation sector during the COVID-19 pandemic. The transportation sector was responsible for 27% of total U.S. GHG emissions in 2020, more than any other sector (Figure 19), and for 36% of all CO₂ emissions from fossil fuel combustion. Transportation CO₂ emissions for 2020 decreased 13% from 2019 to 2020, but were 7% higher than transportation CO₂ emissions in 1990 (EPA 2022b).

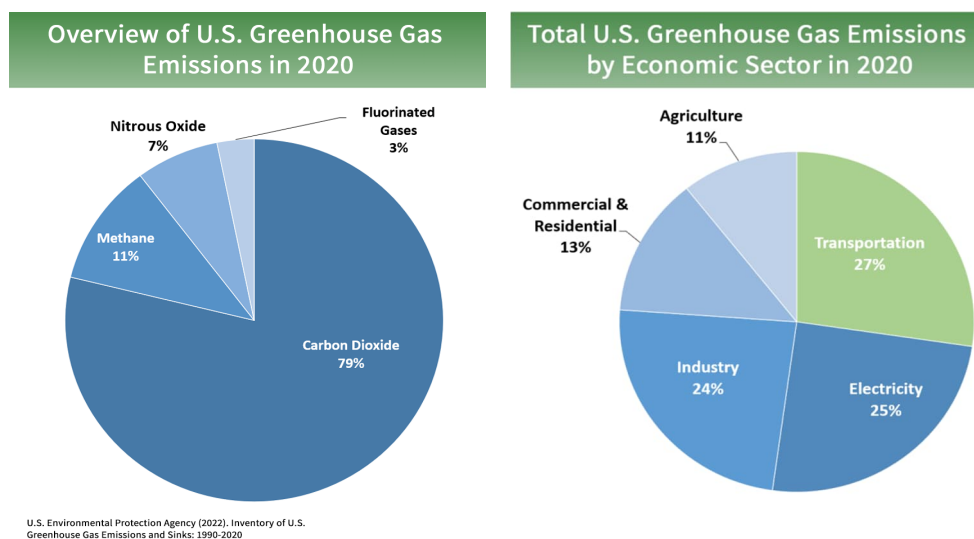


Figure 19: U.S. 2020 Greenhouse Gas Emissions

State GHG Inventory

The CARB collects GHG emissions data for transportation, electricity, commercial/residential, industrial, agricultural, and waste management sectors each year. It then summarizes and highlights major annual changes and trends, to demonstrate the State's progress in meeting its GHG emissions reduction goals. The 2022 edition of the GHG emissions inventory reported emissions trends from 2000 to 2020. Total California GHG emissions in 2020 were 369.2 MMTCO₂e, a reduction of 35.3 MMTCO₂e from 2019 and 61.8 MMTCO₂e below the 2020 statewide limit of 431 MMTCO₂e. However, much of the decrease from 2019 to 2020 is likely because of the effects of the COVID-19 pandemic on the transportation sector, during which VMT declined under stay-at-home orders and reductions in goods movement. Nevertheless, transportation remained the largest source of GHG emissions, accounting for 37% of statewide emissions (Figure 20). Including upstream emissions from oil extraction, petroleum refining, and oil pipelines in California, transportation was responsible for about 47% of statewide emissions in 2020; however, those emissions are accounted for in the industrial sector. California's gross domestic product (GDP) and GHG emissions intensity (GHG emissions per unit of GDP) both declined from 2019 to 2020 (Figure 21). Total GHG emissions are expected to increase as the economy recovers over the next few years (CARB 2022a).

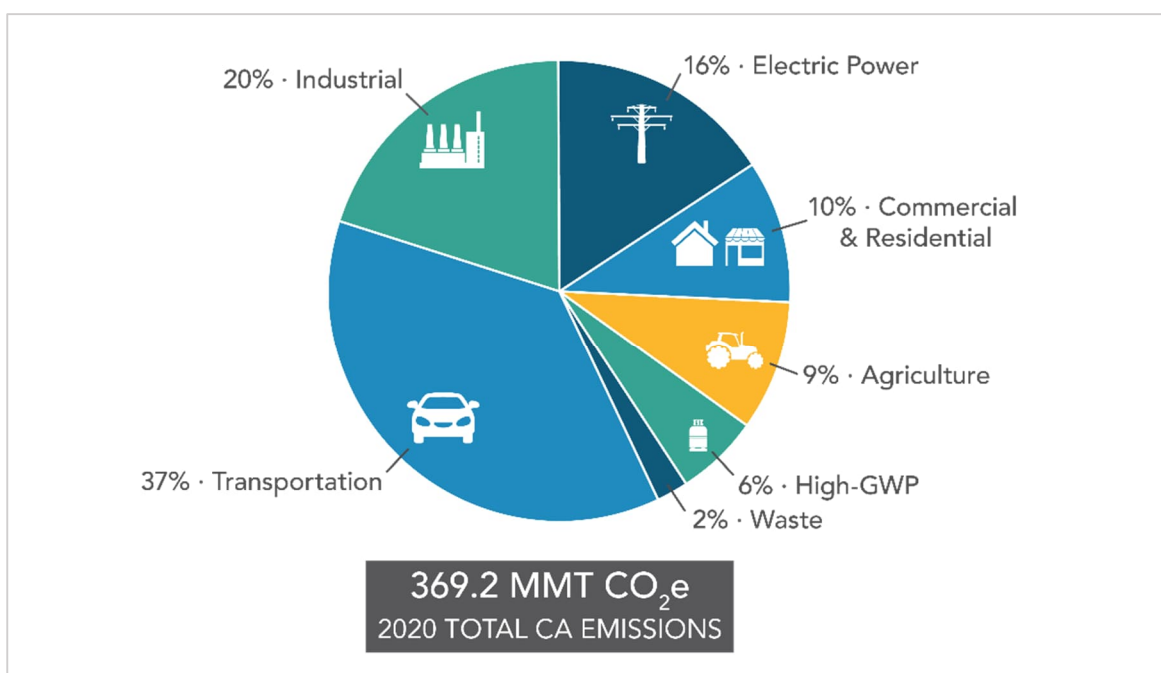


Figure 20: California 2020 Greenhouse Gas Emissions by Scoping Plan Category

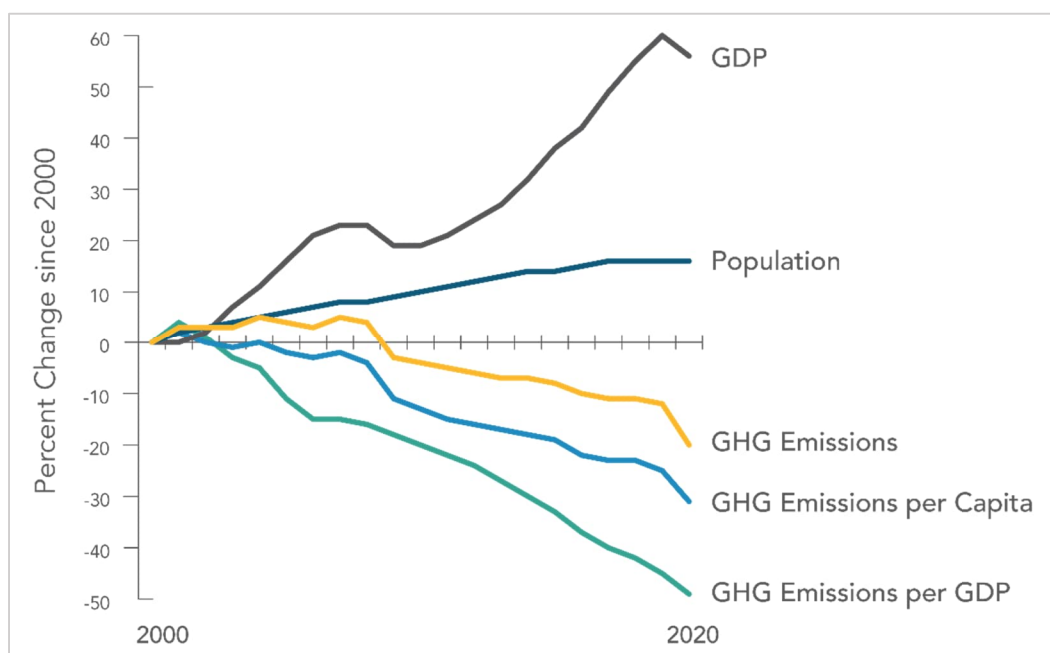


Figure 21: Change in California GDP, Population, and GHG Emissions since 2000

AB 32 required the CARB to develop a Scoping Plan describing the approach California would take to achieve the goal of reducing GHG emissions to 1990 levels by 2020, and to update it every 5 years. The CARB adopted the first scoping plan in 2008. The second updated plan, California's 2017 Climate Change Scoping Plan, adopted on December 14, 2017, reflected the 2030 target established in EO B-30-15 and Senate Bill 32. The 2022 Scoping Plan⁷ Update additionally laid out a path to achieving carbon neutrality by 2045 (CARB 2022b).

Regional Plans

The CARB sets regional GHG emissions reduction targets for California's 18 MPOs to achieve through planning future projects that cumulatively will achieve those goals, and to report how they will be met in the RTP/SCS. Targets are set at a percent reduction of passenger vehicle GHG emissions per person from 2005 levels. The proposed project is included in the SCAG Connect SoCal financially constrained RTP, the SCAG financially constrained 2023 FTIP, and 2023 FTIP Amendment 23-37. The regional GHG emissions reduction target for the SCAG is less than 19% by 2035 (CARB 2022c).

⁷ Available online at: <https://www2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>.

Table 3-1: Regional and Local Greenhouse Gas Reduction Plans

Title	GHG Reduction Policies or Strategies
<i>County of Los Angeles, Department of Regional Planning Final Unincorporated Los Angeles County Community Climate Action Plan 2020</i> (adopted August 2015)	• LUT-1: Bicycle Programs and Supporting Facilities • LUT-2: Pedestrian Network • LUT-3: Transit Expansion
<i>Our County, Los Angeles Countywide Sustainability Plan</i> (adopted August 2019)	Strategy 3B: Implement transit-oriented development
<i>Los Angeles County General Plan 2035</i> (adopted October 2015)	Air Quality element

3.3.3 Project Analysis

GHG emissions from transportation projects can be divided into those emissions produced during operation and use of the State Highway System (operational emissions) and those emissions produced during construction. The primary GHG emissions produced by the transportation sector are CO₂, CH₄, N₂O, and HFCs. CO₂ emissions are a product of burning gasoline or diesel fuel in internal combustion engines, along with relatively small amounts of CH₄ and N₂O. A small amount of HFC emissions related to refrigeration also is included in the transportation sector.

The CEQA Guidelines generally address GHG emissions as a cumulative impact because of the global nature of climate change (PRC Section 21083[b][2]). As the California Supreme Court explained, “because of the global scale of climate change, any one project’s contribution is unlikely to be significant by itself” (Cleveland National Forest Foundation v. San Diego Assn. of Governments (2017) 3 Cal.5th 497, 512). In assessing cumulative impacts, whether a project’s incremental effect would be “cumulatively considerable” must be determined (CEQA Guidelines Sections 15064(h)(1) and 15130).

To make this determination, the incremental impacts of the proposed project must be compared with the effects of past, current, and probable future projects. Although climate change ultimately is a cumulative impact, not every individual project that generates GHG emissions must be found to contribute to a significant cumulative impact on the environment.

Operational Emissions

CO₂ from fossil fuel combustion is the largest component of U.S. GHG emissions, and transportation is the largest contributor of CO₂. The largest emitters of transportation CO₂ emissions in 2020 were passenger cars (38.5%), freight trucks (26.3%), and light-duty trucks (18.9%). The remainder came from other modes of transportation, including aircraft, ships, boats, and trains, as well as pipelines and lubricants (EPA 2022b). Because CO₂ emissions represent the greatest percentage of GHG emissions, they have been selected as a proxy for the following analysis of potential climate change impacts.

The highest levels of CO₂ from mobile sources, such as automobiles, occur at stop-and-go speeds (0 to 25 mph) and speeds over 55 mph; the most severe emissions occur from 0 to 25 mph (Figure 22). To the extent that a project enhances operational efficiency and improves travel times in high-congestion travel corridors, GHG emissions, particularly CO₂, may be reduced, provided that improved travel times do not induce additional VMT.

Four primary strategies can reduce GHG emissions from transportation sources: (1) improving the transportation system and operational efficiencies, (2) reducing travel activity (e.g. VMT), (3) transitioning to lower GHG emitting fuels, and (4) improving vehicle technologies and efficiency. To be most effective, all four strategies need to be pursued concurrently.

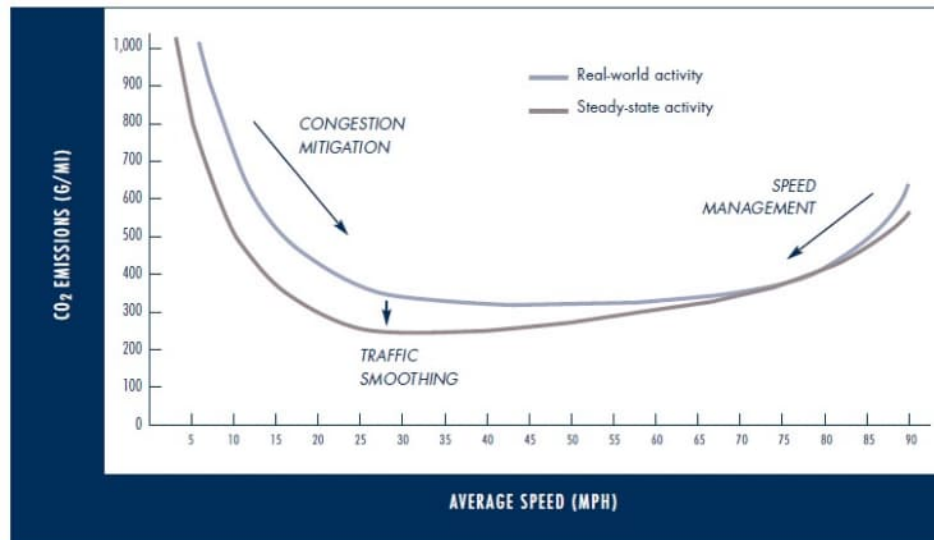


Figure 22: Possible Use of Traffic Operation Strategies in Reducing On-road CO₂ Emissions

The proposed project is listed in and conforms with the SCAG Connect SoCal financially constrained RTP, SCAG financially constrained 2023 FTIP, and 2023 FTIP Amendment 23-37. The design concept and scope of the proposed project is consistent with the project description in the SCAG Connect SoCal, 2023 FTIP amendment, and the “open to traffic” assumptions of the SCAG regional GHG emissions analysis. The RTP includes several guiding principles that address land use and transportation investments/strategies. Principles that are consistent with the proposed project include:

- Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability, and safety, and that preserve the existing transportation system.
- Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single-occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.
- Encourage transportation investments that will result in improved air quality and public health, and reduced GHG emissions.

The Build Alternative would widen The Old Road, Sky View Lane, and Rye Canyon Road from four to six lanes, reconstruct The Old Road Bridge over Santa Clara River, construct a Class IV bikeway, and extend the Multi-Use Trail to improve multimodal travel facilities. The proposed project would improve mobility in the project area, improve existing traffic operations and accommodate future traffic projections, decrease travel time on the congested roadway system, and result in less pollutant emissions than the No-Build Alternative because of improvements in vehicle delay.

The proposed project would enable The Old Road corridor to maximize productivity through improvements to the capacity of the roadway lanes, allowing for more flexibility in traffic movement and higher efficiencies. Table 3-2 summarizes VMT for both the local and regional area for No-Build and Build Alternative scenarios in the opening year (2028) and design year (2048). The table shows that the VMT change percentage between the No-Build Alternative and the Build Alternative are minor (less than $\pm 1\%$). For the opening year Build Alternative, because of the increase in the number of lanes on The Old Road, the volume on The Old Road slightly would increase in the local area. However, in the design year, VMT would decrease in the local and regional areas. This would be because of improved congestion on alternative routes or more motorists using transit modes of travel. This reduction in VMT shows the proposed project's consistency with the RTP principles focused on reducing GHG emissions.

Table 3-2: VMT Changes for Local Area and Regional Area

Area	Opening Year (2028) VMT (vehicle miles)			Design Year (2048) VMT (vehicle miles)		
	No-Build	Build	Change (%)	No-Build	Build	Change (%)
Local Area	1,217,386	1,223,760	0.52%	1,654,698	1,652,187	-0.15%
Regional Area	217,849,258	217,729,337	-0.06%	225,893,139	224,856,168	-0.46%

Note: VMT = vehicle miles traveled

Quantitative Analysis

The latest CT-EMFAC 2021 and VMT data were used in estimating GHG emissions for the 2022 baseline as well as for all future year alternatives. CT-EMFAC 2021 provides emission factors for such GHG gases as CO₂, CH₄, N₂O, and HFCs, which cause GHG emissions effects with varying global warming potentials. Table 3-3 summarizes GHG emissions for each alternative in CO₂.

Table 3-3: Modeled Annual CO₂ Emissions and Vehicle Miles Traveled, by Alternative

Alternative	CO ₂ e Emissions (metric tons/year)	Annual VMT ^a
Existing/Baseline 2022	5,286	16,209,874
Open to Traffic 2028		
No-Build	5,172	18,019,307
Build Alternative	4,941	18,055,345
20-Year Horizon 2048		
No-Build	6,463	24,050,748
Build Alternative	5,519	24,139,736

Notes:

CO₂ = carbon dioxide; CO₂e = carbon dioxide equivalent; VMT = vehicle miles traveled

a. Annual VMT values derived from Daily VMT values multiplied by 347, per CARB methodology (CARB 2008: I-19).

Source: CT-EMFAC 2021

As shown in Table 3-3, the Build Alternative would result in fewer CO₂ emissions than the No-Build Alternative and existing conditions in the opening year (2028) because of improvements of traffic operations to be consistent with LACPW highway design speed safety standards and

reductions in vehicle delay at study area intersections. In the design/horizon year of 2048, ambient regional growth would result in higher CO₂ emissions for the Build Alternative than Existing Conditions in 2018, but the magnitude of emissions would be substantially lower than the No-Build Alternative in the same year.

CARB developed the EMFAC model to facilitate preparation of statewide and regional mobile source emissions inventories. The model generates emissions rates that can be multiplied by vehicle activity data from all motor vehicles, including passenger cars to heavy-duty trucks, operating on highways, freeways, and local roads in California. EMFAC has a rigorous scientific foundation, has been approved by EPA, and has been vetted through multiple stakeholder reviews. Caltrans developed CT-EMFAC to apply project-specific factors to the CARB's model.

EMFAC's GHG emission rates are based on tailpipe emissions test data, and the model does not account for factors such as the rate of acceleration and vehicle aerodynamics, which influence the amount of emissions generated by a vehicle. Therefore, GHG emissions quantified using CT-EMFAC are estimates and may not reflect actual on-road emissions. Furthermore, the model does not account for induced travel. Nevertheless, modeling GHG estimates with EMFAC or CT-EMFAC remains the most precise means of estimating future GHG emissions. While CT-EMFAC is currently the best available tool for calculating GHG emissions from mobile sources, it is important to note that the GHG results are only useful for a comparison of alternatives. Federal CAFE and GHG emissions standards continue to evolve, and models will be updated to account for regulatory changes.

Construction Emissions

Construction GHG emissions would result from material processing and transportation, operation of on-site construction equipment, and idling vehicles stalled in traffic delays because of construction. These emissions would be produced at different levels throughout the construction phase; their frequency and occurrence could be reduced through innovations in plans and specifications and by implementing better traffic management during the construction phase.

Use of long-life pavement, improved traffic management plans, and changes in materials also could help offset GHG emissions that would be produced during construction, by allowing longer intervals between maintenance and rehabilitation activities.

Construction GHG emissions were estimated for the Build Alternative using detailed equipment inventories and proposed project construction scheduling information, provided by LACPW (2022), combined with GHG emissions factors from the EMFAC 2021 and OFFROAD models that are built into the Road Construction Emissions Model. Table 3-4 shows estimated construction-related GHG emissions

All construction contracts would include Caltrans Standard Specifications related to air quality. Section 7-1.02A and Section 7 1.02C, Emissions Reduction, would require contractors to comply with all laws applicable to the proposed project, and to certify their awareness of and intent to comply with all CARB GHG emissions reduction regulations. Section 14-9.02, Air Pollution Control, would require contractors to comply with all air pollution control rules, regulations, ordinances, and statutes. Certain common regulations, such as equipment idling restrictions, that would reduce construction vehicle emissions also would help reduce GHG emissions.

Table 3-4: Construction-Related GHG Emissions for the Build Alternative

Phase/Activity	PM ₁₀ (lb/day)	PM _{2.5} (lb/day)	CO (lb/day)	NO _x (lb/day)	CO ₂ (tons/day)
<i>2024 Construction Activity Emissions</i>					
West Bridge Replacement – Site Prep	11.4	3.2	28.0	33.2	5.0
The Old Road (N) – Clearing/Grubbing	21.3	5.3	26.0	28.3	3.1
The Old Road (N) – Excavation/Grading	22.2	5.7	35.3	56.7	10.2
<i>2025 Construction Activity Emissions</i>					
The Old Road (N) – Excavation/Grading	22.2	5.7	35.3	56.7	10.2
The Old Road (N) – Utilities/Sub-Grade	21.0	5.0	24.3	21.6	3.2
<i>2026 Construction Activity Emissions</i>					
The Old Road (N) – Utilities/Sub-Grade	21.0	5.0	24.3	21.6	3.2
The Old Road (N) – Paving/Restoration	1.1	0.8	24.4	25.2	4.7
West Bridge Replacement – Foundations	11.0	2.9	24.8	21.4	3.3
West Bridge Replacement – Bridge Deck	10.9	2.8	27.4	20.4	3.1
The Old Road (S) – Clearing/Grubbing	21.2	5.2	25.2	24.8	3.1
<i>2027 Construction Activity Emissions</i>					
West Bridge Replacement – Bridge Deck	10.9	2.8	27.4	20.4	3.1
The Old Road (S) – Clearing/Grubbing	21.2	5.2	25.2	24.8	3.1
The Old Road (S) – Excavation/Grading	22.1	5.6	34.3	54.0	10.0
East Bridge Replacement – Site Prep	11.0	2.9	24.5	22.2	3.4
East Bridge Replacement – Foundations	11.0	2.9	29.1	21.8	3.2
The Old Road (S) – Utilities/Sub-Grade	21.0	5.0	23.9	21.6	3.2
<i>2028 Construction Activity Emissions</i>					
The Old Road (S) – Utilities/Sub-Grade	21.0	5.0	23.9	21.6	3.2
East Bridge Replacement – Bridge Deck	10.9	2.8	27.1	20.4	3.1
The Old Road (S) – Paving/Restoration	1.1	0.8	24.1	25.1	4.6
Emissions Analysis					
2024 Maximum Daily Emissions (lb/day)	32.7	8.5	54.0	61.5	8.1
2025 Maximum Daily Emissions (lb/day)	22.2	5.7	35.3	56.7	10.2
2026 Maximum Daily Emissions (lb/day)	32.1	8.0	52.6	46.6	8.0
2027 Maximum Daily Emissions (lb/day)	33.1	8.5	63.4	76.2	13.4
2028 Maximum Daily Emissions (lb/day)	31.9	7.8	51.2	45.5	7.7
All Maximum Daily Emissions (lb/day)	33.1	8.5	63.4	76.2	13.4
Total Build Alternative Emissions (tons)	17.4	4.5	32.9	35.6	11,797.3
<i>Annual Average Emissions (tons)</i>	3.9	1.0	7.3	7.9	2,621.6

Notes:

CO = carbon monoxide; CO₂ = carbon dioxide; lb = pound(s); NO_x = nitrogen oxides;
PM₁₀ = particles of 10 micrometers or smaller; PM_{2.5} = particles of 2.5 micrometers and smaller
Source: Terry A. Hayes Associates Inc., Road Construction Emissions Model (Version 9.0.1).

CEQA Conclusion

Although the proposed project would result in GHG emissions during construction, it is not expected to result in an increase in operational GHG emissions. The Build Alternative would result in less CO₂ emissions because of improved traffic flow when compared to the No-Build

Alternative and existing conditions in 2028, and lower CO₂ emissions than the No-Build Alternative in 2048. The proposed project would not conflict with any applicable plan, policy, or regulation adopted for reducing GHG emissions. With implementation of construction GHG emissions reduction measures, the impact would be reduced to a less-than-significant level.

Caltrans is firmly committed to implementing measures to help reduce GHG emissions. These measures are outlined in the following section.

3.3.4 Greenhouse Gas Reduction Strategies

Statewide Efforts

In response to AB 32, California is implementing measures to achieve GHG emission reductions that cause climate change. Climate change programs in California are effectively reducing GHG emissions from all sectors of the economy. Efforts include regulations, market programs, and incentives that will transform transportation, industry, fuels, and other sectors, to take California into a sustainable, low-carbon, and cleaner future, while maintaining a robust economy (CARB 2022d).

Major sectors of the California economy, including transportation, will need to reduce GHG emissions to meet 2030 and 2050 GHG emissions targets. The Governor's Office of Planning and Research identified five sustainability pillars in a 2015 report, as follows: (1) increasing the share of renewable energy in the State's energy mix to at least 50% by 2030; (2) reducing petroleum use by up to 50% by 2030; (3) increasing the energy efficiency of existing buildings by 50% by 2030; (4) reducing emissions of short-lived climate pollutants; and (5) stewarding natural resources, including forests, working lands, and wetlands, so that they store carbon, are resilient, and enhance other environmental benefits (OPR 2015). OPR later added strategies related to achieving statewide carbon neutrality by 2045, in accordance with EO B-55-18 and AB 1279 (OPR 2022).

The transportation sector is integral to the people and economy of California. To achieve GHG emissions reduction targets, it is vital for the State to build on past successes in reducing criteria and toxic air pollutants from transportation and goods movement. GHG emissions reductions will come from cleaner vehicle technologies, lower carbon fuels, and reduction of VMT. Reducing today's petroleum use in cars and trucks by 50% is a key State goal for reducing GHG emissions by 2030 (California Environmental Protection Agency 2010).

In addition, Senate Bill 1386 (Wolk 2016) established as State policy the protection and management of natural and working lands and requires State agencies to consider that policy in their own decision-making. Trees and vegetation in forests and on rangelands, farms, and wetlands remove CO₂ from the atmosphere through biological processes and sequester the carbon in aboveground and below-ground matter.

Subsequently, Governor Newsom issued EO N-82-20 to combat the crises in climate change and biodiversity. The order instructed State agencies to use existing authorities and resources to identify and implement near- and long-term actions to accelerate natural removal of carbon and build climate resilience in California forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities, in ways serving all communities and, in particular, low-income, disadvantaged, and vulnerable communities. To support this order, the California Natural Resources Agency (2022a) released Natural and Working Lands Climate Smart Strategy, with a focus on nature-based solutions.

Caltrans Activities

Caltrans continues to be involved on the Governor's Climate Action Team as the CARB works to implement EOs S-3-05 and S-01-07 and help achieve the targets set forth in AB 32. EO B-30-15, issued in April 2015, and Senate Bill 32 (2016) set an interim target to cut GHG emissions to 40% below 1990 levels by 2030. The following major initiatives are underway at Caltrans to help meet these targets.

Climate Action Plan for Transportation Infrastructure

The California Action Plan for Transportation Infrastructure (CAPTI) builds on EOs signed by Governor Newsom in 2019 and 2020, targeted at reducing GHG emissions in transportation, which account for more than 40% of all polluting emissions, to achieve the State's climate goals. Under *The California Action Plan for Transportation Infrastructure*, where feasible and within existing funding program structures, the State will invest discretionary transportation funds in sustainable infrastructure projects that align with its climate, health, and social equity goals (California State Transportation Agency 2021).

California Transportation Plan

The *California Transportation Plan* is a statewide, long-range transportation plan to meet California's future mobility needs and reduce GHG emissions. It serves as an umbrella document for all the other statewide transportation planning documents. The *California Transportation Plan* 2050 presents a vision of a safe, resilient, and universally accessible transportation system that supports vibrant communities, advances racial and economic justice, and improves public and environmental health. The plan's climate goals are to achieve statewide GHG emissions reduction targets and increase resilience to climate change. It demonstrates how GHG emissions from the transportation sector can be reduced through advancements in clean fuel technologies; continued shifts toward active travel, transit, and shared mobility; more efficient land use and development practices; and continued shifts to telework (Caltrans 2021a).

Caltrans Strategic Plan

The *Caltrans 2020–2024 Strategic Plan* includes goals of stewardship, climate action, and equity. The climate action strategies include developing and implementing a Caltrans Climate Action Plan; a robust program of climate action education, training, and outreach; partnership and collaboration; a VMT monitoring and reduction program; and engaging with the most vulnerable communities in developing and implementing Caltrans climate action activities (Caltrans 2021b).

Caltrans Policy Directives and Other Initiatives

Caltrans Director's Policy 30 (DP-30) Climate Change (June 22, 2012) established a Caltrans policy to ensure coordinated efforts to incorporate climate change into Caltrans decisions and activities. The *Greenhouse Gas Emissions and Mitigation Report* (Caltrans 2020b) provides a comprehensive overview of Caltrans forecasts for GHG emissions. The report documents and evaluates current Caltrans procedures and activities that track and reduce GHG emissions and identifies additional opportunities for further reducing GHG emissions from Caltrans-controlled emission sources, in support of Caltrans and State goals.

3.3.5 Project-Level GHG Reduction Strategies

The following measures also would be implemented in the proposed project, to reduce GHG emissions and potential climate change impacts. Most of the construction impacts on air quality would be short-term, and therefore would not result in long-term adverse conditions.

Implementation of the following measures, some of which also may be required for other purposes, such as stormwater pollution control, would reduce any air quality impacts resulting from construction activities:

- The construction contractor will comply with LACPW Special Provisions and Procedures, which specifically will require compliance by the contractor with all applicable laws and regulations related to air quality, including Air Pollution Control District and Air Quality Management District regulations and local ordinances.
- Construction equipment and vehicles will be properly tuned and maintained. All construction equipment will use low sulfur fuel, as required by Title 17, Section 93114 of the CCR.
- The construction contractor will comply with the SCAQMD's rules, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities).
- Diesel-powered off-road equipment will limit idling in accordance with the CARB's Regulation for In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449) and approved amendments.
- Diesel-powered on-road vehicles and trucks will limit idling in accordance with the CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (13 CCR 2485).

No AMMs would be needed to reduce operational air quality impacts or GHG emissions. The proposed project is not anticipated to cause or contribute to any new violation of the State and federal standards of the criteria pollutants.

3.3.6 Adaptation

Reducing GHG emissions is only one part of an approach to addressing climate change. Caltrans must plan for the effects of climate change on the State's transportation infrastructure and strengthen or protect its facilities from damage. Climate change is expected to produce increased variability in precipitation, rising temperatures, rising sea levels, variability in storm surges and their intensity, and in the frequency and intensity of wildfires. Flooding and erosion can damage or wash out roads; longer periods of intense heat can buckle pavement and railroad tracks; and storm surges combined with a rising sea level can inundate highways. Wildfire can burn facilities and indirectly cause damage when rain falls on denuded slopes that generate landslides after a fire. Effects will vary by location and may, in the most extreme cases, require that a facility be relocated or redesigned. Accordingly, Caltrans must consider these types of climate stressors in how highways are planned, designed, built, operated, and maintained.

Federal Efforts

Under NEPA assignment, Caltrans is obligated to comply with all applicable federal environmental laws and FHWA NEPA regulations, policies, and guidance.

The *Fourth National Climate Assessment*, published in 2018, presents the foundational science and the "human welfare, societal, and environmental elements of climate change and variability for 10 regions and 18 national topics, with particular attention paid to observed and projected

risks, impacts, consideration of risk reduction, and implications under different mitigation pathways.”

The USDOT Policy Statement on Climate Adaptation in June 2011 committed the federal Caltrans Department of Transportation to “integrate consideration of climate change impacts and adaptation into the planning, operations, policies, and programs of USDOT in order to ensure that taxpayer resources are invested wisely, and that transportation infrastructure, services and operations remain effective in current and future climate conditions” (USDOT 2011). The USDOT Climate Action Plan (2021) followed up with a statement of policy to “accelerate reductions in greenhouse gas emissions from the transportation sector and make our transportation infrastructure more climate change resilient now and in the future,” following this set of guiding principles (USDOT 2021):

- Use best-available science
- Prioritize the most vulnerable
- Preserve ecosystems
- Build community relationships
- Engage globally

USDOT developed its climate action plan pursuant to the federal EO 14008, Tackling the Climate Crisis at Home and Abroad (January 27, 2021). This EO recognized the threats of climate change to national security and ordered federal government agencies to prioritize actions on climate adaptation and resilience in their programs and investments (White House 2021).

FHWA Order 5520 (Transportation System Preparedness and Resilience to Climate Change and Extreme Weather Events, December 15, 2014) established FHWA policy to strive to identify the risks of climate change and extreme weather events to current and planned transportation systems. FHWA has developed guidance and tools for transportation planning that foster resilience to climate effects and sustainability at the federal, state, and local levels (FHWA 2019).

State Efforts

Climate change adaptation for transportation infrastructure involves long-term planning and risk management to address vulnerabilities in the transportation system. A number of State policies and tools have been developed to guide adaptation efforts.

California’s Fourth Climate Change Assessment (Fourth Assessment; 2018) is the State’s effort to “translate the state of climate science into useful information for action.” It provides information to help decision-makers across sectors and at State, regional, and local scales protect and build the resilience of Californians, infrastructure, natural systems, working lands, and waters. The State’s approach recognizes that the consequences of climate change occur at the intersections of people, nature, and infrastructure. The Fourth Assessment reported that if no measures were taken to reduce GHG emissions by 2021 or sooner, the state was projected to experience a 2.7 to 8.8 degrees Fahrenheit increase in average annual maximum daily temperatures, with impacts on agriculture, energy demand, natural systems, and public health; a two-thirds decline in water supply from snowpack and water shortages that would impact agricultural production; a 77% increase in average area burned by wildfire, with consequences

for forest health and communities; and large-scale erosion of up to 67% of Southern California beaches and inundation of billions of dollars' worth of residential and commercial buildings because of sea level rise (State of California 2018).

Sea-level rise is a particular concern for transportation infrastructure in the coastal zone. Major urban airports will be at risk of flooding from sea-level rise combined with storm surge as early as 2040; San Francisco airport already is at risk. Miles of coastal highways vulnerable to flooding in a 100-year storm event will triple to 370 by 2100, and 3,750 miles will be exposed to temporary flooding. The Fourth Assessment's findings highlight the need for proactive action to address these current and future impacts of climate change.

In 2008, Governor Schwarzenegger recognized the need when he issued EO S-13-08, focused on sea-level rise. Technical reports on the latest sea-level rise science were first published in 2010 and were updated in 2013 and 2017. The 2017 projections of sea-level rise and new understanding of processes and potential impacts in California were incorporated into the State of California Sea-Level Rise Guidance Update in 2018. This EO also gave rise to the California Climate Adaptation Strategy (2009), updated in 2014 as Safeguarding California: Reducing Climate Risk (Safeguarding California Plan), which addressed the full range of climate change impacts and recommended adaptation strategies. The Safeguarding California Plan was updated in 2018, and again in 2021 as the California Climate Adaptation Strategy, incorporating key elements of the latest sector-specific plans, such as the Natural and Working Lands Climate Smart Strategy, Wildfire and Forest Resilience Action Plan, Water Resilience Portfolio, and The California Action Plan for Transportation Infrastructure (described above). Priorities in the 2021 California Climate Adaptation Strategy included acting in partnership with California Native American tribes, strengthening protections for climate-vulnerable communities that lack capacity and resources, nature-based climate solutions, use of best available climate science, and partnering and collaboration to best leverage resources (California Natural Resources Agency 2022b).

EO B-30-15, signed in April 2015, required State agencies to factor climate change into all planning and investment decisions. This EO recognized that effects of climate change in addition to sea-level rise also threaten California's infrastructure. At the direction of EO B-30-15, the Office of Planning and Research published Planning and Investing for a Resilient California: A Guidebook for State Agencies in 2017, to encourage a uniform and systematic approach.

AB 2800 (Quirk 2016) created the multidisciplinary Climate-Safe Infrastructure Working Group to help actors throughout the state address the findings of California's Fourth Climate Change Assessment. It released its report, Paying it Forward: The Path Toward Climate-Safe Infrastructure in California, in 2018. The report provided guidance to State agencies on how to address the challenges of assessing risk in the face of inherent uncertainties still posed by the best available science on climate change. It also examined how State agencies could use infrastructure planning, design, and implementation processes to address the observed and anticipated climate change impacts (Climate Change Infrastructure Working Group 2018).

Caltrans Adaptation Efforts

Caltrans Vulnerability Assessments

Caltrans completed climate change vulnerability assessments to identify segments of the State Highway System, vulnerable to climate change effects of precipitation, temperature, wildfire, storm surge, and sea level rise.

The climate change data in the assessments were developed in coordination with climate change scientists and experts in federal, State, and regional organizations at the forefront of climate science. The findings of the vulnerability assessments guide analysis of at-risk assets and development of Adaptation Priority Reports as a method to make capital programming decisions to address identified risks.

Sea-Level Rise

The project area is outside the coastal zone and not in an area subject to sea-level rise. Accordingly, direct impacts on transportation facilities because of projected sea-level rise are not expected.

Precipitation and Flooding

As discussed in Section 2.3.1, the project area is within the Santa Clara Watershed. The project area is in FIRM parcels 06037C0805G and 06037C0815G, in Zone X, which is defined by FEMA as an area of minimal flood hazard. A portion of the project area, The Old Road Bridge, would be constructed within FEMA's regulatory 100-year base floodplain, within Zone AE (FEMA 2022). The District 7 Climate Change Vulnerability Assessment indicates the potential for a zero to 4.9% increase in 100-year storm precipitation depth in the project vicinity by 2025 and 2085, and by 5 to 9.9% by 2055. A number of local geomorphic variables would affect how a given precipitation event would affect streamflow, making it difficult to assess potential impacts at a particular location. The Old Road Bridge replacement is anticipated to cause a maximum increase of 6 inches to the FEMA 100-year BFE. The hydraulic analysis results indicated that BFEs would decrease upstream from the proposed bridge, compared to existing conditions. In addition, the results showed no rise in BFEs downstream. The corresponding increase in the horizontal extents of the existing base floodplain would be a maximum of 5 feet in width; occurring predominantly within the floodplains upstream from the I-5 bridge. The proposed project would reconstruct The Old Road Bridge over Santa Clara River at an elevation approximately 9 feet higher on the north end and 15 feet higher on the south end than the existing bridge, to meet the County capital storm floodway requirements. The proposed project also would implement temporary construction site BMPs to reduce the number of pollutants being discharged into receiving water bodies, and would avoid storing hazardous and non-hazardous materials within the Zone AE floodplain. The new bridge would not be likely to be affected by future changes in storm precipitation, and the risk of interrupting traffic flow or emergency vehicles or access on The Old Road would be low.

Wildfire

The majority of the project area is within a VHFHSZ in a State Responsibility Area in LA County (CAL FIRE 2022). The Caltrans Climate Change Vulnerability Assessment for District 7 evaluated roads at risk for future wildfire and determined that I-5, which parallels The Old Road, would be a moderate level of concern for wildfire exposure in 2055. However, for 2085, the northern portion of I-5 that is adjacent to The Old Road would be a moderate level of concern for wildfire exposure, but the southern portion of I-5 adjacent to the project area would be a high level of concern for wildfire exposure (Caltrans 2019b). No portion of The Old Road, Rye Canyon Road, or Sky View Lane has been determined to be of concern for wildfire exposure by Caltrans. As discussed in Section 3.2, the proposed project would be constructed in a region prone to wildfire risk. Potential wildfire risk would be managed by implementation of standard construction practices and regulatory compliance measures related to safeguards for construction. Similarly, the additional lanes on The Old Road as part of the proposed project would act as firebreaks and reduce vegetation that would be prone to wildfire. The proposed project would expand the existing facilities in the project area and would not exacerbate wildfire risks.

Temperature

The Caltrans Climate Change Vulnerability Assessment for District 7 determined that the average maximum temperature over 7 days is expected to increase by up to 3.9 degrees Fahrenheit around 2025, and to 11.9 degrees Fahrenheit toward the end of the century (Caltrans 2019b). These projections are for the ambient air temperature only and do not include additional heat effects, such as those from the Urban Heat Island. As discussed in the Caltrans Climate Change Vulnerability Assessment, pavement design can be altered based on climate change vulnerability. Caltrans divided the state into nine pavement climate regions, to help determine the best pavement types for each area. The project area is within the Inland Valley pavement region. Pavement design guidelines would be followed during project construction to minimize impacts related to increasing temperatures.

Chapter 4 Comments and Coordination

Early and continuing coordination with the general public and public agencies is an essential part of the environmental process. It helps planners determine the necessary scope of environmental documentation and the level of analysis required, and to identify potential impacts and avoidance, minimization, and/or mitigation measures and related environmental requirements. Agency and tribal consultation and public participation for this proposed project have been accomplished through a variety of formal and informal methods, including interagency coordination meetings, public meetings, public notices, Project Development Team meetings, correspondence with other interested parties. This chapter summarizes the results of Caltrans's efforts to fully identify, address, and resolve project-related issues through early and continuing coordination.

4.1 Scoping Process

The formal scoping period was initiated with the preparation and distribution of a Notice of Preparation (NOP) (Appendix E). A NOP is required under Section 15082 of the CEQA Guidelines and is used to notify responsible agencies, trustee agencies, federal agencies, and the public that the lead agency intends to prepare an EIR for a project. The NOP was posted at the State Clearinghouse No. 2023030209 on March 7, 2023, and was circulated to the public agencies responsible for environmental resources affected by the proposed project. LACPW held a virtual scoping meeting for the proposed project on March 16, 2023, at 6 p.m. Pacific Standard Time, which could be accessed via a Zoom meeting link or Zoom telephone number. In addition to the publication of the NOP and virtual scoping meeting, the following public notification efforts were conducted:

- A project-specific web presence was established for convenient public access and outreach (<https://pw.lacounty.gov/pmd/TheOldRoad-over-SantaClaraRiver/>).
- The NOP was made available at Public Works Transportation Planning and Programs Division: 11th floor, 900 South Fremont Avenue, Alhambra, California, 91803.
- A total of 15 copies of the NOP were mailed to appropriate local, state, and federal agencies and elected officials representing the proposed project area.
- LACPW mailed the NOP to 10 tribal governments and applicable agencies.

4.2 Consultation and Coordination with Public Agencies

The NOP was circulated to the following agencies:

• CDFW	• LA County Sanitation Districts
• USACE	• LA County Sheriff's Department
• CARB	• NAHC
• State Office of Historic Preservation	• Los Angeles RWQCB
• Department of Toxic Substances Control	• SCAG (inter-governmental review)
• SWRCB Division of Drinking Water	• South Coast Air Quality Management District (CEQA review)

- Southern California Regional Rail Authority
- LA County Fire/Caltrans Planning Division
- LA County Parks and Recreation

Comment letters received were the following:

CDFW. CDFW provided recommendations to discuss the need and purpose of the proposed project, design a range of feasible alternatives, and guidance for avoiding and minimizing impacts on sensitive biological resources.

NAHC. NAHC provided recommendations for consultation.

Los Angeles County Sanitation Districts. The Districts provided requests to incorporate its facilities in proposed project plans and address concerns on access to the Valencia Water Reclamation Plant and the Multi-Use Trail bisecting the Valencia Water Reclamation Plant creating hazards.

Los Angeles County Caltrans of Parks and Recreation. Caltrans provided a copy of the Board of Supervisors-approved Caltrans of Parks and Recreation Trail Plan for the Newhall Land Entrada North subdivision. A request was made to include this information in the document analysis.

SCAG. SCAG provided information resources to facilitate project consistency with applicable plans and strategies, demographic and growth factor statistics for the county, and recommended using the Final Program EIR for Connect SoCal as guidance for mitigation.

The proposed project completed Interagency Consultation for Transportation Conformity on May 23, 2023. The proposed project was presented to the Transportation Conformity Working Group—comprised of representative members from EPA, FTA, FHWA, SCAG, LA Metro, Caltrans (HQ, Districts 7, 8, 9, 12) Riverside County Transportation Commission, LA County, LACPW, Ventura County Air Pollution Control District, Orange County Transportation Authority, CARB, SCAQMD, and Antelope Valley Air Quality Management District. A review of PM Hot Spot Interagency Review Form was conducted.

4.3 Circulation, Review, and Comments on the Draft Environmental Document

Public input on the proposed project was solicited during the review period for the Draft EIR/EA. All formal comments have been addressed and responses are published in this Final EIR/EA. If the decision is made to approve the proposed project, a Notice of Determination will be published for compliance with CEQA, and Caltrans will decide whether to issue a Finding of No Significant Impact (FONSI) or require an EIS for compliance with NEPA. A Notice of Availability of the FONSI will be sent to the affected units of federal, state, and local government, and to the State Clearinghouse, in compliance with EO 12372.

Revised Notice of Availability

LACPW (CEQA); California Department of Transportation (NEPA) extended the public review period for the Draft EIR/EA, which began on February 27, 2024. The review period was extended from its original end date of April 11, 2024, to April 18, 2024. Interested parties were

encouraged to submit their comments in writing by no later than 5 p.m. on April 18, 2024. All comments received by the conclusion of the extended public review period have been duly considered in preparation of this Final EIR/EA for the proposed project. The period was extended because of requests from regulatory agencies for additional time. The State Clearinghouse also was notified, and it updated the project information available online at <https://ceqanet.opr.ca.gov/2023030209/2>.

The NOA provided the project location (including the project location map), project description, a summary of significant environmental effects, information regarding the public review period, and document availability.

4.4 Comments and Response to Comments

This section includes all comments received on the Draft EIR/EA during the 52-day public and agency review period (February 27, 2024 through April 18, 2024). No new significant environmental impacts or issues beyond those already identified in the Draft EIR/EA for the proposed project were raised during the public review period. Pursuant to Section 15088.5 of the CEQA Guidelines, none of the comments received during the comment period involved any new significant impacts or “significant new information” that would require recirculation of the Draft EIR/EA.

Table 4-1: List of Commenters on the Draft EIR/EA

Comment Letter No.	Name	Commenting Agency	Date
1	Jasbir Singh	Property Owner	March 11, 2024
2	Eunice Ambriz	Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians)	March 4, 2024
3	Nina Moskol	Santa Clarita Valley Bicycle Coalition/ Bike LA	March 14, 2024
4	Jimmy Melnarik	Santa Clarita Valley Bicycle Coalition	March 14, 2024
5	Nick Decinque	Resident	March 20, 2024
6	Thuy Hua	County of Los Angeles Department of Regional Planning	March 26, 2024
7	Miguel Cabrera	California Department of Conservation, Geologic Energy Management Division	April 14, 2024
8	James M. Danza (FSCR) and Lynne Plambeck (SCOPE)	Friends of the Santa Clara River (FSCR) and Santa Clarita Organization for Planning and the Environment (SCOPE)	April 10, 2024
9	Lynne Plambeck	Santa Clarita Organization for Planning and the Environment (SCOPE)	April 15, 2024
10	Mike Hennawy	City of Santa Clarita	April 18, 2024
11	Stacy Fortner	CDW Corporation	April 18, 2024
12	James M. Danza (FSCR) and Lynne Plambeck (SCOPE)	Friends of the Santa Clara River (FSCR) and Santa Clarita Organization for Planning and the Environment (SCOPE)	April 18, 2024
13	Heather A. Pert	California Department of Fish and Wildlife (CDFW)	April 18, 2024

Requirements for Responding to Comments on a Draft EIR/EA

Although this document is a joint EIR/EA, the following relates only to the Final EIR and CEQA Guidelines associated with responding to comments. Section 15088 of the CEQA Guidelines requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the environmental issue(s) raised and provide a detailed response. Rationale must be provided when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. As long as a good faith effort at full disclosure is made (CEQA Guidelines Section 15204), lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters.

Pursuant to Section 15064 of the CEQA Guidelines, an effect will not be considered significant in the absence of substantial evidence. Section 15088 of the CEQA Guidelines also recommends that where the response to comments results in revisions to the Draft EIR, those revisions should be noted as a revision to the Draft EIR or in a separate section of the Final EIR.

Comments and Response to Comments

Written comments on the Draft EIR/EA 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 EIR/EA and minor staff-initiated changes are compiled in their entirety and are demarcated with a vertical line in the margin of this Final EIR/EA. Where responses result in a change to the final document, it is noted, and the resulting change is identified in Appendix G, Clarifications and Corrections to the Draft EIR, of this Final EIR.

Comment Letter 1

From: jasbir sinhh < jessiebola@yahoo.com > Sent: Monday, March 11, 2024 9:48 PM To: Ebigalle Voigt < EVOIGT@dpw.lacounty.gov > Subject: The Old Road over Santa Clara River and the Southern Pacific Transportation Company Bridge, et al. Project	
CAUTION: External Email. Proceed Responsibly.	
Hello	
My name is Singh, I am the property owner APN: 2826-037-027 on The old Road & Sky View Lane intersection. I would like obtain information regards to Proposed Staging Area. Acquisition Area 56,500 SF, aquisition and type Temporary Easement.	
Telephone (323) 997-1668 jessiebola@yahoo.com	
Respectfully, Jasbir Singh	
	Comment 1

Commenter: Jasbir Singh, property owner of APN: 2826-037-027.

Date of Letter: March 11, 2024

Comment Letter 1:

"Hello My name is Singh, I am the property owner APN: 2826-037-027 on The old Road & Sky View Lane intersection. I would like obtain information regards to Proposed Staging Area. Acquisition Area 56,500 SF, aquisition and type Temporary Easement."

Response to Comment Letter 1:

The commenter received the NOA (via email response from Los Angeles County Public Works, Principal CEA, Ebigalle Voigt on March 13, 2024) with project information and additional information as followed: "The current design of The Old Road over Santa Clara River and the Southern Pacific Transportation Company (SPT Co.) Bridge, et al. Project (Project) designates APN 2826-037-027 as a potential staging area for construction. Staging areas store equipment and other construction materials temporarily for the duration of construction. No grading or excavation would occur. The parcel would be utilized for the duration of construction and returned to its' original state post-construction."

Comment Letter 2

From: Eunice Ambriz < Eunice.Ambriz@sanmanuel-nsn.gov > Sent: Monday, March 4, 2024 7:14:02 PM (UTC+00:00) Monrovia, Reykjavik To: DPW-The Old Road EIR < theoldroadeir@pw.lacounty.gov > Subject: Old Road Over Santa Clara River and Southern Pacific Transportation Company Bridge Project [COU-LADPW-2023-1]	
CAUTION: External Email. Proceed Responsibly.	
Dear Ebigalle, Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians) regarding the above-referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by the Cultural Resources Management Department on March 4, 2024. The proposed project is located 1	
outside of Serrano ancestral territory and, as such, YSMN will not be requesting to receive consulting party status with the lead agency or to participate in the scoping, development, or review of documents created pursuant to legal and regulatory mandates. Regards, Eunice Eunice Ambriz Cultural Resources Technician Eunice.Ambriz@sanmanuel-nsn.gov O:(909) 864-8933 x 50-2033 M:(909) 649-4867 36560 Community Center Dr Highland, California 92346	

Comment
2Comment
2 cont.

Commenter: Eunice Ambriz, Cultural Resources Technician – Yuhaaviatam of San Manuel Nation.

Date of Letter: March 4, 2024

Comment Letter 2:

“Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians) regarding the above-referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by the Cultural Resources Management Department on March 4, 2024. The proposed project is located outside of Serrano ancestral territory and, as such, YSMN will not be requesting to receive consulting party status with the lead agency or to participate in the scoping, development, or review of documents created pursuant to legal and regulatory mandates.”

Response to Comment Letter 2:

This comment has been acknowledged and the request has been documented.

Comment Letter 3

PN LOS ANGELES COUNTY

THE OLD ROAD OVER SANTA CLARA RIVER AND THE SOUTHERN PACIFIC TRANSPORTATION COMPANY
BRIDGE, ET AL. PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT/ ENVIRONMENTAL ASSESSMENT
COMMENT CARD

Please hand in or mail back by April 11, 2024
Comments can also be e-mailed to TheOldRoadEIR@pw.lacounty.gov

Name: NINA MOSKOL

Organization (if any): SANTA CLARITA VALLEY BICYCLE COALITION / BIKE-LA

Address: 23121 POPLAR GLEN CIRCLE, VALENCIA, CA 91354

E-mail (optional): NMOSKOL@sbccglobal.net

Comments: AT SCVBC WE ARE IN FAVOR OF ALTERNATIVE #2
THERE IS CURRENTLY NO BICYCLE OR PEDESTRIAN
INFRASTRUCTURE ON THE TWO BRIDGES SLATED FOR
REPLACEMENT. WE NEED THESE AMMENITIES FOR LOCAL
RESIDENTS. ALSO, THE OLD ROAD IS A MAJOR BICYCLE
ROUTE TO AND FROM CASTAIC, AND IS IN POOR, POOR CONDITION.
BICYCLE INFRASTRUCTURE IN THE FORM OF TRAILS WILL ALSO CONNEC

Check one: I would like to speak tonight ☒ I would like my comment noted for the record ☒

Comment 3

Commenter: Nina Moskol, Santa Clarita Valley Bicycle Coalition / Bike LA

Date of Letter: March 14, 2024

Comment Letter 3:

"At SCVBC we are in favor of Alternative #2. There is currently no bicycle or pedestrian infrastructure on the two bridges slated for replacement. We need these amenities for local residents. Also, The Old Road is a major bicycle route to and from Castaic, and is in poor, poor condition. Bicycle infrastructure in the form of trails will also connect."

Response to Comment Letter 3:

Thank you for the support of The Old Road Project, it has been noted for the record.

Comment Letter 4

LOS ANGELES COUNTY

THE OLD ROAD OVER SANTA CLARA RIVER AND THE SOUTHERN PACIFIC TRANSPORTATION COMPANY
BRIDGE, ET AL. PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT/ ENVIRONMENTAL ASSESSMENT
COMMENT CARD

Please hand in or mail back by April 11, 2024
Comments can also be e-mailed to TheOldRoadEIR@pw.lacounty.gov

Name: JIMMY MELNARIK
Organization (if any): SCV BICYCLE COALITION
Address: 27745 DEL MONTE DR 141
E-mail (optional): JIMMELNARIK91@GMAIL.COM

Comments: I WOULD LIKE TO SEE THE CLASS IV BIKE LANE
EXTEND TO CASTAIC AND ALONG HENRY MAYO DR TOWARD
COMMERCE CENTER. I WOULD LIKE TO SEE CLASS IV
BIKE LANE BOTH NORTH AND SOUTHBOUND. HOW
CAN CURRENT PLAN SAFELY PUT NORTHBOUND BICYCLES
ONTO HENRY MAYO DR? WIDENING ROADS USUALLY →

Check one: I would like to speak tonight ☐ I would like my comment noted for the record ☒

LEADS TO INCREASED VEHICULAR SPEEDS. WILL
THERE BE ANY STEPS TAKEN TO ENSURE
PEDESTRIAN SAFETY FROM AUTOS? IS IT POSSIBLE
TO HAVE NON-FLEXIBLE BARRIERS SOMETHING MORE
STATIONARY?

Affix \$0.68
Stamp

Los Angeles County Public Works
Attention: Ebegalle Voigt
P.O. Box 1460
Alhambra, CA 91802-1460

Comment 4-1

Comment 4-2

Comment 4-2 cont.

Commenter: Jimmy Melnarik, Santa Clarita Valley Bicycle Coalition

Date of Letter: March 14, 2024

Comment Letter 4-1:

"I would like to see the Class IV bike lane extend to Castaic and along Henry Mayo Drive toward commerce center. I would like to see Class IV bike lane both north and southbound."

Response to Comment Letter 4-1:

The project would install Class IV bike lanes north and southbound along The Old Road from Henry Mayo Drive to Magic Mountain Parkway. Beyond those project limits would be outside the scope of this project.

Comment Letter 4-2:

“How can current plan safely put northbound bicycles onto Henry Mayo Drive? Widening roads usually leads to increased vehicular speeds. Will there be any steps taken to ensure pedestrian safety from autos? Is it possible to have non-flexible bollards something more stationary?”

Response to Comment Letter 4-2:

Regarding pedestrian safety concerns provided by the commenter, Section 2.2.8 – Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final EIR/EA addresses this comment. The Build Alternatives would incorporate the following improvements that have the potential to decrease the VMT generated by the Build Alternative. These improvements include:

- A Class IV bikeway, bike share programs, bike parking, and a Multi-Use Trail to encourage non-automobile trips and improve safety for cyclists

In addition, as stated in Section 2.2.7 – Utilities/Emergency Services of the EIR/EA, the proposed project would implement AMM COM-4 to ensure pedestrian safety during construction. Implementation of COM-4 includes alternate and detour routes strategies, and street/intersection improvements will occur (e.g., widening, pavement rehabilitation, removal of median), to provide added capacity to handle detour traffic; signal improvements; make adjustments in signal timing, and/or signal coordination to increase vehicle throughput, improve traffic flow, and optimize intersection capacity; set restrictions at intersections and roadways necessary to reduce congestion and improve safety; and enforce parking restrictions on alternate and detour routes during work hours to increase capacity, reduce traffic conflicts, and improve access.

Regarding the possibility of having non-flexible bollards, it is considered infeasible because of safety reasons.

Comment Letter 5

From: Nick Decinque <nick.decinque@gmail.com>
Sent: Wednesday, March 20, 2024 7:02:19 PM (UTC+00:00) Monrovia, Reykjavik
To: DPW-The Old Road EIR
Subject: Old Road project

CAUTION: External Email. Proceed Responsibly.

I want to comment and say I fully support the Old Road project and look forward to it being completed. I live near the project and have attempted to ride a bike that direction and it's currently impossible. Especially with no current sidewalks either. Installing protected bike lanes will be huge for the local community.

My only ask is to install the bike lanes on both sides of the road. It is difficult to cross that road due to some large intersections, so having bike lanes on both sides will allow cyclists to use whichever side is easiest for them. Also, there is a trail connection to the Santa Clarita paseos that has been mentioned in the project but it would be great if there is a proper connection there to the old road bike lanes. This will allow cyclists on the old road to easily get to the paseo trail where they can access almost all of Santa Clarita. This one connection can open up all Santa Clarita to bike to Six Flags on protected bike trails, for example.

Comment
5

Commenter: Nick Decinque, Resident

Date of Letter: March 20, 2024

Comment Letter 5:

"I want to comment and say I fully support The Old Road project and look forward to it being completed. I live near the project and have attempted to ride a bike that direction and it's currently impossible. Especially with no current sidewalks either. Installing protected bike lanes will be huge for the local community. My only ask is to install the bike lanes on both sides of the road. It is difficult to cross that road due to some large intersections, so having bike lanes on both sides will allow cyclists to use whichever side is easiest for them. Also, there is a trail connection to the Santa Clarita paseos that has been mentioned in the project but it would be great if there is a proper connection there to the old road bike lanes. This will allow cyclists on the old road to easily get to the paseo trail where they can access almost all of Santa Clarita. This one connection can open up all Santa Clarita to bike to Six Flags on protected bike trails, for example."

Response to Comment Letter 5:

Regarding pedestrian safety concerns provided by the commenter, Section 2.2.8 – Traffic and Transportation/Pedestrian and Bicycle Facilities of the joint Draft EIR/EA addresses this comment. The Build Alternatives would incorporate the following improvements that have the potential to decrease the VMT generated by the Build Alternative. These improvements include:

- A Class IV bikeway, bike share programs, bike parking, and a Multi-Use Trail to encourage non-automobile trips and improve safety for cyclists. The project proposes bike lanes on both sides of the road.

Comment Letter 6

From: Thuy Hua <THua@planning.lacounty.gov>
Sent: Tuesday, March 26, 2024 3:16 PM
To: Ebigalle Voigt <EVOIGT@dpw.lacounty.gov>
Cc: Susan Zarei <SZAREI@dpw.lacounty.gov>; Hank Fung <HFUNG@dpw.lacounty.gov>; Samuel Dea <sdea@planning.lacounty.gov>; Iris Chi <IChi@planning.lacounty.gov>
Subject: RE: The Old Rd over Santa Clara River and SPT CO Bridge et al - DRP comments

Hi Ebigalle,

DRP suggests the following inclusions in the DEIR since there will be impacts to the Santa Clara River Significant Ecological Area:

Compliance with SEA Ordinance

2.2.2 Consistency with State, Regional, and Local Plans and Programs

- Include how the project is subject to the SEA Ordinance and compatible with County Code 22.102.080.D (Findings)
- Include how the project is consistent with review procedures for County projects per County Code 22.102.130

Comment
6-1

Comment
6-2

1

VEG-5

- Include LA County Planning in the list of agencies to review the Vegetation Management and Restoration Plan to ensure restoration is planned with consistency with the SEA Ordinance.

Comment
6-3

VEG-6

- Include LA County Planning in the list of agencies to consult to determine adequate replacement ratios to mitigate permanent and temporary impacts to sensitive vegetation communities. The minimum 1:1 replacement ratio may not be appropriate for more sensitive SEA resources.

Comment
6-4

VEG-7

- Include LA County Planning in the list of agencies to consult for the removal of exotic plant species as a potential compensation for permanent and/or temporary removal of riparian habitats.

Comment
6-5

WALNUT-1

- Include LA County Planning in the list of agencies to consult for the replacement ratio of 2:1 for the removal of 1 Southern CA black walnut tree.

Comment
6-6

OAK-8

- Include LA County Planning in the list of agencies to consult for the replacement ratio of 2:1 replacement (10:1 for heritage trees) for the removal of 15 valley oak trees.

Comment
6-7

Should you have follow up questions, please contact Iris Chi who is copied on this email. Thank you for the opportunity to review.

Commenter: Thuy Hua, Supervising Planner, County of Los Angeles Department of Regional Planning**Date of Letter: March 26, 2024****Comment Letter 6-1:**

"DRP suggests the following inclusions in the DEIR since there will be impacts to the Santa Clara River Significant Ecological Area: Compliance with SEA Ordinance 2.2.2 Consistency with State, Regional, and Local Plans and Programs

Include how the project is subject to the SEA Ordinance and compatible with County Code 22.102.080.D (Findings)"

Response to Comment Letter 6-1:

Comment letter 6-1 has been acknowledged and addressed in the Final EIR/EA. Information regarding the Significant Ecological Area (SEA) has been included in Section 2.2.1 (Regional Conservation Plans) and Table 2-3: Consistency with Plans and Policies of the EIR/EA.

Comment Letter 6-2:

"Compliance with SEA Ordinance 2.2.2 Consistency with State, Regional, and Local Plans and Programs:

Include how the project is consistent with review procedures for County projects per County Code 22.102.130"

Response to Comment Letter 6-2:

Comment letter 6-2 has been addressed in the Final EIR/EA. Information regarding the Significant Ecological Area (SEA) has been included in Section 2.2.1 (Regional Conservation Plans) and Table 2-3: Consistency with Plans and Policies of the EIR/EA.

Comment Letter 6-3:

"VEG-5: Include LA County Planning in the list of agencies to review the Vegetation Management and Restoration Plan to ensure restoration is planned with consistency with the SEA Ordinance"

Response to Comment Letter 6-3:

Comment letter 6-3 has been acknowledged and addressed in the Final EIR/EA. AMM VEG-5 (Section 2.4.1 - Natural Communities, of the EIR/EA) has been revised to include Los Angeles County Planning Agency review to ensure SEA consistency.

Comment Letter 6-4:

"VEG-6: Include LA County Planning in the list of agencies to consult to determine adequate replacement ratios to mitigate permanent and temporary impacts to sensitive vegetation

communities. The minimum 1:1 replacement ratio may not be appropriate for more sensitive SEA resources.”

Response to Comment Letter 6-4:

Comment letter 6-4 has been acknowledged and addressed in the Final EIR/EA. AMM VEG-6 (Section 2.4.1 - Natural Communities, of the EIR/EA) has been revised to incorporate the comment.

Comment Letter 6-5:

“VEG-7: Include LA County Planning in the list of agencies to consult for the removal of exotic plant species as a potential compensation for permanent and/or temporary removal of riparian habitats.”

Response to Comment Letter 6-5:

Comment letter 6-5 has been acknowledged and addressed in the Final EIR/EA. AMM VEG-5 (Section 2.4.1 - Natural Communities, of the EIR/EA) has been revised to incorporate the comment.

Comment Letter 6-6:

“WALNUT-1: Include LA County Planning in the list of agencies to consult for the replacement ratio of 2:1 for the removal of 1 Southern CA black walnut tree.”

Response to Comment Letter 6-6:

Comment letter 6-6 has been acknowledged and addressed in the Final EIR/EA. AMM WALNUT-1 (Section 2.4.3- Plant Species, of the EIR/EA) has been revised to incorporate the comment.

Comment Letter 6-7:

“OAK-8: Include LA County Planning in the list of agencies to consult for the replacement ratio of 2:1 replacement (10:1 for heritage trees) for the removal of 15 valley oak trees.

Should you have follow up questions, please contact Iris Chi who is copied on this email. Thank you for the opportunity to review.”

Response to Comment Letter 6-7:

Comment letter 6-7 has been acknowledged and addressed in the Final EIR/EA. AMM OAK-8 (Section 2.4.3. - Plant Species, of the EIR/EA) has been revised to incorporate the comment.

Comment Letter 7



California
Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
David Shabazian, Director
715 P Street, MS 1803
Sacramento, CA. 95814
T: (916) 445-5986

04/14/2023

County: Los Angeles - County of Los Angeles Department of Public Works
Ebigalle Voigt
evoigt@dpw.lacounty.gov

Construction Site Well Review (CSWR) ID: 1012760

Assessor Parcel Number(s): 2826005013

Project Location Address: 28144 The Old Rd Valencia, California 91355

Project Title: CEQA Review: The Old Road over Santa Clara River and the Southern Pacific Transportation Company (SP)

Public Resources Code (PRC) § 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received and reviewed the above referenced project dated 4/13/2023. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following well evaluation.

The project is located in Los Angeles County, within the boundaries of the following fields:

Castaic Junction (ABD)

Our records indicate there are 1 known oil or gas wells located within the project boundary as identified in the application.

Comment
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- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 1
- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0

The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure.

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cont.

There are no guarantees a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantees that such abandonments will not leak.

The Division advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations should be provided to the Division in Latitude and Longitude, NAD 83 decimal format. The Division expects any wells found leaking to be reported to it immediately.

Failure to plug and reabandon the well may result in enforcement action, including an order to perform reabandonment well work, pursuant to PRC § 3208.1, and 3224.

PRC § 3208.1 give the Division the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. Responsibility for re-abandonment costs may be affected by the choices made by the local

permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for reabandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.

2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be reabandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.

3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the reabandonment.

No well work may be performed on any oil, gas, or geothermal well without written approval from the Division. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. The Division also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR §1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from the Division is required before work can start.

The Division makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements

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cont.

near oil or gas wells, the Division recommends that information regarding the above identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

2. The Division recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC § 3106, the Division has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.

If during development activities, any wells are encountered that were not part of this review, the property owner is expected to immediately notify the Division's construction site well review engineer in the Northern district office, and file for Division review an amended site plan with well casing diagrams. The District office will send a follow-up well evaluation letter to the property owner and local permitting agency.

Should you have any questions, please contact me at (805) 937-7246 or via email at Miguel.Cabrera@conservation.ca.gov.

Sincerely,

Miguel Cabrera
Northern District Deputy

cc: Blake Foreshee - Submitter
cc: Ebigalle Voigt - Plan Checker

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cont.

Wells Not Abandoned to Current Division Requirements as Prescribed by Law & Projected to be Built Over or Have Future Access Impeded

The wells listed below are not abandoned to current Division requirements as prescribed by law, and based upon information provided, are projected to be built over or have future access impeded. The Division expects these wells to be reabandoned in compliance with current California law, prior to development activities.

API	Well Designation	Operator	Well Evaluations
0403716533	Newhall Land & Farming Co. 75	Exxon Mobil Corporation	The base of fresh water plug does not meet the requirements of CCR § 1723.2 (b) (1). The surface plug does not meet the requirements of CCR § 1723.5.

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cont.

Commenter: Miguel Cabrera, California Department of Conservation, Geologic Energy Management Division.

Date of Letter: April 14, 2024

Comment Letter 7:

"Construction Site Well Review (CSWR) ID: 1012760 Assessor Parcel Number(s): 2826005013 Project Location Address: 28144 The Old Rd Valencia, California 91355 Project Title: CEQA Review: The Old Road over Santa Clara River and the Southern Pacific Transportation Company (SP)

Public Resources Code (PRC) § 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, and geothermal wells. The California Geologic Energy Management Division (CalGEM) has received and reviewed the above referenced project dated 4/13/2023. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following well evaluation. The project is located in Los Angeles County, within the boundaries of the following fields: Castaic Junction (ABD).

Our records indicate there are 1 known oil or gas wells located within the project boundary as identified in the application.

- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 1*
- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0*
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0 •*
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0*

The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure.

There are no guarantees a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantees that such abandonments will not leak.

The Division advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations should be provided to the Division in Latitude and Longitude, NAD 83 decimal format. The Division expects any wells found leaking to be reported to it immediately.

Failure to plug and reabandon the well may result in enforcement action, including an order to perform reabandonment well work, pursuant to PRC § 3208.1, and 3224.

PRC § 3208.1 give the Division the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for reabandonment as:

- 1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.*
- 2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be reabandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.*
- 3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the reabandonment.*

No well work may be performed on any oil, gas, or geothermal well without written approval from the Division. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. The Division also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR §1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from the Division is required before work can start.

The Division makes the following additional recommendations to the local permitting agency, property owner, and developer:

- 1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, the Division recommends that information regarding the above identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.*
- 2. The Division recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.*

As indicated in PRC § 3106, the Division has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.

If during development activities, any wells are encountered that were not part of this review, the property owner is expected to immediately notify the Division's construction site well review engineer in the Northern district office, and file for Division review an amended site plan with well casing diagrams. The District office will send a follow-up well evaluation letter to the property owner and local permitting agency. Should you have any questions, please contact me at (805) 937-7246 or via email at Miguel.Cabrera@conservation.ca.gov."

Response to Comment Letter 7:

Section 2.3.5 of the EIR/EA details that if the plugged oil/gas well within the central portion of the proposed project is disturbed during construction of the proposed project it would be re-abandoned in accordance with current CalGEM regulations. AMM HAZ-1 also details that measure. Based on the results of the April 2023 geophysical survey, it is not anticipated that this well would be disturbed during construction of the Build Alternative.

Comment Letter 8



Friends of the Santa Clara River

PO Box 7713 Ventura, California 93006 (805) 320-2265
www.fscr.org

SCOPE

Santa Clarita Organization for Planning and the Environment

TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY

POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



4-10-24

Los Angeles County Public Works and all approving agencies

Attention: Ebigalle Voigt

P.O. Box 1460

Alhambra, CA 91802-1460

Via e-mail to: TheOldRoadEIR@pw.lacounty.gov

RE: The Old Road over Santa Clara River and the Southern Pacific Transportation Company

Bridge, et al. Project LOS ANGELES COUNTY, CALIFORNIA DISTRICT 7 – LA

BRLS-5953(601) & STPL-5953(682)

Draft Environmental Impact Report/ Environmental Assessment

Dear Sirs and Madams:

The Friends of the Santa Clara River and Santa Clarita Organization for Planning and the Environment (SCOPE) jointly submit the following comments. Our members live and recreate in the vicinity of this project and thus have knowledge and standing to make these comments. These comments are timely submitted by April 11th, within the EIR/EA comment period.

Although we are long-standing (30 years and 35 years respectively) and well-known planning and conservation groups within the area of this project and known to Los Angeles County Department of Public Works, we were not notified of this project directly, only having become aware of it through a news article in the Daily News late in the EIR process. We were thus deprived of commenting on the NOP where our comments might have been helpful in creating a more informative document.

We have serious concerns about this project due to the under-estimation of traffic generation, VMT, greenhouse gases and air pollution by the environmental documentation and the habitat impacts caused by the bridge replacement over the Santa Clara River in a location

where listed endangered species are known to exist as well as the extreme loss of oaks, apparently including the historical heritage oak located near the north west corner of Magic Mountain Parkway and



Comment
8-1

SCOPE and FSCR Comments on Old Road Widening and Bridge Replacement

2

the Old Road. This intersection was already recently improved and should not include additional widening. We therefore request that the County/Metro/CalTrans and DOT add additional alternatives that would address and avoid these impacts.

It is amazing to us that the County/Metro/Caltrans/DOT would propose these expensive and biologically harmful additions in an area where the I-5 freeway is already being expanded with additional lanes. CalTrans has often stated in other venues that freeway lane expansions are necessary to take traffic off of local roadways. If this is the case as CalTrans has stated elsewhere, then the Old Road expansion is unnecessary.

Comment
B-1 Cont.

We support the addition of a dedicated bike/pedestrian way only along with bridge repair, but not the additional roadway lanes due to the phenomenon of “induced demand” as described below. Additional lanes would cause increased negative health impacts to cyclists or pedestrians trying to use this bikeway due to increased pm2.5 and pm10 as well as other harmful pollutants from auto emissions known to cause lung damage.

We also support the dedicated trail/bikeway expansion as a safe means of non-vehicular travel to the industrial center and a recreational opportunity as long as this part of the project does not result in removal of oaks or other habitat destruction. We feel sure that such impacts can be avoided with careful planning.

Incorrect Analysis of Induced traffic (adding additional lanes)

According to the EIR/EA

“Regarding operational emissions, the Build Alternative would result in lower gaseous criteria pollutant (NOX, CO, and ROG/VOC) emissions than the No-Build Alternative and Existing Conditions because of improvements in vehicle delay and turnover of the regional vehicle fleet. Slight increases in PM10 and PM2.5 emissions are attributed to fugitive dust associated with break wear, tire wear, and resuspended road dust, which combined constitute over 90% of PM emissions from vehicle travel on roadways.” (P.27)

Comment
B-2

This analysis is patently incorrect. According to a report by the CA Air Resources Board, as California continued to expand roadways. Total interstate and principal arterial lane miles in California increased from 58,258 in 2016 to 61,376 in 2019, or by 5.4 percent. While jurisdictions expand roadways for several reasons (e.g., to accommodate cars, freight, safety, carpooling, buses on shoulders), **the research literature shows that added roadway capacity often induces additional VMT and GHG emissions.**¹[emphasis added]. The SCAG and MTC/ABAG regions added the most in total lane miles, while the KCOG, MCAG, and SACOG regions had the highest per capita lane mile increases from 2016 to 2019, which could increase GHG emissions and VMT in the long term.²

A paper entitled “Induced Vehicle Travel in the Environmental Review Process”, published by the National Center for Sustainable Transportation, a US DOT University Transportation Center states:

“If we expand roadway capacity, more drivers will come, or so economic theory suggests and a substantial body of empirical research now shows. Despite strong evidence, the “induced

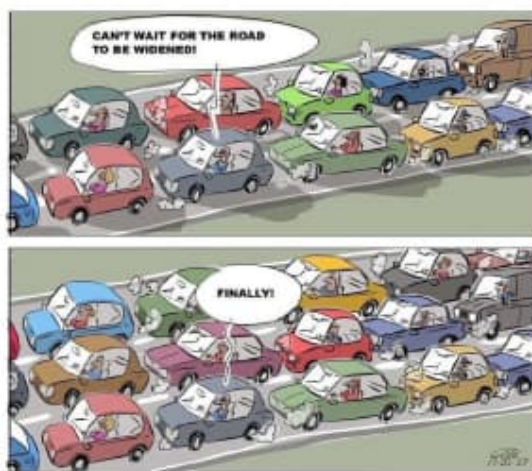
¹ S. Handy, M. Boarnet. 2014. Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions. Available at: https://ww2.arb.ca.gov/sites/default/files/2020-06/Impact_of_Highway_Capacity_and_Induced_Travel_on_Passenger_Vehicle_Use_and_Greenhouse_Gas_Emissions_Policy_Brief.pdf

² CA Air Resources Board, 2022 Progress Report | California’s Sustainable Communities and Climate Protection Act, page 13

SCOPE and FSCR Comments on Old Road Widening and Bridge Replacement

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travel" effect is often ignored, underestimated, or misestimated in the planning process, particularly in the assessment of the environmental impacts of roadway capacity expansions. Underestimating induced travel will generally lead to overestimation of the traffic congestion relief benefits a highway expansion project might generate, along with underestimation of its environmental impacts. A major reason that induced travel tends to be underplayed in environmental analyses is that travel demand models do not typically include all of the feedback loops necessary to accurately predict the induced travel effect. We developed an online tool, based on elasticities reported in the literature, to facilitate the estimation of the induced vehicle travel impacts of roadway capacity expansion projects in California, with



potential future expansion to other geographies. We describe the tool, apply it to five case study highway capacity expansion projects, and then compare the results with the induced travel estimates reported in the environmental impact analyses for those projects. Our results suggest that environmental analyses frequently fail to fully capture the induced vehicle travel effects of highway capacity expansion projects.³

It appears that is exactly what has occurred in the EIR/EA analysis for this project in order to justify its approval.

Further, this incorrect traffic analysis also invalidates the Air Quality and

Climate Change/ Greenhouse Gas sections as more pollutants will be created over time rather than less.

Climate Change and GHG generation by the proposed project

As stated above, the project fails to evaluate the "induced demand" in its analysis, thus underestimating the VMT which in turn results in an underestimation of the GHG generation and air quality effects.

An idea of how much more traffic will be generated in the future by these additional lanes can be calculated by using The Induced Demand Calculator. The Induced Travel Calculator estimates project-induced VMT using the project length entered by the user, regional lane-mile and VMT data from Caltrans, and estimates of elasticities (the percentage change in VMT that results from a one percent increase in lane-miles) from peer-reviewed studies. The Calculator is freely available for use here: <https://travelcalculator.ncst.ucdavis.edu/>. The VMT derived from this calculator should have been used to calculate VMT and the resulting GHG generation.

Table 3-1 (Page 379) in this section lists several reports that address GHG reduction strategies. **None of these strategies include adding additional traffic lanes.**

While the proposed project may be listed in the SCAG Connect SoCal financially

³ Volker, J. M. B., Lee, A. E., & Handy, S. (2020). Induced Vehicle Travel in the Environmental Review Process. *Transportation Research Record*. <https://doi.org/10.1177/0361198120923365>

Comment
8-2 Cont.

Comment
8-3

SCOPE and FSCR Comments on Old Road Widening and Bridge Replacement

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constrained RTP and the SCAG financially constrained 2023 FTIP, contrary to statements in the EIR, the lane additions portion of this project is not consistent with the guiding principles that address land use and transportation investments/strategies. This is due to the EIR/EAs failure to recognize the problem of "Induced Demand" as described in the traffic section above.

Principles that are listed in the EIR, but are inconsistent with the proposed project include:

- Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single-occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices (demand will in fact increase); and
- Encourage transportation investments that will result in improved air quality and public health, and reduced GHG emissions. (As described above induced demand results in long term additional VMT and additional GHG and air quality impacts)

In fact, reference to several plans that should have been included, are notably missing.

We note that as of this date there is no approved Los Angeles County Climate Action Plan. The City of Santa Clarita (the other entity participant in the One Valley One Vision) has an outdated Climate Action Plan approved in 2012, but has not complied with the approved requirements of that plan, including updated reports and needed revisions. (See attachment 1 Response to PRA indicating no updates and reports exist). **We believe that this project cannot be approved without these legally required underlying plans which should be providing the GHG reduction strategies for transportation projects.**

On December 15, 2022 California's air board unanimously approved a sweeping state plan to battle climate change, creating a new blueprint for the next five years to cut carbon emissions, reduce reliance on fossil fuels and speed up the transition to renewable energy. Yet this plan is nowhere mentioned in the current EIR/EA. We believe that omission is due to this documents non-conformance with that plan.

The EIR/EA also leaves out several sources of GHG. These must be calculated and included in the analysis and mitigation. They include but are not limited to:

- The additional concrete⁴ that will be required to replace bridge abutments and pavement. (The EIR states that Implementation of the Build Alternative would result in a net increase of approximately 43 acres of impervious area, a substantial amount in addition to the replacement of current paving. p.16)
- The removal of 18 oaks⁵. Please calculate the loss of carbon sequestration provided by these trees. Young trees do not replace to sequestration value of older trees.

We do not concur with the conclusion on EIR/EA page 388 that no operational mitigation for Air Quality or GHG is required because the full impact as described above has not been calculated. Further, the failure to calculate induced demand which will increase VMT may require additional mitigation for project impacts beyond operational impacts, but we cannot know this because the data was not included in the EIR. **These issues must be addressed.**

⁴ The chemical reactions involved produce even more carbon dioxide as a by-product. Making one kilogram of cement sends one kilogram of CO₂ into the atmosphere. Worldwide every year cement and concrete production generates as much as 9 percent of all human CO₂ emissions. Scientific American, Feb 1, 2023 <https://www.scientificamerican.com/article/solving-cements-massive-carbon-problem/>

⁵ In addition, SB 1386 (Wolk 2016) established as state policy the protection and management of natural and working lands and requires state agencies to consider that policy in their own decision making. Trees and vegetation on forests, rangelands, farms, and wetlands remove CO₂ from the atmosphere through biological processes and sequester the carbon in above- and below-ground matter. EIR at page 386

Comment
8-3 Cont.

SCOPE and FSCR Comments on Old Road Widening and Bridge Replacement

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Wildfire – The statement on page 391 *“Similarly, the additional lanes as part of the proposed project would act as firebreaks and reduce vegetation that is prone to wildfire. The proposed project would ultimately expand the existing facilities in the proposed project area and would not exacerbate wildfire risks.”* Reducing natural vegetation is not a goal of this project and contrary to state law as embodied in Wolk SB1386 cited in footnote 6 below. Also, the last major fire in the area, jumped the 8 lanes of the freeway and the Old Road due to wind-driven embers⁶. Roads offer no protection in the wind-driven wildfires that have occurred recently in Santa Clarita.

Comment
8-4**Biological impacts**

We note that both USFWS and CDFW are cooperating agencies on this draft EIR/EA, and urge CalTrans and County Public Works to ensure that these agencies are given full license to enforce restrictions that protect and benefit the essential wildlife flora and fauna of Santa Clara River. We hope that they were not simply added as token checkbox on legal requirements.

Comment
8-5

The increasing reduction of freedom of movement for air, water and terrestrial animals is already causing risk to wildlife species health, biodiversity, and for an increasing number pushed to the point of extinction.

While the EIR/EA preparer attached a letter from USFW Ventura Office in Appendix F that provides a list of endangered species in the area, it did not include the recent U.S. Fish and Wildlife Proposal to list both Species of Western Pond Turtle under the Endangered Species Act.⁷ The southwestern pond turtle may occur in the project area.

Oaks

Oaks are an important and beloved native species, that are protected by County and City of Santa Clarita Ordinances. The project proposes to remove 18 oaks, mostly rare Valley Oaks, including two heritage oaks estimated to be over 300 years old. Yet no map of the oak trees to be removed was included in the EIR/EA so that avoidance suggestions by the public can be made. Although the EIR/EA states that an oak report was completed in 2019, it is not included in the Appendix as is the normal practice. Thus, we cannot know if the report accurately discloses all oaks. This failure also precludes the public's ability to make suggestions as to avoidance. Additionally, we believe this report may have been completed for a different project since it was completed well before the signed 2022 MOU and is not included in the list of Technical Reports in Appendix B. There is no indication that any oak tree permits have been issued as required by the County for oak removals, nor has a hearing been scheduled for removal of heritage oaks as required by the County Oak Ordinance.

Comment
8-6

- **Failure to provide any meaningful information about these important and rare trees to be removed from a County designated Significant Ecological Area is an EIR/EA deficiency.**

We maintain that more traffic will also have additional impacts to the vegetation, specifically trees in the river channel from the lane widening. Native Californian riparian and oak woodland trees play a vital role in the health of our floodplains. Phytoremediation, the benefit that trees give our climate by cleaning air, soil and water is lessened by a greater load than they can tolerate. They clean our air and balance climate via their contribution to the

⁶ 5 Freeway reopens near Magic Mountain in Santa Clarita as Rye Fire burns, Daily news, Dec 5th 2017, <https://www.dailynews.com/2017/12/05/newly-ignite-d-rye-fire-in-santa-clarita-forces-closure-of-5-freeway-near-magic-mountain/>

⁷ <https://www.fws.gov/press-release/2024-04/us-fish-and-wildlife-service-reopens-public-comment-period-proposal-list-both>

SCOPE and FSCR Comments on Old Road Widening and Bridge Replacement

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passage of air and water through the Santa Clara River riparian corridor and are an essential part of the river and the wildlife that have called it home for thousands of years.⁸

"Trees play an important role in maintaining the ecological balance, pollution reduction and lessening the burden of pollutant by absorbing pollutants. However, trees in urban cities are growing in a severe stressful environment due to incomplete burning of fossil fuel and badly maintained vehicles resulting shorten life span of plant. The growth of plants could be affected by several reasons and one of them is the presence of toxic pollutants derived from the auto vehicular exhaust emission."⁹

Comment
6-7**Birds**

USFW letter attached in Exhibit F provided considerable links regarding migratory birds and protections afforded them. That is because at least two endangered migratory birds are present in the project area. These include the Southwestern Willow Fly Catcher and the Least Bell's Vireo. The Yellow-billed Cuckoo is also listed as occurring in this area. Nesting sites of these endangered migratory birds must be avoided. That means scheduling any construction in a manner that avoids nesting season. Scheduling construction to avoid nesting season must be included as a mitigation measure.

"Highways cause significant impacts to birds in four ways: direct mortality, indirect mortality, habitat fragmentation, and disturbance."¹⁰ We request that you include a discussion of these impacts in the EIR/EA document and include mitigation measures to address and reduce these impacts (as found in the reference for footnote 9).

The devastating consequences of giving more room for increased traffic as proposed by this project include threats to birds from collision with road vehicles: "Collisions with vehicles are believed to be among the top five direct causes of bird mortality in the United States. A recent study estimated that between 89 million and 340 million birds die annually in vehicle collisions on U.S. roads."¹¹ The EIR/EA should have disclosed this impact.

Comment
6-8

Increased vehicular traffic also increases threats to birds from traffic noise. In 2016, Caltrans produced a 96-page document "Effects of Traffic Noise and Road Construction Noise on Birds." The opening abstract states:

"There is a long-standing concern that roadway construction noise and subsequent traffic noise may be detrimental to wildlife, and especially birds, which relies heavily on acoustic communication. The Endangered Species Act provides additional, compelling, motivation for understanding the effects of traffic and construction noise on federally listed bird species that are in danger of extinction. Effects of construction and/or traffic noise may be nonexistent in certain circumstances, such as when the level of these noises is below natural ambient noise levels, and insignificant in other circumstances, such as when the noise adds very little to existing ambient noise levels. In contrast, construction or traffic noise that adds significantly to natural ambient noise has the possibility of producing a suite of significant short- and long-term behavioral and physiological changes in birds. These may include changes in foraging location and behavior; interference with acoustic communication between conspecifics; failure to recognize other important biological signals, such as sounds of predators and/or prey;

⁸ California Department of Food and Agriculture, 3288 Meadowview Road, Sacramento, CA 95832, USA.)

⁹ "Impact of Auto Exhaust Pollution on Trees" Print ISBN: 978-93-89562-14-9, eBook ISBN: 978-93-89562-15-6

¹⁰ Mitigation Measures for Highway-caused Impacts to Birds1 Sandra L. Jacobson USDA Forest Service Gen. Tech. Rep. PSW-GTR-191. 2005

¹¹ Threats to Birds: Collisions-Road Vehicles | U.S. Fish & Wildlife Service (fws.gov)

SCOPE and FSCR Comments on Old Road Widening and Bridge Replacement

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decreasing hearing sensitivity temporarily or permanently; and/or increasing stress and altering steroid hormone levels. Any of these effects could have long-term consequences and enduring impacts that include interference with breeding by individuals and populations, thereby threatening the survival of individuals or species.”¹² In spite of this being CalTrans own document and CalTrans considering a project in an area with three listed endangered species, **none of this was disclosed in the EIR/EA.**

Increasing the amount of traffic also increases threats to birds from increased lighting. “Lighting can attract large numbers of night-migrating birds from as far as 5 kilometers away. Birds can become entrapped in these areas of bright lights, circling endlessly, depleting energy stores needed for migration, and even colliding with buildings and infrastructure. This phenomenon is particularly prevalent on nights with low-cloud ceilings or foggy weather, when birds tend to migrate at lower altitudes where light reflecting on clouds can be disorienting. Multiple mass-mortality events, each involving hundreds of birds, have been documented on foggy nights during migration.”¹³ This impact was not disclosed in the EIR/EA. Although the document does provide a requirement that lighting be pointed downward, we believe other mitigation would have been suggested if the impact had been disclosed.

Comment
8-7 Cont.

Our position is that all birds including endangered species, should be protected before being further affected and harmed by increased traffic. While mitigation measures are suggested by USFWS in current outreach, none of these serve to prevent the loss of collisions or flight paths being polluted by noise, exhaust and density of mechanical occupation. In every wildlife agency recommendation list, one finds the suggestion to modify landuse planning to protect against these factors. We are standing for the landuse measure in this case, and therefore do not support the road widening which enables more of these severe dangers to wildlife. The wildlife agencies and other biological monitors must be given full support for all wildlife protection mitigation in the sensitive area of the Santa Clara River.

Fish

The site is home to two listed endangered fish., the Unarmored Three-spined Stickleback and the Arroyo Chub. It may be the last population of UTS in existence. These species are affected by silted water and other water pollution, and of course would be exterminated by dewatering in the area. The EIR/EA does not fully discuss impacts to these endangered fish and how they will be protected if project construction proceeds.

Comment
8-8**Other Reptiles, amphibians and plants**

We are concerned that surveys for these species did not follow required protocols since the EIR/EA does not fully disclose time of day and appears to rely on surveys only done in 2023. There is existing literature from other EIRs in the County’s possession which indicate the presence of other listed species. We are particularly concerned about the pond turtle, whose status was just re-opened for review, since we don’t see surveys for it in the document.

The reach of the Santa Clara River over which this project passes, is not in isolation. Negative human effects on its ecology in this stretch, continue downstream and cause animals upstream to be disconnected. In addition to the species mentioned by USFWS, 25% of California’s endemic plant species are in found in this region. Some may not yet be listed as threatened or endangered but only due to the fact that investment in studies is not as great as investment in human transportation or consumption needs. It is very likely that many plants, native to this area of the Santa Clara River are either no longer present or in swift decline. This

Comment
8-9

¹² CALTRANS-Birds_6-1-2016_FINAL_without_endnote

¹³ Threats to Birds: Collisions - Nighttime Lighting | U.S. Fish & Wildlife Service (fws.gov)

SCOPE and FSCR Comments on Old Road Widening and Bridge Replacement

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rich native biodiversity is not limited only to plants, it is a system of animals, insects, watershed hydrogeology and climate.

Projects such as widening a lane of traffic from 2 to 3 lanes, may seem like an insignificant addition; but, in fact it is a part of the slow destruction of our natural ecological systems. We are putting one of the richest areas of biodiversity in the world at risk. This biodiversity is not limited to only plants, it is a system of animals, insects, hydrogeology and more. Adding more and more opportunity for human sprawl that requires infrastructure to support cars, chemicals, use of natural resources to make and power them is the definition of how to endanger all these aspects of ecological diversity which ultimately harms humans too. Once this is gone, it is gone. Rivers themselves are becoming endangered. The Santa Clara River is already the Southern California's largest river system that remains in a relatively natural state. Relatively here, is a vital word. All conservation measures are needed to not only maintain that but more vitally, restore its ecological health and protection. Mitigation for this proposed work cannot be the simple pass for impacts that can damage more than mitigation may be able to rehabilitate.

Comment
8-9 Cont.**Aesthetics**

Included in the Conservation and Open Space Element of the Santa Clarita Valley Area Plan, are policies generally protecting visual aesthetics of the surrounding mountains, but Policy CO-6.6.1 speaks to light pollution. The policy is to "Enhance views of the night sky by reducing light pollution through use of light screens, downward directed lights, minimized reflective paving surfaces and reduced lighting levels, as deemed appropriate by the reviewing authority"

Comment
8-10

We do not agree that, as stated in the CEQA EIR/NEPA EA "The proposed project area is not designated as, or considered eligible to be considered as, a scenic resource by the County of Los Angeles or the State of California (Caltrans 2018)." However, below the sightline, the Santa Clara River is of equal value and vital habitat for native natural wildlife systems.

Inadequate Alternative analysis

Alternatives are important to ensure that the best project is built and that the greatest number of societal needs are met. We have never reviewed an EIR/EIS such as this that provides only for the project itself or no project and believe this is an insufficient level of analysis. We agree with CDFW that there should be a variety of alternatives and ask that the County and other lead agencies should provide an appropriate array of alternatives to properly evaluate this project, including those that would reduce impacts in this sensitive area, help meet the County's climate action goals and reduce VMT and air pollution. They should include:

Comment
8-11

- A project where no additional lanes are added, but with the addition of a bike and pedestrian lane.
- A project where one additional lane is added that can be reversed with the flow of traffic.
- A project where only the bridge is replaced
- A project that reduces oak removals, especially the historical heritage oak located close to the north west corner of Magic Mountain Parkway and the Old Road.

Conclusion

As stated in the opening paragraphs, we oppose the lane additions proposed by this project because they will only serve to increase traffic impacts in future years through "Induced Demand", an impact which was not discussed in the EIR/EA. Additionally the project would

Comment
8-12

SCOPE and FSCR Comments on Old Road Widening and Bridge Replacement

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have severe biological impacts to endangered species in the area of the Santa Clara River which is also a Count Significant Ecological area. The number of heritage and rare Valley Oaks slated for removal is unacceptable.

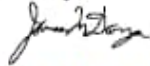
This document is deficient in many areas as described above. We request that these deficiencies be address and a new document recirculated. The new document should include a broader range of alternatives as well as the missing information that is normally provided in environmental documents, including but not limited to the initial study and the comment letters from agencies and the public on the Notice of Preparation.

Comment
8-12 Cont.

Last, we do not think an EA was the appropriate Federal document for a project such as this based on the number of endangered species and the extent of the potential impacts on those species. Compliance with NEPA would require an EIS.

We look forward to working with the agencies to make this a better project.

Sincerely,



James M. Danza, MS, AICP
Chair, Friends of the Santa Clara River



Lynne Plambeck, Resident
Santa Clarita Organization for Planning and the Environment

Attachment 1

Email Response from the City of Santa Clarita indicating they have no updates or reports as required by their 2012 Climate Action Plan

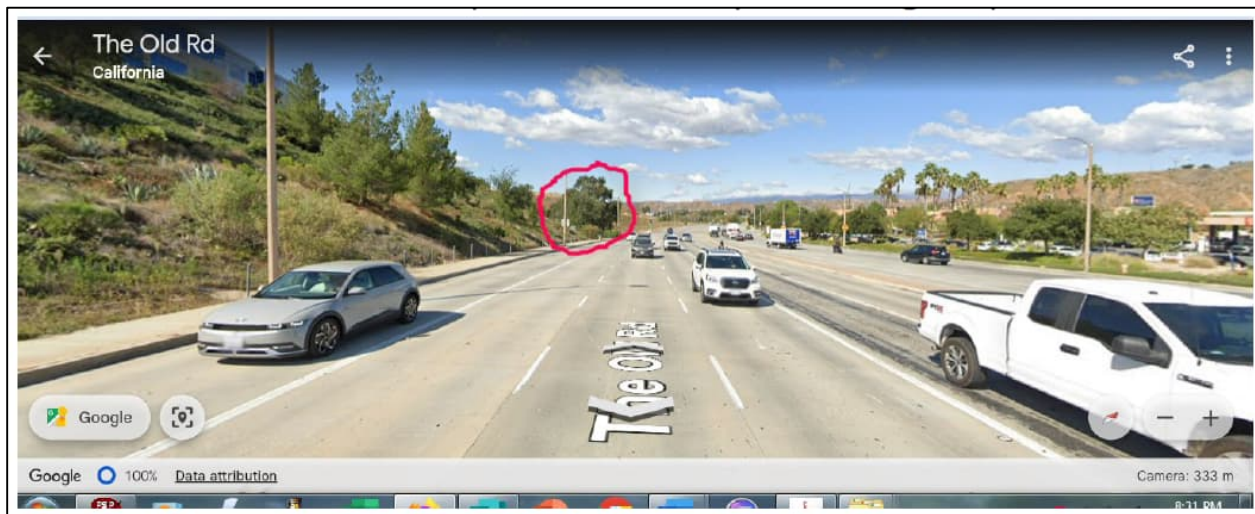
Commenter: James M. Danza, Chair, Friends of the Santa Clara River (FSCR) and Lynne Plambeck, Resident, Santa Clarita Organization for Planning and the Environment (SCOPE)

Date of Letter: April 10, 2024

Comment Letter 8-1:

"The Friends of the Santa Clara River and Santa Clarita Organization for Planning and the Environment (SCOPE) jointly submit the following comments. Our members live and recreate in the vicinity of this project and thus have knowledge and standing to make these comments. These comments are timely submitted by April 11th, within the EIR/EA comment period. Although we are long-standing (30 years and 35 years respectively) and well-known planning and conservation groups within the area of this project and known to Los Angeles County Department of Public Works, we were not notified of this project directly, only having become aware of it through a news article in the Daily News late in the EIR process. We were thus deprived of commenting on the NOP where our comments might have been helpful in creating a more informative document. We have serious concerns about this project due to the under-estimation of traffic generation, VMT, greenhouse gases and air pollution by the environmental documentation and the habitat impacts caused by the bridge replacement over the Santa Clara River in a location where listed endangered species are known to exist as well as the extreme loss of oaks, apparently including the historical heritage oak located near the north west corner of Magic Mountain Parkway and The Old Road. This intersection was already recently improved and should not include additional widening. We therefore request that the County/Metro/CalTrans and DOT add additional alternatives that would address and avoid these impacts. It is amazing to us that the County/Metro/Caltrans/DOT would propose these expensive and biologically harmful additions in an area where the I-5 freeway is already being expanded with additional lanes. CalTrans has often stated in other venues that freeway lane expansions are necessary to take traffic off of local roadways. If this is the case as CalTrans has stated elsewhere, then The Old Road expansion is unnecessary. We support the addition of a dedicated bike/pedestrian way only along with bridge repair, but not the additional roadway lanes due to the phenomenon of "induced demand" as described below. Additional lanes would cause increased negative health impacts to cyclists or pedestrians trying to use this bikeway due to increased pm2.5 and pm10 as well as other harmful pollutants from auto emissions known to cause lung damage. We also support the dedicated trail/bikeway expansion as a safe means of non-vehicular travel to the industrial center and a recreational opportunity as long as this part of the project does not result in removal of oaks or other habitat destruction. We feel sure that such impacts can be avoided with careful planning"

Reference photo used in Comment Letter 8-1.



Response to Comment Letter 8-1:

In accordance with CEQA Guidelines, Section 15082, the Notice of Preparation (NOP) was circulated for a 30-day comment period, starting March 6, 2023, and ending April 4, 2023. The NOP was made available for viewing online and at the Los Angeles County Public Works office, and a virtual scoping meeting was held March 16, 2023 to solicit comments on the proposed project. Consistent with those requirements, the County is only required “to send a notice of preparation...to the Office of Planning and Research and each responsible and trustee agency and file with the county clerk...” This does not require “direct” notice to “well known planning and conservation groups” as alleged in the comment.

Section 15087 of the CEQA Guidelines specifies the form of posting the Notice of Availability (NOA) of a Draft EIR. The NOA for the Draft EIR/EA was released on February 27, 2024, for a 45-day comment period, which then was extended until April 18, 2024, for a total of 52 days. The NOA was published on LA County’s website at: <https://pw.lacounty.gov/projects/the-old-road-over-santa-clara-river/>. It was also filed with the State Clearinghouse and posted on CEQANet at: <https://ceqanet.opr.ca.gov/2023030209/2> and published in The Santa Clarita Valley Signal newspaper on February 27, 2024, March 2, 2024, and April 12, 2024. The NOA also was mailed to property owners within a 100-foot radius of the project limits, as well as to relevant State, local, and regional agencies. A public meeting on the Draft EIR/EA was held in-person and virtually on March 14, 2024, to solicit public input on the proposed project.

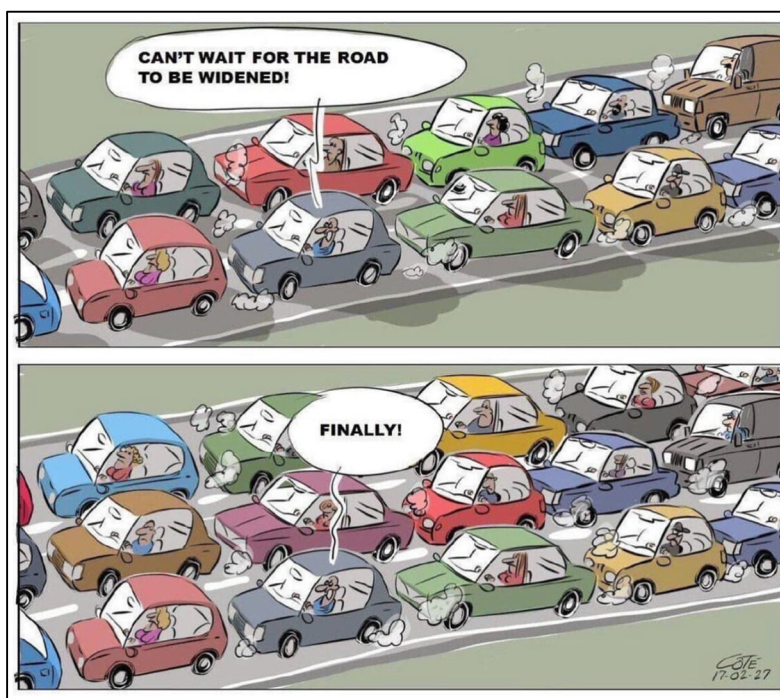
With respect to the “*under-estimation of traffic generation, VMT, greenhouse gases and air pollution*”, please see Responses 8-2 through 8-12 below, which explain that the Draft EIR/EA expressly considered induced VMT and respond to the commenter’s suggested alternatives.

Comment Letter 8-2:

*“Incorrect Analysis of Induced traffic (adding additional lanes) According to the EIR/EA
“Regarding operational emissions, the Build Alternative would result in lower gaseous criteria pollutant (NOx, CO, and ROG/VOC) emissions than the No- Build Alternative and Existing Conditions because of improvements in vehicle delay and turnover of the regional vehicle fleet.”*

*Slight increases in PM10 and PM2.5 emissions are attributed to fugitive dust associated with break wear, tire wear, and resuspended road dust, which combined constitute over 90% of PM emissions from vehicle travel on roadways.” (P.27) This analysis is patently incorrect. According to a report by the CA Air Resources Board, as California continued to expand roadways. Total interstate and principal arterial lane miles in California increased from 58,258 in 2016 to 61,376 in 2019, or by 5.4 percent. While jurisdictions expand roadways for several reasons (e.g., to accommodate cars, freight, safety, carpooling, buses on shoulders), **the research literature shows that added roadway capacity often induces additional VMT and GHG emissions. [emphasis added]**. The SCAG and MTC/ABAG regions added the most in total lane miles, while the KCOG, MCAG, and SACOG regions had the highest per capita lane mile increases from 2016 to 2019, which could increase GHG emissions and VMT in the long term. A paper entitled “Induced Vehicle Travel in the Environmental Review Process”, published by the National Center for Sustainable Transportation, a US DOT University Transportation Center states: “If we expand roadway capacity, more drivers will come, or so economic theory suggests and a substantial body of empirical research now shows. Despite strong evidence, the “induced travel” effect is often ignored, underestimated, or misestimated in the planning process, particularly in the assessment of the environmental impacts of roadway capacity expansions. Underestimating induced travel will generally lead to overestimation of the traffic congestion relief benefits a highway expansion project might generate, along with underestimation of its environmental impacts. A major reason that induced travel tends to be underplayed in environmental analyses is that travel demand models do not typically include all of the feedback loops necessary to accurately predict the induced travel effect. We developed an online tool, based on elasticities reported in the literature, to facilitate the estimation of the induced vehicle travel impacts of roadway capacity expansion projects in California, with potential future expansion to other geographies. We describe the tool, apply it to five case study highway capacity expansion projects, and then compare the results with the induced travel estimates reported in the environmental impact analyses for those projects. Our results suggest that environmental analyses frequently fail to fully capture the induced vehicle travel effects of highway capacity expansion projects.” It appears that is exactly what has occurred in the EIR/EA analysis for this project in order to justify its approval. Further, this incorrect traffic analysis also invalidates the Air Quality and Climate Change/Greenhouse Gas sections as more pollutants will be created over time rather than less.”*

Reference photo used in Comment Letter 8-2:



Response to Comment Letter 8-2:

The commenter states that the Draft EIR/EA fails to evaluate induced travel, and therefore implies errors in the VMT analysis and the air quality and GHG analysis. The commenter references page 27 of the Draft EIR/EA to allegedly prove this point. However, the commenter is quoting the *Executive Summary's* overview of Air Quality Impacts. The Executive Summary is not intended to provide detailed methodology (e.g. induced demand methodology) rather it provides “a brief summary of the proposed actions and its consequences.” (CEQA Guidelines § 15123.)

Contrary to the assertions in the comment, the Draft EIR/EA expressly included induced travel calculations using the Induced Travel Calculator recommended in the commenter letter. This VMT analysis, including induced demand was expressly considered in the air quality analysis, which explained why the magnitude of EPA-projected reductions is so great (even after accounting for VMT growth), that MSAT emissions in the study area are likely to be lower in the future.” (Draft EIR/EA p. 237). Please see Responses 8-2 through 8-12 below, which explain that the Draft EIR/EA expressly considered induced VMT.

Comment Letter 8-3:

“Climate Change and GHG generation by the proposed project As stated above, the project fails to evaluate the “induced demand” in its analysis, thus underestimating the VMT which in turn results in an underestimation of the GHG generation and air quality effects. An idea of how much more traffic will be generated in the future by these additional lanes can be calculated by using The Induced Demand Calculator. The Induced Travel Calculator estimates project-induced VMT using the project length entered by the user, regional lane-mile and VMT data from Caltrans, and estimates of elasticities (the percentage change in VMT that results from a one percent increase in lane-miles) from peer-reviewed studies. The Calculator is freely

available for use here: <https://travelcalculator.ncst.ucdavis.edu/>. The VMT derived from this calculator should have been used to calculate VMT and the resulting GHG generation. Table 3-1 (Page 379) in this section lists several reports that address GHG reduction strategies. **None of these strategies include adding additional traffic lanes [emphasis added]**. While the proposed project may be listed in the SCAG Connect SoCal financially constrained RTP and the SCAG financially constrained 2023 FTIP, contrary to statements in the EIR, the lane additions portion of this project is not consistent with the guiding principles that address land use and transportation investments/strategies. This is due to the EIR/EAs failure to recognize the problem of “Induced Demand” as described in the traffic section above. Principles that are listed in the EIR, but are inconsistent with the proposed project include:

- Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single-occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices (demand will in fact increase); and
- Encourage transportation investments that will result in improved air quality and public health, and reduced GHG emissions. (As described above induced demand results in long term additional VMT and additional GHG and air quality impacts)

In fact, reference to several plans that should have been included, are notably missing [emphasis added]. We note that as of this date there is no approved Los Angeles County Climate Action Plan. The City of Santa Clarita (the other entity participant in the One Valley One Vision) has an outdated Climate Action Plan approved in 2012, but has not complied with the approved requirements of that plan, including updated reports and needed revisions. (See attachment 1 Response to PRA indicating no updates and reports exist). **We believe that this project cannot be approved without these legally required underlying plans which should be providing the GHG reduction strategies for transportation projects [emphasis added]**. On December 15, 2022 California's air board unanimously approved a sweeping state plan to battle climate change, creating a new blueprint for the next five years to cut carbon emissions, reduce reliance on fossil fuels and speed up the transition to renewable energy. Yet this plan is nowhere mentioned in the current EIR/EA. We believe that omission is due to this documents non-conformance with that plan. The EIR/EA also leaves out several sources of GHG. These must be calculated and included in the analysis and mitigation. They include but are not limited to:

- The additional concrete that will be required to replace bridge abutments and pavement. (The EIR states that Implementation of the Build Alternative would result in a net increase of approximately 43 acres of impervious area, a substantial amount in addition to the replacement of current paving. p.16)
- The removal of 18 oaks. Please calculate the loss of carbon sequestration provided by these trees. Young trees do not replace to sequestration value of older trees.

We do not concur with the conclusion on EIR/EA page 388 that no operational mitigation for Air Quality or GHG is required because the full impact as described above has not been calculated.

*Further, the failure to calculate induced demand which will increase VMT may require additional mitigation for project impacts beyond operational impacts, but we cannot know this because the data was not included in the EIR. **These issues must be addressed [emphasis added].***

Response to Comment Letter 8-3:

The comment alleges that the VMT analysis, and interrelated resources areas, fail to evaluate induced VMT demand, and suggests the Draft EIR/EA analysis be revised using the induced VMT calculator from NCST. As noted in Response 8-2, this opinion appears to be based upon the commenter reading an excerpt of the Executive Summary, and not the detailed VMT analysis.

Contrary to the commenter's assertions, the Draft EIR/EA expressly included an induced VMT demand analysis using the National Center for Sustainable Transportation-Induced Travel Calculator (NCST Calculator), i.e. the calculator referenced in the comment. (See Section 2.2.8 of the EIR/EA). More specifically, the Draft EIR/EA pages 182-183 state:

Transportation studies consistently show that adding roadway capacity increases network-wide VMT by a nearly equivalent proportion within a few years, reducing or negating any initial congestion relief. *That increase in VMT is called "induced travel."* In order to calculate induced travel VMT, *the National Center for Sustainable Transportation-Induced Travel Calculator (NCST Calculator) is used.* The induced VMT results derived from the NCST Calculator are shown in Table 2-32, which shows the induced VMT for the Build Alternative. The total lane miles added by the Build Alternative is 4.12. The induced VMT is 9.7 million additional VMT per year in the regional area (Los Angeles County), which results in a total 26,575 VMT per day.

The induced VMT results derived from the NCST Calculator were added to the VMT changes between baseline and Build conditions calculated from the regional travel demand model. This combined VMT provides a conservative approach to assess the project level and cumulative level VMT impacts. Caltrans included the National Center for Sustainable Transportation-Induced Travel Calculator (NCST Calculator) in its 2020 Transportation Analysis Framework as a method to estimate – or at least benchmark – induced VMT, since the NCST Calculator allows users to estimate the VMT induced annually as a result of expanding the capacity of publicly owned roadways. Induced VMT is calculated by the following equation.

Induced VMT = % Changes in Lane Miles × Existing VMT × Elasticity

The elasticity factor used by NCST Calculator is currently 0.75 for Class II other freeways and expressways and Class III other principal arterials. Consequently, the Project's VMT analysis, Air Quality analysis, and Greenhouse gas analysis expressly considered induced VMT.

The comment also alleges the Project is inconsistent with SCAG's Connect SoCal (i.e., the Regional Transportation Plan/Sustainable Communities Strategy) because the project will add vehicular lanes and because of the lack of induced demand analysis. As noted above, an induced demand analysis was performed. Furthermore, the commenter concedes that the project is expressly listed in SCAG's Connect SoCal's FTIP (i.e., Federal Transportation

Improvement Program). As also discussed in the Draft EIR/EA, the goals of the RTP/SCS are not as narrowly drawn as alleged by the commenter:

Connect SoCal includes more than 4,000 transportation projects, ranging from highway improvements to railroad grade separations, bicycle lanes, new transit hubs, and replacement bridges. These future investments were included in county plans that were developed by the six CTCs, all seeking to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices. The goals of Connect SoCal are to: 1) encourage regional economic prosperity and global competitiveness; 2) improve mobility, accessibility, reliability, and travel safety for people and goods; 3) enhance the preservation, security, and resilience of the regional transportation system; 4) increase person and goods movement and travel choices within the transportation system; 5) reduce greenhouse gas emission and improve air quality; 6) support healthy and equitable communities; 7) adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) encourage development of diverse housing types in areas that are supported by multiple transportation options; and 10) promote conservation of natural and agricultural lands and restoration of habitats. (Draft EIR/EA pp. 102.)

The Draft EIR/EA also found the Project consistent with the RTP/SCS. (See Draft EIR/EA pp. 109-111.) As also discussed in SCAG's November 2, 2023 Notice of Availability for "the draft 2023 FTIP Amendment #23-26. Federal requirements stipulate *that the FTIP must be consistent with the new RTP. The 2023 FTIP Amendment #23-26 fulfills this requirement.*" That draft 2023 FTIP was subsequently adopted.⁸ With the inclusion in the FTIP, the Project was found consistent with SCAG's Connect SoCal.

The comment also alleges that the project cannot be approved without an approved Climate Action Plan. A Climate Action Plan is not a mandatory planning document and does not preclude adoption of the Project. The commenter further alleges that the Draft EIR/EA fails to discuss CARB's 2022 Scoping Plan, and alleges the Project is inconsistent with that Plan. While not clearly articulated, this alleged inconsistency appears to be premised upon the commenter's mistaken belief that an induced VMT analysis was not performed, and the mistaken belief that all roadway projects are inconsistent with the Scoping Plan. Contrary to the assertions in the comment, the 2022 Scoping Plan was discussed in the Draft EIR/EA on pp. 376–379. Furthermore, no policy is in the Scoping Plan, which precludes new roadways/vehicular lanes. The commenter does not identify any actual policy inconsistencies with CARB's 2022 Scoping Plan; therefore, no further response is feasible.

The commenter also alleges that the Draft EIR/EA "leaves out several sources of GHG" allegedly "additional concrete that will be require to replace bridge abutments and pavement" and "removal of 18 oaks." Concrete manufacturing is regulated by the state of California regarding GHG emissions and thus the California Air Resources Board establishes GHG policy

⁸ SCAG FTIP Consistency Amendment #23-26: <https://scag.ca.gov/sites/main/files/file-attachments/23-26-la-finalcomparison.pdf?1698948634>

and regulations for such industrial facilities within the context of promoting GHG reductions across the state. The standard methods of quantifying GHG emissions for construction or operations is to focus on the direct emissions from equipment and to not include such upstream emissions in project analyses. This is consistent with the approach in the state GHG emissions inventory, which does not include upstream emissions, with the exception of electricity generation emissions associated with imported electricity. This is also consistent with the methodology and practices included in the recommended construction emissions modeling tools, including Road Construction Emissions Model (RCEM), California Emissions Estimator Model (CalEEMod), and the Caltrans Construction Emissions Tool (CAL-CET).

In addition, as shown in Table 3-3 of the EIR-EA, the Build Alternative would result in lower emissions compared to the No-Build Alternative because of improvements to traffic operations to be consistent with LACPW highway design speed safety standards and reductions in vehicle delay at study area intersections. Specifically, in the opening year (2028) scenario, the Build Alternative would result in approximately 231 MT CO₂e fewer emissions than the No-Build Alternative. In the design/horizon year of 2048, the Build Alternative would result in 944 MT CO₂e fewer emissions than the No-Build Alternative. Therefore, the project would result in a GHG emissions benefit.

Implementation of the project would require the removal of 15 valley oak trees; however, pursuant to Section 22.56.2050-2260 of the Los Angeles County Oak Tree Ordinance and as required by the compensatory mitigation measure OAK-8, all oak trees removed will be replaced by a tree of the same species at a ratio of 2:1. Therefore, the potential loss in carbon sequestration associated with the removal of the 15 trees would be offset by the sequestered carbon that would occur over the lifetime of the replacement trees. Nonetheless, in order to address the commenter's concern regarding the potential loss in carbon sequestration, the analysis quantified the sequestered carbon dioxide emissions for the existing 15 trees that would be removed with implementation of the proposed project. According to the iTree Planting Calculator (version 2.7.0), the 15 trees sequester approximately 72.36 MT CO₂ of carbon dioxide emissions over their projected lifetime. The ultimate release of the sequestered carbon dioxide is largely dependent on whether the trees are harvested into wood products, buried, or burned and/or allowed to decay. For example, as noted by the U.S. Department of Agriculture Office of Sustainability & Climate (<https://www.fs.usda.gov/managing-land/sustainability-and-climate/carbon>), when trees are harvested for wood products, the carbon within them is preserved in these products and remains stored, not released into the atmosphere. Therefore, the sequestered carbon in the trees that would be removed would not necessarily be immediately released into the atmosphere. However, for conservative purposes, even if these emissions were directly released as a result of tree removal, the Build Alternative would still result in a GHG emissions benefit compared to the No-Build Alternative under both opening year and horizon year conditions. Therefore, no additional analysis or change to the EIR/EA conclusions regarding this topic are required.

Comment Letter 8-4:

“Wildfire – The statement on page 391 “Similarly, the additional lanes as part of the proposed project would act as firebreaks and reduce vegetation that is prone to wildfire. The proposed project would ultimately expand the existing facilities in the proposed project area and would not exacerbate wildfire risks.” Reducing natural vegetation is not a goal of this project and contrary to state law as embodied in Wolk SB1386 cited in footnote 6 below. Also, the last major fire in the area, jumped the 8 lanes of the freeway and The Old Road due to wind-driven embers (footnote 6). Roads offer no protection in the wind-driven wildfires that have occurred recently in Santa Clarita.” Footnote 6: <https://www.dailynews.com/2017/12/05/newly-ignited-rye-fire-in-santa-clarita-forces-closure-of-5-freeway-near-magic-mountain/>

Response to Comment Letter 8-4:

As stated in Section 3.2, operation of the proposed project would not exacerbate wildfire risks or result in temporary or ongoing impacts on the environment. The comment provides no evidence to the contrary, other than noting that fires have jumped up to 8 lanes of the freeway. However, it is not the purpose of CEQA to fix existing environmental deficiencies. (*Watsonville Pilots Association v. City of Watsonville* (2010) 183 Cal.App.4th 1059 [“The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope”]; *Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal. App. 5th 161, 193–95 [Project in wildfire hazard zone did not exacerbate impacts].) Furthermore, although the proposed project area is susceptible to wildfire risks, standard construction practices and regulatory safety compliance measures will be implemented. For example, the California Public Resources Code (PRC) includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that use an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas. These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC § 4442)
- Appropriate fire suppression equipment would be maintained during the highest fire danger period—from April 1 to December 1 (PRC § 4428)
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain the appropriate fire suppression equipment (PRC § 4427)
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 ft of any flammable materials (PRC § 4431)

Regarding wildfire concerns provided by the commenter, Section 3.2 – Wildfire of the joint Draft EIR/EA addresses this comment.

Comment Letter 8-5:

“Biological impacts -- We note that both USFWS and CDFW are cooperating agencies on this Draft EIR/EA, and urge CalTrans and County Public Works to ensure that these agencies are given full license to enforce restrictions that protect and benefit the essential wildlife flora and fauna of Santa Clara River. We hope that they were not simply added as token checkbox on legal requirements. The increasing reduction of freedom of movement for air, water and terrestrial animals is already causing risk to wildlife species health, biodiversity, and for an increasing number pushed to the point of extinction. While the EIR/EA preparer attached a letter from USFW Ventura Office in Appendix F that provides a list of endangered species in the area, it did not include the recent U.S. Fish and Wildlife Proposal to list both Species of Western Pond Turtle under the Endangered Species Act. The southwestern pond turtle may occur in the project area.”

Response to Comment Letter 8-5:

Impacts on Biological Resources is provided on Draft EIR/EA Sections 2.4 and 3.1, *Biological Resources* (pp. 340-343), including discussion of migration corridors (Section 2.4.1). Adding a regulatory label to a species (i.e. the potential listing under the FESA) is not new information which triggers recirculation. (See *Fund for Environmental Defense v. County of Orange* (1988) 204 Cal.App.3d 1538 [Adjacent property subsequently designated as wilderness park did not result in supplemental CEQA review.].) While Southwestern Pond Turtle (*Actinemys pallida*; WPT) was not included in the January 2024 USFWS Official Species List, WPT was addressed in the impact analysis of the Final EIR/EA, Section 2.4.5. Focused WPT surveys conducted in 2023 resulted in the observation of WPT in a drainage connected to the Santa Clara River, and therefore the species is assumed present in the project area (see Table 2-54 in Section 2.4.4). Since the species is present, AMMs WPT-1 and WPT-2 will be implemented by the project to reduce the risk of impact on WPT to less than significant levels.

Comment Letter 8-6:

“Oaks - Oaks are an important and beloved native species, that are protected by County and City of Santa Clarita Ordinances. The project proposes to remove 18 oaks, mostly rare Valley Oaks, including two heritage oaks estimated to be over 300 years old. Yet no map of the oak trees to be removed was included in the EIR/EA so that avoidance suggestions by the public can be made. Although the EIR/EA states that an oak report was completed in 2019, it is not included in the Appendix as is the normal practice. Thus, we cannot know if the report accurately discloses all oaks. This failure also precludes the public's ability to make suggestions as to avoidance. Additionally, we believe this report may have been completed for a different project since it was completed well before the signed 2022 MOU and is not included in the list of Technical Reports in Appendix B. There is no indication that any oak tree permits have been issued as required by the County for oak removals, nor has a hearing been scheduled for removal of heritage oaks as required by the County Oak Ordinance.

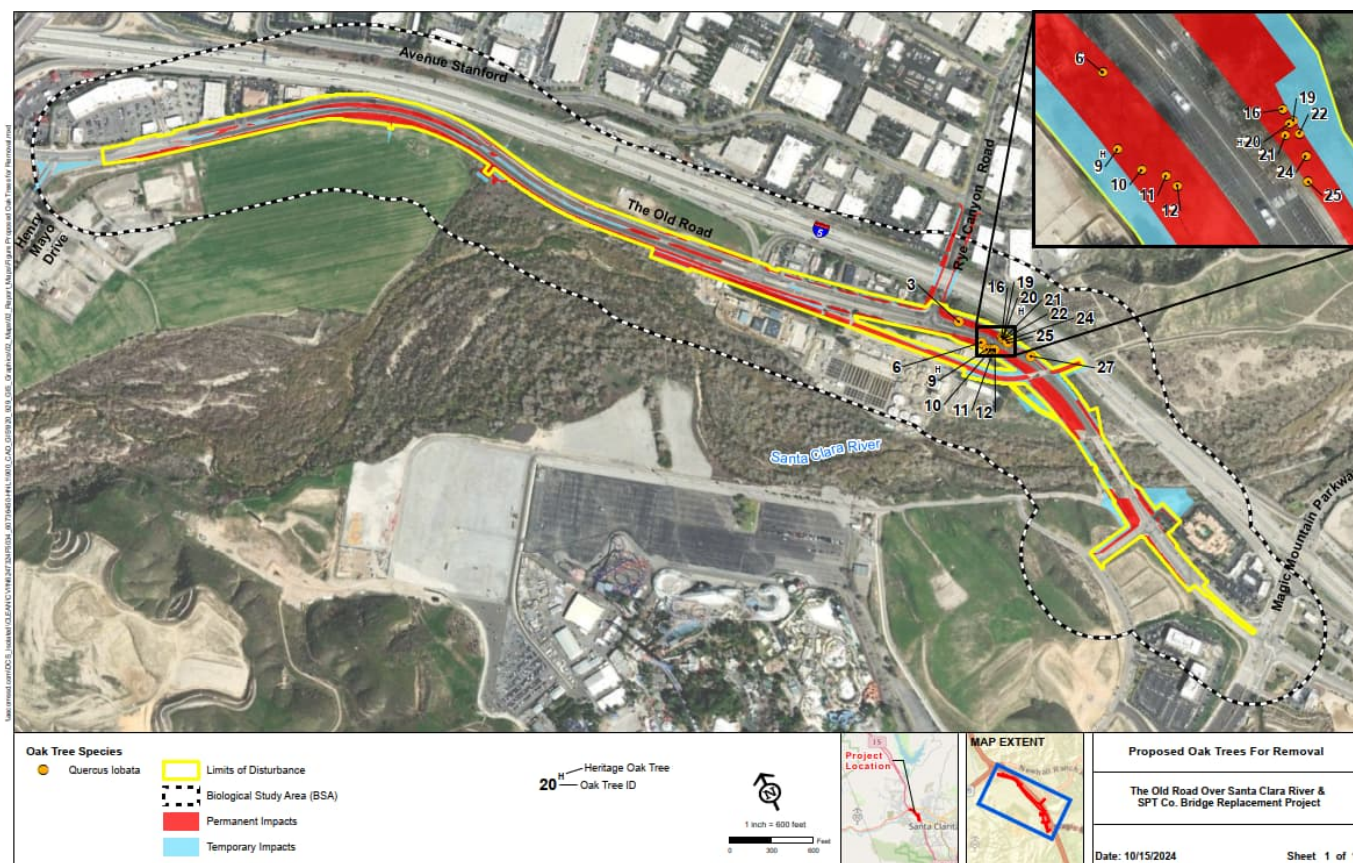
- ***Failure to provide any meaningful information about these important and rare trees to be removed from a County designated Significant Ecological Area is an EIR/EA deficiency [emphasis added].***

We maintain that more traffic will also have additional impacts to the vegetation, specifically trees in the river channel from the lane widening. Native Californian riparian and oak woodland trees play a vital role in the health of our floodplains. Phytoremediation, the benefit that trees give our climate by cleaning air, soil and water is lessened by a greater load than they can tolerate. They clean our air and balance climate via their contribution to the passage of air and water through the Santa Clara River riparian corridor and are an essential part of the river and the wildlife that have called it home for thousands of years. "Trees play an important role in maintaining the ecological balance, pollution reduction and lessening the burden of pollutant by absorbing pollutants. However, trees in urban cities are growing in a severe stressful environment due to incomplete burning of fossil fuel and badly maintained vehicles resulting shorten life span of plant. The growth of plants could be affected by several reasons and one of them is the presence of toxic pollutants derived from the auto vehicular exhaust emission."

Response to Comment Letter 8-6:

Under the Build Alternative, there are 15 valley oak trees proposed for removal, of which, two are heritage trees under the Los Angeles County Oak Tree Ordinance (Section 2.4.3. of the Final EIR/EA, p. 343). AMM OAK-1 through OAK-8 are included to avoid, minimize, and mitigate impacts on the oak trees as feasible during construction. Specific to heritage oak trees, per AMM OAK-8, All heritage trees that will be removed will be replaced at a 10:1 ratio. The 2019 Oak Tree Report was completed for the project and contains figures of the oak tree locations in relation to the project area. The 2019 Oak Tree Report was sent originally sent to the commenter on April 15, 2024, and also sent again as part of the Public Records Act (PRA) request. SCOPE acknowledged that they received it when it was received. (See Response 9-1). The County will comply with all applicable permits and procedures after the final design stage of the project, prior to construction; the hearing has not yet been scheduled.

The commenter faults the Draft EIR/EA for not providing "map of the oak trees to be removed." The level of detail for baseline conditions is controlled by CEQA Guidelines Section 15125(a), which explains that "The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project." The information requested by the commenter was not necessary to analyze the impacts of the Proposed Project. Nevertheless, below is a figure of the oak trees in the project area proposed for removal.



The commenter further alleges “more traffic will also have additional impacts on the vegetation, specifically trees in the river channel from the lane widening.” The commenter does not opine upon the content of the Draft EIR/EA’s Biological Resource analysis, which is provided in Draft EIR/EA Sections 2.4 and 3.1, *Biological Resources* (pp. 340-343), including discussion of impacts on different vegetation communities (Section 2.4.1).

Comment Letter 8-7:

“Birds - USFW letter attached in Exhibit F provided considerable links regarding migratory birds and protections afforded them. That is because at least two endangered migratory birds are present in the project area. These include the Southwestern Willow Fly Catcher and the Least Bell’s Vireo. The Yellow-billed Cuckoo is also listed as occurring in this area. Nesting sites of these endangered migratory birds must be avoided. That means scheduling any construction in a manner that avoids nesting season. Scheduling construction to avoid nesting season must be included as a mitigation measure.” Highways cause significant impacts to birds in four ways: direct mortality, indirect mortality, habitat fragmentation, and disturbance.” We request that you include a discussion of these impacts in the EIR/EA document and include mitigation measures to address and reduce these impacts (as found in the reference for footnote 9). The devastating consequences of giving more room for increased traffic as proposed by this project include threats to birds from collision with road vehicles: “Collisions with vehicles are believed to be among the top five direct causes of bird mortality in the United States. A recent study estimated

that between 89 million and 340 million birds die annually in vehicle collisions on U.S. roads.”. The EIR/EA should have disclosed this impact. Increased vehicular traffic also increases threats to birds from traffic noise. In 2016, Caltrans produced a 96-page document “Effects of Traffic Noise and Road Construction Noise on Birds.” The opening abstract states: “There is a long-standing concern that roadway construction noise and subsequent traffic noise may be detrimental to wildlife, and especially birds, which relies heavily on acoustic communication. The Endangered Species Act provides additional, compelling, motivation for understanding the effects of traffic and construction noise on federally listed bird species that are in danger of extinction. Effects of construction and/or traffic noise may be nonexistent in certain circumstances, such as when the level of these noises is below natural ambient noise levels, and insignificant in other circumstances, such as when the noise adds very little to existing ambient noise levels. In contrast, construction or traffic noise that adds significantly to natural ambient noise has the possibility of producing a suite of significant short- and long-term behavioral and physiological changes in birds. These may include changes in foraging location and behavior; interference with acoustic communicate between conspecifics; failure to recognize other important biological signals, such as sounds of predators and/or prey; decreasing hearing sensitivity temporarily or permanently; and/or increasing stress and altering steroid hormone levels. Any of these effects could have long-term consequences and enduring impacts that include interference with breeding by individuals and populations, thereby threatening the survival of individuals or species.” In spite of this being CalTrans own document and CalTrans considering a project in an area with three listed endangered species, **none of this was disclosed in the EIR/EA [emphasis added]**. Increasing the amount of traffic also increases threats to birds from increased lighting. “Lighting can attract large numbers of night-migrating birds from as far as 5 kilometers away. Birds can become entrapped in these areas of bright lights, circling endlessly, depleting energy stores needed for migration, and even colliding with buildings and infrastructure. This phenomenon is particularly prevalent on nights with low-cloud ceilings or foggy weather, when birds tend to migrate at lower altitudes where light reflecting on clouds can be disorienting. Multiple mass-mortality events, each involving hundreds of birds, have been documented on foggy nights during migration.”¹³ This impact was not disclosed in the EIR/EA. Although the document does provide a requirement that lighting be pointed downward, we believe other mitigation would have been suggested if the impact had been disclosed. Our position is that all birds including endangered species, should be protected before being further affected and harmed by increased traffic. While mitigation measures are suggested by USFWS in current outreach, none of these serve to prevent the loss of collisions or flight paths being polluted by noise, exhaust and density of mechanical occupation. In every wildlife agency recommendation list, one finds the suggestion to modify landuse planning to protect against these factors. We are standing for the landuse measure in this case, and therefore do not support the road widening which enables more of these severe dangers to wildlife. The wildlife agencies and other biological monitors must be given full support for all wildlife protection mitigation in the sensitive area of the Santa Clara River.

Response to Comment Letter 8-7:

The commenter requests the Draft EIR/EA analyze impacts on migratory birds and nesting sites. This analysis has already been performed and included in the Draft EIR/EA. Impacts on birds and associated nesting, are discussed in Section 2.4.4 Avoidance and minimization measures detailed in Section 2.4.5 (GEN-1 to GEN 15 and RIP-1 to RIP-3) would be implemented and provide impact avoidance for non-listed birds including those protected by the Migratory Bird Treaty Act. In particular, to remain in compliance with the Migratory Bird Treaty Act, pre-construction nesting bird surveys prior to vegetation clearing or grubbing during the avian breeding season will reduce the potential for injury or mortality to nesting birds. Furthermore, conducting ground-disturbing activities outside of the avian nesting season or noise monitoring for loud construction activities may be necessary if done during the avian nesting season.

In regard to noise impacts on birds, construction noise would be short-term, intermittent, and overshadowed by local traffic noise. During operations of the expanded road, vehicle noise will be moved slightly close to the Santa Clara River (because of the expanded road); however, noise levels are not expected to significantly increase above current baseline levels.

The commenter also asserts impacts on biological resources because of an alleged increase in vehicular VMT because of collisions with animals and lighting. As discussed in Responses 8-2 and 8-3, these comments appear to rely upon the incorrect premise that the Draft EIR/EA did not consider induced VMT. As noted above, induced VMT was considered, and the project is anticipated to result in an overall reduction in total VMT, as discussed on Draft EIR/EA p. 176. The commenter also does not take into consideration that the project is being proposed in connection with an existing roadway, which is already subject to motor vehicles, and their associated lighting. Indeed, identical arguments were rejected in *National Parks and Conservation Ass'n v. County of Riverside* (1999) 71 Cal.App.4th 1341 ["The opponents complain that the information in the EIR about night lighting only covers the townsite buildings and does not deal with such issues as increased car headlights...The EIR sets forth a realistic assessment of existing night lighting in the area and concludes that the projected expansion of the townsite will not make much difference. This was a reasonable conclusion *in light of the already developed nature of the townsite*, and the County had an adequate basis for finding no significant impact in this particular respect."] Similar arguments regarding nighttime lighting impacts on biological resources were also recently raised and rejected by the Court of Appeal in *Coronado Citizens for Transparent Government v. City of Coronado* (2024; 4th District Case No. D082360 [Concluding impacts would not be significant, due in part to the fact that "the project site is in a developed area near a highway and bike path, both of which are lit."].

Furthermore, the Draft EIR/EA considered potential impacts on biological resources from lighting and noise, including those associated with construction and operation. (See Draft EIR/EA p. 265-266.)

During construction, per AMM GEN-12, lighting will be of the lowest illumination necessary for human safety, will be diverted away from any native vegetation communities, and will consist of low-sodium or similar lighting equipped with shields to focus light downward onto the

appropriate subject area. During operations, per AMM LION-2, any permanent streetlights installed on The Old Road Bridge or along the west side of The Old Road where it is adjacent to the Santa Clara River will be shielded so that light does not directly glare into native habitat within the Santa Clara River.

Comment Letter 8-8:

“Fish - The site is home to two listed endangered fish., the Unarmored Three-spined Stickleback and the Arroyo Chub. It may be the last population of UTS in existence. These species are affected by silted water and other water pollution, and of course would be exterminated by dewatering in the area. The EIR/EA does not fully discuss impacts to these endangered fish and how they will be protected if project construction proceeds.”

Response to Comment Letter 8-8:

The project was specifically designed to avoid dewatering to avoid impacts on arroyo chub and UTS. AMMs UTS-1 to UTS-2 will be implemented to avoid impacts on both arroyo chub and UTS. Per AMM UTS-2, work activities will be conducted in a way to ensure no surface water contact, and a biological monitor will be present during all ground disturbing activities when near the Santa Clara River. Vegetation trimming and removal will be conducted in a way to prevent contact with surface water, and BMPs will be placed along the length of the Santa Clara River to ensure no inadvertent spills, erosion, or sedimentation occurs.

Comment Letter 8-9:

“Other Reptiles, amphibians and plants - We are concerned that surveys for these species did not follow required protocols since the EIR/EA does not fully disclose time of day and appears to rely on surveys only done in 2023. There is existing literature from other EIRs in the County's possession which indicate the presence of other listed species. We are particularly concerned about the pond turtle, whose status was just re-opened for review, since we don't see surveys for it in the document. The reach of the Santa Clara River over which this project passes, is not in isolation. Negative human effects on its ecology in this stretch, continue downstream and cause animals upstream to be disconnected. In addition to the species mentioned by USFWS, 25% of California's endemic plant species are in found in this region. Some may not yet be listed as threatened or endangered but only due to the fact that investment in studies is not as great as investment in human transportation or consumption needs. It is very likely that many plants, native to this area of the Santa Clara River are either no longer present or in swift decline. This rich native biodiversity is not limited only to plants, it is a system of animals, insects, watershed hydrogeology and climate. Projects such as widening a lane of traffic from 2 to 3 lanes, may seem like an insignificant addition; but, in fact it is a part of the slow destruction of our natural ecological systems. We are putting one of the richest areas of biodiversity in the world at risk. This biodiversity is not limited to only plants, it is a system of animals, insects, hydrogeology and more. Adding more and more opportunity for human sprawl that requires infrastructure to support cars, chemicals, use of natural resources to make and power them is

the definition of how to endanger all these aspects of ecological diversity which ultimately harms humans too. Once this is gone, it is gone. Rivers themselves are becoming endangered. The Santa Clara River is already the Southern California's largest river system that remains in a relatively natural state. Relatively here, is a vital word. All conservation measures are needed to not only maintain that but more vitally, restore its ecological health and protection. Mitigation for this proposed work cannot be the simple pass for impacts that can damage more than mitigation may be able to rehabilitate."

Response to Comment Letter 8-9:

The commenter raises concerns about the biological surveys, due in part to their mistaken belief that the Draft EIR/EA did not prepare surveys for "the pond turtle."

As discussed in Response 8-5, Impacts on the Southwestern Pond Turtle (*Actinemys pallida*; WPT) was included in the focused WPT surveys conducted in 2023, which resulted in the observation of WPT in a drainage connected to the Santa Clara River, and therefore the species is assumed present in the project area. (Draft EIR/EA Table 2-54 in Section 2.4.4, and 2.4.5) Table 2-46 in the EIR/EA includes a summary of the biological surveys conducted for the project and Section 2.4.5- Threatened and Endangered Species includes information regarding the focused surveys conducted. In addition, the detailed survey can be found in the Natural Environment Study (January 2023).

The general measures GEN-1 through GEN-15 and southwestern pond turtle-specific measures WPT-1 and WPT-2 would be implemented. These measures would reduce potential impacts on non-listed special-status reptile and amphibian species. In addition, consultation with USFWS has concluded and a Biological Opinion was issued on August 30, 2024. All appropriate avoidance, minimization, and/or mitigation measures have been incorporated herein.

Comment Letter 8-10:

"Aesthetics - Included in the Conservation and Open Space Element of the Santa Clarita Valley Area Plan, are policies generally protecting visual aesthetics of the surrounding mountains, but Policy CO- 6.6.1 speaks to light pollution. The policy is to "Enhance views of the night sky by reducing light pollution through use of light screens, downward directed lights, minimized reflective paving surfaces and reduced lighting levels, as deemed appropriate by the reviewing authority" We do not agree that, as stated in the CEQA EIR/NEPA EA "The proposed project area is not designated as, or considered eligible to be considered as, a scenic resource by the County of Los Angeles or the State of California (Caltrans 2018)." However, below the sightline, the Santa Clara River is of equal value and vital habitat for native natural wildlife systems."

Response to Comment Letter 8-10:

The proposed project area is not designated as, or considered eligible to be considered as, a scenic resource by the County of Los Angeles or the State of California. VIS-1 has been incorporated to minimize potential lighting effects and would include directional lighting aimed downward at the construction site during proposed project construction where appropriate. Please see Response 8-7 for additional discussion of lighting.

Comment Letter 8-11:

“Inadequate Alternative - analysis Alternatives are important to ensure that the best project is built and that the greatest number of societal needs are met. We have never reviewed an EIR/EIS such as this that provides only for the project itself or no project and believe this is an insufficient level of analysis. We agree with CDFW that there should be a variety of alternatives and ask that the County and other lead agencies should provide an appropriate array of alternatives to properly evaluate this project, including those that would reduce impacts in this sensitive area, help meet the County's climate action goals and reduce VMT and air pollution. They should include:

- A project where no additional lanes are added, but with the addition of a bike and pedestrian lane.*
- A project where one additional lane is added that can be reversed with the flow of traffic.*
- A project where only the bridge is replaced*
- A project that reduces oak removals, especially the historical heritage oak located close to the north west corner of Magic Mountain Parkway and The Old Road.*

Response to Comment Letter 8-11:

The commenter asserts that they “have never reviewed an EIR/EIS such as this that provides only for the project itself or no project and believe this is an insufficient level of analysis.” An identical alternatives analysis was recently upheld in *Save Our Access San Gabriel Mountains v. Watershed Conservation Authority* (2021) 68 Cal.App.5th 8, 29-33. In that case, the Court of Appeal rejected a challenge to alternatives analysis which “fully analyzed two alternatives the project and ‘no project.’” In rejecting Petitioner’s challenge to that alternatives analysis, the Court of Appeal explained “Here, the project’s intent is ‘to provide recreational improvements and ecological restoration,’ focusing ‘on reducing impacts along the most heavily used section of the river.’ Plaintiff has not shown it is “manifestly unreasonable” to analyze only the project and the ‘no project’ alternative.”

Similarly, the Project’s objectives here include but are not limited to: (1) Replace and upgrade the FHWA-designated Structural Deficient Santa Clara River Bridge to a status of good condition, (2) Reduce forecasted traffic congestion and increase regional roadway capacity on The Old Road and adjacent roadway system to accommodate projected growth in the area, and (3) Provide an emergency overflow route on The Old Road to enhance safety for the adjacent roadway system that would support Operation Snowflake, an effort implemented by the California Department of Transportation (Caltrans), the California Highway Patrol, and local partner agencies in response to emergency closures of Interstate 5, by providing an alternative route when the I-5 experiences full closures because of snowy and icy conditions, (4) Alleviate current congestion on The Old Road and the adjacent roadway system, (6) Enhance traffic flow and roadway safety on The Old Road and adjacent roadways.

As described in the Final EIR/EA Section 1.3.5, the project evaluated a number of project alternatives that were ultimately eliminated because of constructability, non-standard design issues, cost, or other reasons.

Regarding the commenter's suggestions, they provide no evidence these recommendations would reduce or avoid a significant environmental impact. Furthermore, the suggestions are not considered potentially feasible, due in part to their failure to meet most of the project objectives. For example, the commenter first recommends "A project where no additional lanes are added, but with the addition of a bike and pedestrian lane." These would meet none of the project objectives identified above.

The commenter also requests an alternative "where one additional lane is added that can be reversed with the flow of traffic." The commenter provides no evidence this recommendation would reduce or avoid a significant environmental impact. In addition, reversible lanes were considered infeasible for this project since reversible lane systems are not suited for suburban roadways that have access points to nearby businesses or shopping districts such as The Old Road. They can compromise the safety of drivers because of the lack of public awareness and complex operations. Reports suggest an increase of vehicle collisions in areas where reversible lanes are implemented.

Furthermore, this would not accomplish the project objectives identified above and would in fact result in increased environmental impacts on the creation of hazardous conditions from the reversal of traffic flow and increased driver confusion.

The commenter requests an alternative "where only the bridge is replaced." As discussed in Section 1.3.5, this scenario was rejected "because of its failure to meet Los Angeles County's Highway and Bikeway Master Plan objectives." It also fails to meet most of the project objectives identified above.

The commenter also requests an alternative "that reduces oak removals, especially the historical heritage oak located close to the northwest corner of Magic Mountain Parkway and The Old Road." This is a goal, not an alternative. *South of Market Community Action Network* (2019) 33 Cal.App.5th 321, 345 ["Moreover, while they argue the City unreasonably failed to consider their proposed 'Community' and 'Zero-Parking' alternatives, plaintiffs did not meet their burden to show those alternatives were feasible and adequate because they were capable of attaining most of the basic objectives of the project. The proponents of the 'Community Preferred Project Alternative' submitted only general descriptions of the proposed alternative."]. Furthermore, mitigation measures have been proposed to reduce impacts on less than significant associated with oak tree removal.

Comment Letter 8-12:

"Conclusion - As stated in the opening paragraphs, we oppose the lane additions proposed by this project because they will only serve to increase traffic impacts in future years through "Induced Demand", an impact which was not discussed in the EIR/EA. Additionally the project would have severe biological impacts to endangered species in the area of the Santa Clara

River which is also a Count Significant Ecological area. The number of heritage and rare Valley Oaks slated for removal is unacceptable. This document is deficient in many areas as described above. We request that these deficiencies be address and a new document recirculated. The new document should include a broader range of alternatives as well as the missing information that is normally provided in environmental documents, including but not limited to the initial study and the comment letters from agencies and the public on the Notice of Preparation. Last, we do not think an EA was the appropriate Federal document for a project such as this based on the number of endangered species and the extent of the potential impacts on those species. Compliance with NEPA would require an EIS. We look forward to working with the agencies to make this a better project."

Response to Comment Letter 8-12:

Please reference Responses 8-3 and 8-4 which address the commenter's assertions related to induced VMT, which was discussed in the Draft EIR/EA. Please reference Responses 8-5 through 8-10, which address the commenter's assertions related to Biological Resources and Oak trees. Please reference Responses 8-11, which addresses the commenter's assertions related to Alternatives.

The commenter also faults the Draft EIR/EA for not including (1) a copy of the Notice of Preparation (NOP) and agency comments thereto, and the Initial Study. None of these documents are mandatory components of the Draft EIR/EA. There is no obligation to prepare an initial study. (CEQA Guidelines § 15063(a).) A copy of the NOP was included as Appendix E to the Draft EIR/EA, and comments received on the NOP were summarized on Draft EIR/EA p. 393. Nevertheless, comments received on the NOP are available on the project website at: <https://pw.lacounty.gov/projects/the-old-road-over-santa-clara-river>.

Comment Letter 9

From: SCOPE <exec-scope@earthlink.net>

Sent: Monday, April 15, 2024 4:54 PM

To: Hank Fung <HFUNG@dpw.lacounty.gov>

Subject: Re: The Old Road over Santa Clara River and Southern Pacific Transportation Company Bridge, et al Project, Public Review Period Extension

CAUTION: External Email. Proceed Responsibly.

Thank you Hank. Has the DEIR changed? Did you receive the comment we filed on Thursday the 11th? Would you please provide the Oak Tree report, which was not included with the DEIR?

Comment
9-1

Just out of curiosity, why was the comment period extended?

Lynne Plambeck

From: SCOPE <exec-scope@earthlink.net>

Sent: Tuesday, April 16, 2024 9:32 AM

To: Hank Fung <HFUNG@dpw.lacounty.gov>

Subject: RE: The Old Road over Santa Clara River and Southern Pacific Transportation Company Bridge, et al Project, Public Review Period Extension

CAUTION: External Email. Proceed Responsibly.

Thank you for providing the oak report. We note that there are no photos of the oaks proposed for removal and no map of removals. Just FYI - this report will not be sufficient to apply for a County oak tree permit. Have you done that already?

Also, would you please provide the "Project-level conformity analysis" mentioned in the revised NOA. and the air quality and noise reports listed as Technical reports for this EIR. We are all wondering why these weren't included in the EIR as appendices or posted on your website.

Comment
9-2

Thank you for your time and help.

Lynne Plambeck

661 255-6899

Commenter: Lynne Plambeck, Resident, Santa Clarita Organization for Planning and the Environment (SCOPE)**Date of Letter: April 15, 2024****Comment Letter 9-1:**

"Thank you Hank. Has the DEIR changed? Did you receive the comment we filed on Thursday the 11th? Would you please provide the Oak Tree report, which was not included with the DEIR? Just out of curiosity, why was the comment period (period) extended?"

Response to Comment Letter 9-1:

Ms. Plambeck was responded by Los Angeles County Public Works Senior Civil Engineer, Hank Fung, on April 15, 2024, which follows: "The DEIR has not changed. We received your comment on April 11 and sent the extension notice to all parties who commented by email. The period was extended because of requests from regulatory agencies for additional time. I will check on the Oak Tree Report referenced in the document, dated June 2019. Thanks."

The Oak Tree Report was sent originally on April 15, 2024, and also sent again as part of the Public Records Act (PRA) request. SCOPE acknowledged that they received it when it was received. Please also see Response 8-6.

Comment Letter 9-2:

"Thank you for providing the oak report. We note that there are no photos of the oaks proposed for removal and no map of removals. Just FYI - this report will not be sufficient to apply for a County oak tree permit. Have you done that already? Also, would you please provide the "Project-level conformity analysis" mentioned in the revised NOA. and the air quality and noise reports listed as Technical reports for this EIR. We are all am wondering why these weren't included in the EIR as appendices or posted on your website. Thank you for your time and help."

Response to Comment Letter 9-2:

SCOPE provided comments on April 11, 2024. On April 15, 2024, notification was sent that the comment period was extended to April 18, 2024. At that time, SCOPE requested the oak tree report, which was provided April 15, 2024, as acknowledged. In addition the air quality and noise reports were requested as well. LACPW tried to email them that day, but the emails were non-deliverable. LACPW contacted SCOPE to ask for other arrangements but those were not responded to, until the Public Records Act request was received from SCOPE June 13, 2024. With regard to air quality, the proposed project is included in the SCAG Connect SoCal. The associated Air Quality Conformity Analysis verifies that Connect SoCal and the 2023 FTIP conform with the latest EPA transportation conformity regulations and the Conformity SIP. See the Cumulative Impact Analysis in Section 2.3.6, Air Quality, and Response to Comment 11 of this document for more details.

Comment Letter 10

 City of SANTA CLARITA 23920 Valencia Boulevard • Santa Clarita, California 91355-2196 Phone: (661) 259-2489 • FAX: (661) 259-8125 www.santa-clarita.com	
April 18, 2024	
Ms. Ebigalle Voigt, Principal CEA Los Angeles County Public Works 900 S. Fremont Ave Alhambra, CA 91803	
Dear Ms. Voigt:	
Subject: Notice of Completion for The Old Road over Santa Clara River and the Southern Pacific Transportation Company Bridge, et al. Project DEIR	
The City of Santa Clarita (City) respectfully submits comments on two subjects as part of the project's subsequent Environmental Impact Report (EIR).	
The City respectfully requests that the County ensure all elements of the proposed Multi-Use Trail remain in the final approved plans. As described on page 78 of the Draft EIR (DEIR), the trail extension shall include bike lanes, a pedestrian path and an equestrian trail extension from the existing trail south of Rye Canyon Road to just northwest of the I-5, Rye Canyon Road Exit 171 on- and off-ramps. This extension, included in Los Angeles County Bicycle Master Plan, was also identified as a priority in the City of Santa Clarita's 2020 Non-Motorized Transportation Plan and provides a vital link between the City of Santa Clarita and the Val Verde and Castaic communities. Additionally, County Policy CO-9.2, referenced on page 129 of the DEIR calls for a continuous trail network with connectivity to City, Regional, State, and Federal trails such as the Pacific Crest Trail.	Comment 10-1
The City strongly encourages that this project not preclude the connection of the proposed trail extension to the future Crest to Coast Trail, which will ultimately provide connectivity to the Pacific Crest Trail and allow for connectivity to non-motorized facilities as noted in the Caltrans Active Transportation Plan.	
The City notes and supports as identified in Section 1.3.3.1 the installation of fiberoptic communication along The Old Road. In conjunction with Intersection Improvements identified in Chapter 1 of the Draft EIR, the City encourages and adds that the project should ensure and not preclude the telecommunication infrastructure and fiber connectivity between all traffic signals along The Old Road corridor and the City of Santa Clarita. This effort previously began and exists with traffic signals intersecting The Old Road at Magic Mountain Parkway, Valencia Boulevard, McBean Parkway, and Calgrove Boulevard. Allowing this pattern to continue in the future at Lyons Avenue, Rye Canyon Road, Newhall Ranch Road, and any other future project	Comment 10-2

Ms. Ebigalle Voigt
April 18, 2024
Page 2

adjacent intersections and traffic signals would be consistent with the City's Connected City Infrastructure Program and result in addressing diverse telecommunication infrastructure needs during emergencies and other needed occurrences.

Comment
10-2 Cont.

Thank you in advance for your commitment to see that the EIR reviews these issues appropriately.

Sincerely,



Mike Hennawy
Director of Public Works

MH:JS:sh

S:\PW\TRAFFIC\Letter\DEIR Comment Letter-The Old Road

cc: Members of the City Council
Kenneth W. Striplin, City Manager

Commenter: Mike Hennawt, Director of Public Works – City of Santa Clarita.

Date of Letter: April 18, 2024

Comment Letter 10-1:

"The City of Santa Clarita (City) respectfully submits comments on two subjects as part of the project's subsequent Environmental Impact Report (EIR).

The City respectfully requests that the County ensure all elements of the proposed Multi-Use Trail remain in the final approved plans. As described on page 78 of the Draft EIR (DEIR), the trail extension shall include bike lanes, a pedestrian path and an equestrian trail extension from the existing trail south of Rye Canyon Road to just northwest of the I-5, Rye Canyon Road Exit 171 on- and off-ramps. This extension, included in Los Angeles County Bicycle Master Plan, was also identified as a priority in the City of Santa Clarita's 2020 Non-Motorized Transportation Plan and provides a vital link between the City of Santa Clarita and the Val Verde and Castaic communities. Additionally, County Policy CO-9.2, referenced on page 129 of the DEIR calls for

a continuous trail network with connectivity to City, Regional, State, and Federal trails such as the Pacific Crest Trail.

The City strongly encourages that this project not preclude the connection of the proposed trail extension to the future Crest to Coast Trail, which will ultimately provide connectivity to the Pacific Crest Trail and allow for connectivity to non-motorized facilities as noted in the Caltrans Active Transportation Plan.”

Response to Comment Letter 10-1:

As designed, the proposed project includes an extension of the Multi-Use Trail from the existing trail south of Rye Canyon Road to just northwest of the I-5, Rye Canyon Road on- and off-ramps. Future trail connections are not precluded with the aforementioned improvements.

Comment Letter 10-2:

“The City notes and supports as identified in Section 1.3.3.1 the installation of fiberoptic communication along The Old Road. In conjunction with Intersection Improvements identified in Chapter 1 of the Draft EIR, the City encourages and adds that the project should ensure and not preclude the telecommunication infrastructure and fiber connectivity between all traffic signals along The Old Road corridor and the City of Santa Clarita. This effort previously began and exists with traffic signals intersecting The Old Road at Magic Mountain Parkway, Valencia Boulevard, McBean Parkway, and Calgrove Boulevard. Allowing this pattern to continue in the future at Lyons Avenue, Rye Canyon Road, Newhall Ranch Road, and any other future project adjacent intersections and traffic signals would be consistent with the City’s Connected City Infrastructure Program and result in addressing diverse telecommunication infrastructure needs during emergencies and other needed occurrences.”

Response to Comment Letter 10-2:

CEQA provides that a lead agency need only prepare written responses to comments submitted during the public comment period that raise “environmental issues” (CEQA Guidelines, § 15088 (a)). The additional comments do not specify an environmental issue related to the Draft EIR/EA; therefore, no response is necessary. However, the commenter’s statement is included in the Final EIR/EA for the decision-makers’ consideration as part of the lead agency’s deliberations on the proposed project. This comment has been acknowledged and documented for the record.

Comment Letter 11

From: Stacy Fortner <stacfor@cdw.com>
Sent: Thursday, April 18, 2024 11:58:32 PM (UTC+00:00) Monrovia, Reykjavik
To: DPW-The Old Road EIR <theoldroadeir@pw.lacounty.gov>
Subject: Old Road Comments

CAUTION: External Email. Proceed Responsibly.

Hot Spot analysis should be required because we are in a PM10 and PM2.5 non-attainment zone made worse by truck traffic to the landfill which will use this road if expanded. Wrong traffic analysis Should have used Magic Mountain off ramp.(they used south b exit at rye to count trucks - this reduced the amount of observed truck traffic.)

Comment
11

Thanks,

Stacy Fortner
Pronouns: She/her

Commenter: Stacy Fortner CDW

Date of Letter: April 18, 2024

Comment Letter 11:

"Hot Spot analysis should be required because we are in a PM10 and PM2.5 non-attainment zone made worse by truck traffic to the landfill which will use this road if expanded. Wrong traffic analysis Should have used Magic Mountain off ramp.(they used south b exit at rye to count trucks - this reduced the amount of observed truck traffic.)"

Response to Comment Letter 11:

Project-level conformity analysis shows that the project will conform to the State Implementation Plan, including localized impact analysis with interagency consultation for particulate matter (PM10 and PM2.5) and carbon monoxide (CO) required by 40 CFR 93.116 and 93.123. This Project is not considered a Project of Concern regarding particulate matter (PM10 and PM2.5) as defined in 40 CFR 93.123(b)(1). A detailed PM10 and PM2.5 hot-spot analysis was not completed because Clean Air Act and 40 CFR 93.116 requirements are met without an explicit hot-spot analysis. The project comes from a conforming Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP). Please also see Response 8-3 for discussion of the Project's inclusion in the FTIP. In addition, as discussed on Draft EIR/EA p. 393, the proposed project has completed Interagency Consultation for Transportation Conformity on May 23, 2023. The proposed project was presented to the Transportation Conformity Working Group—comprised of representative members. review of PM Hot Spot Interagency Review Form, was conducted. The project was concurred as not of air quality concern for PM10 and PM2.5.)

Comment Letter 12



Friends of the Santa Clara River

PO Box 7713 Ventura, California 93006 (805) 320-2265
www.fscr.org**SCOPE****Santa Clarita Organization for Planning and the Environment**TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY

POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



4-18-24

Los Angeles County Public Works and all approving agencies
Attention: Ebigalle Voigt
P.O. Box 1460
Alhambra, CA 91802-1460Via e-mail to: TheOldRoadEIR@pw.lacounty.gov**RE: The Old Road over Santa Clara River and the Southern Pacific Transportation Company
Bridge, et al. Project LOS ANGELES COUNTY, CALIFORNIA DISTRICT 7 – LA
BRLS-5953(601) & STPL-5953(682)
Draft Environmental Impact Report/ Environmental Assessment****Additional Comments Made Under the Revised Notice of Availability**

Dear Sirs and Madams:

The Friends of the Santa Clara River and Santa Clarita Organization for Planning and the Environment (SCOPE) jointly submit the following additional comments. Our members live and recreate in the vicinity of this project and thus have knowledge and standing to make these comments. These comments are timely submitted by the extended NOA date April 18th, within the EIR/EA comment period.

We incorporate by reference our previous comments submitted on April 11th and comments made by any resource or air quality agencies or organizations or individuals that expand on our comments.

These comments are based on new information from reports recently supplied to us. We restate our concern that none of the reports listed in the appendix and on which data the information in EIR and EA were based, were circulated with the EIR/EA, precluding accurate review and public input. These reports are apparently only provided upon request and apparently sometimes not even then. (We requested but did not receive the noise report.) **We ask that we be provided all these reports and that a two-week extension of the review period be granted so that we can review them.**

Comment
12-1

SCOPE and FSCR Additional Comments - Old Road Widening & Bridge Replacement 2**Inaccurate traffic Analysis in Air Quality Report Leading to an Inaccurate conformity report**

The Air Quality Report with which we were provided only two days ago) was not circulated with the EIR/EA and not included on the website. It was not available until requested. Upon receipt of the report, purported to be the basis for data in the Consistency Analysis, we noted that it was unsigned and that there was no review date or reviewer signature. Was this report reviewed for accuracy as required? It is unusual for a Consulting firm to submit a report without a verifying signature.

The Air Quality report and therefor the Conformity Analysis both state that passenger traffic on the proposed project segment of the Old Road is mainly generated by Magic Mountain. This is completely incorrect. Amusement park attendees exit from either direction on Magic Mountain Parkway, which then leads directly into the park. Directions on the Six Flags Magic Mountain website for travelers from all localities and from both north and south state "Exit Magic Mountain Parkway. Turn left at the traffic signal at the bottom of the exit ramp going under the Freeway overpass. Proceed along Magic Mountain Parkway to the parking toll booths and the Park entrances." ¹There is no direction given to turn right onto the Old Road, and in fact doing so is out of the way and would require turning around. Only employees that access the park's northerly parking lots would use the Old Road for a short distance. But this portion of the Old Road was already expanded to three lanes many years ago as a result of the I-5/ Magic Mountain interchange upgrade.

In fact, the traffic on this section on the Old Road comes mainly from employees and trucks having to utilize the Old Road to access the western end of the Valencia industrial park via Rye Canyon Rd or employees having to access to back parking lot on Sky View drive (as noted in the report². (See project map for these locations.) This fact is verified by the actual traffic study data in Table 1-2, page 6 of the Air Quality report done in 2018, though it is probably less now as stated in the report. Traffic on the Old Road is therefore usually scant except during commuting hours. (see picture on right, aerial by Daily News, March 18th, 2024). While the report estimates massive traffic increases, some of this will not occur. Traffic generated by Six Flags employees at Sky View (accessed by less than .1 miles on the Old Road from Magic Mountain Parkway) will not increase without park expansion, which is a limited possibility. That is also true of the Valencia Industrial Center. There are no nearby residents (see aerial photo in project location descript, and no local streets where traffic is causing congestion because this segment of the Old Road is mostly located next to empty fields. (See Project aerial, on the cover of the Air Quality report.) This information is not included in the project location description.

So, the question is, where is all this future traffic supposedly coming from? The EIR/EIS is quiet on this issue. It states that it is from SCAG "projected growth" However several large projects in the area have been delayed or withdrawn or would not be accessed by this expansion (i.e., Landmark Village, requested tract map delay to 2028, Entrada project withdrawn, see [attachment 1](#)). This project seems to be growth inducing. A chapter discussing growth inducement should be included in the EIR/EA

Comment
12-2



¹ <https://www.sixflags.com/magicmountain/plan-your-visit/directions>

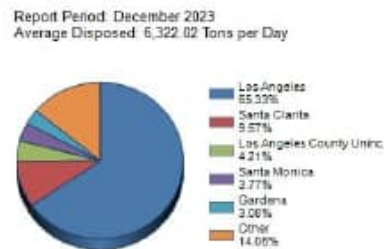
²

SCOPE and FSCR Additional Comments - Old Road Widening & Bridge Replacement 3

The project description also failed to mention that the I-5 is currently being expanded by two lanes, one in each direction, in this same area.³ This project began many years ago and so may not have been subject to more recent air quality and greenhouse gas analysis required today.

The Conformity Analysis and Air Quality Report fail to mention numerous sources of truck traffic, including the Chiquita Canyon Landfill, the Valencia Sanitation Plant expansion and numerous now existing ware houses, and others that are for lease in the project location description. We surmise that this may have been an effort to support the report's low truck traffic analysis in order to avoid identifying it as a Project of Air Quality Concern requiring a Hot Spot Analysis.

The Conformity Analysis is based on a traffic analysis in the Air Quality Report that was completed in 2018⁴. While it is true that 2018 would give a more accurate traffic count for passenger vehicles where traffic was severely reduced during Covid, it is not accurate for truck traffic. Several warehouses⁵ and a major expansion of the Chiquita Canyon Landfill which receives 90% of its diesel truck trash deliveries from elsewhere in Los Angeles County and Southern California – see diagram at right obtained from the Los Angeles County Department of Public Works website) and Valencia Sanitation plant were approved or built after that date and would not have been reflected in the 2018 data, especially truck data. The Los Angeles County Department of Public Works is aware and has records of these approvals, since their office is involved in the permit process. We include records of these projects by reference and will produce them upon request. Failure to list these nearby projects that create diesel PM10 and PM2.5 emissions is an EIR/EA deficiency.



Comment
12-2 Cont

The Air Quality Report appears to have substantially understated truck traffic trips by choosing to obtain data from a single off ramp exiting from the Southbound direction to the Industrial Center⁶ when the greater amount of traffic would be heading northbound from other areas in Los Angeles and the Port, and exiting at Magic Mountain, then turning right to access the Valencia Industrial area or proceeding to the Sanitation Plant, the Commerce Center, the commercial furniture store, the fire station and/or the Chiquita Landfill. Thus, the report was able, by using the 2018 date and a less used off-ramp, to substantially underestimate diesel truck traffic and avoid a Project of Air Quality Concern designation.

While some of this truck traffic may prefer to use the I-5 because it is faster now, if the Old Road is expanded and traffic speeds increased to 60 miles per hour as proposed, these trucks will undoubtedly find it shorter and faster to use the Old Road, thus substantially increasing diesel pollution on this road.

³ <https://www.metro.net/projects/i-5-enhancements/>

⁴ Air Quality Report, page 6 See note 1

⁵ 104 warehouse listings in area at the time of writing this comment letter, see website:

<https://www.propertyshark.com/cre/industrial/us/ca/santa-clarita/valencia/?IncludeCoworking=false&CoworkingWorkspaceTypes=0&MapView=True&Zoom=10&Viewport=-119.18794389756575,34.217071697858586,-118.37495561631575,34.62037087129809&GeopickerType=viewport>

⁶ Air Quality Report, page 6 See note 2

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We therefore request that an updated and accurate Air Quality Report be provided and re-circulated to all interested parties, along with a corrected Air Quality and traffic Analysis.

Comment
12-2 Cont

Need for a Hot Spot Analysis

A hot spot analysis for this project was not completed, however a hot spot analysis under 40 Code of Federal Regulations 93.123(b)—PM10 and PM2.5 Hot Spots, for the following reasons:

- The project is in a non-attainment zone for PM2.5 and PM10.
- The project is longer than 1 mile (it is 2.2 miles).
- The Old Road is designated as a Major Highway under the County of Los Angeles General Plan, Mobility Element therefore this project is an expansion of a major highway⁷. The Conformity Analysis is itself internally inconsistent where it states on page one that a goal of the project is to conform with the Mobility Element which designates the Old Road as a Major Highway, but then states on page 3 regarding the need for a Hot Spot Analysis, that is not needed because the Old Road is not a **not a major highway**.
- This is an expanded highway project that will have a significant increase in the number of diesel vehicles. Neither the Consistency Analysis nor the Air Quality Report currently state this, but we believe that is due to an incorrect traffic analysis using a traffic study location with lower truck counts and failure to identify nearby facilities using diesel trucks as described above. This must be corrected.
- When the facts above that were undisclosed in the EIR/EA and air quality report, are corrected and re-circulated, we believe that the data will show that this must be considered a project of air quality concern and requires a Hot Spot Analysis.

Comment
12-3

Climate Change and GHG generation by the proposed project

We continue to believe as stated in our previous comment letter, that this project fails to evaluate the “induced demand” as required by CalTrans guidelines, thus underestimating the VMT which in turn resulting in an underestimation of the GHG generation and air quality effects.

Table 3-1 (Page 379) in this section lists several reports that address GHG reduction strategies. **None of these strategies include adding additional traffic lanes.**

On December 15, 2022 California’s air board unanimously approved a sweeping state plan to battle climate change, creating a new blueprint for the next five years to cut carbon emissions, reduce reliance on fossil fuels and speed up the transition to renewable energy. Yet this plan is nowhere mentioned in the current EIR/EA. We believe that omission is due to this documents non-conformance with that plan.

The EIR/EA also leaves out several sources of GHG. These must be calculated and included in the analysis and mitigation. They include but are not limited to:

- The additional concrete⁸ that will be required to replace bridge abutments and pavement. (The EIR states that Implementation of the Build Alternative would result in a net increase of approximately 43 acres of impervious area, a substantial amount in addition to the replacement of current paving. p.16)

Comment
12-4

⁷ Air Quality Report page 3, lists one of the purposes of the project “To be consistent with the Los Angeles County Mobility Element, which identifies The Old Road as a 6-lane **major highway**.” [emphasis added]

⁸ The chemical reactions involved produce even more carbon dioxide as a by-product. Making one kilogram of cement sends one kilogram of CO₂ into the atmosphere. Worldwide every year cement and concrete production generates as much as 9 percent of all human CO₂ emissions. Scientific American, Feb 1, 2023 <https://www.scientificamerican.com/article/solving-cements-massive-carbon-problem/>

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- The removal of 18 oaks⁹. Please calculate the loss of carbon sequestration provided by these trees. Young trees do not replace to sequestration value of older trees.
- Additional diesel truck trips that will be enabled by the lane expansion and the increasing the speed limit to 60 miles per hour.

Comment
12-4 Cont.

We do not concur with the conclusion on EIR/EA page 388 that no operational mitigation for Air Quality or GHG is not required because the full impact as described above has not been calculated. Further, the failure to calculate induced demand which will increase VMT may require additional mitigation for project impacts beyond operational impacts, but we cannot know this because the data was not included in the EIR. **These issues must be addressed.**

Biological Impacts

We note again that both USFWS and CDFW are cooperating agencies on this draft EIR/EA, and urge CalTrans and County Public Works to ensure that these agencies are given full license to enforce restrictions that protect and benefit the essential wildlife flora and fauna of Santa Clara River. We hope that they were not simply added as token checkboxes on legal requirements. We understand that consultation will be required under the Endangered Species Act.

Comment
12-5

The increasing reduction of freedom of movement for air, water and terrestrial animals is already causing risk to wildlife species health, biodiversity, and for an increasing number pushed to the point of extinction. The Santa Clara River is a major wildlife corridor. We urge CalTrans and Department of Public Works to abide by recent laws including SB790, Stern 2021.

While the EIR/EA preparer attached a letter from USFW Ventura Office in Appendix F that provides a list of endangered species in the area, it did not include the recent U.S. Fish and Wildlife Proposal to list both Species of Western Pond Turtle under the Endangered Species Act.¹⁰ The southwestern pond turtle may occur in the project area.

Oaks

Oaks are an important and beloved native species, that are protected by County and City of Santa Clara Ordinances. The project proposes to remove 18 oaks, mostly rare Valley Oaks, including two heritage oaks estimated to be over 300 years old. Yet no map of the oak trees to be removed was included in the EIR/EA so that avoidance suggestions by the public can be made. Although the EIR/EA states that an oak report was completed in 2019, it is not included in the Appendix as is the normal practice. We requested and received this report prior to making these additional comments. However, the report is deficient in that it doesn't provide a map of the oaks, the location of the oaks to be removed and photographs of the individual trees, all information normally included in oak reports and required for the County permitting process. Thus, we cannot know if the report accurately discloses all oaks. This failure also precludes the public's ability to make suggestions as to avoidance. Additionally, we believe this report may have been completed for a different project since it was completed well before the signed 2022 MOU and is not included in the list of Technical Reports in Appendix B. There is no indication that any oak tree permits have been issued as required by the County for oak removals, nor has a hearing been scheduled for removal of heritage oaks as required by the County Oak Ordinance.

Comment
12-6

⁹ In addition, SB 1386 (Wolk 2016) established as state policy the protection and management of natural and working lands and requires state agencies to consider that policy in their own decision making. Trees and vegetation on forests, rangelands, farms, and wetlands remove CO₂ from the atmosphere through biological processes and sequester the carbon in above- and below-ground matter. EIR at page 386

¹⁰ <https://www.fws.gov/press-release/2024-04/us-fish-and-wildlife-service-reopens-public-comment-period-proposal-list-both>

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- **Failure to provide meaningful information about these important and rare trees to be removed from a County designated Signiant Ecological Area is an EIR/EA deficiency.**

We maintain that more traffic will also have additional impacts to the vegetation, specifically trees in the river channel from the lane widening. Native Californian riparian and oak woodland trees play a vital role in the health of our floodplains. Phytoremediation, the benefit that trees give our climate by cleaning air, soil and water is lessened by a greater load than they can tolerate. They clean our air and balance climate via their contribution to the passage of air and water through the Santa Clara River riparian corridor and are an essential part of the river and the wildlife that have called it home for thousands of years.¹¹

Comment
12-6 Cont.

Fish, Birds

The site is home to two listed endangered fish., the Unarmored Three-spined Stickleback and the Arroyo Chub. It may be the last population of UTS in existence. These species are affected by silted water and other water pollution, and of course would be exterminated by dewatering in the area. The EIR/EA does not fully discuss impacts to these endangered fish and how they will be protected if project construction proceeds.

Comment
12-7

This area is an identified nesting area for the Least Bell's Vireo and Willow Flycatcher, migratory birds that will require special mitigation to protect.

Other Reptiles, amphibians and plants

We are concerned that surveys for these species did not follow required protocols since the EIR/EA does not fully disclose time of day and appears to rely on surveys only done in 2023. There is existing literature from other EIRs in the County's possession which indicate the presence of other listed species. We are particularly concerned about the pond turtle, whose status was just re-opened for review, since we don't see surveys for it in the document.

SouthCoast Wildlands, "Wildlands of the Santa Clara River¹²" can be accessed for locations of some of these animals.

Comment
12-8

The reach of the Santa Clara River over which this project passes, is not in isolation. Negative human effects on its ecology in this stretch, continue downstream and cause animals upstream to be disconnected. In addition to the species mentioned by USFWS, 25% of California's endemic plant species are in found in this region. Some may not yet be listed as threatened or endangered but only due to the fact that investment in studies is not as great as investment in human transportation or consumption needs. It is very likely that many plants, native to this area of the Santa Clara River are either no longer present or in swift decline. This rich native biodiversity is not limited only to plants, it is a system of animals, insects, watershed hydrogeology and climate.

Projects such as widening a lane of traffic from 2 to 3 lanes, may seem like an insignificant addition; but, in fact it is a part of the slow destruction of our natural ecological systems. We are putting one of the richest areas of biodiversity in the world at risk. This biodiversity is not limited to only plants, it is a system of animals, insects, hydrogeology and more. Adding more and more opportunity for human sprawl that requires infrastructure to support cars, chemicals, use of natural resources to make and power them is the definition of how to endanger all these aspects of ecological diversity which ultimately harms humans too. Once this is gone, it is gone. Rivers themselves are becoming endangered. The Santa Clara River is already the Southern California's largest river system that remains in a relatively natural state. Relatively here, is a vital word. All conservation measures are needed to not only maintain that but more vitally,

¹¹ California Department of Food and Agriculture, 3288 Meadowview Road, Sacramento, CA 95832, USA.)

¹² <http://www.scwildlands.org/reports/wildlandsofthescrwatershed.pdf>

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restore its ecological health and protection. Mitigation for this proposed work cannot be the simple pass for impacts that can damage more than mitigation may be able to rehabilitate.

Comment
12-8 Cont.

Conclusion

As stated in our first letter, we oppose the lane additions proposed by this project because they will only serve to increase traffic impacts in future years through "Induced Demand", an impact which was not discussed in the EIR/EA. Additionally the project may not be needed at this time or at all due to reduced traffic. A new and more accurate traffic study and air quality analysis should be conducted.

The project will have severe biological impacts to endangered species in the area of the Santa Clara River which is also a County Significant Ecological area. The number of heritage and rare Valley Oaks slated for removal is unacceptable.

We believe this project is required to prepare and provide a Hot Spot Analysis for the reasons stated.

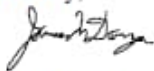
We request that these deficiencies be address and a new document recirculated. The new document should include a broader range of alternatives as well as the missing information that is normally provided in environmental documents, including but not limited to the initial study and the comment letters from agencies and the public on the Notice of Preparation, along with the technical reports that were listed, but not provided, in the Appendices.

Last, we do not think an EA was the appropriate Federal document for a project such as this based on the number of endangered species and the extent of the potential impacts on those species. Compliance with NEPA would require an EIS.

We look forward to working with the agencies to make this a better project.

Comment
12-9

Sincerely,



James M. Danza, MS, AICP
Chair, Friends of the Santa Clara River



Lynne Plambeck, President
Santa Clarita Organization for Planning and the Environment

Commenter: James M. Danza (FSCR) and Lynne Plambeck (SCOPE) Friends of the Santa Clara River (FSCR) and Santa Clarita Organization for Planning and the Environment (SCOPE)

Date of Letter: April 18, 2024

Comment Letter 12-1:

"The Friends of the Santa Clara River and Santa Clarita Organization for Planning and the Environment (SCOPE) jointly submit the following additional comments. Our members live and recreate in the vicinity of this project and thus have knowledge and standing to make these comments. These comments are timely submitted by the extended NOA date April 18th, within the EIR/EA comment period. We incorporate by reference our previous comments submitted on April 11th and comments made by any resource or air quality agencies or organizations or

*individuals that expand on our comments. These comments are based on new information from reports recently supplied to us. We restate our concern that none of the reports listed in the appendix and on which data the information in EIR and EA were based, were circulated with the EIR/EA, precluding accurate review and public input. These reports are apparently only provided upon request and apparently sometimes not even then. **(We requested but did not receive the noise report.) We ask that we be provided all these reports and that a two-week extension of the review period be granted so that we can review them [emphasis].***"

Response to Comment Letter 12-1:

The commenter incorporates by reference their prior comments submitted on April 11, 2024. Please see Responses 8-1 through 8-12 which respond to those comments.

The commenter faults the Draft EIR/EA for not including reports which are referenced in Appendix B, *List of Technical Studies*. These reports do not need to be included in the Draft EIR. As explained in CEQA Guidelines §15148, "Preparation of EIRs is dependent upon information from many sources, including engineering project reports and many scientific documents relating to environmental features. These documents should be cited *but not included in the EIR.*" Similar assertions were rejected in *Save Petaluma River v. City of Petaluma* (2022) Case No A163192 ["Petitioners also contend the EIR's references to studies and site visits did not constitute substantial evidence supporting its special status species analysis because such studies and visits were not included in the administrative record and were not otherwise adequately documented, e.g., the names of the participants and descriptions of what took place are not disclosed in the record... section 15148 of the Guidelines provides: 'Preparation of EIRs is dependent upon information from many sources, including engineering project reports and many scientific documents relating to environmental features. These documents should be cited but not included in the EIR.'"];]

See also *Blue v. City of Los Angeles* (2006) 137 Cal.App.4th 1131 ["[W]e reject plaintiffs' contention the lack of access to the Walker Sheets precluded plaintiffs from commenting at the public hearing on the condition of the structures in the project area...As respondents point out, the real 'raw data' was not the 'Walker Sheets,' but rather, the existing conditions at the properties in the project area. By inspecting the project area themselves, plaintiffs could have made their own assessment as to the accuracy of the information regarding conditions in the project area as set forth in the report to the City Council. The lack of access to the 'Walker Sheets' did not preclude plaintiffs from commenting..."]

Los Angeles County Public Works attempted to provide the requested reports via email (via a SharePoint link so as not to be limited by file size) on April 18, 2024 and did not receive a response from the commenter as to an alternate location to mail the files when the email bounced. As further acknowledged in the comment, these reports were ultimately received by the commenter.

Comment Letter 12-2:

"Inaccurate traffic Analysis in Air Quality Report Leading to an Inaccurate conformity report [emphasis] *The Air Quality Report with which we were provided only two days ago) was not circulated with the EIR/EA and not included on the website. It was not available until requested. Upon receipt of the report, purported to be the basis for data in the Consistency Analysis, we noted that it was unsigned and that there was no review date or reviewer signature. Was this report reviewed for accuracy as required? It is unusual for a Consulting firm*

to submit a report without a verifying signature. The Air Quality report and therefore the Conformity Analysis both state that passenger traffic on the proposed project segment of The Old Road is mainly generated by Magic Mountain. This is completely incorrect. Amusement park attendees exit from either direction on Magic Mountain Parkway, which then leads directly into the park. Directions on the Six Flags Magic Mountain website for travelers from all localities and from both north and south state "Exit Magic Mountain Parkway. Turn left at the traffic signal at the bottom of the exit ramp going under the Freeway overpass. Proceed along Magic Mountain Parkway to the parking toll booths and the Park entrances." There is no direction given to turn right onto The Old Road, and in fact doing so is out of the way and would require turning around. Only employees that access the park's northerly parking lots would use The Old Road for a short distance. But this portion of The Old Road was already expanded to three lanes many years ago as a result of the I-5/Magic Mountain interchange upgrade. In fact, the traffic on this section on The Old Road comes mainly from employees and trucks having to utilize The Old Road to access the western end of the Valencia industrial park via Rye Canyon Rd or employees having to access to back parking lot on Sky View drive (as noted in the report). (See project map for these locations.) This fact is verified by the actual traffic study data in Table 1-2, page 6 of the Air Quality report done in 2018, though it is probably less now as stated in the report. Traffic on The Old Road is therefore usually scant except during commuting hours. (see picture on right, aerial by Daily News, March 18th, 2024). While the report estimates massive traffic increases, some of this will not occur. Traffic generated by Six Flags employees at Sky View (accessed by less than .1 miles on The Old Road from Magic Mountain Parkway) will not increase without park expansion, which is a limited possibility. That is also true of the Valencia Industrial Center. There are no nearby residents (see aerial photo in project location description, and no local streets where traffic is causing congestion because this segment of The Old Road is mostly located next to empty fields. (See Project aerial, on the cover of the Air Quality report.) This information is not included in the project location description. So, the question is, where is all this future traffic supposedly coming from? The EIR/EIS is quiet on this issue. It states that it is from SCAG "projected growth" However several large projects in the area have been delayed or withdrawn or would not be accessed by this expansion (i.e., Landmark Village, requested tract map delay to 2028, Entrada project withdrawn, see attachment 1).

This project seems to be growth inducing. A chapter discussing growth inducement should be included in the EIR/EA The project description also failed to mention that the I-5 is currently being expanded by two lanes, one in each direction, in this same area. This project began many years ago and so may not have been subject to more recent air quality and greenhouse gas analysis required today. The Conformity Analysis and Air Quality Report fail to mention numerous sources of truck traffic, including the Chiquita Canyon Landfill, the Valencia Sanitation Plant expansion and numerous now existing ware houses, and others that are for lease in the project location description. We surmise that this may have been an effort to support the report's low truck traffic analysis in order to avoid identifying it as a Project of Air Quality Concern requiring a Hot Spot Analysis. The Conformity Analysis is based on a traffic analysis in the Air Quality Report that was completed in 2018. While it is true that 2018 would give a more accurate traffic count for passenger vehicles where traffic was severely reduced during Covid, it is not accurate for truck traffic. Several warehouses and a major expansion of the Chiquita Canyon Landfill which receives 90% of its diesel truck trash deliveries from elsewhere in Los Angeles County and Southern California – see diagram at right obtained from the Los Angeles County Department of Public Works website) and Valencia Sanitation plant were approved or built after that date and would not have been reflected in in the 2018 data, especially truck data. The Los Angeles County Department of Public Works is aware and has records of these approvals, since their office is involved in the permit process. We include

*records of these projects by reference and will produce them upon request. Failure to list these nearby projects that create diesel PM10 and PM2.5 emissions is an EIR/EA deficiency. The Air Quality Report appears to have substantially understated truck traffic trips by choosing to obtain data from a single off ramp exiting from the Southbound direction to the Industrial Center when the greater amount of traffic would be heading northbound from other areas in Los Angeles and the Port, and exiting at Magic Mountain, then turning right to access the Valencia Industrial area or proceeding to the Sanitation Plant, the Commerce Center, the commercial furniture store, the fire station and/or the Chiquita Landfill. Thus, the report was able, by using the 2018 date and a less used off-ramp, to substantially underestimate diesel truck traffic and avoid a Project of Air Quality Concern designation. While some of this truck traffic may prefer to use the I-5 because it is faster now, if The Old Road is expanded and traffic speeds increased to 60 miles per hour as proposed, these trucks will undoubtedly find it shorter and faster to use The Old Road, thus substantially increasing diesel pollution on this road. **We therefore request that an updated and accurate Air Quality Report be provided and recirculated to all interested parties, along with a corrected Air Quality and traffic Analysis [emphasis].***

Response to Comment Letter 12-2:

Please see response 12-1 for discussion of reference document availability. The comment also alleges “This project seems to be growth inducing. A chapter discussing growth inducement should be included in the EIR/EA.” The Draft EIR/EA already included an analysis of Growth Inducement in Section 2.2.5 and tables 2-5 and 2-8. In addition, the I-5 North County Enhancements Project is discussed in Section 2.4.7.

The commenter further alleges “The Conformity Analysis and Air Quality Report fail to mention numerous sources of truck traffic, including the Chiquita Canyon Landfill, the Valencia Sanitation Plant expansion and numerous now existing ware houses, and others that are for lease in the project location description...Failure to list these nearby projects that create diesel PM10 and PM2.5 emissions is an EIR/EA deficiency.” In making these assertions the commenter appears to be challenging the cumulative analyses for air quality and transportation. However, in making these assertions, the commenter ignores the actual cumulative methodology for these resource areas.

Induced VMT analysis and the Air Quality analysis are inherently cumulative in nature. OPR and CEQA case law have expressly upheld combined project level and cumulative thresholds. As discussed in OPR’s Technical Advisory on VMT, “When using an absolute VMT metric, i.e., total VMT [as utilized for the Project], analyzing the combined impacts for a cumulative impacts analysis may be appropriate.” (OPR p. 6.)⁹ Similar combined thresholds have been upheld in CEQA. (*Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899 [combined cumulative air quality thresholds]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059 [combined hydrology thresholds].) Similar approaches have been upheld under NEPA. *Center for Community Action and Environmental Justice v. Federal Aviation Administration* (2021; 9th Circuit Case No. 20-70272) 18 F.4th 592.

OPR’s trip inducement elasticity discussion is inherently cumulative in nature. OPR acknowledges that inducement includes “all direct or indirect environmental effects.” (OPR p. 20.) Similarly, OPR explains that this includes “the amount of VMT growth likely to result from background population growth.” (OPR p. 23.) “VMT is largely a regional impact.” (OPR p. 27.) OPR acknowledges that inducement considers “land use changes. Faster travel times along a corridor lead to land development farther along that corridor; that new development generates

⁹ OPR SB743 Technical Advisory: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

and attracts longer trips, which increases vehicle travel. Over several years, this induced growth component of induced vehicle travel can be substantial, making it critical to include in analyses.” (OPR p. 32.) Similarly, OPR acknowledges that “long run elasticity” includes “land use change.” (OPR p. 33.)

As further discussed in CEQA case law, public agencies do not need to identify every individual project, when utilizing such cumulative projections/modeling. (*City of Long Beach v. LAUSD* (2009) 176 Cal.App.4th 889, 910 [“Long Beach next argues that LAUSD omitted from its cumulative impacts section and its responses to comments ‘closely related past’ projects identified by Long Beach.” In rejecting this argument, the Court explained “SCAQMD’s CEQA Handbook, upon which the air quality assessment of the project was based, “does not require a listing of emissions from existing and planned projects (e.g., existing emissions from vehicles traveling on freeways, ports, and refineries, as well as residential and commercial developments) for a cumulative air quality impacts analysis.”].)

Cumulative conditions were therefore considered through the elasticity formula¹⁰ utilized in the induced VMT analysis (i.e. the same formula the commenter recommended in Response 8-3), through the SCAG’s Activity Based Model which is based upon their growth projections,¹¹ the 2022 AQMP, which is used to derive the cumulative air quality thresholds,¹² and the County’s General Plan.¹³ For discussion of Hot Spot analysis and conformity, please see Response 12-3.

Comment Letter 12-3:

“Need for a Hot Spot Analysis -- A hot spot analysis for this project was not completed, however a hot spot analysis under 40 Code of Federal Regulations 93.123(b)—PM10 and PM2.5 Hot Spots, for the following reasons:

- *The project is in a non-attainment zone for PM2.5 and Pm10.*
- *The project is longer than 1 mile (it is 2.2 miles).*
- *The Old Road is designated as a Major Highway under the County of Los Angeles General Plan, Mobility Element therefore this project is an expansion of a major highway. The Conformity Analysis is itself is internally inconsistent where it states on page one that a goal of the project is to conform with the Mobility Element which designates The Old Road as a Major Highway, but then states on page 3 regarding the need for a Hot Spot Analysis, that is not needed because The Old Road **is not a not a major highway[emphasis]**.*
- *This is an expanded highway project that will have a significant increase in the number of diesel vehicles. Neither the Consistency Analysis nor the Air Quality Report currently state this, but we believe that is due to an incorrect traffic analysis using a traffic study location with lower truck counts and failure to identify nearby facilities using diesel trucks as described above. This must be corrected.*

¹⁰ Induced VMT elasticity formula information available at: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf (p. 24.)

¹¹ SCAG Activity Based Model details, including Model Development Reports, are available at: <https://scag.ca.gov/transportation-models> and SCAG Growth Projections: https://scag.ca.gov/sites/main/files/file-attachments/2016_2040rtpscs_finalgrowthforecastbyjurisdiction.pdf?1605576071

¹² 2022 SCAQMD AQMP available at: <https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan> and SCAQMD Air Quality Thresholds: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>

¹³ Los Angeles County General Plan: <https://planning.lacounty.gov/long-range-planning/general-plan/>

- *When the facts above that were undisclosed in the EIR/EA and air quality report, are corrected and re-circulated, we believe that the data will show that this must be considered a project of air quality concern and requires a Hot Spot Analysis."*

Response to Comment Letter 12-3:

Project-level conformity analysis shows that the project will conform to the State Implementation Plan, including localized impact analysis with interagency consultation for particulate matter (PM10 and PM2.5) and carbon monoxide (CO) required by 40 CFR 93.116 and 93.123. This Project is not considered a Project of Concern regarding particulate matter (PM10 and PM2.5) as defined in 40 CFR 93.123(b)(1). A detailed PM10 and PM2.5 hot-spot analysis was not completed because Clean Air Act and 40 CFR 93.116 requirements are met without an explicit hot-spot analysis. The project comes from a conforming Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP). Please also see Response 8-3 for discussion of the Project's inclusion in the FTIP. In addition, as discussed on Draft EIR/EA p. 393, the proposed project has completed Interagency Consultation for Transportation Conformity on May 23, 2023. The proposed project was presented to the Transportation Conformity Working Group—comprised of representative members. A review of PM Hot Spot Interagency Review Form was conducted. The project was concurred as not of air quality concern for PM10 and PM2.5.)

Comment Letter 12-4:

*"Climate Change and GHG generation by the proposed project -- We continue to believe as stated in our previous comment letter, that this project fails to evaluate the "induced demand" as required by CalTrans guidelines, thus underestimating the VMT which in turn resulting in an underestimation of the GHG generation and air quality effects. Table 3-1 (Page 379) in this section lists several reports that address GHG reduction strategies. **None of these strategies include adding additional traffic lanes [emphasis].** On December 15, 2022 California's air board unanimously approved a sweeping state plan to battle climate change, creating a new blueprint for the next five years to cut carbon emissions, reduce reliance on fossil fuels and speed up the transition to renewable energy. Yet this plan in nowhere mentioned in the current EIR/EA. We believe that omission is due to this documents non-conformance with that plan. The EIR/EA also leaves out several sources of GHG. These must be calculated and included in the analysis and mitigation. They include but are not limited to:*

- *The additional concrete that will be required to replace bridge abutments and pavement. (The EIR states that Implementation of the Build Alternative would result in a net increase of approximately 43 acres of impervious area, a substantial amount in addition to the replacement of current paving. p.16)*
- *The removal of 18 oaks. Please calculate the loss of carbon sequestration provided by these trees. Young trees do not replace to sequestration value of older trees.*
- *Additional diesel truck trips that will be enabled by the lane expansion and the increasing the speed limit to 60 miles per hour.*

*We do not concur with the conclusion on EIR/EA page 388 that no operational mitigation for Air Quality or GHG is not required because the full impact as described above has not been calculated. Further, the failure to calculate induced demand which will increase VMT may require additional mitigation for project impacts beyond operational impacts, but we cannot know this because the data was not included in the EIR. **These issues must be addressed [emphasis]."***

Response to Comment Letter 12-4:

As explained in Responses 8-2 and 8-3, contrary to the assertions in the comment, the Draft EIR/EA expressly considered induced VMT. Please also see Response 8-4 for discussion of the 2022 CARB Scoping Plan and alleged sources of additional GHG emissions.

Comment Letter 12-5:

“Biological Impacts -- We note again that both USFWS and CDFW are cooperating agencies on this draft EIR/EA, and urge CalTrans and County Public Works to ensure that these agencies are given full license to enforce restrictions that protect and benefit the essential wildlife flora and fauna of Santa Clara River We hope that they were not simply added as token checkboxes on legal requirements. We understand that consultation will be required under the Endangered Species Act. The increasing reduction of freedom of movement for air, water and terrestrial animals is already causing risk to wildlife species health, biodiversity, and for an increasing number pushed to the point of extinction. The Santa Clara River is a major wildlife corridor. We urge CalTrans and Department of Public Works to abide by recent laws including SB790, Stern 2021. While the EIR/EA preparer attached a letter from USFW Ventura Office in Appendix F that provides a list of endangered species in the area, it did not include the recent U.S. Fish and Wildlife Proposal to list both Species of Western Pond Turtle under the Endangered Species Act. The southwestern pond turtle may occur in the project area.”

Response to Comment Letter 12-5:

Please see Responses 8-5 through 8-10 for responses to the commenter's assertions related to Biological Resources, including wildlife corridors and the Western Pond Turtle (WPT).

Comment Letter 12-6:

“Oaks -- Oaks are an important and beloved native species, that are protected by County and City of Santa Clarita Ordinances. The project proposes to remove 18 oaks, mostly rare Valley Oaks, including two heritage oaks estimated to be over 300 years old. Yet no map of the oak trees to be removed was included in the EIR/EA so that avoidance suggestions by the public can be made. Although the EIR/EA states that an oak report was completed in 2019, it is not included in the Appendix as is the normal practice. We requested and received this report prior to making these additional comments. However, the report is deficient in that it doesn't provide a map of the oaks, the location of the oaks to be removed and photographs of the individual trees, all information normally included in oak reports and required for the County permitting process. Thus, we cannot know if the report accurately discloses all oaks. This failure also precludes the public's ability to make suggestions as to avoidance. Additionally, we believe this report may have been completed for a different project since it was completed well before the signed 2022 MOU and is not included in the list of Technical Reports in Appendix B. There is no indication that any oak tree permits have been issued as required by the County for oak removals, nor has a hearing been scheduled for removal of heritage oaks as required by the County Oak Ordinance.

- ***Failure to provide meaningful information about these important and rare trees to be removed from a County designated Significant Ecological Area is an EIR/EA deficiency [emphasis].***

We maintain that more traffic will also have additional impacts to the vegetation, specifically trees in the river channel from the lane widening. Native Californian riparian and oak woodland trees play a vital role in the health of our floodplains. Phytoremediation, the benefit that trees

give our climate by cleaning air, soil and water is lessened by a greater load than they can tolerate. They clean our air and balance climate via their contribution to the passage of air and water through the Santa Clara River riparian corridor and are an essential part of the river and the wildlife that have called it home for thousands of years.”

Response to Comment Letter 12-6:

Please refer to comment response 8-6.

Comment Letter 12-7:

“Fish, Birds -- The site is home to two listed endangered fish., the Unarmored Three-spined Stickleback and the Arroyo Chub. It may be the last population of UTS in existence. These species are affected by silted water and other water pollution, and of course would be exterminated by dewatering in the area. The EIR/EA does not fully discuss impacts to these endangered fish and how they will be protected if project construction proceeds. This area is an identified nesting area for the Least Bell's Vireo and Willow Flycatcher, migratory birds that will require special mitigation to protect.”

Response to Comment Letter 12-7:

Please refer to response to comment 8-8 above. Compensatory mitigation for potential impacts on these species is provided in GEN-15.

Comment Letter 12-8:

“Other Reptiles, amphibians and plants -- We are concerned that surveys for these species did not follow required protocols since the EIR/EA does not fully disclose time of day and appears to rely on surveys only done in 2023. There is existing literature from other EIRs in the County's possession which indicate the presence of other listed species. We are particularly concerned about the pond turtle, whose status was just re-opened for review, since we don't see surveys for it in the document. SouthCoast Wildlands, “Wildlands of the Santa Clara River” can be accessed for locations of some of these animals. The reach of the Santa Clara River over which this project passes, is not in isolation. Negative human effects on its ecology in this stretch, continue downstream and cause animals upstream to be disconnected. In addition to the species mentioned by USFWS, 25% of California's endemic plant species are in found in this region. Some may not yet be listed as threatened or endangered but only due to the fact that investment in studies is not as great as investment in human transportation or consumption needs. It is very likely that many plants, native to this area of the Santa Clara River are either no longer present or in swift decline. This rich native biodiversity is not limited only to plants, it is a system of animals, insects, watershed hydrogeology and climate. Projects such as widening a lane of traffic from 2 to 3 lanes, may seem like an insignificant addition; but, in fact it is a part of the slow destruction of our natural ecological systems. We are putting one of the richest areas of biodiversity in the world at risk. This biodiversity is not limited to only plants, it is a system of animals, insects, hydrogeology and more. Adding more and more opportunity for human sprawl that requires infrastructure to support cars, chemicals, use of natural resources to make and power them is the definition of how to endanger all these aspects of ecological diversity which ultimately harms humans too. Once this is gone, it is gone. Rivers themselves are becoming endangered. The Santa Clara River is already the Southern California's largest river system that remains in a relatively natural state. Relatively here, is a vital word. All conservation measures are needed to not only maintain that but more vitally, restore its ecological health and protection.

Mitigation for this proposed work cannot be the simple pass for impacts that can damage more than mitigation may be able to rehabilitate.”

Response to Comment Letter 12-8:

Please refer to response to comment 8-9.

Comment Letter 12-9:

“As stated in our first letter, we oppose the lane additions proposed by this project because they will only serve to increase traffic impacts in future years through “Induced Demand”, an impact which was not discussed in the EIR/EA. Additionally the project may not be needed at this time or at all due to reduced traffic. A new and more accurate traffic study and air quality analysis should be conducted. The project will have severe biological impacts to endangered species in the area of the Santa Clara River which is also a County Significant Ecological area. The number of heritage and rare Valley Oaks slated for removal is unacceptable. We believe this project is required to prepare and provide a Hot Spot Analysis for the reasons stated. We request that these deficiencies be address and a new document recirculated. The new document should include a broader range of alternatives as well as the missing information that is normally provided in environmental documents, including but not limited to the initial study and the comment letters from agencies and the public on the Notice of Preparation, along with the technical reports that were listed, but not provided, in the Appendices. Last, we do not think an EA was the appropriate Federal document for a project such as this based on the number of endangered species and the extent of the potential impacts on those species. Compliance with NEPA would require an EIS. We look forward to working with the agencies to make this a better project.”

Response to Comment Letter 12-9:

Please see response to comment 8-12.

Comment Letter 13



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
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San Diego, CA 92123
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



April 18, 2024

Ebigalle Voigt
Los Angeles County Public Works
PO Box 1460
Alhambra, CA 91802
theoldroadeir@pw.lacounty.gov

Subject: Draft Environmental Impact Report for The Old Road Over Santa Clara River and the Southern Pacific Transportation Company Bridge, et al. Project, SCH #2023030209, Los Angeles County

Dear Ebigalle Voigt:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) for The Old Road Over Santa Clara River and the Southern Pacific Transportation Company (SPT Co.) Bridge, et al. Project (Project), proposed by Los Angeles County Public Works (LACPW; Lead Agency). 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 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.

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Code, §1900 et seq.), CDFW recommends LACPW obtain appropriate authorization under the Fish and Game Code.

Project Summary

Project Applicant: LACPW

Objective: The Project includes the reconstruction and widening of roadways, replacement of two bridges, reconfiguration of an intersection at Sky View Lane and The Old Road, traffic signal equipment upgrades, reconstruction of drainage facilities, and extension of an existing foot trail. The Project is intended to provide improvements to existing traffic operations and accommodate future traffic projections along The Old Road and adjacent roadways. The two bridges would be replaced to improve roadway safety and provide adequate clearance for flood conditions in the stream below. The replacement bridge over the Santa Clara River would increase the roadway width from four lanes to six lanes. The new bridge would also increase the span height 9 feet higher on the northern side and 15 feet higher on the southern side.

Location: The Project occurs on and adjacent to The Old Road between Henry Mayo Drive and Magic Mountain Parkway (approximately two miles), near the unincorporated community of Castaic Junction, in western Los Angeles County. The Project site also includes a 0.58-mile extension of the County Multi-Purpose Regional River Trail (Multi-Use Trail). The Multi-Use Trail is located on the southbound side of The Old Road from where the trail travels under The Old Road and Interstate 5 (I-5) just southeast of Rye Canyon Road to just northwest of the I-5 on- and off-ramps. The Project site is contiguous between Henry Mayo Road and Magic Mountain Parkway, which form the northern and southern boundaries of the Project site, respectively. The Project site also includes portions of Rye Canyon Road and Sky View Lane which intersect The Old Road.

Biological Setting: Most of the Project site is developed as paved roadway and roadway right-of-way (ROW). The south side of the Project site is directly adjacent to the Santa Clara River and can be primarily characterized as undeveloped land with a few exceptions including an office complex, a recreation vehicle storage facility, agricultural fields, and the Valencia Water Reclamation Plant. The undeveloped areas contain riparian, herbaceous, and shrubland vegetation communities and open water stream habitat. The Santa Clara River flows through the Project site. The Project includes alterations to an unnamed tributary stream feeding into the mainstem Santa Clara River ("Northern Drainage" in the DEIR) from concrete-lined flood control channels draining the north side of the Project site. The north side of the Project site is generally characterized by commercial office and residential development.

Vegetation communities within the Project limits and surrounding area include upland mustard or star-thistle fields (*Brassica nigra* - *Centaurea (solstitialis, melitensis)* Herbaceous Semi-Natural Alliance; 37.6 acres), Fremont cottonwood forest and woodland (*Populus fremontii* - *Fraxinus velutina* - *Salix gooddingii* Forest & Woodland Alliance; 34.1 acres), wild oats and annual brome grasslands (*Avena* spp. - *Bromus*

spp. Herbaceous Semi-Natural Alliance; 17.4 acres), California buckwheat scrub (*Eriogonum fasciculatum* Shrubland Alliance; 7.2 acres), giant reed marshes (*Arundo donax* Herbaceous Semi-Natural Alliance; 4.5 acres), mulefat-elderberry thickets (*Baccharis salicifolia* Shrubland Alliance / *Baccharis salicifolia* - *Sambucus nigra* Association; 4.2 acres), big sagebrush scrub (*Artemisia tridentata* Shrubland Alliance; 4.0 acres), non-native wetlands (1.1 acres), sandbar willow thickets (*Salix exigua* Shrubland Alliance; 1.0 acre), and coyote brush scrub (*Baccharis pilularis* Shrubland Alliance; 0.7 acre).

Sensitive species that have been detected or likely to occur within the Project limits and surrounding area include Crotch's bumble bee (*Bombus crotchii*; CESA-listed candidate species), southwestern willow flycatcher (*Empidonax traillii extimus*; federal Endangered Species Act (ESA)-listed, CESA-listed), least Bell's vireo (*Vireo bellii pusillus*; ESA-listed, CESA-listed), white-tailed kite (*Elanus leucurus*; California Fully Protected Species), Santa Ana sucker (*Catostomus santaanae*; ESA-listed); unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*; ESA-listed, CESA-listed, and California Fully Protected Species; hereafter "UTS"), mountain lion (*Puma concolor*; CESA-listed candidate species), arroyo toad (*Anaxyrus californicus*; ESA-listed, California Species of Special Concern (SSC)), arroyo chub (*Gila orcuttii*; SSC), southwestern pond turtle (*Actinemys pallida*; SSC) California legless lizard (*Anniella* spp.; SSC), California glossy snake (*Arizona elegans occidentalis*; SSC), coastal whiptail (*Aspidoscelis tigris stejnegeri*; SSC), coast horned lizard (*Phrynosoma blainvillii*; SSC), two-striped garter snake (*Thamnophis hammondi*; SSC), burrowing owl (*Athene cunicularia*; SSC), yellow-breasted chat (*Icteria virens*; SSC), loggerhead shrike (*Lanius ludovicianus*; SSC), yellow warbler (*Setophaga petechia*; SSC), pallid bat (*Antrozous pallidus*; SSC), Townsend's big-eared bat (*Corynorhinus townsendii*; SSC), spotted bat (*Euderma maculatum californicus*; SSC), western mastiff bat (*Eumops perotis*; SSC), western red bat (*Lasiurus blossevillii*; SSC), and American badger (*Taxidea taxus*; SSC).

Comments and Recommendations

CDFW met with LACPW to discuss the Project on November 7, 2022, June 20, 2023, October 26, 2023, November 13, 2023, and March 21, 2024. During these meetings, CDFW discussed concerns for potential Project impacts on unarmored threespine stickleback (UTS) among other sensitive species. CDFW offers the comments and recommendations below to assist LACPW in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends LACPW revise several existing Mitigation Measures in the DEIR by removing the strikethrough language and including the underlined language.

Comment
13-1

Comment #1: Impacts to Unarmored Threespine Stickleback

Issue: The Project may impact suitable habitat (including water quality) for UTS, which is a Fully Protected species under Fish and Game Code, section 5515 and an

endangered species under both CESA and ESA. The Project may also result in take of UTS.

Specific impacts: The Project may result in temporary or permanent loss of suitable spawning, foraging, and refuge habitat for UTS. Project-related alterations to stream flow and sediment transport may create conditions no longer suitable for the species to persist. Changes in stream morphology could scour the streambed and potentially destroy UTS habitat and degrade water quality. Additionally, construction activities may also cause the death, entrapment, or injury of adults, eggs, and juveniles. Take of UTS could occur through direct injury and/or mortality to fish drawn into dewatering pumps, entrapment by construction materials, trampled by foot traffic, or acoustic injury during drilling or pile-driving. UTS could also be harmed by degradation of water quality, loss of suitable habitat by development or scouring, and stranding by stream diversion or dewatering activities.

Comment
13-1 Cont.

Why impacts would occur: There have been numerous records of UTS in the Santa Clara River within and near the Project site. The DEIR does not discuss or provide mitigation measures to reduce impacts to UTS after Project construction activities have been completed. The DEIR also does not propose mitigation measures that would adequately prevent take of UTS in situations where Project contact with surface waters cannot be avoided. The DEIR includes UTS-specific mitigation measures intended to be implemented during the construction of the Project to reduce impacts. However, CDFW is concerned the Project could continue to impact UTS and their habitat for years following the conclusion of construction. Project activities (e.g., streambed grading, installation of bridge piers) are likely to alter erosion and streambed processes. The new replacement bridge over the Santa Clara River would also be wider and cast a larger shadow over stream riparian and aquatic habitats.

DEIR Mitigation Measure UTS-1 appears to be sufficient to avoid take of UTS potentially occurring within the Northern Drainage, but this mitigation measure does not apply to the broader Project, mainstem Santa Clara River, or other waterways where UTS may occur. DEIR Mitigation Measure UTS-2 does not sufficiently prevent or mitigate the risk of take or impacts to UTS from the Project. Mitigation measure UTS-2 does not include appropriate mitigation to be implemented if "unforeseen circumstances arise during construction of the bridge piles that may result in impacts to UTS" aside from contacting the U.S. Fish and Wildlife Service (USFWS). If the Project's seasonal work period does not halt prior to the start of the storm season, or if a heavy storm occurs during the dry season, surface waters could contact Project equipment and materials and UTS could become entrapped, entangled, or stranded.

Evidence impacts would be significant: Except as provided in the Fish and Game Code (e.g., for necessary scientific research), take of any Fully Protected species is prohibited and cannot be authorized by CDFW (Fish and G. Code, § 5515 and § 3511). "Take" is defined in section 86 of Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Species designated under Fish and Game code as Fully Protected may not be taken or possessed at any time and no

licenses or permits may be issued for their take (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Fully protected status precludes CDFW from authorizing any amount of incidental take or intentional take to meet any project mitigation requirement. Given the legal status of fully protected animals, mitigation measures used to avoid instances of take should meet very high standards of effectiveness.

UTS is listed as an endangered species under both CESA and ESA. UTS has a very restricted range and steep population declines make the species vulnerable to extirpation from the State (Richmond et al. 2015; Turba et al. 2022). Accordingly, UTS meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of UTS could require a mandatory finding of significance by LACPW (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: All Project equipment, temporary support structures, construction materials, and debris shall be removed from the stream prior to the start of the storm season and at least 48 hours prior to any forecast rain events.

Recommendation #1: All bridge structures spanning UTS habitat should be designed to avoid take of UTS (during both construction and operation of the bridge) and minimize impacts to their habitat. CDFW's design recommendations include:

Comment
13-1 cont

- a. Halting Project activities and future maintenance activities during any wet or rainy conditions. Project personnel, equipment, temporary support structures, construction materials, and debris should avoid contact with surface waters occupied by UTS.
- b. No temporary or permanent bridge piers or other support structures within the channel during the wet season or within 48 hours of a storm event.
- c. Rip-rap or other slope protections should not constrict water flow in the channel. Placement of these materials should avoid the channel to the greatest extent possible. Slope protection materials should not be grouted. Revegetation of ungrouted rip-rap is recommended.
- d. Conducting an in-depth hydraulic study to examine the potential effects of the Project (and Project alternatives) on stream conditions including streambed scouring and bank erosion. The study should include analyses under modeled 2-, 5-, 10-, 25-, 50-, and 100-year flood event conditions.
- e. Avoiding all surface water diversions and dewatering activities.
- f. If subsurface dewatering cannot be avoided, discharges should not be made into existing surface waters.
- g. The Project should use alternatives to hydrocarbon-based asphalt paving.

Asphalt pavement continues to leach hydrocarbons and heavy metals, becoming a significant point source of environmental contamination (Sadler 1999).	Comment 13-1 Cont
Comment #2: Impacts to Least Bell's Vireo and Southwestern Willow Flycatcher Issue: The Project could impact least Bell's vireo and southwestern willow flycatcher, both listed as endangered species under CESA and ESA. Specific impacts: Project activities could result in nest abandonment or decreased feeding frequency. This could result in increased nestling mortality, a significant impact on least Bell's vireo and/or southwestern willow flycatcher. The Project may also result in a loss of breeding and/or foraging habitat for least Bell's vireo and southwestern willow flycatcher. Why impact would occur: The Project site contains suitable habitat for both species, and several recent documented occurrences of least Bell's vireo. Project activities include vegetation removal, surface water diversion, dewatering, drilling, and construction. Project activities could create elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. These disturbances and stressors occurring near potential nests could cause individuals to abandon their nests, resulting in the loss of fertile eggs or nestlings. After construction activities are completed, the Project could continue to impact these species through an increase in noise from heavier road use and closer access by recreational trail users. The increase of shading from new bridges could result in the decline or loss of vegetated habitat for riparian birds and other species. The Project has proposed Mitigation Measures RIP-1, RIP-2, RIP-3, and RIP-4 to mitigate for potential impacts on least Bell's vireo and southwestern willow flycatcher. The mitigation measure would attempt to avoid "to the extent possible" construction activities (including vegetation removal) during the nesting season (RIP-1) and conduct pre-construction nest surveys to determine the presence of active nests (RIP-2). If an active nest is detected, Mitigation Measure RIP-3 proposes the establishment of a 300-foot no-work buffer. However, this no-work buffer zone may still not be sufficiently large to effectively prevent Project disturbance of nesting behavior or abandonment of an active nest. Mitigation Measure RIP-4 proposes compensatory mitigation for the removal of habitat. However, Mitigation Measure RIP-4 does not sufficiently commit LACPW to providing compensatory mitigation for Project impacts. Additionally, Mitigation Measure RIP-4 does not distinguish or qualify Project impacts if an active nest is found or if take of least Bell's vireo or southwestern willow flycatcher occurs. These four Mitigation Measures as proposed do not provide sufficient protections to avoid or minimize Project impacts to least Bell's vireo and southwestern willow flycatcher. Inadequate avoidance, minimization, and mitigation measures for impacts on least Bell's vireo and southwestern willow flycatcher will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special status by CDFW or USFWS. Take under ESA is more broadly defined than	Comment 13-2

CESA. 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.

Evidence impact would be significant: CDFW considers adverse impacts to a species protected by CESA, absent appropriate mitigation, to be significant under CEQA. Under CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). DEIR Mitigation Measures RIP-1, RIP-2, RIP-3, and RIP-4 as proposed may not (1) provide a sufficiently large buffer to avoid take, (2) commit the Project to mitigation particularly if take occurs, (3) adopt specific performance standards the mitigation will achieve, nor (4) identify the type(s) of potential action(s) that can feasibly achieve that performance standard that will be considered, analyzed, and potentially incorporated in the mitigation measure (CEQA Guidelines, § 15126.4).

Comment
13-2 cont

CDFW considers impacts to CESA-listed species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. In addition, nests of all native bird species are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #2: If work is scheduled during the riparian avian breeding season (February 15 through September 15), and within suitable habitat for least Bell's vireo or southwestern willow flycatcher, a qualified biologist will conduct a preconstruction nesting survey to ensure that no active bird nests are present within ~~300 feet~~ 500 feet of construction activities. If no nests are detected, then vegetation removal will be permitted during the nesting season. The qualified biologist shall establish and maintain a minimum 300-foot no-disturbance buffer around all active bird nests. For raptors and special status species, this buffer shall be expanded to a minimum of 500 feet.

Mitigation Measure #3: If an active least Bell's vireo or southwestern willow flycatcher nest is detected, no construction activities will be permitted within ~~300 feet~~ 500 feet of the nest. Work, vehicle traffic, and foot traffic within nest buffers may not resume until the young fledge and disperse, or the nest has been determined to fail by the qualified biologist. Limits of construction to avoid a nest site will be established in the field with flagging and stakes or construction fencing.

Mitigation Measure #4: In addition to mitigation measure GEN-14 proposed in the DEIR, CDFW recommends the installation of signage and educational displays to inform users of the extended Multi-Use Trail when they are approaching an "Environmentally Sensitive Area" within 500 feet of suitable habitat for least Bell's vireo and southwestern willow flycatcher. CDFW also recommends LACPW install appropriate public information signage at trail access points to:

- 1) educate and inform the public about wildlife present in the area;

- 2) advise on proper use of the trail in a manner respectful to wildlife; and,
- 3) provide local contact information to report injured or dead wildlife.

Signage should be written in the language(s) understandable to all those likely to use the trails. LACPW should provide a long-term maintenance plan to repair and replace the signs.

Mitigation Measure #5: Seasonal closures shall occur on all sections of the Multi-Use Trail within 500 feet of suitable habitat for least Bell's vireo and southwestern willow flycatcher during their nesting season. Public access to the Project sections of the Multi-Use Trail shall be closed during nighttime hours.

Comment
13-2 cont

Mitigation Measure #6: If the Project or any Project-related activity for the duration of the Project will result in take of a CESA-listed species, or a candidate for listing under CESA, LACPW shall seek appropriate take authorization under CESA before commencing Project activities. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) 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 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.

Comment #3: Impacts to Crotch's Bumble Bee

Issue: The Project may impact suitable habitat for Crotch's bumble bee, a candidate CESA-listed species.

Specific impacts: The Project may result in temporal or permanent loss of suitable nesting and foraging habitat of Crotch's bumble bee. Project ground disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

Why impacts would occur: The DEIR does not discuss the Project's direct, indirect, or cumulative impacts on Crotch's bumble bee nor does it recommend mitigation measures to reduce impacts to Crotch's bumble bee. Without sufficient species-specific avoidance, minimization, or mitigation measures, impacts to Crotch's bumble bee may occur.

Comment
13-3

According to [California's Natural Diversity Database \(CNDDDB\)](#), there have been historical observations of Crotch's bumble bee in the Santa Clara River watershed (CDFW 2024a). Crotch's bumble bee may fly vast distances and utilize a variety of

areas that offer suitable nesting habitat and floral resources. Aerial photography shows areas, especially around fallow agricultural fields, ROWs, and dry stream banks along The Old Road, where Crotch's bumble bee may inhabit the Project site. Crotch's bumble bee primarily nest in late February through late October underground in abandoned small mammal burrows. They may also nest under perennial bunch grasses or thatched annual grasses, under brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2018). Overwintering sites utilized by Crotch's bumble bee mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014). Ground disturbance and vegetation removal associated with Project implementation during the breeding season could result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas adjacent to the Project site. Potential habitat loss, as a result of the proposed Project, could also reduce foraging habitat for this species in the broader landscape, as urban development continues to eliminate large tracts of native vegetation.

Comment
13-3 cont

Evidence impacts would be significant: A petition to list the Crotch's bumble bee, an endangered species under CESA, is currently pending before the California Fish and Game Commission (Commission) (Cal. Reg. Notice Register 2018, No. 45-Z, pp. 1986–1987 [November 9, 2018]). The Commission designated the Crotch's bumble bee as a candidate species under CESA in June 2019 (Cal. Reg. Notice Register 2019, No. 26-Z, pp. 954–955 [June 28, 2019]). The Commission's decision to designate the Crotch's bumble bee as a candidate species is the subject of a pending legal challenge (Almond Alliance of California v. Fish and Game Commission [2022] 79 Cal. App. 5th 337, pet. for review pending, S275412). On September 30th, 2022, candidacy was reinstated for the four bumble bee species petitioned for listing: Franklin's, Crotch's, western, and suckley cuckoo.

Crotch's bumble bee is also listed as an invertebrate of conservation priority under the [California Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) (CDFW 2017). Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Also, Crotch's bumble bee has a very restricted range and steep population declines make the species vulnerable to extirpation from the State (CDFW 2017). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by LACPW (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #7: LACPW shall retain a qualified entomologist with appropriate handling permits and familiar with the species behavior and life history of the species. Focused surveys shall follow CDFW's [Survey Considerations for California Endangered Species Act \(CESA\) Candidate Bumble Bee Species](#) (CDFW 2023). Prior to finalizing the CEQA document, focused surveys shall be conducted throughout the entire Project

site during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. If Crotch's bumble bee is detected within the Project area, the LACPW shall consult with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & G. Code, § 2080 et seq). LACPW should have a copy of a fully executed take authorization prior to any ground disturbance and vegetation removal. If an ITP through CESA will be pursued, then the final EIR should also include details of impacts to the species and compensatory mitigation including land protection instruments and in-perpetuity funding.

Comment
13-3 cont

Comment #4: Impacts to Mountain Lion and Wildlife Connectivity

Issue: The Project may impact mountain lion and wildlife connectivity.

Specific impact: Project activities have the potential to significantly impact the movement of mountain lion and other wildlife species in the area.

Why impacts would occur: The Santa Clara River serves as an important corridor for the natural movement of wildlife, including several sensitive species such as mountain lion, least Bell's vireo, and southwestern willow flycatcher. Mountain lions may occur within the Project footprint or in areas immediate adjacent to the Project. The DEIR cites local National Park Service biologists who have used global positioning system (GPS) tracking collars to confirm the movement of several mountain lions along the Santa Clara River in the vicinity of the Project site. The tracked movement of mountain lions suggests that the existing Santa Clara River riparian corridor (with its existing bridges and other developed infrastructure) is relatively intact. However, the Project could threaten or diminish the quality of the riparian corridor for wildlife movement and connectivity. These impacts could occur as the Project proposes removal of riparian vegetation and active construction within, above, and adjacent to the stream.

Comment
13-4

After construction activities have been completed, the Project could still continue to impact wildlife connectivity by presenting an increase in noise, light, or recreational trail users. These factors could deter or interfere with the free movement of animals under bridges or near trails. The Project may increase human presence (e.g., new development, public trail access); as a result traffic, noise, and artificial lighting may increase during Project construction and over the life of the Project. Most factors affecting the ability of the southern California mountain lion populations to survive and reproduce are caused by humans (Yap et al. 2019). As California has continued to grow in human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety. Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020). Areas of high human activity have lower occupancy of rare carnivores. Mountain lions tend to avoid roads and trails regardless of how much they are used (Lucas 2020). Increased traffic could cause vehicle strikes. Mountain lions avoid areas with low woody vegetation cover and artificial outdoor

lighting (Beier 1995). As human population density increases, the probability of persistence of mountain lions decreases (Woodroffe 2000).

Evidence impact would be significant: The mountain lion is a specially protected mammal in the state (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit of mountain lion in southern and central coastal California as threatened under CESA (CDFW 2020). As a CESA candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA. The Project may have significant impacts because no mitigation has been proposed for any unavoidable direct and indirect impacts from Project activities or subsequent residential development as well as permanent or temporal losses of habitat for mountain lion.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #8: Trash receptacles shall be placed in areas to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas. Trash receptacles shall be fully covered with secure wildlife-proof lids.

Mitigation Measure #9: LACPW shall prohibit the use of anticoagulant rodenticides during the Project term as well as the future maintenance and operational life of the Multi-Use Trail.

Recommendation #2: Light Output Analysis. LACPW should include a light output analysis report as a part of the final EIR to support efforts to minimize impacts from Project lighting. The goal of this light output analysis is to minimize the extent, duration, and intensity of lighting needed to achieve Project objectives. This analysis should include isolux diagrams that note current light levels present during pre-Project conditions and the predicted light levels that will be created upon completion of the Project. If an increase in light output from current levels to the projected future levels is evident, additional avoidance, minimization, or mitigation shall be developed in coordination with the natural resource agencies to offset Project impacts (e.g., Mitigation Measure #15 below).

Mitigation Measure #10: Within 60 days of Project completion, LACPW shall conduct a ground survey that compares projected light levels (as designed) with actual as-built light levels achieved upon completion of the Project (including the extended Multi-Use Trail) through comparison of isolux diagrams. If an increase from the projected levels to the actual levels is discovered additional avoidance, minimization or mitigation measures may also be required in coordination with the natural resource agencies. This analysis should be conducted across all potential alternatives and compared in table and map format.

Mitigation Measure #11: Light Output Limits. All LEDs or other light bulbs installed as a result of the Project shall be rated to emit or produce light at or under 2700 Kelvin that results in the output of a warm or amber white color spectrum. Light fixtures shall be

Comment
13-4 cont.

designed and installed in a manner that minimizes the duration and brightness of lighting to the degree necessary for safety.

Mitigation Measure #12: Vehicle Light Barriers. Solid barriers at a minimum height of 3.5 feet shall be installed in areas where they have the potential to reduce illumination from overhead lights and from vehicle lights into areas outside of the roadway. Barriers should only be utilized as a light pollution minimization measure if they do not create a significant barrier to wildlife movement. Additional barrier types should be employed when feasible, such as privacy slats into the spacing of cyclone fencing to create light barriers for areas outside the roadway.

Mitigation Measure #13: Reflective Signs and Road Striping. Retroreflectivity of signs and road striping shall be implemented throughout the project to reduce the need for electrical lighting.

Mitigation Measure #14: Light Pole Modifications and Shielding. All light poles or sources of illumination that will be new or replacement installations of existing light sources shall be installed with the appropriate shielding to avoid light pollution into natural landscapes or aquatic habitat with the project corridor in coordination with CDFW. In addition, the light pole arm length and mast heights should be modified to site specific conditions to reduce light spillage into natural landscapes or aquatic habitat within the project corridor. In areas with sensitive natural landscapes or aquatic habitat LACPW should also analyze and determine if placing the light poles at non-standard intervals has the potential to further reduce the potential for light pollution caused by decreasing the number of light output sources in sensitive areas.

Mitigation Measure #15: LACPW shall conduct a study to examine and monitor wildlife movement under the newly expanded bridge (The Old Road over Santa Clara River), comparing pre-Project and post-Project conditions using identical methods. If the Project has resulted in a decrease in wildlife movement through the riparian corridor under the new bridge (particularly for sensitive species), LACPW shall implement corrective actions such as adjustments to bridge lighting, abatement of bridge and roadway noise, installation of additional riparian vegetation, and installation of refuge habitat (e.g., boulders, woody debris, etc.) and/or provide additional compensatory mitigation.

Mitigation Measure #16: No lighting shall be installed along the extended Multi-Use Trail. Trail access shall be closed at night. LACPW shall develop a Trail Management Plan for CDFW review and approval prior to the start of trail extension Project activities.

Recommendation #3: The DEIR proposes the creation and/or restoration of vegetation for sensitive natural communities within and near the Project area (e.g., Mitigation Measures VEG-5, VEG-6, and VEG-7). CDFW recommends prioritizing these habitat creation and restoration efforts so that they enhance the likelihood of free wildlife movement under and around the new bridge. In addition to newly created or restored

Comment
13-4 cont.

vegetation habitat, CDFW recommends the installation of refugia structures that may encourage wildlife movement (e.g., boulders, large woody debris, etc.)

Comment
13-4 cont.

Comment #5: Impacts to Streams

Issue: The Project may impact streams.

Specific impacts: The Project includes alterations to the streambed and banks at several locations in the mainstem Santa Clara River and a "Northern Drainage" tributary. Alterations include the removal of riparian vegetation, streambed grading, excavation, and drilling, installation of rock slope protection or rip-rap, demolition of existing bridge structures, utilities, and other infrastructure, installation of bridge piers, and increased shading of the riparian corridor under bridges. The Project could also impact the stream through degraded water quality, increased streambed scour and bank erosion, and changes to the riparian vegetation.

Why impacts would occur: Several alterations to the stream are included in the Project as intentional activities (e.g., vegetation removal, grading, bridge demolition, bridge construction, etc.). The Project could also impact streams after construction is completed by altering the existing water flow and sediment transport.

Comment
13-5

The Project may impact stream and riparian habitats, which absent appropriate mitigation, could result in substantial erosion or siltation within and downstream from the Project site. Furthermore, the Project may result in the loss of riparian habitat. Specifically, the Project may result in the direct removal of sandbar willow thicket, mulefat-elderberry thicket, and Fremont cottonwood forest. Additional riparian habitat types may be impacted indirectly by Project activities. Riparian habitats provide important food, nesting habitat, cover, and migration corridors for wildlife. Only 5 to 10 percent of California's original riparian habitat exists today and much of the remaining habitat is in a degraded condition (NRC 2002).

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:

- a. Divert or obstruct the natural flow of any river, stream, or lake;
- b. Change the bed, channel, or bank of any river, stream, or lake;
- c. Use material from any river, stream, or lake; or,
- d. Deposit or dispose of material into any river, stream, or lake.

CDFW requires an 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 would be in close proximity to these resources. Without appropriate mitigation, the Project continues to have 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 #17: The Project will result in the alteration of streams. As such, CDFW concurs with the Project's proposal for LACPW to notify CDFW pursuant to Fish and Game Code, section 1602. LACPW shall comply with the mitigation measures detailed in an LSA Agreement issued by CDFW. LACPW shall also provide compensatory mitigation for any impacted stream and associated natural community. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2024b).

Mitigation Measure #18: CDFW recommends LACPW mitigate for Project impacts to streams and riparian habitat by replacing habitat at no less than 3:1 ratio for all impacts. CDFW considers all Project impacts from sediment removal and sediment placement to be permanent. Mitigation lands should support streams and riparian habitat of similar vegetation composition, density, coverage, and species richness and abundance.

Comment
13-5 cont.

Recommendation #4: 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.

Additional Recommendations

Recommendation #5: The DEIR described focused rare plant surveys conducted in June 2018 and May to June 2023. However, these surveys would have likely missed the peak blooming period for several rare plant species that could potentially occur near the Project site including white rabbit-tobacco (*Pseudognaphalium leucocephalum*), Newhall sunflower (*Helianthus inexpectatus*), and Palmer's grapplehook (*Harpagonella palmeri*). CDFW recommends additional focused rare plant surveys during the appropriate blooming periods for these species.

Comment
13-6

Recommendation #6: The DEIR proposes Mitigation Measure BAT-1. CDFW recommends LACPW revise Mitigation Measure BAT-1 by removing the strikethrough language and including the underlined language to offer increased protections to bats:

No earlier than ~~20~~ 7 days prior to the commencement of construction activities around the two bridge locations, a field survey will be conducted by a qualified biologist to determine if active roosts of bats are present on or within 300 feet of the proposed project boundaries. Should an active roost be identified, a determination will be made regarding whether the roost is used as a night-roost, day-roost, or maternity-roost. If an active roost would be removed, MM BAT-2 (below) will be implemented. Alternatively, if an active roost is identified within 300 feet of the disturbance boundary, but would not be removed, MM BAT-3 (below) will be implemented. Trees and/or structures determined to be maternity roosts shall be left in place until the end of the maternity season. Because the ambient noise levels already exceed acceptable noise levels due to surrounding construction activities and traffic noise, additional noise mitigation will not be implemented. Consequently, no interference will take place with bat echolocation and insect foraging.

Comment
13-6 cont.

Mitigation and Monitoring Reporting Plan

CDFW recommends including mitigation measures recommended in this letter in the final EIR. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist LACPW in developing mitigation measures that are (1) consistent with CEQA Guidelines section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation, monitoring, and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). LACPW is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code, section 21081.6(a)(1), CDFW has provided LACPW with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment 1).

Comment
13-7

Environmental Data

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd.(e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The [CNDDDB field survey form](#) can be filled out and submitted online (CDFW 2024d). Please view the [types of information](#) that can be reported to CNDDDB.

Comment
13-8

Environmental Document Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of

environmental review by CDFW. Payment of the environmental document filing fee is required in order 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.)

Comment
13-8 cont.

Conclusion

CDFW appreciates the opportunity to provide comments and recommendations regarding the Project to assist LACPW in adequately analyzing and minimizing/mitigating impacts to biological resources. To ensure significant impacts are adequately mitigated to a level less-than-significant, the feasible mitigation measures described above should be incorporated as enforceable conditions in the final EIR for the Project. CDFW looks forward to discussing the Project and our comments detailed above prior to the adoption of the final EIR. If you have any questions or comments regarding this letter, please contact David Lin, Senior Environmental Scientist (Specialist), at (562) 619-0509 or by email at David.Lin@wildlife.ca.gov.

Sincerely,

(DocuSigned by:

Heather A. Pert

CP4234088148441

Heather A. Pert

Environmental Program Manager I

Commenter: Heather A. Pert, California Department of Fish and Wildlife (CDFW)

Date of Letter: April 18, 2024

Comment Letter 13-1:

"Comments and Recommendations

CDFW met with LACPW to discuss the Project on November 7, 2022, June 20, 2023, October 26, 2023, November 13, 2023, and March 21, 2024. During these meetings, CDFW discussed concerns for potential Project impacts on unarmored threespine stickleback (UTS) among other sensitive species. CDFW offers the comments and recommendations below to assist LACPW in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends LACPW revise several existing Mitigation Measures in the DEIR by removing the strikethrough language and including the underlined language.

Comment #1: Impacts to Unarmored Threespine Stickleback Issue:

The Project may impact suitable habitat (including water quality) for UTS, which is a Fully Protected species under Fish and Game Code, section 5515 and an endangered species under both CESA and ESA. The Project may also result in take of UTS.

Specific impacts:

The Project may result in temporary or permanent loss of suitable spawning, foraging, and refuge habitat for UTS. Project-related alterations to stream flow and sediment transport may create conditions no longer suitable for the species to persist. Changes in stream morphology could scour the streambed and potentially destroy UTS habitat and degrade water quality. Additionally, construction activities may also cause the death, entrapment, or injury of adults,

eggs, and juveniles. Take of UTS could occur through direct injury and/or mortality to fish drawn into dewatering pumps, entrapment by construction materials, trampled by foot traffic, or acoustic injury during drilling or pile-driving. UTS could also be harmed by degradation of water quality, loss of suitable habitat by development or scouring, and stranding by stream diversion or dewatering activities.

Why impacts would occur:

There have been numerous records of UTS in the Santa Clara River within and near the Project site. The DEIR does not discuss or provide mitigation measures to reduce impacts to UTS after Project construction activities have been completed. The DEIR also does not propose mitigation measures that would adequately prevent take of UTS in situations where Project contact with surface waters cannot be avoided. The DEIR includes UTS-specific mitigation measures intended to be implemented during the construction of the Project to reduce impacts. However, CDFW is concerned the Project could continue to impact UTS and their habitat for years following the conclusion of construction. Project activities (e.g., streambed grading, installation of bridge piers) are likely to alter erosion and streambed processes. The new replacement bridge over the Santa Clara River would also be wider and cast a larger shadow over stream riparian and aquatic habitats. DEIR Mitigation Measure UTS-1 appears to be sufficient to avoid take of UTS potentially occurring within the Northern Drainage, but this mitigation measure does not apply to the broader Project, mainstem Santa Clara River, or other waterways where UTS may occur. DEIR Mitigation Measure UTS-2 does not sufficiently prevent or mitigate the risk of take or impacts to UTS from the Project. Mitigation measure UTS-2 does not include appropriate mitigation to be implemented if “unforeseen circumstances arise during construction of the bridge piles that may result in impacts to UTS” aside from contacting the U.S. Fish and Wildlife Service (USFWS). If the Project’s seasonal work period does not halt prior to the start of the storm season, or if a heavy storm occurs during the dry season, surface waters could contact Project equipment and materials and UTS could become entrapped, entangled, or stranded.

Evidence impacts would be significant:

Except as provided in the Fish and Game Code (e.g., for necessary scientific research), take of any Fully Protected species is prohibited and cannot be authorized by CDFW (Fish and G. Code, § 5515 and § 3511). “Take” is defined in section 86 of Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” Species designated under Fish and Game code as Fully Protected may not be taken or possessed at any time and no licenses or permits may be issued for their take (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Fully protected status precludes CDFW from authorizing any amount of incidental take or intentional take to meet any project mitigation requirement. Given the legal status of fully protected animals, mitigation measures used to avoid instances of take should meet very high standards of effectiveness. UTS is listed as an endangered species under both CESA and ESA. UTS has a very restricted range and steep population declines make the species vulnerable to extirpation from the State (Richmond et al. 2015; Turba et al. 2022). Accordingly, UTS meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of UTS could require a mandatory finding of significance by LACPW (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):**Mitigation Measure #1:**

All Project equipment, temporary support structures, construction materials, and debris shall be removed from the stream prior to the start of the storm season and at least 48 hours prior to any forecast rain events.

Recommendation #1: All bridge structures spanning UTS habitat should be designed to avoid take of UTS (during both construction and operation of the bridge) and minimize impacts to their habitat. CDFW's design recommendations include:

- a) Halting Project activities and future maintenance activities during any wet or rainy conditions. Project personnel, equipment, temporary support structures, construction materials, and debris should avoid contact with surface waters occupied by UTS.*
- b) No temporary or permanent bridge piers or other support structures within the channel during the wet season or within 48 hours of a storm event.*
- c) Rip-rap or other slope protections should not constrict water flow in the channel. Placement of these materials should avoid the channel to the greatest extent possible. Slope protection materials should not be grouted. Revegetation of ungrouted rip-rap is recommended.*
- d) Conducting an in-depth hydraulic study to examine the potential effects of the Project (and Project alternatives) on stream conditions including streambed scouring and bank erosion. The study should include analyses under modeled 2-, 5-, 10-, 25-, 50-, and 100-year flood event conditions*
- e) Avoiding all surface water diversions and dewatering activities.*
- f) If subsurface dewatering cannot be avoided, discharges should not be made into existing surface waters.*
- g) The Project should use alternatives to hydrocarbon-based asphalt paving. DocuSign Envelope ID: 4C003E19-B655-4AB0-A208-A405ECFCB8A0 Asphalt pavement continues to leach hydrocarbons and heavy metals, becoming a significant point source of environmental contamination (Sadler 1999)."*

Response to Comment Letter 13-1:

The bridge structures spanning UTS habitat would be designed to minimize impacts on UTS habitat. Project activities would not occur during rainy conditions.

Comment Letter 13-2:

"Comment #2: Impacts to Least Bell's Vireo and Southwestern Willow Flycatcher

Issue: The Project could impact least Bell's vireo and southwestern willow flycatcher, both listed as endangered species under CESA and ESA.

Specific impacts: Project activities could result in nest abandonment or decreased feeding frequency. This could result in increased nestling mortality, a significant impact on least Bell's vireo and/or southwestern willow flycatcher. The Project may also result in a loss of breeding and/or foraging habitat for least Bell's vireo and southwestern willow flycatcher.

Why impact would occur: The Project site contains suitable habitat for both species, and several recent documented occurrences of least Bell's vireo. Project activities include vegetation removal, surface water diversion, dewatering, drilling, and construction. Project activities could

create elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. These disturbances and stressors occurring near potential nests could cause individuals to abandon their nests, resulting in the loss of fertile eggs or nestlings. After construction activities are completed, the Project could continue to impact these species through an increase in noise from heavier road use and closer access by recreational trail users. The increase of shading from new bridges could result in the decline or loss of vegetated habitat for riparian birds and other species. The Project has proposed Mitigation Measures RIP-1, RIP-2, RIP-3, and RIP-4 to mitigate for potential impacts on least Bell's vireo and southwestern willow flycatcher. The mitigation measure would attempt to avoid "to the extent possible" construction activities (including vegetation removal) during the nesting season (RIP-1) and conduct pre-construction nest surveys to determine the presence of active nests (RIP-2). If an active nest is detected, Mitigation Measure RIP-3 proposes the establishment of a 300-foot no-work buffer. However, this no-work buffer zone may still not be sufficiently large to effectively prevent Project disturbance of nesting behavior or abandonment of an active nest. Mitigation Measure RIP-4 proposes compensatory mitigation for the removal of habitat. However, Mitigation Measure RIP-4 does not sufficiently commit LACPW to providing compensatory mitigation for Project impacts. Additionally, Mitigation Measure RIP-4 does not distinguish or qualify Project impacts if an active nest is found or if take of least Bell's vireo or southwestern willow flycatcher occurs. These four Mitigation Measures as proposed do not provide sufficient protections to avoid or minimize Project impacts to least Bell's vireo and southwestern willow flycatcher. Inadequate avoidance, minimization, and mitigation measures for impacts on least Bell's vireo and southwestern willow flycatcher will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special status by CDFW or USFWS. Take under ESA is more broadly defined than CESA. 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.

Evidence impact would be significant: CDFW considers adverse impacts to a species protected by CESA, absent appropriate mitigation, to be significant under CEQA. Under CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). DEIR Mitigation Measures RIP-1, RIP-2, RIP-3, and RIP-4 as proposed may not (1) provide a sufficiently large buffer to avoid take, (2) commit the Project to mitigation particularly if take occurs, (3) adopt specific performance standards the mitigation will achieve, nor (4) identify the type(s) of potential action(s) that can feasibly achieve that performance standard that will be considered, analyzed, and potentially incorporated in the mitigation measure (CEQA Guidelines, § 15126.4). CDFW considers impacts to CESA-listed species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. In addition, nests of all native bird species are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #2: If work is scheduled during the riparian avian breeding season (February 1 through September 15), and within suitable habitat for least Bell's vireo or southwestern willow flycatcher, a qualified biologist will conduct a preconstruction nesting survey to ensure that no active bird nests are present within 300 feet 500 feet of construction activities. If no nests are detected, then vegetation removal will be permitted during the nesting season. The qualified biologist shall establish and maintain a minimum 300-foot no-disturbance buffer around all active bird nests. For raptors and special status species, this buffer shall be expanded to a minimum of 500 feet.

Mitigation Measure #3: If an active least Bell's vireo or southwestern willow flycatcher nest is detected, no construction activities will be permitted within 300 feet 500 feet of the nest. Work, vehicle traffic, and foot traffic within nest buffers may not resume until the young fledge and disperse, or the nest has been determined to fail by the qualified biologist. Limits of construction to avoid a nest site will be established in the field with flagging and stakes or construction fencing.

Mitigation Measure #4: In addition to mitigation measure GEN-14 proposed in the DEIR, CDFW recommends the installation of signage and educational displays to inform users of the extended Multi-Use Trail when they are approaching an "Environmentally Sensitive Area" within 500 feet of suitable habitat for least Bell's vireo and southwestern willow flycatcher. CDFW also recommends LACPW install appropriate public information signage at trail access points to:

- 1) educate and inform the public about wildlife present in the area; DocuSign Envelope ID: 4C003E19-B655-4AB0-A208-A405ECFCB8A0*
- 2) advise on proper use of the trail in a manner respectful to wildlife; and,*
- 3) provide local contact information to report injured or dead wildlife.*

Signage should be written in the language(s) understandable to all those likely to use the trails. LACPW should provide a long-term maintenance plan to repair and replace the signs.

Mitigation Measure #5: Seasonal closures shall occur on all sections of the Multi-Use Trail within 500 feet of suitable habitat for least Bell's vireo and southwestern willow flycatcher during their nesting season. Public access to the Project sections of the Multi-Use Trail shall be closed during nighttime hours.

Mitigation Measure #6: If the Project or any Project-related activity for the duration of the Project will result in take of a CESA-listed species, or a candidate for listing under CESA, LACPW shall seek appropriate take authorization under CESA before commencing Project activities. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) 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 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."

Response to Comment Letter 13-2:

MMs RIP-1 to RIP-2 (Section 2.4.5- Threatened and Endangered Species, of the EIR/EA) were updated to incorporate CDFW's revisions to the measures.

Comment Letter 13-3:

"Comment #3: Impacts to Crotch's Bumble Bee Issue: The Project may impact suitable habitat for Crotch's bumble bee, a candidate CESA-listed species. Specific impacts: The Project may result in temporal or permanent loss of suitable nesting and foraging habitat of Crotch's bumble

bee. Project ground disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

Why impacts would occur: The DEIR does not discuss the Project's direct, indirect, or cumulative impacts on Crotch's bumble bee nor does it recommend mitigation measures to reduce impacts to Crotch's bumble bee. Without sufficient species-specific avoidance, minimization, or mitigation measures, impacts to Crotch's bumble bee may occur. According to California's Natural Diversity Database (CNDDDB), there have been historical observations of Crotch's bumble bee in the Santa Clara River watershed (CDFW 2024a). Crotch's bumble bee may fly vast distances and utilize a variety of DocuSign Envelope ID: 4C003E19-B655-4AB0-A208-A405ECFCB8A0 areas that offer suitable nesting habitat and floral resources. Aerial photography shows areas, especially around fallow agricultural fields, ROWs, and dry stream banks along The Old Road, where Crotch's bumble bee may inhabit the Project site. Crotch's bumble bee primarily nest in late February through late October underground in abandoned small mammal burrows. They may also nest under perennial bunch grasses or thatched annual grasses, under brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2018). Overwintering sites utilized by Crotch's bumble bee mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014). Ground disturbance and vegetation removal associated with Project implementation during the breeding season could result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas adjacent to the Project site. Potential habitat loss, as a result of the proposed Project, could also reduce foraging habitat for this species in the broader landscape, as urban development continues to eliminate large tracts of native vegetation.

Evidence impacts would be significant: A petition to list the Crotch's bumble bee, an endangered species under CESA, is currently pending before the California Fish and Game Commission (Commission) (Cal. Reg. Notice Register 2018, No. 45-Z, pp. 1986–1987 [November 9, 2018]). The Commission designated the Crotch's bumble bee as a candidate species under CESA in June 2019 (Cal. Reg. Notice Register 2019, No. 26-Z, pp. 954–955 [June 28, 2019]). The Commission's decision to designate the Crotch's bumble bee as a candidate species is the subject of a pending legal challenge (Almond Alliance of California v. Fish and Game Commission [2022] 79 Cal. App. 5th 337, pet. for review pending, S275412). On September 30th, 2022, candidacy was reinstated for the four bumble bee species petitioned for listing: Franklin's, Crotch's, western, and suckley cuckoo. Crotch's bumble bee is also listed as an invertebrate of conservation priority under the California Terrestrial and Vernal Pool Invertebrates of Conservation Priority (CDFW 2017). Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Also, Crotch's bumble bee has a very restricted range and steep population declines make the species vulnerable to extirpation from the State (CDFW 2017). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by LACPW (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #7: LACPW shall retain a qualified entomologist with appropriate handling permits and familiar with the species behavior and life history of the species. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023). Prior to finalizing the CEQA document, focused surveys shall be conducted throughout the entire Project site during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. If Crotch's bumble bee is

detected within the Project area, the LACPW shall consult with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & G. Code, § 2080 et seq). LACPW should have a copy of a fully executed take authorization prior to any ground disturbance and vegetation removal. If an ITP through CESA will be pursued, then the Final EIR should also include details of impacts to the species and compensatory mitigation including land protection instruments and in-perpetuity funding."

Response to Comment Letter 13-3:

Focused surveys for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023) were conducted in summer 2024 throughout the BSA and none were detected. Most habitat within the BSA has been historically disturbed, is fragmented, and does not contain large patches of consistent high quality nectar sources. The habitat is low quality and hence the species is unlikely to occur within the BSA. If Crotch's bumble bee is detected within the Project area, LACPW shall consult with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & G. Code, § 2080 et seq).

Comment Letter 13-4:

"Comment #4: Impacts to Mountain Lion and Wildlife Connectivity Issue: The Project may impact mountain lion and wildlife connectivity.

Specific impact: Project activities have the potential to significantly impact the movement of mountain lion and other wildlife species in the area.

Why impacts would occur: The Santa Clara River serves as an important corridor for the natural movement of wildlife, including several sensitive species such as mountain lion, least Bell's vireo, and southwestern willow flycatcher. Mountain lions may occur within the Project footprint or in areas immediate adjacent to the Project. The DEIR cites local National Park Service biologists who have used global positioning system (GPS) tracking collars to confirm the movement of several mountain lions along the Santa Clara River in the vicinity of the Project site. The tracked movement of mountain lions suggests that the existing Santa Clara River riparian corridor (with its existing bridges and other developed infrastructure) is relatively intact. However, the Project could threaten or diminish the quality of the riparian corridor for wildlife movement and connectivity. These impacts could occur as the Project proposes removal of riparian vegetation and active construction within, above, and adjacent to the stream. After construction activities have been completed, the Project could still continue to impact wildlife connectivity by presenting an increase in noise, light, or recreational trail users. These factors could deter or interfere with the free movement of animals under bridges or near trails. The Project may increase human presence (e.g., new development, public trail access); as a result traffic, noise, and artificial lighting may increase during Project construction and over the life of the Project. Most factors affecting the ability of the southern California mountain lion populations to survive and reproduce are caused by humans (Yap et al. 2019). As California has continued to grow in human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety. Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020). Areas of high human activity have lower occupancy of rare carnivores. Mountain lions tend to avoid roads and trails regardless of how much they are used (Lucas 2020). Increased traffic could cause vehicle strikes. Mountain lions avoid areas with low

woody vegetation cover and artificial outdoor lighting (Beier 1995). As human population density increases, the probability of persistence of mountain lions decreases (Woodroffe 2000).

Evidence impact would be significant: The mountain lion is a specially protected mammal in the state (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit of mountain lion in southern and central coastal California as threatened under CESA (CDFW 2020). As a CESA candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA. The Project may have significant impacts because no mitigation has been proposed for any unavoidable direct and indirect impacts from Project activities or subsequent residential development as well as permanent or temporal losses of habitat for mountain lion.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #8: Trash receptacles shall be placed in areas to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas. Trash receptacles shall be fully covered with secure wildlife-proof lids.

Mitigation Measure #9: LACPW shall prohibit the use of anticoagulant rodenticides during the Project term as well as the future maintenance and operational life of the Multi-Use Trail.

Recommendation #2: Light Output Analysis. LACPW should include a light output analysis report as a part of the final EIR to support efforts to minimize impacts from Project lighting. The goal of this light output analysis is to minimize the extent, duration, and intensity of lighting needed to achieve Project objectives. This analysis should include isolux diagrams that note current light levels present during pre-Project conditions and the predicted light levels that will be created upon completion of the Project. If an increase in light output from current levels to the projected future levels is evident, additional avoidance, minimization, or mitigation shall be developed in coordination with the natural resource agencies to offset Project impacts (e.g., Mitigation Measure #15 below).

Mitigation Measure #10: Within 60 days of Project completion, LACPW shall conduct a ground survey that compares projected light levels (as designed) with actual as-built light levels achieved upon completion of the Project (including the extended Multi-Use Trail) through comparison of isolux diagrams. If an increase from the projected levels to the actual levels is discovered additional avoidance, minimization or mitigation measures may also be required in coordination with the natural resource agencies. This analysis should be conducted across all potential alternatives and compared in table and map format.

Mitigation Measure #11: Light Output Limits. All LEDs or other light bulbs installed as a result of the Project shall be rated to emit or produce light at or under 2700 Kelvin that results in the output of a warm or amber white color spectrum. Light fixtures shall be designed and installed in a manner that minimizes the duration and brightness of lighting to the degree necessary for safety.

Mitigation Measure #12: Vehicle Light Barriers. Solid barriers at a minimum height of 3.5 feet shall be installed in areas where they have the potential to reduce illumination from overhead lights and from vehicle lights into areas outside of the roadway. Barriers should only be utilized as a light pollution minimization measure if they do not create a significant barrier to wildlife

movement. Additional barrier types should be employed when feasible, such as privacy slats into the spacing of cyclone fencing to create light barriers for areas outside the roadway.

Mitigation Measure #13: Reflective Signs and Road Striping. Retroreflectivity of signs and road striping shall be implemented throughout the project to reduce the need for electrical lighting.

Mitigation Measure #14: Light Pole Modifications and Shielding. All light poles or sources of illumination that will be new or replacement installations of existing light sources shall be installed with the appropriate shielding to avoid light pollution into natural landscapes or aquatic habitat with the project corridor in coordination with CDFW. In addition, the light pole arm length and mast heights should be modified to site specific conditions to reduce light spillage into natural landscapes or aquatic habitat within the project corridor. In areas with sensitive natural landscapes or aquatic habitat LACPW should also analyze and determine if placing the light poles at non-standard intervals has the potential to further reduce the potential for light pollution caused by decreasing the number of light output sources in sensitive areas.

Mitigation Measure #15: LACPW shall conduct a study to examine and monitor wildlife movement under the newly expanded bridge (The Old Road over Santa Clara River), comparing pre-Project and post-Project conditions using identical methods. If the Project has resulted in a decrease in wildlife movement through the riparian corridor under the new bridge (particularly for sensitive species), LACPW shall implement corrective actions such as adjustments to bridge lighting, abatement of bridge and roadway noise, installation of additional riparian vegetation, and installation of refuge habitat (e.g., boulders, woody debris, etc.) and/or provide additional compensatory mitigation.

Mitigation Measure #16: No lighting shall be installed along the extended Multi-Use Trail. Trail access shall be closed at night. LACPW shall develop a Trail Management Plan for CDFW review and approval prior to the start of trail extension Project activities.

Recommendation #3: The DEIR proposes the creation and/or restoration of vegetation for sensitive natural communities within and near the Project area (e.g., Mitigation Measures VEG-5, VEG-6, and VEG-7). CDFW recommends prioritizing these habitat creation and restoration efforts so that they enhance the likelihood of free wildlife movement under and around the new bridge. In addition to newly created or restored vegetation habitat, CDFW recommends the installation of refugia structures that may encourage wildlife movement (e.g., boulders, large woody debris, etc.)”

Response to Comment Letter 13-4:

LACPW is currently assessing the potential feasibility of these measures. For measures specific to the Multi-Use trail, LACPW will not be managing or maintaining the trail, so implementation of measures specific to the Multi-Use Trail are not feasible for LACPW to implement. Additional MM LION-3 (same as Mitigation Measure #15, above) was added to the EIR/EA to understand the potential impacts of expanding The Old Road Bridge over the Santa Clara River on wildlife movement under the bridge.

Comment Letter 13-5:

“Comment #5: Impacts on Streams

Issue: The Project may impact streams.

Specific impacts: The Project includes alterations to the streambed and banks at several locations in the mainstem Santa Clara River and a "Northern Drainage" tributary. Alterations include the removal of riparian vegetation, streambed grading, excavation, and drilling, installation of rock slope protection or rip-rap, demolition of existing bridge structures, utilities, and other infrastructure, installation of bridge piers, and increased shading of the riparian corridor under bridges. The Project could also impact the stream through degraded water quality, increased streambed scour and bank erosion, and changes to the riparian vegetation. Why impacts would occur: Several alterations to the stream are included in the Project as intentional activities (e.g., vegetation removal, grading, bridge demolition, bridge construction, etc.). The Project could also impact streams after construction is completed by altering the existing water flow and sediment transport.

The Project may impact stream and riparian habitats, which absent appropriate mitigation, could result in substantial erosion or siltation within and downstream from the Project site. Furthermore, the Project may result in the loss of riparian habitat. Specifically, the Project may result in the direct removal of sandbar willow thicket, mulefat-elderberry thicket, and Fremont cottonwood forest. Additional riparian habitat types may be impacted indirectly by Project activities. Riparian habitats provide important food, nesting habitat, cover, and migration corridors for wildlife. Only 5 to 10 percent of California's original riparian habitat exists today and much of the remaining habitat is in a degraded condition (NRC 2002).

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:

- a. Divert or obstruct the natural flow of any river, stream, or lake;*
- b. Change the bed, channel, or bank of any river, stream, or lake;*
- c. Use material from any river, stream, or lake; or,*
- d. Deposit or dispose of material into any river, stream, or lake.*

CDFW requires an 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 would be in close proximity to these resources. Without appropriate mitigation, the Project continues to have 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 #17: The Project will result in the alteration of streams. As such, CDFW concurs with the Project's proposal for LACPW to notify CDFW pursuant to Fish and Game Code, section 1602. LACPW shall comply with the mitigation measures detailed in an LSA Agreement issued by CDFW. LACPW shall also provide compensatory mitigation for any impacted stream and associated natural community. Please visit CDFW's Lake and Streambed Alteration Program webpage for more information (CDFW 2024b).

Mitigation Measure #18: CDFW recommends LACPW mitigate for Project impacts on streams and riparian habitat by replacing habitat at no less than 3:1 ratio for all impacts.

CDFW considers all Project impacts from sediment removal and sediment placement to be permanent. Mitigation lands should support streams and riparian habitat of similar vegetation composition, density, coverage, and species richness and abundance.

Recommendation #4: 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 on 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 on 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."

Response to Comment Letter 13-5:

LACPW concurs with mitigation measures 17 and 18 presented in comment 13-5. LACPW intends to mitigate for Project impacts on streams and riparian habitat at a 3:1 ratio for all areas except a concrete-lined drainage (Drainage A in the EIR/EA) for which a 1:1 ratio is proposed.

Comment Letter 13-6:

"Additional Recommendations

*Recommendation #5: The DEIR described focused rare plant surveys conducted in June 2018 and May to June 2023. However, these surveys would have likely missed the peak blooming period for several rare plant species that could potentially occur near the Project site including white rabbit-tobacco (*Pseudognaphalium leucocephalum*), Newhall sunflower (*Helianthus inexpectatus*), and Palmer's grapplehook (*Harpagonella palmeri*). CDFW recommends additional focused rare plant surveys during the appropriate blooming periods for these species.*

Recommendation #6: The DEIR proposes Mitigation Measure BAT-1. CDFW recommends LACPW revise Mitigation Measure BAT-1 by removing the strikethrough language and including the underlined language to offer increased protections to bats: No earlier than 20 7 days prior to the commencement of construction activities around the two bridge locations, a field survey will be conducted by a qualified biologist to determine if active roosts of bats are present on or within 300 feet of the proposed project boundaries. Should an active roost be identified, a determination will be made regarding whether the roost is used as a night-roost, day-roost, or maternity-roost. If an active roost would be removed, MM BAT-2 (below) will be implemented. Alternatively, if an active roost is identified within 300 feet of the disturbance boundary, but would not be removed, MM BAT-3 (below) will be implemented. Trees and/or structures determined to be maternity roosts shall be left in place until the end of the maternity season. Because the ambient noise levels already exceed acceptable noise levels due to surrounding construction activities and traffic noise, additional noise mitigation will not be implemented. Consequently, no interference will take place with bat echolocation and insect foraging."

Response to Comment Letter 13-6:

Rare plant surveys were conducted in spring and summer 2023 during the peak blooming period for the rare plant species with the greatest potential to occur within the project area. Before the start of surveys, qualified botanists reviewed the list of potential rare plant species known from the area (based on various database searches) and paid particular attention to rare plants with a potential to occur. The three rare plant species mentioned would likely have been detected and identified during spring/summer 2023 surveys even if their peak blooming periods didn't correspond completely with the survey timeframe. This is because plant phenology was advanced in spring/summer 2023 (because of the preceding wet winter). Furthermore, botanists attempted to check nearby reference populations of several rare plant species to ensure surveys were timed appropriately. Finally, botanists were able to correctly identify all the plant species they detected, even if some were not blooming. In particular they did not find *Pseudognaphalium* or *Helianthus* species that they couldn't definitively identify.

MM BAT-1 (Section 2.4.4 Wildlife Species, of the DEIR) was edited per Recommendation 6 provided in comment letter 13-6.

Comment Letter 13-7:

"Mitigation and Monitoring Reporting Plan

CDFW recommends including mitigation measures recommended in this letter in the final EIR. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist LACPW in developing mitigation measures that are (1) consistent with CEQA Guidelines section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation, monitoring, and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). LACPW is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code, section 21081.6(a)(1), CDFW has provided LACPW with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment 1)."

Response to Comment Letter 13-7:

LACPW appreciates the recommendations and mitigation measures presented and several of them are now incorporated into the document. Responses have been provided above to comments 13-1 through 13-6 and coordination will continue with CDFW in the permitting phase of the project.

Comment Letter 13-8:

"Environmental Data

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd.(e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey

form can be filled out and submitted online (CDFW 2024d). Please view the types of information that can be reported to CNDDDB.

Environmental Document Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order 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.)

Conclusion

CDFW appreciates the opportunity to provide comments and recommendations regarding the Project to assist LACPW in adequately analyzing and minimizing/mitigating impacts on biological resources. To ensure significant impacts are adequately mitigated to a level less-than-significant, the feasible mitigation measures described above should be incorporated as enforceable conditions in the final EIR for the Project. CDFW looks forward to discussing the Project and our comments detailed above prior to the adoption of the final EIR. If you have any questions or comments regarding this letter, please contact David Lin, Senior Environmental Scientist (Specialist), at (562) 619-0509 or by email at David.Lin@wildlife.ca.gov.

Response to Comment Letter 13-8:

Sensitive wildlife species data collected during 2023 field surveys was submitted to CNDDDB on January 15, 2024. LACPW appreciates the recommendations and mitigation measures presented. The filing fee will be paid by LACPW.

Chapter 5 **List of Preparers and Distribution List**

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The preparation of this environmental document and project design involved a team of Caltrans personnel and consultants.

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This Draft Environmental Impact Report/Environmental Assessment and/or a Notice of Availability was distributed to federal, State, regional, and local agencies. In addition, all property owners and occupants within a 0.25-mile radius of the project limits were provided the Notice of Availability.

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AVE STANFORD INDUSTRIAL LLC
1331 JOURNEYS END DR
LA CANADA, CA 91011

28231 AVE CROCKER LLC
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APPENDICES

Appendix A. Title VI Policy Statement

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September 2024

TITLE VI/NON-DISCRIMINATION POLICY STATEMENT

It is the policy of the California Department of Transportation (Caltrans), in accordance with Title VI of the Civil Rights Act of 1964 and the assurances set forth in the Caltrans' Title VI Program Plan, to ensure that no person in the United States shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. Related non-discrimination authorities, remedies, and state law further those protections, including sex, disability, religion, sexual orientation, age, low income, and Limited English Proficiency (LEP).

Caltrans is committed to complying with 23 C.F.R. Part 200, 49 C.F.R. Part 21, 49 C.F.R. Part 303, and the Federal Transit Administration Circular 4702.1B. Caltrans will make every effort to ensure nondiscrimination in all of its services, programs, and activities, whether they are federally funded or not, and that services and benefits are fairly distributed to all people, regardless of race, color, or national origin (including LEP). In addition, Caltrans will facilitate meaningful participation in the transportation planning process in a non-discriminatory manner.

The overall responsibility for this policy is assigned to the Caltrans Director. The Caltrans Title VI Coordinator is assigned to the Caltrans Office of Civil Rights Deputy Director, who then delegates sufficient responsibility and authority to the Office of Civil Rights' managers, including the Title VI Branch Manager, to effectively implement the Caltrans Title VI Program. Individuals with questions or requiring additional information relating to the policy or the implementation of the Caltrans Title VI Program should contact the Title VI Branch Manager at title.vi@dot.ca.gov or at (916) 639-6392, or visit the following web page: <https://dot.ca.gov/programs/civil-rights/title-vi>.

A handwritten signature in black ink, appearing to read 'Tony Tavares'.

TONY TAVARES
Director

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

Appendix B. List of Technical Studies

The following technical studies were prepared in support of this document and the proposed project.

Air Quality Report, Terry A. Hayes Associates Inc., February 2024

Archaeological Survey Report, AECOM, January 2024

Biological Assessment, AECOM, February 2024

Community Impact Assessment, AECOM, September 2023

Historic Property Survey Report, AECOM, January 2024

Historic Resource Evaluation Report, AECOM, January 2024

Initial Site Assessment (Hazardous Materials), AECOM, September 2023

Jurisdictional Delineation and Wetland Assessment, AECOM, January 2019 (Rev 2023)

Location Hydraulic Study and Floodplain Evaluation Report, AECOM, January 2023

Natural Environment Study, AECOM, February 2024

Noise Study Report, Terry A. Hayes Associates Inc., October 2022

Santa Clara River Bridge Scour Analysis at The Old Road Bridge, AECOM, August 2022

Supplemental Archaeological Survey Report/Extended Phase I (SASRXPI), AECOM, September 2024

Supplemental Historic Property Survey Report (SHPSR), AECOM, September 2024

Supplemental Aquatic Resources Delineation Report (ARDR) Technical Memorandum, February 2024

Transportation Assessment Report, AECOM, November 2023 (Rev Dec 2023)

Vehicle Miles Traveled (VMT) Analysis Memorandum, AECOM, November 2023

Visual Impact Assessment (Minor Level), AECOM, December 2022

Water Quality Assessment Report, AECOM, October 2022

Appendix C. Environmental Commitment Record

CEQA, Public Resources Code Section 21081, and Sections 15091 and 15097 of the State CEQA Guidelines require that a Mitigation Monitoring and Reporting Program be adopted when the Lead Agency (LACPW) adopts an environmental document. The purpose of the Environmental Commitments Record (ECR) is to fulfill this requirement under CEQA and to assign responsibility for the implementation, monitoring, and timing of each mitigation measure that has been identified to reduce an identified environmental impact to a less than significant level.

To be sure that all of the environmental measures identified in this document are executed at the appropriate times, the following mitigation program (as articulated on the proposed Environmental Commitments Record [ECR] which follows) would be implemented. During project design, avoidance, minimization, and/or mitigation measures will be incorporated into the project's final plans, specifications, and cost estimates, as appropriate. All permits will be obtained prior to implementation of the project. During construction, environmental and construction/engineering staff will ensure that the commitments contained in this ECR are fulfilled. Following construction and appropriate phases of project delivery, long-term mitigation maintenance and monitoring will take place, as applicable. As the following ECR is a draft, some fields have not been completed and will be filled out as each of the measures is implemented. Note: Some measures may apply to more than one resource area. Duplicative or redundant measures have not been included in this ECR.

ENVIRONMENTAL COMMITMENTS RECORD (ECR)

The Old Road over Santa Clara River and the Southern Pacific Transportation Company Bridge, et al. Project -- LOS ANGELES COUNTY, CALIFORNIA
DISTRICT 7 – LA – BRLS-5953(601) & STPL-5953(682)

Date: June 2025

TASK #	TASK AND BRIEF DESCRIPTION	REFERENCE	TIMING/PHASE	COMMENTS	ENVIRONMENTAL COMPLIANCE INITIAL/DATE
1	Maintain access and parking throughout construction. Before construction, Los Angeles County Department of Public Works (LACPW) will reconfigure access and parking to residential and commercial lots, to allow continued availability of that parking and access.	EIR/EA, AMM COM-1 (Land Use)	Pre-Construction		
2	Provision will be made for motorist information (i.e., existing changeable message signs [CMSs], portable CMSs, stationary ground mounted signs).	EIR/EA, AMM COM-2 (Utilities/Emergency Systems, Public Services, Transportation, Wildfire)	Construction		
3	To the extent possible, incorporation of traffic circulation construction strategies will be implemented (i.e., lane closure restrictions during holidays and special local events, closure of secondary streets during construction to allow quick construction and reopening, lane modification to maintain the number of lanes needed, allowing night work and extended weekend work, maintaining business access, and maintaining pedestrian and bicycle access).	EIR/EA, AMM COM-3 (Utilities/Emergency Systems, Public Services, Transportation, Wildfire)	Construction		
4	Implementation of alternate and detour routes strategies, and street/intersection improvements will occur (e.g., widening, pavement rehabilitation, removal of median), to provide added capacity to handle detour traffic; signal improvements; make adjustments in signal timing, and/or signal coordination to increase vehicle throughput, improve traffic flow, and optimize intersection capacity; set restrictions at intersections and roadways necessary to reduce congestion and improve safety; and enforce parking restrictions on alternate and detour routes during work hours to increase capacity, reduce traffic conflicts, and improve access.	EIR/EA, AMM COM-4 (Utilities/Emergency Systems, Public Services, Transportation, Wildfire)	Construction		
5	Close coordination will occur with utility service providers and emergency service providers, and a public outreach program will be implemented to minimize impacts on surrounding communities.	EIR/EA, AMM COM-5 (Utilities/Emergency Systems)	Construction		
6	Where acquisition is unavoidable, the provisions of the Uniform Act and the 1987 Amendments, as implemented by the Uniform Relocation Assistance and Real Property Acquisition Regulations for Federal and Federally Assisted Programs adopted by the U.S. Department of Transportation (March 2, 1989) and where applicable, the California Public Park Preservation Act of 1971, will be followed. An appraisal of the affected property will be obtained, and an offer for the full appraisal will be made.	EIR/EA, AMM REL-1 (Relocations and Real Property Acquisition)	Pre-Construction		
7	Advance notice will be provided to property owners and business owners on the project construction schedule, to minimize disruptions.	EIR/EA, AMM REL-2 (Relocations and Real Property Acquisition)	Pre-Construction		
8	Directional lighting aimed downward at a work site will be used during project construction where appropriate in the project area.	EIR/EA, AMM VIS-1 (Visual.Aesthetics)	Construction		
9	A textured finish on the proposed retaining wall on Rye Canyon Road at I-5 will be included to discourage graffiti.	EIR/EA, AMM VIS-2 (Visual.Aesthetics)	Construction		
10	All workers will participate in a Worker Environmental Awareness Program for cultural resources. Sign-in sheets will be maintained to document completion of the program by each worker. This training can be administered in-person by or under the supervision of, a Secretary of the Interior (SOI) qualified archaeologist or through screening of a video/slide presentation, prepared by an SOI-qualified archaeologist and overseen by an on-site manager. Contractor education will include the legal framework protecting cultural resources, typical kinds of cultural resources that may be found during project construction, artifacts that would be considered potentially significant, and proper procedures and notifications if cultural resources are discovered. The training will review types of cultural resources and artifacts that would be considered potentially significant to support operator recognition of these materials during construction. Native American tribe(s) traditionally and culturally affiliated with the project area will be given the opportunity to participate in the cultural resource training, to provide project personnel with tribal perspectives on working in areas sensitive for tribal cultural resources.	EIR/EA, AMM CR-1 (Cultural)	Construction		
11	If cultural materials are discovered during construction, all earth-moving activity within 60 feet of the find will be diverted until an SOI-qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures.	EIR/EA, AMM CR-2 (Cultural)	Construction		
12	If human remains are discovered, Section 7050.5 of the California Health and Safety Code states that further disturbances and activities will cease in any area or nearby area suspected to overlie remains, and the County Coroner will be contacted. For the proposed project, work in the immediate vicinity (within a 100-foot buffer of the find) will cease in the event that human remains and/or funerary object(s) are encountered.	EIR/EA, AMM CR-3 (Cultural)	Construction		
13	Any and all archaeological documents created as a part of the project (e.g., isolate records, site records, survey reports, testing reports, monitoring reports) shall be provided to consulting tribes upon request.	EIR/EA, AMM TCR-1 (Tribal Cultural)	Pre-Construction		
14	The project applicant shall retain a professional Tribal Monitor, procured by the Fernandefio Tataviam Band of Mission Indians to observe the following ground-disturbing activities from the project limits at Henry Mayo Drive to the northernmost drainage improvement: grading, excavating, digging, or similar activity. Tribal monitoring services will continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are complete. If the project's scheduled ground-disturbing activities require intermittent Tribal Monitoring, notification shall be submitted to the consulting Tribe in writing with 5 days' notice (if possible) prior to the start of scheduled ground disturbing activities. If TCRs are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of the discovery, and an SOI-qualified archaeologist retained by the project applicant as well as the Tribal Monitor shall assess the find.	EIR/EA,AMM TCR-2 (Tribal Cultural)	Construction		
15	The Lead Agency and/or project applicant shall, in good faith, consult with consulting tribes on the disposition and treatment of any TCRs encountered during all ground-disturbing activities.	EIR/EA, AMM TCR-3 (Tribal Cultural)	Construction		
16	If human remains and/or funerary object(s) are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to Section 7050.5 of the Health and Safety Code, which shall be enforced for the duration of the project. In accordance with Public Resources Code, Section 5097.98, the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant, as determined by the NAHC, should those discoveries be determined as Native American in origin.	EIR/EA, AMM TCR-4 (Tribal Cultural)	Construction		

17	Any disturbed aquatic or wetland habitat will need to be restored or enhanced from existing conditions, such as revegetation, BMPs, and other applicable actions that meet the requirements of the environmental permitting of the proposed project. Where temporary disturbance areas are unavoidable, the disturbance will be minimized to the maximum extent possible, and the area will be restored or enhanced as compared to existing conditions on completion of the bridge construction. Permanent impact areas will be mitigated by restoring and enhancing nearby degraded areas of wetland/riparian habitat.	EIR/EA, AMM HYD-1 (Hydrology and Floodplain)	Pre-Construction		
18	The proposed The Old Road Bridge will be designed to maintain current or improved levels of fish passage in the mainstem of the Santa Clara River. The Old Road Bridge also will be designed so that the proposed piles will not encroach into the active channel during the summer construction season, from June through September.	EIR/EA, AMM HYD-2 (Hydrology and Floodplain)	Pre-Construction		
19	In accordance with the Construction General Permit, Order WQ 2022-0057-DWQ, NPDES NO. CAS000002, an SWPPP will be prepared and implemented to address all construction-related activities, equipment, and materials that will have the potential to affect water quality. The SWPPP will identify the sources of pollutants that may affect the quality of stormwater; include construction site BMPs to control pollutants and sediment; and provide for construction materials management and non-stormwater BMPs. All construction site BMPs will follow the latest edition of the LACPW Construction Site BMP Manual, to control and minimize the impacts of construction-related activities, materials, and pollutants on the watershed. These BMPs will include temporary sediment controls, temporary soil stabilization, scheduling management, waste management, materials handling, and other non-stormwater BMPs.	EIR/EA, AMM WQ-1 (Hydrology, Water Quality and Floodplain) (Geology/Soils/Sesmic/Topography)	Pre-Construction		
20	In compliance with Municipal Permit Order No. R4-2021-0105 requirements, a final project-specific Standard Urban Stormwater Mitigation Plan will be prepared. Bioswales will be constructed in roadway medians to provide water quality treatment in addition to conveying stormwater runoff. The bioswales will provide pollutant removal through settling and filtration in the vegetation lining the channels, and they also will provide the opportunity for volume reduction through infiltration and evapotranspiration. Disturbed soil areas, including slopes, will be reseeded using a California native plant seed blend. An erosion control seed mix (hydroseed) will be applied on all select material areas and slopes flatter than 1:1. Erosion control (bonded fiber matrix) will be applied on all cut slopes steeper than 1:1. As vegetation establishes in disturbed areas and cut slopes stabilize, the potential for suspended sediments coming from the project area into receiving waters gradually will be reduced.	EIR/EA, AMM WQ-2 (Hydrology, Water Quality and Floodplain) (Geology/Soils/Sesmic/Topography)	Pre-Construction		
21	Paleontological Resources Monitoring and Mitigation Plan: Before construction-related excavations, a qualified paleontologist meeting the 2010 Society of Vertebrate Paleontology standards will be retained to develop a Paleontological Resources Monitoring and Mitigation Plan (PRIMMP). The plan will address qualifications of paleontological monitors and will stipulate that the qualified paleontologist and the paleontological resource monitors be empowered to stop excavation activity to investigate or safely remove possible fossils. The plan will incorporate the findings of the project's geotechnical report and construction plans to formulate what construction activities will be monitored, and the plan will include wet screening of boring or drilling spoils. Many paleontological mitigation efforts have recovered significant paleontological resources, especially microvertebrate fossils, from screening of such spoils. The plan also will address unexpected discoveries of paleontological resources.	EIR/EA, AMM PAL-1 (Paleontology)	Pre-Construction		
22	Paleontological Monitoring and Mitigation of Impacts from Construction. A qualified paleontologist will attend the preconstruction meeting and present a Worker Environmental Awareness Program (WEAP) to the project construction personnel. The Worker Environmental Awareness Program training will discuss the types of fossils that potentially may be uncovered during project excavations, laws protecting paleontological resources, and appropriate actions to be taken when fossils are discovered. A qualified paleontologist will oversee that the PRIMMP instructions are implemented. A qualified paleontologist will produce a final paleontological monitoring report that discusses the paleontological monitoring program, any paleontological discoveries, and the preparation, curation, and accessioning of any fossils into a suitable paleontological repository.	EIR/EA, AMM PAL-2 (Paleontology)	Pre-Construction		
23	If the plugged oil/gas well within the central portion of the project area is disturbed during project construction, it will be re-abandoned in accordance with current CalGEM regulations. In addition, because of the informal agreement between CalGEM and LACPW's Environmental Programs Division, a gas mitigation plan will be obtained and submitted to CalGEM.	EIR/EA, AMM HAZ-1 (Hazardous Waste/Materials)	Post-Construction		
24	Crude oil/liquid petroleum pipelines run along The Old Road in the project area. If the pipelines are exposed and/or relocated, impacts on the subsurface may be encountered. Impacts on the subsurface that are discovered from these pipelines and any repairs to the pipelines will be the responsibility of the pipeline owner.	EIR/EA, AMM HAZ-2 (Hazardous Waste/Materials)	Post-Construction		
25	The proposed project includes upgrades to traffic signal equipment and relocation/installation of traffic pole standards and traffic signal equipment as necessary because of new lane configurations, which may generate universal wastes and electronic wastes (E-wastes). Universal wastes and E-wastes generated as part of the proposed project will be disposed appropriately, in accordance with applicable regulations.	EIR/EA, AMM HAZ-3 (Hazardous Waste/Materials)	Post-Construction		
26	Aerially deposited lead (ADL) may be present in the unpaved areas adjacent to the roadway, which, if disturbed should be evaluated to ensure worker safety. If excavated/excess soils are to be transported from the area of the proposed project, they should be sampled and handled in accordance with applicable regulations to ensure worker safety and for classification purposes. The potential presence of ADL will be addressed during the Plan, Specifications, & Estimates phase of the proposed project and would be handled in accordance with LACPW Special Provisions. A Lead Compliance Plan under LACPW Special Provisions would be required during construction when handling lead contaminated soils.	EIR/EA, AMM HAZ-4 (Hazardous Waste/Materials)	Construction		
27	The proposed project includes the replacement of two bridges (over Santa Clara River and the abandoned UPRR tracks). Demolition of the two existing bridges will be subject to the National Emissions Standards for Hazardous Air Pollutants regulations. The regulations require notification to the delegated air district before demolition of concrete structures, regardless of whether asbestos is detected. The regulations require that an ACM Survey be conducted, and that the survey report be part of the notification submittal to the regulatory agency. The ACM survey will be conducted by a Certified Asbestos Consultant (CAC), and samples will be collected from concrete, brown fibrous expansion joint fill material, and other materials that the CAC suspects to contain asbestos.	EIR/EA, AMM HAZ-5 (Hazardous Waste/Materials)	Pre-Construction		
28	Suspect lead-based paint associated with painted curbs, poles, protective bollards, and fire hydrants in the project area, including railings, fencing, metal beams, and other exposed metal elements associated with the bridges will be sampled and handled in accordance with applicable regulations to protect worker safety and for classification. The removal and testing of bridge paint and pavement markings, including painted curbs, will be managed during construction under specific LACPW Special Provisions. A Lead Compliance Plan under LACPW Special Provisions will be required during construction when removing lead-based paint, thermoplastics, painted traffic stripes, and/or pavement markings.	EIR/EA, AMM HAZ-6 (Hazardous Waste/Materials)	Pre-Construction & Construction		
29	Thermoplastic paint and yellow-painted traffic stripes/pavement markings, which typically contain lead chromate, have been used for marking in the project area (roadway and curbs), and these markings will require special removal, handling, and disposal. The removal and testing of all thermoplastic paint and pavement markings will be managed during construction in accordance with LACPW Special Provisions.	EIR/EA, AMM HAZ-7 (Hazardous Waste/Materials)	Construction		
30	Utility relocations will be performed at several intersections because of widening of The Old Road and for bridge improvements. Reconstruction of drainage facilities and catch basins and construction of new drainage facilities and catch basins will be conducted, as needed. Dewatering activities will not be part of the utility relocations in the project area.	EIR/EA, AMM HAZ-8 (Hazardous Waste/Materials)	Construction		
31	If soil in the area of the abandoned UPRR railroad tracks and Multi-Use Trail extension is excavated and off-site disposal is necessary, the soil will be sampled and analyzed for the potential presence of petroleum hydrocarbons, volatile organic compounds (VOCs), metals, herbicides, and pesticides. During construction, soil excavations that are conducted on site will be monitored for visible soil staining and odor. Affected soil will be disposed off-site in accordance with applicable local, State, and federal regulatory guidelines	EIR/EA, AMM HAZ-9 (Hazardous Waste/Materials)	Pre-Construction & Construction		

32	TWW (e.g., utility poles, roadside wooden signposts, metal-beam guardrail posts, former railroad ties) will be handled appropriately, in accordance with applicable regulations and may require special removal, handling, and disposal. All TWW will be managed during construction in accordance with LACPW Special Provisions if TWW is generated.	EIR/EA, AMM HAZ-10 (Hazardous Waste/Materials)	Construction		
33	When contractors are working in the project area and removing soil and/or groundwater, they will be trained to be aware of appropriate handling and disposal methods or options. Higher levels of potential contaminants may be present at some locations; therefore, material to be moved or removed may require individual or specific testing to verify that it is at levels below regulatory action limits.	EIR/EA, AMM HAZ-11 (Hazardous Waste/Materials)	Pre-Construction		
34	Construction of the bridge piles may encounter groundwater, based on the 1997 Seismic Hazard Report for the Newhall Quadrangle. Therefore, the slurry displacement method of construction will be used and will be specified in Section B of the bridge specifications. After groundwater is encountered, drilling slurry will be placed in the hole to an elevation of 10 feet above the groundwater. As drilling progresses, drilling slurry will be added to the hole to maintain the same elevation of 10 feet above the groundwater. The slurry displacement method will contain any debris with concrete barriers and plastic sheeting. Groundwater is not anticipated from the slurry displacement method of construction, and any debris will be placed into Baker tanks.	EIR/EA, AMM HAZ-12 (Hazardous Waste/Materials)	Construction		
35	Section 4216 of the California Government Code requires that any operator or excavator will call Underground Services Alert of California ("DigAlert") 2 working days before any planned excavation, by dialing 811. Delineation of the proposed excavation area will be mandatory. The area to be excavated will be marked with water-soluble or chalk-based white paint on paved surfaces, or with other suitable markings such as flags or stakes on unpaved areas, before calling DigAlert.	EIR/EA, AMM HAZ-13 (Hazardous Waste/Materials)	Construction		
36	A site-specific Health and Safety Plan will be prepared, consistent with LACPW Special Provisions requirements. The Health and Safety Plan will include identification of key personnel; a summary of risk assessment for workers, the community, and the environment; an air monitoring plan; and an emergency response plan.	EIR/EA, AMM HAZ-14 (Hazardous Waste/Materials)	Pre-Construction		
37	As is the case for any project that proposes excavation, the potential exists for unknown hazardous contamination to be revealed during project construction. For any previously unknown hazardous wastes/materials encountered during construction, the procedures outlined in LACPW Special Provisions and Procedures will be followed and implemented during construction activities, as well as SCAQMD Rule 1166 and SCAQMD Rule 1466.	EIR/EA, AMM HAZ-15 (Hazardous Waste/Materials)	Construction		
38	During construction activities, all relevant BMPs will be implemented, including temporary construction site BMPs and the regulatory permit compliance component for the State's Construction General Permit for applicability of an SWPPP (based in part on the disturbed soil areas, shown on the phased plans) and compliance with the County's MS4 NPDES permit as well as adherence to the County's Construction Site BMP Manual and SWPPP preparation manual.	EIR/EA, AMM HAZ-16 (Hazardous Waste/Materials)	Construction		
39	Construction Emissions. Site preparation and roadway construction will include clearing, cut-and-fill activities, grading, removing or improving existing roadways, and paving roadway surfaces. During construction, short-term degradation of air quality will occur from the release of particulate emissions (airborne dust), generated by excavation, grading, hauling, and other activities related to construction. Implementation of the following avoidance, minimization, and/or mitigation measures will minimize construction emissions: •The construction contractor will comply with LACPW Special Provisions. Section 14-9-02 specifically will require compliance by the contractor with all applicable laws and regulations related to air quality, including the Air Pollution Control District and Air Quality Management District regulations and local ordinances. •Construction equipment and vehicles will be properly tuned and maintained. All construction equipment will use low-sulfur fuel, as required under Title 17, Section 93114 of the CCR. •The construction contractor will comply with SCAQMD rules, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). •Diesel-powered off-road equipment will limit idling in accordance with the CARB's Regulation for In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 and approved amendments). •Diesel-powered on-road vehicles and trucks will limit idling in accordance with the CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (13 CCR 2485).	EIR/EA, AMM AQ-1 (Air Quality)	Construction		
40	Bridge construction activities will occur during dry portions of the year, to reduce impacts on the low-flow channel. The limits of grading and temporary work areas will be demarked with high-visibility construction exclusion fencing adjacent to areas with sensitive vegetation communities, to avoid unintentional encroachment into these sensitive areas. Signage will be posted, identifying the excluded areas as Environmentally Sensitive Areas.	EIR/EA, AMM VEG-1 (Biology)	Construction		
41	The project will incorporate storm drain systems to facilitate meeting water quality requirements and for stormwater management, which will minimize erosion and degradation of habitat around the bridge.	EIR/EA, AMM VEG-2 (Biology)	Construction		
42	Standard fugitive dust BMPs, and those required by a SWPPP (e.g., a water truck), will be utilized to reduce impacts of construction-generated erosion and sedimentation into the adjacent Environmentally Sensitive Areas.	EIR/EA, AMM VEG-3 (Biology)	Construction		
43	BMPs will be implemented so that invasive plant material is not spread from the project area to other areas, during disposal off-site or from tracking seed on equipment, clothing, and shoes. Equipment/material imported from an area of invasive plants will be identified, and measures will be implemented to prevent importation and spreading of non native plant material within the project area. All construction equipment will be cleaned thoroughly to remove dirt, seeds, vegetative material, or other debris that may contain or hold seeds of noxious weeds before arriving at and when leaving the project area. Weeds that are removed will be bagged and disposed in an authorized sanitary landfill.	EIR/EA, AMM VEG-4 (Biology)	Construction		
44	Permanent and temporary impacts on sensitive vegetation communities will be replaced by creating or restoring habitats of similar functions and values in the BSA, or credits will be purchased through an applicable mitigation bank. Restoration will be in-kind and at a minimum 1:1 replacement ratio or other ratio, determined in consultation with the regulatory agencies. All mitigation activities will be conducted in accordance with a Habitat Mitigation and Monitoring Plan and in consultation with USACE, RWQCB, and CDFW before the issuance of permits. The Habitat Mitigation and Monitoring Plan will outline the identification and location of areas that can be used for creation, restoration, or habitat enhancement. The plan will include a list of native plant species by habitat type, and this list may be used for on-site revegetation efforts (e.g., planting and seeding). In addition, if necessary to meet mitigation needs, the plan will identify opportunities for additional enhancements of habitats in temporary impact areas, such as supplemental tree planting, weeding adjacent buffer habitat, or other opportunities. The enhancement opportunities will include acreage estimates of treated areas, acreage of invasive removal, and figures to show the treatment area and mapped invasive species. A habitat restoration specialist will determine the optimal areas for habitat establishment and restoration, and will prepare the Habitat Mitigation and Monitoring Plan with details on the concept. The plan will discuss habitat restoration implementation specifically, including plant establishment methods, performance standards, the maintenance and monitoring period, and reporting. In addition, the plan will include LA County Planning in the list of regulatory agencies to consult, to determine adequate replacement ratios, to mitigate temporary and permanent impacts on sensitive vegetation communities. The minimum 1:1 replacement ratio may not be appropriate for more sensitive SEA resources.	EIR/EA, Compensatory Mitigation VEG-5 (Biology)	Pre-Construction, Construction, and Post-Construction		

45	As an alternative to the restoration of habitats to compensate for temporary and/or permanent removal of riparian habitats, the applicant (at the discretion of USACE and CDFW) may remove exotic plant species from the BSA in the following locations: (1) where an infestation of exotics such as giant reed occurs, so that the natural habitat functions and values are substantially degraded and at risk, and where the cover of exotics is equal to or exceeds 25% of the ground; or (2) in other areas where exotics removal will be strategic in a watershed approach to weed management, as determined by USACE and CDFW. The weed removal sites will be selected in a logical manner, so that the eradication of weeds from specific sites will contribute to the overall control of exotics in the watercourses. Removal areas will be kept free of exotic plant species for 5 years after initial treatment. In addition, native riparian vegetation will need to become established through natural colonization and, after 5 years, will need to meet the revegetation plant cover goals, established by USACE and CDFW. In addition, LA County Planning will be included among the agencies listed to consult for the removal of exotic plant species, for potential compensation for temporary and/or permanent removal of riparian habitats.	EIR/EA, Compensatory Mitigation VEG-6 (Biology)	Pre-Construction		
46	The project is expected to directly impact one Southern California black walnut, and indirectly impact one additional tree. A pre-construction survey is required to fence the exact LOD, during which protective fencing will be placed around the one tree that may be indirectly impacted. If feasible, the one Southern California black walnut within the direct footprint of the expanded bridge will be transplanted and replanted outside of the LOD along the bank of Santa Clara River. In addition, because transplanting is not always successful, any Southern California black walnut trees that are directly impacted will be mitigated for at a 2:1 ratio (as individuals, not acreage). The mitigated trees are to be planted nearby at an acceptable location for this species. Ideally, any replacement may be grown in a nursery and re-planted before proposed project implementation. Otherwise, purchasing walnut plants from a native plant nursery would be acceptable, preferably from stock originating in Los Angeles County. In addition, LA County Planning shall be included in the list of agencies to consult for the replacement ratio of 2:1 for the removal of one Southern California black walnut tree.	EIR/EA, AMM WALNUT-1 (Biology)	Pre-Construction		
47	LACPW will notify CDFW pursuant to Section 1602 of the Fish and Game Code. LACPW will comply with the mitigation measures detailed in the Lake and Streambed Alteration Agreement issued by CDFW. LACPW also will provide compensatory mitigation for any affected stream and associated natural community.	EIR/EA AMM WATERS-1 (Biology)	Pre-Construction		
48	LACPW will mitigate for project impacts on streams and riparian habitat by replacing habitat at no less than a 3:1 ratio for impacts on jurisdictional features as shown in Table 2-52, except for concrete-lined Drainage A. Drainage A will be mitigated at a 1:1 ratio. CDFW considers all project impacts from sediment removal and sediment placement to be permanent. Mitigated land will support streams and riparian habitat of similar vegetation composition, density, coverage, and species richness and abundance.	EIR/EA AMM WATERS-2 (Biology)	Pre-Construction		
49	A plan will be developed for protecting oak trees during construction. The intent is to install high-visibility protective fencing along the boundary of The Old Road ROW in areas adjacent to oak trees. For any oak trees located outside of The Old Road ROW, this plan will be approved by the Forestry Division of the County of Los Angeles. For any oak trees located within The Old Road ROW, this plan will be approved by LACPW. Equipment damage to limbs, trunks, and roots of all remaining trees will be avoided during proposed project construction. Even slight trunk injuries can result in susceptibility to long-term pathogenic maladies. High-visibility protective fencing not less than 4 feet in height will be placed at the limits of The Old Road ROW where the protective zone of any individual oak tree or dense stand of oak trees within 200 feet of the grading limits. Oak tree high-visibility protective fencing will be in accordance with the Los Angeles County Code, Chapter 22.176. The protective zone is defined as within the dripline of an oak tree and extending from there to a point at least 5 feet outside of the dripline, or 15 feet from the trunk of a tree, whichever distance is greater. This fencing will be inspected prior to commencement of proposed project construction in the area and will remain in place until construction is completed.	EIR/EA, AMM OAK-1 (Biology)	Pre-Construction		
50	Care must be taken to limit grade changes near the protective zone of an oak tree. Grade changes can lead to plant stress from oxygen deprivation or oak root fungus at the root collar of oaks. Minor grade changes farther from the trunk are not as critical but can negatively affect the health of the tree if not carefully monitored by a County-approved certified arborist. •The grade will not be lowered or raised around the trunk (i.e., within the protective zone) of any oak tree without the approval of the Los Angeles County Forester or LACPW (as applicable), or a County-certified arborist as specified in an approved oak tree permit. A certified arborist will supervise all excavation or grading proposed within the protective zone of a tree. •Trenching, excavation, or clearance of vegetation within the protective zone of an oak tree will be accomplished by the use of hand tools or small handheld power tools. Any major roots encountered will be conserved to the greatest extent possible and treated as recommended by the certified arborist. •No utility trenches will be routed within the protective zone of an oak tree unless no feasible alternative locations are available and will be approved by the County Forester or LACPW, as determined appropriate.	EIR/EA, AMM OAK-2 (Biology)	Construction		
51	•No storage of equipment, supplies, vehicles, or debris will be permitted within the protective zone of an oak tree. •No dumping of construction wastewater, paint, stucco, concrete, or any other cleanup waste will occur within the protective zone of an oak tree. •No temporary structures will be placed within the protective zone of any remaining oak tree.	EIR/EA, AMM OAK-3 (Biology)	Construction		
52	Healthy trees, if not maintained, often grow beyond their ability to support themselves and fail at their naturally occurring weakest point. This point typically is at a branch union or near the main crotch of the tree. Weight-reduction pruning and/or cabling will be part of tree maintenance and preservation program, and specifically: •Pruning of replacement oak trees and preserved oak trees will include the removal of dead wood and stubs, and medium pruning of branches measuring 2 inches in diameter or less. •Pruning of replacement oak trees and preserved oak trees will be in accordance with the guidelines published by the National Arborist Association. In no case will more than 25% of the overall tree canopy and 10% of the overall root mass of any oak tree be removed. After pruning, installation of support cables to prevent future main crotch failures may be necessary, based on a County-certified arborist's determination. •All replacement oak trees will be maintained in accordance with the principles set forth in the publication, Oak Trees: Care and Maintenance (LA County Fire Department, Forestry Division 2022). •A 5-year maintenance period will begin on the start replacement tree planting. All replacement trees failing to survive within this period will be replaced.	EIR/EA, AMM OAK-4 (Biology)	Construction & Post-Construction		
53	Care will be taken to avoid placing any irrigation devices within watering distance of the protected zone of oak trees. Oak trees survive and thrive on annual rainfall alone and generally do not require supplemental irrigation, except during periods of extreme drought or for establishment of newly planted trees (i.e., replacement trees): •Irrigation water will not reach within 15 feet of any oak trunk. •Grass and ground covers will not be planted under the canopy of any oak trees.	EIR/EA, AMM OAK-5 (Biology)	Construction & Post-Construction		
54	An LA County-approved arborist will evaluate the effects of mistletoe, pathogens, and insect pests on the preserved and planted oak trees within the 5-year maintenance period, in addition to the overall health and structural integrity of the trees, to ensure the longevity of the remaining oak trees.	EIR/EA, AMM OAK-6 (Biology)	Post-Construction		

55	Damage to remaining trees will be avoided by workers and equipment during construction activities: •A qualified biologist or LA County-certified arborist will monitor on-site construction and grading activities occurring near all identified oak tree protection zones, to ensure that damage to oak trees does not occur. •Before the start of construction, a qualified biologist or LA County-certified arborist will schedule a field meeting to inform construction workers where all protective zones are located and the importance of avoiding encroachment within the protective zones.	EIR/EA, AMM OAK-7 (Biology)	Construction & Post-Construction		
56	All oak trees that are removed will be replaced by a tree of the same species at a ratio of 2:1. All heritage trees that will be removed will be replaced at a 10:1 ratio. All replacement trees will be at least 24-inch-tall box trees and measure 1 inch or more in diameter, as measured from 1 foot above the base. Free-form trees with multiple stems will be permissible; the combined diameter of the two largest stems of such trees will measure a minimum of 1 inch in diameter, as measured from 1 foot above the base. Replacement trees will consist exclusively of indigenous oak trees and be certified as being grown from a seed source collected in LA County or Ventura County. In addition, the LA County Department of Regional Planning will be included on the list of regulatory agencies to consult for the 2:1 ratio replacement	EIR/EA Compensatory Mitigation OAK-8 (Biology)	Construction		
57	Prior to the start of construction, thorough surveys for UTS will be conducted by a qualified biologist highly knowledgeable and experienced with identifying UTS. The qualified biologist and survey methodology will be approved by USFWS prior to survey commencement. 1.Immediately before the start of construction, the qualified biologist (in close coordination with USFWS) will conduct no-take visual-only surveys for UTS throughout the Northern Drainage, to confirm absence. a.If UTS are detected during either survey, the Northern Drainage will be considered occupied by UTS. If this is the case, the project culvert extension option will not be considered, and an alternative design will be necessary. b.If UTS are not detected, the project potentially can begin. 2.A surface water diversion also will be designed, installed, monitored, and maintained in a manner to verify that sufficient water flow continues to maintain aquatic life downstream from the project area in the Northern Drainage. 3.A surface water diversion will also be designed, installed, monitored, and maintained in a manner that ensures that sufficient water flow continues to maintain aquatic life downstream from the proposed project area in the northern drainage. 4.Additional BMPs will be implemented to avoid and minimize project impacts on water quality, aquatic life, nesting birds, and other natural resources. BMPs will be implemented around the periphery of work areas so that no inadvertent spills, erosion, sedimentation, or construction-related effects occur. 5.If UTS are detected within the project area or Northern Drainage, work will be halted and USFWS and CDFW will be contacted immediately.	EIR/EA AMM UTS-1 (Biology)	Pre-Construction & Construction		
58	For the mainstem of the Santa Clara River where UTS are assumed present, work activities will be conducted so that no surface water contact will occur, and a biological monitor will be present during all ground-disturbing activities when near the Santa Clara River. Vegetation trimming and removal will be conducted in a way to prevent contact with surface water, and BMPs will be implemented along the length of the Santa Clara River so that no inadvertent spills, erosion, or sedimentation occurs. A biological monitor will ensure that materials from concrete decking installation and concrete pouring do not fall into the Santa Clara River, and that all construction personnel and equipment remain outside the active channel. Construction of the piles within the Santa Clara River will occur during summer months to coincide with periods of low flow for the Santa Clara River, to minimize the potential for impacts on surface water in the river. The cast-in-drilled-hole pile with slurry displacement installation method has been selected specifically to avoid the need for dewatering and potential impacts on UTS. A biological monitor will be present during cast-in-drilled-hole pile installation when in proximity to the Santa Clara River, to ensure that vibration impacts do not negatively affect any aquatic species. If unforeseen circumstances arise during construction of the bridge piles that may result in impacts on UTS, USFWS will be contacted to discuss additional potential measures to avoid impacts.	EIR/EA AMM UTS-2 (Biology)	Construction		
59	A qualified biologist will survey the work site no more than 48 hours before the onset of activities, to monitor for southwestern pond turtle and/or southwestern pond turtle nesting activity (i.e., recently excavated nests, nest plugs) or nest depredation (partially to fully excavated nest chambers, nest plugs, scattered eggshell remains, and eggshell fragments). Preconstruction surveys to detect western pond turtle nesting activity will be concentrated within suitable upland habitat in the project area and will focus on areas along south- or west-facing slopes with bare hard-packed clay or silt soils or a sparse vegetation of short grasses or forbs. Survey efforts will focus on suitable aerial and aquatic basking habitat, such as logs, branches, root wads, and riprap, as well as the shoreline and adjacent warm, shallow waters where southwestern pond turtle may be present below the water surface, beneath algal mats or other surface vegetation.	EIR/EA, AMM WPT-1 (Biology)	Pre-Construction		
60	If southwestern pond turtle is observed during the preconstruction survey, the species will be avoided to the greatest extent practicable. If avoidance is not feasible, LACPW will confer with USFWS to determine the best approach so that no take of the species occurs, including additional measures such as implementation of exclusion buffers, nest enclosures, silt fencing, screening, and additional BMP implementation, as appropriate.	EIR/EA, AMM WPT-2 (Biology)	Construction		
61	To the greatest extent possible, construction activities (such as vegetation removal) will be timed to avoid the nesting season for riparian avian species (February 1 through September 1).	EIR/EA, AMM RIP-1 (Biology)	Construction		
62	If work is scheduled during the riparian avian breeding season (February 1 through September 1), and within LBVI or SWFL-occupied and critical habitat, a qualified biologist will conduct a preconstruction nesting survey to verify that no active bird nests are present within 500 feet of construction activities. If no nests are detected, then vegetation removal will be permitted during the nesting season. The biologist will establish and maintain a minimum 300-foot no-disturbance buffer around all active bird nests. For raptors and special-status species, this buffer will be expanded to a minimum of 500 feet.	EIR/EA, AMM RIP-2 (Biology)	Pre-Construction		
63	If an active LBVI or SWFL nest is detected, no construction activities will be permitted within 500 feet of the nest. Work within nest buffers may not resume until the young fledge and disperse, or the nest has been determined to fail by a qualified biologist. Limits of construction to avoid a nest site will be established in the field with flagging and stakes or construction fencing.	EIR/EA, AMM RIP-3 (Biology)	Construction		
64	During construction of The Old Road Bridge, any nighttime lighting necessary for work or placed around temporary work areas/laydown yards will be shielded away from the Santa Clara River. Security lights around temporarily fenced areas under or adjacent to the Santa Clara River will have motion-activated sensors, so that they are not continually on throughout the night but only trigger if someone enters the fenced work area.	EIR/EA, AMM LION-1 (Biology)	Construction		
65	Any permanent streetlights installed on The Old Road Bridge or along the west side of The Old Road adjacent to the Santa Clara River will be shielded, so that the light does not glare directly into native habitat in the river.	EIR/EA, AMM LION-2 (Biology)	Construction		
66	Pending the State-listing status of mountain lion, impacts will be assessed by CDFW during the permitting process, and any necessary avoidance and minimization measures will be implemented.	EIR/EA, AMM LION-3 (Biology)	Pre-Construction		
67	No earlier than 7 days before the start of construction around the two bridge locations, a field survey will be conducted by a qualified biologist to determine whether active bat roosts are present on or within 300 feet of the project boundaries. If an active roost is identified, a determination will be made regarding whether the roost is used as a night roost, a day roost, or a maternity roost. If an active roost is removed, MM BAT-2 (below) will be implemented. Alternatively, if an active roost is identified within 300 feet of the disturbance boundary but will not be removed, MM BAT-3 (below) will be implemented. Trees and/or structures determined to be maternity roosts will be left in place until the end of the maternity season. Because the ambient noise levels already exceed acceptable noise levels from non-project-related surrounding construction activities and traffic noise, additional noise mitigation will not be implemented. Consequently, no interference will take place with bat echolocation and insect foraging.	EIR/EA, AMM BAT-1 (Biology)	Pre-Construction		

68	If a night-roost is identified within the LOD, the roost structure will be removed during the daylight hours while the roost is not in use. If an active day roost is identified, roosting bats will be evicted by using humane exclusionary devices. Before project implementation, the proposed methods for bat exclusion will be approved by CDFW. The roost will not be removed until it has been confirmed by a qualified biologist that all bats have been successfully excluded. If an active maternity roost is identified (the breeding season of native bat species in California generally occurs from April 1 through August 31), the roost will not be disturbed and construction within 300 feet will be postponed or halted, at the discretion of the biological monitor, until the roost is vacated and juveniles have fledged, as determined by the biologist. CDFW will be consulted regarding the necessity to construct replacement roosting habitat or to modify the proposed project (as appropriate), to include features conducive to roosting. This determination will be based on the bat species to be displaced, the abundance of other roost sites in the area, and the size of the roost removed. All CDFW recommendations for roost replacement will be implemented.	EIR/EA, AMM BAT-2 (Biology)	Construction		
69	If a night roost is identified within the 300-foot buffer of the LOD, construction-related activities will be conducted during daylight hours while the roost is not in use. If an active day roost is identified, a determination (in consultation with CDFW or a qualified bat expert) will be made regarding whether construction-related activities (i.e., noise and vibrations) can disturb roosting bats substantially. This determination will be based on baseline noise/vibrations levels, anticipated noise-levels associated with project construction, and the sensitivity to noise-disturbances of the bat species that are present. If noise is determined to result in the temporary abandonment of a day roost, construction-related activities will be scheduled to minimize the period that the roost will be subject to noise-related disturbances. If an active maternity roost is identified (the breeding season of native bat species in California generally occurs from April 1 through August 31), construction within 300 feet of the roost will be postponed or halted, at the discretion of the biological monitor, until the roost is vacated and juveniles have fledged, as determined by the biologist.	EIR/EA, AMM BAT-3 (Biology)	Construction		
70	The contractor(s) will be informed, before the bidding process, regarding the biological constraints of the proposed project (which will be included in Section EC of the Special Provisions). The project limits will be clearly marked on the project plans that are provided to the contractor(s), and areas outside the project limits will be designated as "no construction" zones. A construction manager will be present during all construction activities, to oversee that work is limited to the designated project limits.	EIR/EA, AMM GEN-1	Construction		
71	High-visibility environmentally sensitive area fencing and silt fencing with appropriate signs will be installed by the contractor before the start of work, to prevent habitat impacts and the spread of silt from the construction zone into adjacent habitats. The fencing will be installed along the outer edge of work limits, in a manner that does not impact habitats to be avoided.	EIR/EA, AMM GEN-2	Pre-Construction		
72	Project personnel will strictly limit their activities, vehicles, equipment, and construction materials to within the fenced construction limits, staging areas, and routes between the construction limits and staging areas. The temporary construction fencing will be removed on completion of the construction.	EIR/EA, AMM GEN-3	Construction		
73	All workers will participate in a Worker Environmental Awareness Program for sensitive biological resources. Sign-in sheets will be maintained to document completion of the program by each worker. This training can be administered in person by a qualified biologist or through screening of a video/slide presentation, prepared by a qualified biologist and overseen by an on-site manager. Contractor education training will include a review of special-status species and protected habitats occurring/potentially occurring on site. Identification of these resources and all biological avoidance and minimization measures relevant to the contractors' work will be reviewed. Stop work and notification procedures will be outlined. The training program will include a section specific to UTS, southwestern pond turtle, arroyo toad, LBVI, and SWFL. Training handouts will be provided and posted at the staging areas in the project area.	EIR/EA, AMM GEN-4	Pre-Construction		
74	A qualified biologist, defined as an individual with the appropriate federal and State certifications to conduct the specified activities, will be available to relocate any listed species out of harm's way if detected within the project limits. The biologist will have verified previous experience with the species for which surveys are being conducted and will have been approved by USFWS as qualified to conduct species surveys, monitoring, and relocation activities.	EIR/EA, AMM GEN-5	Pre-Construction		
75	All equipment maintenance; staging; and dispensing of fuel, oil, coolant, or any other such activities will occur in designated areas outside jurisdictional wetlands or waters and within the fenced project limits. These designated areas will be in previously compacted and disturbed areas to the maximum extent practicable, so as to prevent any runoff from entering jurisdictional wetlands or waters. Fueling of equipment will take place within existing paved areas, if feasible, greater than 100 feet from jurisdictional wetlands or waters. Contractor equipment will be checked for leaks before operation and will be repaired as necessary. "Fueling zones" will be designated on construction plans and located away from the Santa Clara River and Northern Drainage.	EIR/EA, AMM GEN-6	Construction		
76	In areas that do not require excavation or grading, native vegetation will be trampled instead of completely removed, to allow regrowth and invasive plant species to be avoided to the extent practical, to reduce the potential for their spread.	EIR/EA, AMM GEN-7	Construction		
77	To reduce impacts on listed species' critical and occupied habitat, before entering the project area, all personnel will remove invasive species materials, propagules, seeds, and individuals from project equipment, materials, and clothing to reduce the proliferation of invasive species. This will include checking to see that construction equipment has been thoroughly power-washed or cleaned, to remove any dirt/mud/sediment from tires and tracks.	EIR/EA, AMM GEN-8	Construction		
78	The project area will be kept as clean of construction-related trash and debris as possible, to avoid attracting predators of sensitive wildlife. All food-related trash items will be enclosed in sealed containers and removed regularly from the project area.	EIR/EA, AMM GEN-9	Construction		
79	Project personnel will be prohibited from bringing pets into the project area.	EIR/EA, AMM GEN-10	Construction		
80	Disposal or temporary placement of excess fill, brush, or other debris will not be allowed in WOTUS or their banks along the Santa Clara River.	EIR/EA, AMM GEN-11	Construction		
81	The majority of construction is expected to be undertaken during daylight; however, when nighttime construction is necessary, lighting will be of the lowest illumination necessary for human safety, will be diverted away from any native vegetation communities, and will consist of low-sodium or similar lighting, equipped with shields to focus light downward onto the appropriate subject area.	EIR/EA, AMM GEN-12	Construction		
82	Exclusionary devices will be installed underneath The Old Road Bridge over Santa Clara River to prevent birds and bats from nesting during construction. Installation of these devices will be completed before February 1 (the beginning of bird breeding season) and will remain until construction is completed. A qualified biologist will inspect the area before installation for nests and evidence of breeding activity. If breeding activity is not detected, inactive nests will be destroyed to prevent birds from establishing breeding. If breeding activity is confirmed, exclusionary devices will be installed in all other areas lacking active nests. Active nests will be monitored by the biologist until breeding is completed. After breeding is completed, exclusionary devices will be installed in these areas.	EIR/EA, AMM GEN-13	Construction		
83	Best efforts will be implemented (within the control of LA County, taking into consideration land ownership) to restrict public access into the Santa Clara River that can adversely affect listed fish and wildlife resources. These actions will include posting signs along the Multi-Use Trail and where sidewalks abut the Santa Clara River, promoting public education and awareness of such ecological sensitivities, and maintaining fences and barricades to prevent unauthorized or unrestricted access to the river bottom, as applicable.	EIR/EA, AMM GEN-14	Construction		

84	Compensatory mitigation for impacts on sensitive natural communities (jurisdictional wetlands and waters) will consist of a combination of in-place and in-kind restoration (at a minimum a 1:1 ratio) and enhancement. A Vegetation Management and Restoration Plan will be prepared for agency review and approval before initiating project impacts. Only native plant species will be included in the plans. Final plans will include the following information and conditions: a.All habitat restoration/enhancement sites will be prepared for planting in a way that mimics natural habitat to the maximum extent practicable. All planting will be installed in a way that mimics natural plant distribution and not in rows. b.Planting will be accomplished through planting palettes of container plants (and plan will specify plant species, size, and number/acre) and planting seed mix (the Vegetation Management and Restoration Plan will specify plant species and pounds/acre). The upland plant palette will include native species specifically associated with existing habitat types. The source and proof of local native status of plant material and seeds will be provided. c.Container plant survival will be 80% of the initial plantings for the first 5 years. At the first and second anniversaries of plant installation, all dead plants will be replaced unless their function has been replaced by natural recruitment. d.The final Restoration/Enhancement Plan will outline the irrigation schedule to the extent practical, to prevent overwatering, runoff, and plants that are artificially robust (in comparison with nearby native vegetation). Irrigation will cease after year 2 or 3, except in cases of extreme drought. e.The final implementation schedule will indicate when all habitat effects, as well as on-site and off-site restoration/enhancement planting and irrigation, will begin and end. Off-site restoration/enhancement planting and irrigation will be completed during the concurrent or next planting season (i.e., late fall to early spring) after beginning project impacts. On-site habitat restoration/enhancement planting and irrigation (if required) will be completed during the concurrent or next planting season (i.e., late fall to early spring), after finishing each phase of project impacts in the restoration/enhancement area. Any temporal loss of habitat caused by delays in restoration/enhancement will be mitigated through habitat preservation or restoration/enhancement at a 0.5:1 ratio for every 6 months of delay (e.g., 1:1 for 12 months of delay, 1.5:1 for 18 months of delay). If LA County is wholly or partly prevented from performing its obligations under the final plans (causing temporal loss from delays) because of unforeseeable circumstances of causes beyond reasonable control, and without the fault or negligence of LA County, they will be excused by such unforeseeable cause(s). f.The 5 years of success criteria for restoration/enhancement areas will include a 40 to 65% absolute native cover (in comparison with adjacent native vegetation communities) or greater, depending on the native vegetation community being restored/enhanced; evidence of the natural recruitment of multiple species; 0% coverage for Cal-IPC's "Invasive Plant Inventory" species that are rated "High," and no more than 10% coverage of other exotic/weed species. Each vegetation community that is restored/enhanced will have a separate percent absolute native cover, as appropriate for the specific vegetation community. For example, this will vary with riparian woodland and marsh vegetation communities having a higher native coverage percent. The final restoration/enhancement plan will detail the specific success criteria with the target percent absolute native cover for each vegetation community. g.A qualitative and quantitative vegetation monitoring plan with a map of proposed sampling locations will be included. Photo points will be used for qualitative monitoring, and stratified random sampling will be used for all quantitative monitoring. h.Annual mitigation and monitoring reports will be submitted to the appropriate regulatory agency after the monitoring period, no later than December 1 of each year. i.If maintenance of the habitat/restoration enhancement area is necessary between February 1 and September 1, a qualified biologist will survey for nesting birds within the restoration/enhancement area, access paths to it, and other areas susceptible to disturbances by site maintenance. Surveys will consist of three visits separated by 2 weeks, starting March 1 of each maintenance/monitoring year. Work will be allowed to continue on site during the survey period. However, if sensitive avian species are found during any of the visits, LACPW will notify and coordinate with the regulatory agencies to identify measures to avoid and/or minimize effects on the sensitive species (e.g., nests and an appropriate buffer will be flagged by a biological monitor and avoided by maintenance workers). j.LACPW will mitigate at a 1:1 ratio for temporary impacts on listed species and a ratio of 3:1 for permanent impacts on listed species. In addition, the plan will include LA County Planning in the list of regulatory agencies to consult, to determine adequate replacement ratios, to mitigate temporary and permanent impacts on sensitive vegetation communities.	EIR/EA, AMM GEN-15	Construction		
85	LACPW will conclude Section 7 informal consultation with NMFS during the Plans Specifications and Estimates (PS&E) phase.	EIR/EA, AMM GEN-16	Pre-Construction		
86	Prior to the start of construction, surveys for steelhead would be conducted by a qualified biologist highly knowledgeable and experienced with identifying the species. Immediately prior to the start of construction, the qualified biologist would conduct no-take visual-only surveys for steelhead throughout the northern drainage (e.g., from the existing The Old Road culvert down to the stream's confluence with the mainstem of the Santa Clara River) and the mainstem Santa Clara River to confirm absence. Immediately following the steelhead survey, a fish-excluding device would be installed and maintained in the northern drainage. No fish exclusion device is proposed for the mainstem Santa Clara River. This device would be designed, installed, monitored, and maintained to: (a) completely exclude steelhead and other aquatic life from the proposed action in the northern drainage during the entire term of work in or near surface waters; and (b) avoid stranding, entrapment, or entanglement of wildlife. The fish-exclusion device would be regularly monitored by a qualified biologist to ensure it is functional. A surface water diversion would also be designed, installed, monitored, and maintained in a manner that ensures that sufficient water flow continues to maintain aquatic life downstream from the proposed project area in the northern drainage. Additional BMPs would be implemented to avoid and minimize proposed action effects to steelhead. BMPs would be placed around the periphery of work areas to ensure no inadvertent spills, erosion, sedimentation, or construction-related effects occur. If steelhead are detected within the proposed project area, work would be halted, and NMFS would be contacted immediately.	EIR/EA, AMM FISH-1	Pre-Construction		
87	For the mainstem of the Santa Clara River, work activities would be conducted in a way to ensure no surface water contact, and a biological monitor would be present during all ground disturbing activities when near the Santa Clara River. Vegetation trimming and removal would be conducted in a way to prevent contact with surface water, and BMPs would be placed along the length of the Santa Clara River to ensure no inadvertent spills, erosion, or sedimentation occurs. A biological monitor would ensure that materials from concrete decking installation and concrete pouring do not fall into the Santa Clara River, and all construction personnel and equipment remain outside of the active channel. Construction of the piles within the Santa Clara River would occur during summer months, to coincide with periods of low flow for the Santa Clara River, to minimize the potential for effects to surface water in the Santa Clara River. The cast-in-drilled-hole pile with slurry displacement installation method was specifically selected to avoid the need for dewatering and potential affects to steelhead. A biological monitor would be present during cast-in-drilled-hole pile installation when in proximity to the Santa Clara River, to ensure that vibration effects are not negatively affecting aquatic species. If unforeseen circumstances arise during construction of the bridge piles that may result in effects to steelhead, the NMFS would be contacted to discuss additional potential measures to avoid effects.	EIR/EA, AMM FISH-2	Construction		

Appendix D. Form AD-1006

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request 02/20/2023			
Name of Project The Old Road over Santa Clara River ar		Federal Agency Involved California Department of Transport			
Proposed Land Use Transportation		County and State Los Angeles County, CA			
PART II (To be completed by NRCS)		Date Request Received By NRCS 3/16/2023		Person Completing Form: P. Fahnestock	
Does the site contain Prime, Unique, Statewide or Local Important Farmland? (If no, the FPPA does not apply - do not complete additional parts of this form)		YES ☒	NO ☐	Acres Irrigated 13,800	Average Farm Size 56 acres
Major Crop(s) hay, vegetables, fruit and nut trees	Farmable Land In Govt. Jurisdiction Acres: 588,886% 23.2		Amount of Farmland As Defined in FPPA Acres: 61,735% 2.4		
Name of Land Evaluation System Used	Name of State or Local Site Assessment System Storie		Date Land Evaluation Returned by NRCS 3/17/2023		
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly		1.08 ac			
B. Total Acres To Be Converted Indirectly					
C. Total Acres In Site		44.03 ac			
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland		1.2			
B. Total Acres Statewide Important or Local Important Farmland		0			
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted		0.001			
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value		55			
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)		86			
PART VI (To be completed by Federal Agency) Site Assessment Criteria (Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)		Maximum Points	Site A	Site B	Site C
1. Area In Non-urban Use	(15)	4			
2. Perimeter In Non-urban Use	(10)	3			
3. Percent Of Site Being Farmed	(20)	0			
4. Protection Provided By State and Local Government	(20)	20			
5. Distance From Urban Built-up Area	(15)	0			
6. Distance To Urban Support Services	(15)	0			
7. Size Of Present Farm Unit Compared To Average	(10)	0			
8. Creation Of Non-farmable Farmland	(10)	10			
9. Availability Of Farm Support Services	(5)	0			
10. On-Farm Investments	(20)	0			
11. Effects Of Conversion On Farm Support Services	(10)	0			
12. Compatibility With Existing Agricultural Use	(10)	2			
TOTAL SITE ASSESSMENT POINTS		160	39		
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100	86		
Total Site Assessment (From Part VI above or local site assessment)		160	39		
TOTAL POINTS (Total of above 2 lines)		260	125		
Site Selected: Site A		Date Of Selection 4/10/2023		Was A Local Site Assessment Used? YES ☐ NO ☒	
Reason For Selection:					
Name of Federal agency representative completing this form: California Department of Transportation Date: 02/20/2023					

(See Instructions on reverse side)

Form AD-1006 (03-02)

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

- Step 1 - Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form. For Corridor type projects, the Federal agency shall use form NRCS-CPA-106 in place of form AD-1006. The Land Evaluation and Site Assessment (LESA) process may also be accessed by visiting the FPPA website, <http://fppa.nrcs.usda.gov/lesa/>.
- Step 2 - Originator (Federal Agency) will send one original copy of the form together with appropriate scaled maps indicating location(s) of project site(s), to the Natural Resources Conservation Service (NRCS) local Field Office or USDA Service Center and retain a copy for their files. (NRCS has offices in most counties in the U.S. The USDA Office Information Locator may be found at http://offices.usda.gov/scripts/ndISAPI.dll/oip_public/USA_map, or the offices can usually be found in the Phone Book under U.S. Government, Department of Agriculture. A list of field offices is available from the NRCS State Conservationist and State Office in each State.)
- Step 3 - NRCS will, within 10 working days after receipt of the completed form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland. (When a site visit or land evaluation system design is needed, NRCS will respond within 30 working days.
- Step 4 - For sites where farmland covered by the FPPA will be converted by the proposed project, NRCS will complete Parts II, IV and V of the form.
- Step 5 - NRCS will return the original copy of the form to the Federal agency involved in the project, and retain a file copy for NRCS records.
- Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form and return the form with the final selected site to the servicing NRCS office.
- Step 7 - The Federal agency providing financial or technical assistance to the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM *(For Federal Agency)*

Part I: When completing the "County and State" questions, list all the local governments that are responsible for local land use controls where site(s) are to be evaluated.

Part III: When completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them or other major change in the ability to use the land for agriculture.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities planned build out capacity) that will cause a direct conversion.

Part VI: Do not complete Part VI using the standard format if a State or Local site assessment is used. With local and NRCS assistance, use the local Land Evaluation and Site Assessment (LESA).

1. Assign the maximum points for each site assessment criterion as shown in § 658.5(b) of CFR. In cases of corridor-type project such as transportation, power line and flood control, criteria #5 and #6 will not apply and will, be weighted zero, however, criterion #8 will be weighed a maximum of 25 points and criterion #11 a maximum of 25 points.
2. Federal agencies may assign relative weights among the 12 site assessment criteria other than those shown on the FPPA rule after submitting individual agency FPPA policy for review and comment to NRCS. In all cases where other weights are assigned, relative adjustments must be made to maintain the maximum total points at 160. For project sites where the total points equal or exceed 160, consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites, Modifications or Mitigation).

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, convert the site assessment points to a base of 160.

Example: if the Site Assessment maximum is 200 points, and the alternative Site "A" is rated 180 points:

$\frac{\text{Total points assigned Site A}}{\text{Maximum points possible}} = \frac{180}{200} \times 160 = 144 \text{ points for Site A}$

For assistance in completing this form or FPPA process, contact the local NRCS Field Office or USDA Service Center.

NRCS employees, consult the FPPA Manual and/or policy for additional instructions to complete the AD-1006 form.

Appendix E. Notice of Preparation

NOTICE OF PREPARATION AND PUBLIC SCOPING MEETING FOR A DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL ASSESSMENT

Date: March 3, 2023

To: State Clearinghouse, Responsible and Trustee Agencies, Organizations and Interested Parties

Subject: Notice of Preparation and Public Scoping Meeting for a Draft Environmental Impact Report/Environmental Assessment

Project: The Old Road over Santa Clara River and the Southern Pacific Transportation Company (SPT Co.) Bridge, Et Al.

Lead Agency: County of Los Angeles Department of Public Works (CEQA), California Department of Transportation (NEPA)

Review Period: 30 days

Public Works will prepare an Environmental Impact Report (EIR)/Environmental Assessment (EA) for The Old Road over Santa Clara River and SPT Co. Bridge, Et Al., project. The County will be the lead agency for the proposed project under the California Environmental Quality Act (CEQA) and Caltrans will be the lead agency under the National Environmental Protection Act (NEPA) as assigned by the Federal Highway Administration. The County has prepared this Notice of Preparation (NOP) to provide agencies, organizations, and other interested parties with information describing the proposed project to identify potential environmental effects pursuant to State requirements.

Public Works is soliciting input from agencies and interested parties on the scope and content of the environmental information to be evaluated in the proposed project EIR/EA. In accordance with CEQA, agencies are requested to review the project description in this NOP and provide their comments on environmental issues related to the statutory responsibilities of the agency. The EIR/EA will be used by the Board when considering approval of the proposed project as well as any related discretionary actions. The proposed project location, description, and potential environmental effects are discussed below.

PROJECT LOCATION

The project site includes the approximately two-mile stretch of existing The Old Road right-of-way between Henry Mayo Drive and Magic Mountain Parkway in western the County, as shown in Figure 1, Project Location Map. Additionally, the proposed project would include an approximately 0.58-mile extension of the County Multi-Purpose Regional River Trail on the southbound side of The Old Road from where the trail travels under The Old Road and Interstate 5 (I-5) just southeast of Rye Canyon Road to just northwest of the I-5 On- and off-ramps. The project site is contiguous to Henry Mayo Road, which forms the northern boundary of the project site; Rye Canyon Road, which intersects with The Old Road in the middle of the project site; Sky View Lane, which intersects with The Old Road in the southern portion of the project site; and Magic Mountain Parkway, which forms the southern boundary of the project site.

PROJECT DESCRIPTION

The project is being proposed to improve existing traffic operations and accommodate future traffic projections along the roadway. The improvements primarily consist of reconstruction and widening of The Old Road, replacement of two bridges, reconstruction and widening of Rye Canyon Road, and

reconstruction and widening of Sky View Lane, including reconfiguration of its intersection with The Old Road. The project would also extend the existing County Multi-Purpose Regional River Trail from its existing terminus just south of Rye Canyon Road to just northwest of the I-5 on- and off-ramps. Current traffic demand in the project area meets or exceeds roadway capacity for many arterial roadways. Increases in traffic demand are anticipated over the next few years concurrent with projected population growth in the area. As such, the widening of The Old Road to six lanes is critical to the passage of traffic and emergency vehicles in the area.

The Old Road over the Santa Clara River bridge is currently not high enough to allow the volume of water of Public Works' Capital Flood event (defined as a 50-year burned and bulked storm) to pass under it. Replacing the bridge at a higher elevation would provide a minimum freeboard of 2.5 feet to allow a Capital Flood event to pass under it. The bridge is currently classified as structurally deficient in accordance to the Federal Highway Administration standards. Replacing the bridge as part of this project would eliminate that classification. The Old Road over the abandoned Southern Pacific Transportation Company Railroad bridge would be reconstructed at a lower grade to improve roadway safety and to match the road elevation at Rye Canyon Road. Both of The Old Road bridge replacements would include additional roadway improvements, such as the addition of bicycle lanes, raised medians, sidewalks, and concrete barriers to separate pedestrians from traffic lanes.

POTENTIAL ENVIRONMENTAL EFFECTS

Based on a preliminary review of the proposed project consistent with Section 15060 of CEQA Guidelines, the County has determined that an EIR/EA should be prepared for this proposed project. In addition, consistent with Section 15082 of CEQA Guidelines, the County has identified the following potential environmental effects of the project, which will be addressed in the EIR/EA for this project:

- Aesthetics
- Agriculture and Forestry 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
- Wildfire

SUBMITTAL OF WRITTEN COMMENTS

In accordance with CEQA Guidelines, Section 15082, this NOP is being circulated for a 30-day comment period, starting March 6, 2023, and ending April 4, 2023. Interested parties must submit their comments in writing by 5 p.m. on April 4, 2023. Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the EIR/EA. Comments must be submitted via postal or electronic mail to the following address:

Department of Public Works
Attention Ms. Ebigalle Voigt
P.O. Box 1460
Alhambra, CA 91802-1460
e-mail: evoigt@dpw.lacounty.gov

SCOPING MEETING

Public Works will hold a virtual scoping meeting for the The Old Road over Santa Clara River and SPT Co. Bridge, Et Al., project to receive comments on the scope and content of the EIR/EA. The scoping meeting will include a brief presentation providing an overview of the Proposed Project and CEQA process. The virtual scoping meeting will be held as follows:

Date: March 16, 2023
Time: 6 p.m. PST
Location: Online, via Zoom meeting link: <https://us06web.zoom.us/j/81799188445>
Or via Zoom telephone number: (669) 900-6833
Webinar ID: 817 9918 8445

DOCUMENT AVAILABILITY

This NOP can be viewed online at <https://pw.lacounty.gov/pmd/TheOldRoad-over-SantaClaraRiver/>. Future project documents, including the Draft and Final EIR/EA, will also be made available online.

The NOP will also be available at the following locations for viewing:

Public Works Transportation Planning and Programs Division, 11th Floor, 900 South Fremont Avenue, Alhambra, CA 91803

Questions regarding this notice should be directed to Ebigalle Voigt at (626) 458-3967 or evoigt@pw.lacounty.gov, Monday through Thursday, between 8 a.m. and 5 p.m.

Si necesita asistencia con la traducción a Español, por favor comuníquese con el representante del departamento de Obras Públicas del Condado de Los Angeles, Sr. Art Correa (626) 458-3948, 72 horas antes de la reunión.

ADA and Title VI Accommodations: Individuals requiring reasonable accommodations, interpretation services, and materials in other languages or in an alternate format may contact the department coordinator at (626) 458-7901. Individuals with hearing or speech impairment may use California Relay Service 711.

EV:sa

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Source: Esri, 2023; Prepared By: AECOM, 2023.



0 500 1,000 Feet

Project Limit

Multi-Use Trail

Figure 1

Project Location Map

Appendix F. USFWS Species List



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ventura Fish And Wildlife Office
2493 Portola Road, Suite B
Ventura, CA 93003-7726
Phone: (805) 644-1766 Fax: (805) 644-3958
Email Address: FW8VenturaSection7@FWS.Gov



In Reply Refer To:

06/13/2025 15:46:33 UTC

Project Code: 2024-0031581

Project Name: The Old Road Over Santa Clara River and Southern Pacific Transportation
Company Bridge Et Al Project

Subject: List of threatened and endangered species that may occur in your proposed project
location or may be affected by your proposed project

To Whom It May Concern:

The enclosed list identifies species listed as threatened and endangered, species proposed for listing as threatened or endangered, designated and proposed critical habitat, and species that are candidates for listing that may occur within the boundary of the area you have indicated using the U.S. Fish and Wildlife Service's (Service) Information Planning and Conservation System (IPaC). The species list fulfills the requirements under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.). Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the species list should be verified after 90 days. We recommend that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists following the same process you used to receive the enclosed list. Please include the Consultation Tracking Number in the header of this letter with any correspondence about the species list.

Due to staff shortages and excessive workload, we are unable to provide an official list more specific to your area. Numerous other sources of information are available for you to narrow the list to the habitats and conditions of the site in which you are interested. For example, we recommend conducting a biological site assessment or surveys for plants and animals that could help refine the list.

If a Federal agency is involved in the project, that agency has the responsibility to review its proposed activities and determine whether any listed species may be affected. If the project is a major construction project*, the Federal agency has the responsibility to prepare a biological assessment to make a determination of the effects of the action on the listed species or critical habitat. If the Federal agency determines that a listed species or critical habitat is likely to be adversely affected, it should request, in writing through our office, formal consultation pursuant to section 7 of the Act. Informal consultation may be used to exchange information and resolve

conflicts with respect to threatened or endangered species or their critical habitat prior to a written request for formal consultation. During this review process, the Federal agency may engage in planning efforts but may not make any irreversible commitment of resources. Such a commitment could constitute a violation of section 7(d) of the Act.

Federal agencies are required to confer with the Service, pursuant to section 7(a)(4) of the Act, when an agency action is likely to jeopardize the continued existence of any proposed species or result in the destruction or adverse modification of proposed critical habitat (50 CFR 402.10(a)). A request for formal conference must be in writing and should include the same information that would be provided for a request for formal consultation. Conferences can also include discussions between the Service and the Federal agency to identify and resolve potential conflicts between an action and proposed species or proposed critical habitat early in the decision-making process. The Service recommends ways to minimize or avoid adverse effects of the action. These recommendations are advisory because the jeopardy prohibition of section 7(a)(2) of the Act does not apply until the species is listed or the proposed critical habitat is designated. The conference process fulfills the need to inform Federal agencies of possible steps that an agency might take at an early stage to adjust its actions to avoid jeopardizing a proposed species.

When a proposed species or proposed critical habitat may be affected by an action, the lead Federal agency may elect to enter into formal conference with the Service even if the action is not likely to jeopardize or result in the destruction or adverse modification of proposed critical habitat. If the proposed species is listed or the proposed critical habitat is designated after completion of the conference, the Federal agency may ask the Service, in writing, to confirm the conference as a formal consultation. If the Service reviews the proposed action and finds that no significant changes in the action as planned or in the information used during the conference have occurred, the Service will confirm the conference as a formal consultation on the project and no further section 7 consultation will be necessary. Use of the formal conference process in this manner can prevent delays in the event the proposed species is listed or the proposed critical habitat is designated during project development or implementation.

Candidate species are those species presently under review by the Service for consideration for Federal listing. Candidate species should be considered in the planning process because they may become listed or proposed for listing prior to project completion. Preparation of a biological assessment, as described in section 7(c) of the Act, is not required for candidate species. If early evaluation of your project indicates that it is likely to affect a candidate species, you may wish to request technical assistance from this office.

Only listed species receive protection under the Act. However, sensitive species should be considered in the planning process in the event they become listed or proposed for listing prior to project completion. We recommend that you review information in the California Department of Fish and Wildlife's Natural Diversity Data Base. You can contact the California Department of Fish and Wildlife at (916) 324-3812 for information on other sensitive species that may occur in this area.

[*A Biological Assessment is required for construction projects (or other undertakings having

similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Ventura Fish And Wildlife Office

2493 Portola Road, Suite B

Ventura, CA 93003-7726

(805) 644-1766

PROJECT SUMMARY

Project Code: 2024-0031581

Project Name: The Old Road Over Santa Clara River and Southern Pacific
Transportation Company Bridge Et Al Project

Project Type: Bridge - Replacement

Project Description: Los Angeles County Public Works (LACPW) proposes to implement the proposed action (improve The Old Road over the Santa Clara River bridge), which would increase regional roadway capacity, reduce congestion, and enhance safety in the project area through implementation of various roadway improvements along The Old Road between Henry Mayo Drive and Magic Mountain Parkway. Additionally, the proposed action would include an extension of the County of Los Angeles Multi-purpose Regional River Trail.

The proposed action is being proposed to improve existing traffic operations and accommodate future traffic projections along the roadway. The improvements primarily consist of reconstruction and widening of The Old Road, replacement of two bridges, reconstruction and widening of Rye Canyon Road, and reconstruction and widening of Sky View Lane, including reconfiguration of its intersection with The Old Road. Current traffic demand in the project area meets or exceeds roadway capacity for many arterial roadways. Substantial increases in traffic demand are anticipated over the next few years based on projected growth in the area. As such, the widening of The Old Road to six lanes is critical to the passage of traffic and emergency vehicles in the area.

The Old Road over the Santa Clara River bridge is currently not high enough to allow the volume of water of a LACPW Capital Flood event (defined as a 50-year burned and bulked storm) to pass under it. Replacing the bridge at a higher elevation would provide a minimum freeboard of 2.5 feet to allow a Capital Flood event to pass under it. Additionally, emergency repairs were performed on the superstructure, piers, and abutment seats of the bridge immediately following the 1994 Northridge earthquake. Nonetheless, the bridge is currently classified as structurally deficient per Federal FHWA standards. Replacing the bridge as part of this proposed action would eliminate that classification.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@34.43139325,-118.59040825435582,14z>



Counties: Los Angeles County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 17 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
California Condor <i>Gymnogyps californianus</i> Population: Wherever found, except where listed as an experimental population There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8193	Endangered
Coastal California Gnatcatcher <i>Polioptila californica californica</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8178	Threatened
Least Bell's Vireo <i>Vireo bellii pusillus</i> There is final critical habitat for this species. Your location overlaps the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5945	Endangered
Southwestern Willow Flycatcher <i>Empidonax traillii extimus</i> There is final critical habitat for this species. Your location overlaps the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6749	Endangered
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

REPTILES

NAME	STATUS
Southwestern Pond Turtle <i>Actinemys pallida</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4768	Proposed Threatened

AMPHIBIANS

NAME	STATUS
Arroyo (=arroyo Southwestern) Toad <i>Anaxyrus californicus</i> There is final critical habitat for this species. Your location overlaps the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3762	Endangered
Western Spadefoot <i>Spea hammondi</i> Population: Southern DPS No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5425	Proposed Threatened

FISHES

NAME	STATUS
Unarmored Threespine Stickleback <i>Gasterosteus aculeatus williamsoni</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7002	Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRUSTACEANS

NAME	STATUS
Riverside Fairy Shrimp <i>Streptocephalus woottoni</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8148	Endangered
Vernal Pool Fairy Shrimp <i>Branchinecta lynchi</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/498	Threatened

FLOWERING PLANTS

NAME	STATUS
California Orcutt Grass <i>Orcuttia californica</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4923	Endangered
Gambel's Watercress <i>Rorippa gambellii</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4201	Endangered
Nevin's Barberry <i>Berberis nevinii</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8025	Endangered
Slender-horned Spineflower <i>Dodecahema leptoceras</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4007	Endangered
Spreading Navarretia <i>Navarretia fossalis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1334	Threatened

CRITICAL HABITATS

There are 3 critical habitats wholly or partially within your project area under this office's jurisdiction.

NAME	STATUS
Arroyo (=arroyo Southwestern) Toad <i>Anaxyrus californicus</i> https://ecos.fws.gov/ecp/species/3762#crithab	Final

NAME	STATUS
Least Bell's Vireo <i>Vireo bellii pusillus</i> https://ecos.fws.gov/ecp/species/5945#crithab	Final
Southwestern Willow Flycatcher <i>Empidonax traillii extimus</i> https://ecos.fws.gov/ecp/species/6749#crithab	Final

IPAC USER CONTACT INFORMATION

Agency: AECOM
Name: Andrew Fisher
Address: 401 West A Street
Address Line 2: Suite 1200
City: San Diego
State: CA
Zip: 92101
Email: andrew.fisher@aecom.com
Phone: 6199371086

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Highway Administration

Appendix G. Clarifications and Corrections on the Draft EIR

Appendix G. Clarifications and Corrections on the Draft EIR

In accordance with Section 15132 (a) of the CEQA Guidelines, this chapter provides changes to the Draft EIR that have been made to clarify, correct, or supplement the information provided in that document. These changes and additions are because of recognition of inadvertent errors or omissions, and to respond to comments received on the Draft EIR during the public review period. The changes described in this chapter do not add significant new information to the Draft EIR that would require recirculation of the Draft EIR. More specifically, CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to PRC Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states: “New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. ‘Significant new information’ requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact on a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”

Section 15088.5 of the CEQA Guidelines also provides that “[re]circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

As demonstrated in this Final EIR, the changes presented in this chapter do not constitute new significant information warranting recirculation of the Draft EIR as set forth in Section 15088.5 of the CEQA Guidelines. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

Changes to the Draft EIR are indicated below under the respective EIR section heading, page number, and paragraph. Paragraph reference is to the first full paragraph on the page. Deletions are shown with ~~strikethrough~~ and additions are shown with double underline.

Minor grammar, editorial, and/or renumbering updates are not listed below.

General

Throughout Chapter 2 and 3, the Final EIR/EA was updated to include that the project was included in the 2023 FTIP Amendment 23-37.

Summary/Mitigation

Table S-1: Summary of Impacts, Project Features, Avoidance, Minimization, and/or Mitigation Measures

Cultural Resources, Affected Environment: A call was held for Section 106 consultation on September 3, 2024, which included Caltrans, LACPW, and the FTBML. Confidential information was discussed in the call, which has been incorporated into the tribal cultural resources assessment. The tribe provided recommended mitigation measures for tribal cultural resources, which have been incorporated into the EIR/EA. Caltrans agreed to FTBML requests during the Section 106 call, which have been incorporated in TCR-1 to TCR-4.

Wetlands and Other Waters, Potential Impact – Build Alternative: The Build Alternative may permanently impact up to 0.05 acre, and temporarily impact 0.03 acre, of Waters of the U.S. (WOTUS). Indirect impact from bridge shading is 0.40 acre of WOTUS. Total impacts on CDFW-jurisdictional streambeds and riparian habitat include approximately 0.20 acre of permanent impacts and 0.13 acre of temporary impacts, as well as 0.94 acre of bridge shading and 0.014 acre because of bridge columns. Permanent impacts are proposed to occur at three features- the Santa Clara River, the Northern Tributary, and Drainage A. The Build Alternative may permanently impact up to 0.33 acre, and temporarily impact 0.15 acre, of WOTUS. New indirect impact from expanded bridge shading is 0.26 acre of WOTUS. Total impacts on CDFW-jurisdictional streambeds and riparian habitat include approximately 1.07 acre of permanent impacts and 0.43 acre of temporary impacts, as well as 0.68 acre of new bridge shading and 0.02 acre because of bridge columns.

Wetlands and Other Waters - Project Features, Avoidance, Minimization, or Mitigation Measures: Avoidance and minimization measures, and compensatory mitigation, described previously under VEG-1 through VEG-5, would be implemented. These measures include use of BMPs and water trucks to minimize fugitive dust and other impacts. Compensation mitigation described previously for VEG-6 and VEG-7 would be implemented and provide the necessary compensation for impacts on the Santa Clara River. All mitigation activities will be conducted in accordance with a Habitat Mitigation and Monitoring Plan because of USACE, RWQCB, and CDFW as part of the regulatory permit process.

Extensive AMMs and BMPs will be employed at the banks of Santa Clara River. Avoidance and minimization measures, and compensatory mitigation, described previously under VEG-1 through VEG-4, would be implemented. These measures include use of BMPs and water trucks to minimize fugitive dust and other impacts.

Compensatory mitigation described previously for VEG-5 and VEG-6 would be implemented and provide the necessary compensation for impacts on the Santa Clara River. All mitigation activities will be conducted in accordance with a Habitat Mitigation and Monitoring Plan because of USACE, RWQCB, and CDFW as part of the regulatory permit process. Additional mitigation measures for impacts on waters include:

WATERS-1: LACPW shall notify CDFW pursuant to Fish and Game Code, section 1602. LACPW shall comply with the mitigation measures detailed in an LSA Agreement issued by CDFW. LACPW shall also provide compensatory mitigation for any impacted stream and associated natural community.

WATERS-2: LACPW shall mitigate for Project impacts on streams and riparian habitat by replacing habitat at no less than 3:1 ratio for impacts on jurisdictional features detailed in Table 2-52 except for concrete-lined Drainage A. Drainage A will be mitigated at a 1:1 ratio. CDFW considers all Project impacts from sediment removal and sediment placement to be permanent. Mitigation lands should support streams and riparian habitat of similar vegetation composition, density, coverage, and species richness and abundance.

Geology and Soils, Avoidance, Minimization, or Mitigation Measures: WQ-1 and WQ-2 would minimize impacts on Geology/Soils/Seismic/Topography resource areas.

Plant Species - Project Features, Avoidance, Minimization, or Mitigation Measures,

WALNUT-1: In addition, LA County Planning shall be included in the list of agencies to consult for the replacement ratio of 2:1 for the removal of one Southern California black walnut tree.

Plant Species - Project Features, Avoidance, Minimization, or Mitigation Measures, OAK-8: In addition, LA County Planning shall be included in the list of agencies to consult for the replacement ratio of 2:1 for the removal of one Southern California black walnut tree.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, VEG-5: Permanent and temporary impacts on sensitive vegetation communities will be replaced by creating or restoring habitats of similar functions and values in the BSA, or credits will be purchased through an applicable mitigation bank. Restoration will be in-kind and at a minimum 1:1 replacement ratio or other ratio, determined in consultation with the regulatory agencies. All mitigation activities will be conducted in accordance with a Habitat Mitigation and Monitoring Plan and in consultation with USACE, RWOCB, and CDFW before the issuance of permits. The Habitat Mitigation and Monitoring Plan will outline the identification and location of areas that can be used for creation, restoration, or habitat enhancement. The plan will include a list of native plant species by habitat type, and this list may be used for on-site revegetation efforts (e.g., planting and seeding). In addition, if necessary to meet mitigation needs, the plan will identify opportunities for additional enhancements of habitats in temporary impact areas, such as supplemental tree planting, weeding adjacent buffer habitat, or other opportunities. The enhancement opportunities will include acreage estimates of treated areas, acreage of invasive removal, and figures to show the treatment area and mapped invasive species. A habitat restoration specialist will determine the optimal areas for habitat establishment and restoration, and will prepare the Habitat Mitigation and Monitoring Plan with details on the concept. The plan will discuss habitat restoration implementation specifically, including plant establishment methods, performance standards, the maintenance and monitoring period, and reporting. In addition, the plan will include LA County Planning in the list of regulatory agencies to consult, to determine adequate replacement ratios, to mitigate temporary and permanent impacts on sensitive vegetation communities. The minimum 1:1 replacement ratio may not be appropriate for more sensitive SEA resources.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, GEN-4: All workers will participate in a Worker Environmental Awareness Program for sensitive biological resources. Sign-in sheets will be maintained to document completion of the program by each worker. This training can be administered in

person by a qualified biologist or through screening of a video/slide presentation, prepared by a qualified biologist and overseen by an on-site manager. Contractor education training will include a review of special-status species and protected habitats occurring/potentially occurring on site. Identification of these resources and all biological avoidance and minimization measures relevant to the contractors' work will be reviewed. Stop work and notification procedures will be outlined. The training program will include a section specific to UTS, southwestern pond turtle, arroyo toad, LBVI, and SWFL. Training handouts will be provided and posted at the staging areas in the project area.

In addition to a qualified biologist being available for species surveys, monitoring, and relocation activities, biological monitors will be present on a daily basis throughout the construction phase, when construction activities are adjacent to federally listed species habitat or have the potential to impact listed species. Biological monitors will be qualified for the monitoring activities and species in the area. A biological monitor will monitor the status of BMPs to ensure that they continue to be implemented after installation and prevent species that are in proximity to construction activities from being affected. In particular, construction monitoring will occur daily when ground-disturbing activities occur in/near the Santa Clara River. The biological monitors will ensure that BMPs are operating effectively, will conduct daily sweeps of the active construction areas to ensure that no listed species are impacted, and will conduct pre-activity clearance surveys ahead of vegetation/ground disturbance when in listed species habitat or critical habitat. Repeat pre-activity clearance surveys will be conducted when a lapse in occurs activities in suitable listed species habitat longer than 3 days after vegetation removal or a previous survey.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, GEN-5: A qualified biologist, defined as an individual with the appropriate federal and state permits to conduct the specified activities, will be available to relocate any listed species out of harm's way, if detected within the project limits of construction. They have verified previous experience with the species for which they are conducting surveys and have been approved by USFWS to ensure that they are qualified ~~truly "qualified"~~ to conduct species surveys, monitoring, and relocation activities.

In addition to a qualified biologist being available for species surveys, monitoring, and relocation activities, biological monitors will be present on a daily basis throughout the construction period when construction activities are adjacent to federally listed species habitat or have the potential to impact listed species. Biological monitors will be qualified for the monitoring activities and species in the area. A biological monitor will monitor the status of BMPs to ensure they continue to work after installation and prevent species that are in proximity to construction activities from being affected by the BMPs. In particular, construction monitoring will occur daily while ground-disturbing activities occur in/near the Santa Clara River. Biological monitors will ensure BMPs are operating effectively, conduct daily sweeps of the active construction areas to ensure no listed species are impacted, and conduct pre-activity clearance surveys ahead of vegetation/ground disturbance when in listed species habitat or critical habitat (that contains the necessary physical and biological features). Repeat pre-activity clearance surveys will be conducted when there is a lapse in activities in suitable listed species habitat longer than three days after vegetation removal or a previous survey.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, GEN-6: All equipment maintenance; staging; and dispensing of fuel, oil, coolant, or any other such activities will occur in designated areas outside of jurisdictional wetlands or waters and within the fenced proposed project limits. These designated areas will

be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent any runoff from entering jurisdictional wetlands or waters. Fueling of equipment will take place within existing paved areas, if feasible, greater than 100 feet from jurisdictional wetlands or waters. Contractor equipment will be checked for leaks prior to operation and repaired as necessary. "Fueling zones" will be designated on construction plans and located away from the Santa Clara River and northern drainage.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, GEN-8: To reduce impacts on listed species critical and occupied habitat, prior to entering the proposed project site area, all personnel will remove invasive species materials, propagules, seeds, individuals, etc. from ~~project equipment, project materials, equipment, and clothes~~ to reduce the proliferation of invasive species. This will include ensuring proposed project construction equipment has been thoroughly power washed or cleaned to remove any dirt/mud/sediment from tires, tracks, etc.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, GEN-9: The proposed project area site will be kept as clean of construction-related trash and debris as possible to avoid attracting predators of sensitive wildlife. All food-related trash items will be enclosed in sealed containers and regularly removed from the proposed project area site.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, GEN-10: ~~Pets of project personnel will not be allowed on the proposed project site.~~ Proposed project personnel will be prohibited from bringing pets into the proposed project area.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, GEN-11: Disposal or temporary placement of excess fill, brush, or other debris will not be allowed in WOTUS or their banks along the Santa Clara River.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, GEN-14: Best efforts will be implemented (within the control of Los Angeles County, taking into consideration land ownership) to restrict public access into Santa Clara River that could adversely affect listed fish and wildlife resources. These actions will include, among other things, posting signs (along the Multi-Use Trail and ~~other areas~~ where the sidewalks abuts the Santa Clara River SEA), ~~identifying an ecologically sensitive area,~~ promoting public education and awareness of such ecological sensitivities, ~~and the maintenance maintaining of fences and barricades~~ to prevent unauthorized or unrestricted access to the river bottom, as applicable.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, GEN-15: Compensatory mitigation for impacts on sensitive natural communities (jurisdictional wetlands and waters) will consist of a combination of in-place and in-kind restoration (at a minimum of 1:1 ratio) and enhancement. A Vegetation Management and Restoration Plan will be prepared for agency review and approval prior to initiating proposed project impacts. Only native plant species will be included in the plans. Final plans will include the following information and conditions:

- a. All habitat restoration/enhancement sites will be prepared for planting in a way that mimics natural habitat to the maximum extent practicable. All planting will be installed in a way that mimics natural plant distribution, and not in rows.

- b. Planting will be accomplished through planting palettes of container plants (and plan will specify plant species, size, and number/acre) and planting seed mix (and plan shall specify plant species and pounds/acre). The upland plant palette proposed in the draft plants will include native species specifically associated with existing habitat types. The source and proof of local native status of plant material and seed will be provided.
- c. Container plant survival will be 80 percent of the initial plantings for the first 5 years. At the first and second anniversaries of plant installation, all dead plants will be replaced unless their function has been replaced by natural recruitment.
- d. The final restoration/enhancement plan will outline the irrigation schedule to the extent practical, to prevent overwatering, runoff, and plants that are artificially robust (compares with the nearby native vegetation). Irrigation will cease after year 2 or 3 except in cases of extreme drought.
- e. A final implementation schedule will indicate when all habitat effects, as well as on-site and off-site restoration/enhancement planting and irrigation, will begin and end. Off-site restoration/enhancement planting and irrigation will be completed during the concurrent or next planting season (i.e., late fall to early spring) after initiating proposed project effects. On-site habitat restoration/enhancement planting and irrigation (if required) will be completed during the concurrent or next planting season (i.e., late fall to early spring) after finishing each phase of proposed project effects within the restoration/enhancement area. Any temporal loss of habitat caused by delays in restoration/enhancement will be mitigated through habitat preservation or restoration/enhancement at a 0.5:1 ratio for every 6 months of delay (1:1 for 12 months' delay, 1.5:1 for 18 months' delay, etc.). If the County is wholly or partly prevented from performing obligations under the final plans (causing temporal loss because of delays) because of unforeseeable circumstances of causes beyond reasonable control, and without the fault or negligence of the County, they will be excused by such unforeseeable cause(s).
- f. Five years of success criteria for restoration/enhancement areas will include a total of 40 to 65 percent absolute native cover (compared with adjacent native vegetation communities) or greater, depending on the native vegetation community being restored/enhanced; evidence of the natural recruitment of multiple species; 0 percent coverage for Cal-IPC's "Invasive Plant Inventory" species that are rated "High," and no more than 10 percent coverage for other exotic/weed species. Each vegetation community that is restored/enhanced will have a separate percent absolute native cover appropriate for the specific vegetation community. For example, this will vary with riparian woodland and marsh vegetation communities having a higher native coverage percent. The final restoration/enhancement plan will detail the specific success criteria with the target percent absolute native cover for each vegetation community.
- g. A qualitative and quantitative vegetation monitoring plan with a map of proposed sampling locations will be included. Photo points will be used for qualitative monitoring, and stratified random sampling will be used for all quantitative monitoring.
- h. Annual mitigation and monitoring reports will be submitted to the appropriate regulatory agency after the monitoring period no later than December 1 of each year.

- i. If maintenance of the habitat/restoration enhancement area is necessary between February 1 and September 1, a qualified biologist will survey for nesting birds within the restoration/enhancement area, access paths to it, and other areas susceptible to disturbances by site maintenance. Surveys will consist of three visits separated by 2 weeks starting March 1 of each maintenance/monitoring year. Work will be allowed to continue on the site during the survey period. However, if sensitive avian species are found during any of the visits, the applicant will notify and coordinate with regulatory agencies to identify measures to avoid and/or minimize effects on the sensitive species (e.g., nests and an appropriate buffer will be flagged by a biological monitor and avoided by the maintenance work).
- j. LACPW will mitigate at a 1:1 ratio for temporary impacts on listed species and a ratio of 3:1 for permanent impacts on listed species. In addition, the plan will include LA County Planning in the list of regulatory agencies to consult, to determine adequate replacement ratios, to mitigate temporary and permanent impacts on sensitive vegetation communities.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, UTS-2: For the mainstem of the Santa Clara River where UTS are assumed present, work activities will be conducted in a way to ensure no surface water contact and a biological monitor will be present during all ground disturbing activities when near the Santa Clara River. Vegetation trimming and removal will be conducted in a way to prevent contact with surface water, and BMPs will be placed along the length of the Santa Clara River to ensure no inadvertent spills, erosion, or sedimentation occurs. A biological monitor will ensure that materials from concrete decking installation and concrete pouring do not fall into the Santa Clara River and all construction personnel and equipment remain outside of the active channel. Construction of the piles within the Santa Clara River will occur during summer months to coincide with periods of low flow for the Santa Clara River to minimize the potential for impacts on surface water in the Santa Clara River UTS impacts. The cast-in-drilled-hole pile with slurry displacement installation method was specifically selected to avoid the need for dewatering and potential affects to UTS. A biological monitor will be present during cast-in-drilled-hole pile installation when in proximity to the Santa Clara River to ensure that vibration effects are not negatively impacting aquatic species. If unforeseen circumstances arise during construction of the bridge piles that may result in impacts on UTS, the USFWS will be contacted to discuss additional potential measures to avoid impacts. ~~Vegetation trimming and removal will be conducted in a way to prevent contact with surface water, and BMPs will be placed along the length of the Santa Clara River to ensure no inadvertent spills, erosion, or sedimentation occurs. A biological monitor will be present during cast-in-drilled-hole pile installation when in proximity to the Santa Clara River to ensure that vibration effects are not negatively affecting aquatic species. Any additional measures developed in consultation with USFWS will be incorporated.~~

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, UTS-4: ~~UTS-4: While the proposed project is anticipated to avoid direct take of UTS, there is still potentially occupied and assumed occupied habitat that may require mitigation. Impacts on occupied habitat may be mitigated through obtaining credits at an applicable mitigation bank, the creation or enhancement of similar riparian habitat at an approved mitigation site, or by the removal of exotic species from an area of existing similar habitat as determined by USFWS. The requirement for replacing suitable habitat by obtaining credits at an applicable mitigation bank, creating/restoring new habitat, and/or removing exotic species from existing habitat will be determined in consultation with USFWS.~~

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, ARTO-1: ~~ARTO-1: Prior to clearing, grubbing, and construction activities, arroyo toad exclusionary fencing will be installed around the perimeter of all work areas adjacent to potential arroyo toad breeding habitat as determined by a qualified arroyo toad biologist. In areas without water flows, the fence will consist of woven nylon fabric or similar material at least 2 feet high, staked firmly to the ground. No fencing will be placed in areas of flowing water (because of the potential for UTS). In areas where soils are suitable for burrowing, the lower 1 foot of material will stretch outward along the ground and be secured with a continuous line of sandbags to prevent burrowing beneath the fence. Doubling this line (i.e., stacking sand or gravel bags two-deep) may reduce maintenance and should be considered to improve the integrity of the fencing. In areas where soils are not suitable for burrowing, (i.e., hardpack soils), fencing may be buried to reduce maintenance concerns and improve the integrity of the fencing over time. Decisions on the appropriate fencing installation method for a given reach will be made by the qualified arroyo toad biologist. All fencing will be removed following completion of project activities. Ingress and egress of equipment and personnel will use two identified access points to the site, which will be as narrow as possible and closed off by exclusionary fence when personnel are not present.~~

Threatened and Endangered Species—Project Features, Avoidance, Minimization, or Mitigation Measures, ARTO-2: ~~ARTO-2: Prior to vegetation grubbing or construction, but after exclusionary fence has been installed around the impact footprint, at least three surveys for arroyo toad of any life stages or clutches will be conducted within the fenced area by a qualified biologist knowledgeable of arroyo toad biology and ecology. Surveys will be conducted during the appropriate climatic conditions during the appropriate time of day or night to maximize the likelihood of encountering arroyo toad. If arroyo toad of any life stages or clutches is found within the proposed project area, it will be captured and translocated, by the biologist, to the closest area of suitable habitat within Santa Clara River. Before each workday begins, the qualified biologist will also check to see if arroyo toad has entered the impact footprint. If arroyo toad is found within the impact footprint, it will be moved outside of the impact footprint, if suitable habitat exists, or out of harm's way.~~

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, ARTO-3: ~~ARTO-3: The qualified biologist will be present during each morning before construction activities begin to inspect all arroyo toad exclusionary fencing for damage or holes, conduct a sweep of the work area for arroyo toad of any life stages, inspect any covered stockpiles for gaps or sign that arroyo toad has accessed the soils underneath and will be present when these covers are removed. If burrows characteristic of arroyo toad are found, the burrows will be hand-excavated. The qualified biologist will relocate any arroyo toad found to suitable habitat adjacent to the construction site but at least 200 feet away.~~

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, ARTO-4: ~~ARTO-4: Excavations or trenches created by construction activities that have the potential to trap arroyo toad will be covered with cover plates or other materials at the end of each workday. Excavations or trenches that are covered will have the edges sealed with sandbags, bricks, or boards to prevent arroyo toad from becoming trapped in excavations or trenches. The qualified biologist will inspect all excavations and trenches (covered and uncovered) for the presence of arroyo toad prior to disturbance of soils or removal of cover plates. The qualified biologist will be present when the cover plates are removed and will inspect and relocate any arroyo toad that may have entered the trench during the night to suitable habitat adjacent to the construction site but at least 200 feet away.~~

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, RIP-2: If work is scheduled during the riparian avian breeding season (February 1 through September 1), and within LBVI or SWFL occupied and critical habitat, a qualified biologist will conduct a preconstruction nesting survey to ensure that no active bird nests are present within 500 feet of construction activities. If no nests are detected, then vegetation removal will be permitted during the nesting season. The qualified biologist shall establish and maintain a minimum 300-foot no-disturbance buffer around all active bird nests. For raptors and special status species, this buffer shall be expanded to a minimum of 500 feet.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, RIP-3: If an active LBVI or SWFL nest is detected, no construction activities will be permitted within 300 500 feet of the nest. Work, ~~vehicle traffic, and foot traffic,~~ within nest buffers may not resume until the young fledge and disperse, or the nest has been determined to fail by the qualified biologist. Limits of construction to avoid a nest site will be established in the field with flagging and stakes or construction fencing.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, LION-3: LION-3: Pending the state listing status of mountain lion, impacts will be assessed by CDFW during the permitting process and any necessary avoidance and minimization measures will be implemented.

Threatened and Endangered Species - Project Features, Avoidance, Minimization, or Mitigation Measures, Compensatory Mitigation:

Unarmored Threespine Stickleback

~~**UTS-3:** While the project is anticipated to avoid direct take of UTS, there is still potentially occupied and assumed occupied habitat that may require mitigation. Impacts on occupied habitat may be mitigated through obtaining credits at an applicable mitigation bank, the creation or enhancement of similar riparian habitat at an approved mitigation site, or by the removal of exotic species from an area of existing similar habitat as determined by USFWS. The requirement for replacing suitable habitat by obtaining credits at an applicable mitigation bank, creating/restoring new habitat, and/or removing exotic species from existing habitat will be determined in consultation with USFWS. None.~~

Arroyo Toad

~~**ARTO-5:** To compensate for the direct loss of arroyo toad critical habitat, in consultation with USFWS, it may be necessary to acquire mitigation lands and/or conduct restoration (such as nonnative species removal) within Santa Clara River or other similar location. The specific mitigation ratio will be determined in consultation with USFWS. Critical habitat to be mitigated will be in-kind and contain the same physical and biological features that were present in the critical habitat removed by the proposed project. None.~~

~~**WPT-3:** Pending the federal listing determination for this species, further consultation may be required with USFWS to determine the appropriate mitigation approach. Under its current status, compensatory mitigation for permanent and temporary loss of habitat for southwestern pond turtle will be provided in compensatory mitigation required for federally listed species impacts on arroyo toad, LBVI, and SWFL, similar to the approach proposed for non-listed special status wildlife species. None.~~

Least Bell's Vireo and Southwestern Willow Flycatcher

RIP-4: The removal of LBVI and SWFL critical habitat will be mitigated through obtaining credits at an applicable mitigation bank, the creation or enhancement of similar riparian habitat at an approved mitigation site, or by the removal of exotic species from an area of existing similar habitat. The requirement for replacing suitable habitat by obtaining credits at an applicable mitigation bank, creating/restoring new habitat, and/or removing exotic species from existing habitat will be determined in consultation with USFWS. Included under **GEN-15**.

Mountain Lion

LION-3: Pending the state listing status of mountain lion, impacts will be assessed by CDFW during the Incidental Take Permitting process and any necessary mitigation avoidance and minimization measures will be acquired/implemented. None.

Wildfire: As discussed in Section 2.2.7, AMMs COM-2 through COM-4 would be implemented to reduce or eliminate temporary effects on traffic and emergency services. In addition, although the proposed project area is susceptible to wildfire risks, standard construction practices and regulatory safety compliance measures would reduce the risks to less than significant. The proposed project would not cause any permanent road closures but would cause temporary lane closures during construction. However, as discussed in Section 2.2.7, AMMs COM-2 through COM-4 would be implemented to reduce or eliminate the temporary effects on traffic and emergency services. In addition, although the project area is susceptible to wildfire risks, standard construction practices and regulatory safety compliance measures would reduce the risks. The impact would be reduced to a less-than-significant level with mitigation incorporated.

Climate Change: None. The proposed project would result in GHG emissions during construction; however, that would be offset by the long-term improvements in operational GHG emissions compared with existing conditions. As discussed in Section 3.3.3, the Build Alternative would result in less emissions than the No-Build Alternative and existing conditions in the opening year (2028) because of improvements in average vehicle speed and reductions in vehicle delay. In addition, in the design year (2048), ambient regional growth would result in higher GHG emissions for the Build Alternative than existing conditions in 2018, but the magnitude of emissions would be substantially lower than the No-Build Alternative in the same year. The proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, the impacts would be less than significant, and no mitigation is required.

Public Services: As discussed in Section 2.2.7, AMMs COM-2 through COM-4 would be implemented to reduce or eliminate temporary effects on emergency services. In addition, as stated in AMM COM-5, coordination would occur with utility service providers, and a public outreach program would be implemented to minimize impacts on surrounding communities. As such, impacts on public services would be minimal. Therefore, the proposed project would not cause existing public services to provide additional services or create new associated facilities, and impacts would be less than significant. During construction, temporary impacts on traffic are anticipated because of possible lane closures and detours. However, as discussed in Section 2.2.7, avoidance and minimization COM-2 through COM-4 would be implemented to reduce or eliminate temporary effects on emergency services. In addition, as stated in AMM COM-5, coordination would occur with utility service providers, and a public outreach program would be implemented to minimize impacts on surrounding communities. Thus, impacts on public services, including police and fire protection,

would minimal. Therefore, the proposed project would not cause existing public services to provide additional services or create new associated facilities. The impacts would be reduced to a less-than-significant level with mitigation incorporated.

Chapter 1 Proposed Project

1.3.5 Alternatives Considered but Eliminated from Further Discussion Prior to the “Draft” Initial Study/Environmental Assessment (IS/EA)

Alternative Alignment for the Multi-Use Trail

This alternative proposed an alternate alignment for the Multi-Use Trail along the west boundary of The Old Road right-of-way. This alternative was eliminated from detailed consideration because it would not avoid or reduce the impacts of or require less mitigation than the chosen alternative, for the following reasons:

Cultural Resources: This alternative would require substantial additional excavation and this area has not been analyzed for cultural and historical resources. The proposed alignment has had cultural studies completed and did not find any impacts.

Water Quality and Storm Runoff: This alternative would increase the amount of impervious area compared to the chosen alternative and the amount of low impact development devices necessary to treat the storm water runoff would require more surface area.

Plant Species: The alternative alignment would not reduce the number of trees which would need to be removed as part of the project and would not lessen any of the project's impacts on plant species.

Public Services: The alternative alignment would reduce corner sight distance for trail users at the connection to the proposed bridge.

This alternative proposed an alternate alignment for the Multi-Use Trail. The alignment would have been moved from the proposed alignment that passes through the Valencia Water Reclamation Plant to the west boundary of The Old Road right-of-way. This realignment for the Multi-Use Trail was not feasible because of the following reasons:

- ~~There are over 30 oak trees which would need to be removed for the alternate alignment. The County Oak Tree ordinance calls for a replacement ratio of 10:1 which would be infeasible in the project area.~~
- ~~The alternate alignment would involve substantial additional excavation. This area has been identified as sensitive for cultural resources, so there would be an increased risk of encountering and having to develop a plan and mitigate for such.~~
- ~~The realigned trail will not be large enough to accommodate for the Low Impact Device (LID) feature currently proposed.~~
- ~~This alternative would join the existing trail at an intersection of 50° at the proposed bridge, resulting in poor sight distance.~~
- ~~This alternative would result in users walking between two retaining walls along a curve, which may result in reduced sight distance.~~

1.3.6 Permits and Approvals Needed

United States Fish and Wildlife Service (USFWS)

~~A Biological Assessment was submitted to the USFWS on March 19, 2024 and Biological Assessment was submitted to the USFWS on March 19, 2024 and A Biological Opinion was received (dated August 30, 2024), prior to the approval of the EIR/EA and issuance of the FONSI.~~

Federal Highway Administration

Air quality studies have been submitted for FHWA determination ~~after the environmental document's public circulation period has closed and prior to a FONSI.~~

State Historic Preservation Office

~~In compliance with the National Historic Preservation Act Section 106 and Assembly Bill (AB) 52, the NAHC was contacted in July 2020. The Fernandeño Tataviam Band of Mission Indians requested further consultation and a meeting once the Cultural Resources Report, as well as grading and excavation details were made available. and Section 106 and AB 52 consultation will continue regarding the proposed project has concluded.~~

Chapter 2 Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures

Regional Conservation Plans

County of Los Angeles – Significant Ecological Areas (SEA) Program Ordinance

The proposed project area is within the County of Los Angeles's SEA program boundary, and thus subject to comply with the program ordinance. Specifically, the proposed project shall comply with County Code 22.102.080.D – SEA Conditional Use Permit and 22.102.130 - Review Procedures for County Projects.

SEAs are officially designated areas within LA County with irreplaceable biological resources. The SEA Program objective is to conserve genetic and physical diversity within LA County by designating biological resource areas that are capable of sustaining themselves into the future. The SEA Ordinance establishes the permitting, design standards, and review process for development within SEAs, balancing preservation of the County's natural biodiversity with private property rights.

The SEA Program, through goals and policies of the General Plan and the SEA ordinance (Title 22 zoning regulations), help guide development within SEAs. The General Plan goals and policies are intended to ensure that privately-held lands within the SEAs retain the right of reasonable use, while avoiding activities and developments that are incompatible with the ability of SEAs to thrive in the long term.

Table 2-3: Consistency with Plans and Policy:

Policy/Goal

County Code 22.102.080.D. - SEA Conditional Use Permit: Findings. The Commission or Hearing Officer shall approve an application for a SEA CUP, if the Commission or Hearing Officer finds that the application substantiates, in addition to those required by Section 22.158.050 (Findings and Decisions).

County Code 22.102.130 - Review Procedures for County Projects. County projects proposing development in a SEA shall submit an application for a review by the Department. County projects and maintenance activities performed as a result of emergency or hazard management shall be documented. The documentation shall be provided to the Department for a determination of the applicability of this Chapter. Emergency or hazard management activities include any activity required, requested, authorized, or permitted by a local, State, or federal agency, in response to an emergency.

Alternative 1: No-Build

Consistent: No changes to land within SEA boundaries would occur.

Alternative 2: Build Alternative

Consistent: Under Alternative 2, the lead agency would submit and include required information to the lead County Department, including the project scope of work; location map; environmental documents, if applicable; and regulatory permit requirements, if applicable.

2.2.10 Cultural Resources

The information in this section is based on the Historic Resources Evaluation Report (HRER) (AECOM 2023e), the Historic Property Survey Report (HPSR) (AECOM 2023f), the Archaeological Survey Report (ASR) (AECOM 2023g), and the Extended Phase I Report (XPI) (AECOM 2024c), and the Supplemental HPSR (SHPSR) (AECOM 2024a) and the Supplemental ASR (SASR) (AECOM 2024b).

Affected Environment

The ADI is limited to those areas that will be directly impacted by the proposed project, including all sliver takes. The vertical extent of the ADI encompasses the maximum depth of excavation, which may extend 17 to 43 feet beneath the existing ground surface for retaining wall foundation piles. At the bridge locations, the APE extends substantially deeper; piles would be installed at approximately 150 feet deep within the riverbed and 100 feet deep at the abutments and wingwalls. The vertical APE also includes the maximum height of construction, which will extend no more than 54 feet above the existing ground surface ~~which, exclusive of the bridge locations, may extend up to 15.5 feet beneath the existing ground surface, and the maximum height of construction, which will extend no more than 36.5 feet above the existing ground surface.~~ Embedment depth (excavation) for the retaining walls would be between 17 feet to 43 feet. ~~The wing walls embedment depth (excavation) would be between 43 feet to 100 feet. At the bridge locations, the APE extends substantially deeper; piles would be installed at approximately 150 feet deep within the riverbed and 100 feet deep at the abutments.~~

Section 106 Native American Consultation

As the federal lead agency, Caltrans conducted Native American consultation in compliance with Section 106 of the NHPA. Consultation efforts are summarized next.

Section 106 consultation efforts for the proposed project included a review of the Sacred Lands File by the Native American Heritage Commission (NAHC), which produced negative results per a letter dated July 25, 2018. The NAHC provided a list of 16 Native American representatives from 11 tribal entities who may have interest in or knowledge of the project area. Tribes identified by the NAHC include:

- Barbareno/Ventureno Band of Mission Indians (BVBMI)
- Fernandeno Tataviam Band of Mission Indians (FTBMI)
- Gabrieleno Band of Mission Indians – Kizh Nation (GBMIKN)
- Gabrielino/Tongva Nation (GTN)
- Gabrieleno/Tongva San Gabriel Band of Mission Indians (GTSGBMI)

- Gabrielino-Tongva Tribe (GTT)
- Kern Valley Indian Community (KVIC)
- Kitanemuk & Yowlumne Tejon Indians (KYTI)
- Santa Ynez Band of Chumash Indians (Santa Ynez)
- Soboba Band of Luiseno Indians (Soboba)
- Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians) (San Manuel)

These individuals were contacted by letter in August 2018. An attempt was made to contact those who had not responded to the letter by phone. Because of these initial contact efforts, seven responses were received. Four stated that the APE lies outside their tribal territory or deferred to other Native American groups (BVBMI, GBMIKN, San Manuel, and Soboba). Three (BVBMI, GTSGBMI, FTBMI) said that the proposed project APE was sensitive for cultural resources and recommended monitoring, including one tribe, the FTBMI, who also stated the tribe would like to formally consult on the proposed project. The Santa Ynez had no comment. No response was received from four tribes (GTN, GTT, KVIC, KYTI).

In December 2022, letters were sent to the initial tribal representatives as identified by the NAHC in 2018, to provide them with an update on the project status. Because of these re-notification letters, the Santa Ynez requested formal consultation, a representative from the BVBMI requested to participate in monitoring for proposed archaeological fieldwork, and the San Manuel indicated that the project area is outside the tribe's ancestral territory, and they would not request consulting party status.

Between April 18, 2023 and May 3, 2023, representatives identified by the NAHC were provided with an update on the project status and were offered an opportunity to review the XPI proposal for the project. Thereafter, the Santa Ynez concluded consultation, the BVBMI deferred consultation to a local tribe, the San Manuel requested the opportunity to consult on placement of environmentally sensitive areas, if they are needed, and representatives from two tribes, the BVBMI and the FTBMI, indicated that they were interested in providing Native American monitoring for future work.

On July 30, 2024, six representatives that previously engaged in consultation, including representatives from the BVBMI, FTBMI, GTSGBMI, Santa Ynez, and San Manuel, were contacted via e-mail with an informational letter, detailing project refinements, including a map of APE refinements. The contact letter included a brief introduction and history of the proposed project, details on the project changes, and next steps. Representatives were invited to reach out with any project-related questions or concerns. A follow-up e-mail was sent to those contacts who did not respond to the letter of August 14, 2024. The follow-up e-mail also included information regarding the Notice of Availability (NOA) for the Draft Environmental Impact Report/Environmental Assessment (EIR/EA). The email stated that the NOA had been provided via mail in April 2024. The follow-up e-mail also informed representatives that comments from the public review period were being reviewed, responses were being compiled, and the Final EIR/EA was being revised for approval.

In the process of the updated consultation efforts, three responses were received. The San Manuel indicated that the project area was outside their territory, and they did not wish to request consulting party status. The Santa Ynez reached out to LACPW, requesting a consultation meeting following the Notice of Filing. In a call on August 14, 2024, the Santa Ynez wanted to ensure that the FTBMI were being consulted and requested that the Santa Ynez be informed of any future project changes. The FTBMI also responded to the updated consultation notice. The tribe responded on August 14, 2024 to the follow-up e-mail and requested that moving forward, all documentation for projects related to regulatory frameworks be sent to a specific e-mail address, to ensure receipt by the correct staff. The tribe also requested information on accessing the Draft EIR/EA and asked that the letter and map that were sent on July 30, 2024 be forwarded to the Cultural Resources Management Division Manager. AECOM provided the requested information, and on August 20, 2024, the tribe followed up via e-mail, requesting a meeting with Caltrans to address questions and provide confidential information. Caltrans held a call with the tribe on August 20, 2024.

A call was held for Section 106 consultation on September 3, 2024, which included Caltrans, LACPW, and the FTBMI. Confidential information was discussed in the call, which has been incorporated into the tribal cultural resources assessment. The tribe provided recommended mitigation measures for tribal cultural resources, which have been incorporated into the EIR/EA. Caltrans agreed to FTBMI requests during the Section 106 call, which have been incorporated in TCR-1 to TCR-4.

No response was received from three contacted individuals who represented two different tribes, the BVBMI and the GTSGBMI. A detailed summary of consultation efforts for the proposed project is available in the 2023 Archaeological Survey Report (AECOM 2023g) and the 2024 Supplemental HPSR (AECOM 2024i).

Alternative 2: Build Alternative

The results of the HRER (AECOM 2023e), 2023 HPSR (AECOM 2023f), and the 2024 Supplemental HPSR (AECOM 2024) and the ~~HPSR (AECOM 2023f)~~ indicate that eight built environment resources were identified within the APE. Of these eight resources, three were previously determined ineligible for the NRHP (The Old Road over Santa Clara River Bridge (P-19-190315); The Old Road Bridge over the SPT Co. (CA53C0328); and the Route 5/126 Separation Bridge (CA532928), and four resources, P-19-186567, PD-1 concrete culvert, P-19-186541, and Valencia Water Reclamation Plant, were determined ineligible for listing in the NRHP as a result of the current studies. One resource, the SPRR SBL/SPB is assumed eligible for the purpose of this project, however, the section of the SPRR SBL/SPB that is within the APE is not eligible as a contributing element. ~~Therefore, the proposed project achieves a finding of No Historic Properties Affected.~~ In addition, the ASR (AECOM 2023g), and XPI investigation (AECOM 2023), and Supplemental ASR/XPI (AECOM 2024) determined that the project does exhibit archaeological sensitivity but the potential to encounter intact archaeological deposits is low.

Results of Native American consultation did not identify any previously recorded tribal cultural resources within the APE. However, confidential information provided during consultation indicates that the APE exhibits sensitivity for previously unrecorded tribal cultural resources. Additionally, there is potential for previously unknown archaeological and historical resources to be discovered during construction of the Build Alternative. Therefore, the project has potential to impact cultural resources and tribal cultural resources. With implementation of the AMMs

discussed below in Section 2.2.10, potential impacts to cultural resources and tribal cultural resources would not be adverse.

2.2.12.4 Avoidance, Minimization, and/or Mitigation Measures

The following AMMs will be implemented to reduce adverse effects on cultural resources under the Build Alternative:

CR-1: Worker Environmental Awareness Program. All workers will participate in a Worker Environmental Awareness Program training for cultural resources. Sign-in sheets will be maintained to document completion of the program by each worker. This training can be administered in-person by or under the supervision of a Secretary of Interior (SOI) qualified archaeologist or through screening of a video/slide presentation prepared by a SOI-qualified archaeologist and overseen by an on-site manager. Contractor training will include the legal framework protecting cultural resources, typical kinds of cultural resources that may be found during construction, artifacts that would be considered potentially significant, and proper procedures and notifications if cultural resources are discovered. The training will review types of cultural resources and artifacts that would be considered potentially significant to support operator recognition of these materials during construction. Native American tribe(s) traditionally and culturally affiliated with the project area shall be afforded the opportunity to participate in the cultural resource training to provide project personnel with tribal perspectives on working in areas sensitive for Tribal Cultural Resources. ~~All workers must participate in a Worker Environmental Awareness Program for cultural resources. Contingent upon the results of AB 52 consultation, Native American representatives shall be afforded the opportunity to participate in the cultural resource training to provide project personnel with tribal perspectives on working in areas sensitive for Tribal Cultural Resources.~~

CR-2: Inadvertent Cultural Resource Discovery. If cultural materials are discovered during construction, all earthmoving activity within 60 feet of the find will be diverted until a SOI-qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures. ~~If cultural materials are discovered during construction, all earthmoving activity within 50 feet of the find will be diverted until a SOI-qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures.~~

CR-3: If human remains are discovered, Section 7050.5 of the California Health and Safety Code states that further disturbances and activities will cease in any area or nearby area suspected to overlie remains, and the County Coroner will be contacted. For the proposed project, work in the immediate vicinity (within a 100-foot buffer of the find) will cease in the event that human remains and/or funerary object(s) are encountered.

Table 2-46 through Table 2-54 were updated with the current status of field surveys completed since the circulation of the draft EIR/EA and minor updates to impact acreages as a result of coordination with the regulatory agencies.

Alternative 2: Build Alternative

Birds: The direct and indirect impacts on birds protected by the Migratory Bird Treaty Act include the potential for injury and/or mortality to nesting birds if not adequately buffered during construction activities or during clearing and grubbing. There is the potential for increased noise, visual, and pedestrian disturbance from the roadway expanding into Santa Clara River. By

expanding the road closer to the river, roadway pollution and disturbance is moved closer to the center of the river and the vegetation buffer along the edge of the river is reduced. The expanded road and bridge contributes to increased habitat fragmentation. As habitat is fragmented, it becomes less resilient and local species populations may decline from a variety of edge-induced impacts. These edge-induced impacts included There is an increased potential for fire, spread of nonnative, invasive plant species, unauthorized trespass into the river, increased predation, habitat avoidance because of increased noise and night-time lighting, and additional roadway edge effects from the proposed project. There is also the potential for increased avian roadkill both along The Old Road and over the bridge because the bridge is wider and has more lanes, and vehicles are traveling faster. Birds are likely to experience mortality while flying along the Santa Clara River and if they fly over the bridge, there is the potential for vehicle strike.

2.4.5 Threatened and Endangered Species

Regulatory Setting

The primary federal law protecting threatened and endangered species is FESA: 16 USC Section 1531, et seq.; 50 CFR Part 402 can also be referenced. This act and later amendments provide for the conservation of endangered and threatened species and the ecosystems upon which they depend. Under Section 7 of this act, federal agencies, such as FHWA (and Caltrans, as assigned), are required to consult with USFWS and NMFS to ensure that they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species or destroy or adversely modify federally-designated critical habitat. Critical habitat is defined as geographic locations critical that contain the physical and biological features necessary for the existence of a threatened or endangered species.

Caltrans conducted formal Section 7 consultation with the USFWS for the proposed project by sending a Biological Assessment to the USFWS on March 19, 2024. The USFWS issued a Biological Opinion (2024-0031581-S7-001) for the proposed project on August 30, 2024. The analysis and avoidance and minimization measures detailed in the Biological Opinion are reflected herein.

California has enacted a similar law at the state level, CESA, California Fish and Game Code Section 2050, et seq. CESA emphasizes early consultation to avoid potential impacts to rare, endangered, and threatened species and to develop appropriate planning to offset project caused losses of listed species populations and their essential habitats. CDFW is the agency responsible for implementing CESA. Section 2080 of the California Fish and Game Code prohibits “take” of any species determined to be an endangered species or a threatened species. Take is defined in Section 86 of the California Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” CESA allows for take incidental to otherwise lawful development projects; for these actions an incidental take permit is issued by CDFW. For species listed under both FESA and CESA requiring a Biological Opinion under Section 7 of FESA, CDFW may also authorize impacts to CESA species by issuing a Consistency Determination under Section 2080.1 of the California Fish and Game Code.

Arroyo Toad: There are no manmade barriers present in this reach that could completely or substantially impede upland movement of arroyo toad. However, some stretches of the riverbank in the survey area are near vertical (e.g., southern cliff areas) and of a height that would significantly impede migration out of the stream channel. Furthermore, there was a prevalence of nonnative species that are known to prey on arroyo toads. Therefore, while the

species was historically documented within the BSA, the species is considered unlikely to occur in the BSA and LOD given the lack of confirmed sightings in many years. The longest adult arroyo toads have been documented to survive is between 7 and 8 years (Hitchcock et al. 2022) and since no breeding has been documented since 2000, the species may be extirpated from the BSA. Causation is difficult to ascertain, but years of historical drought and the prevalence of nonnative species which consume all life stages of arroyo toads may be contributing factors. Furthermore, the recent Biological Opinion (2024-0031581-S7-001) from the USFWS (USFWS 2024) for the proposed project did not include an analysis of potential effects on arroyo toad (only arroyo toad critical habitat) and hence the USFWS likely concludes the species is absent from the BSA.

Least Bell's Vireo

Focused LBVI surveys also were conducted in spring and summer 2024. The survey areas were split between Woodstar Biological and AECOM. Because Woodstar Biological already was conducting surveys throughout the mainstem Santa Clara River, its survey area encompassed the entire BSA up to the west side of the I-5 Bridge, including the Northern Drainage. AECOM conducted surveys east of I-5 within the 500-foot buffer. Woodstar Biological documented multiple LBVI territories throughout the BSA west of I-5 (Woodstar Biological 2024). AECOM documented one LBVI territory east of I-5 within the BSA (AECOM 2024b).

LBVI was detected throughout the BSA in all areas except the habitat between The Old Road Bridge and west of I-5. This area previously was occupied by LBVI in 2018. Heavy rainfall in winter 2022-2023 and 2023-2024 likely caused vegetation scour, shifting LBVI territories slightly downstream to the west. However, LBVI is expected to move back into the formerly occupied habitat between The Old Road Bridge and west of I-5. The combined data between 2018 and 2024 indicate that LBVI is present throughout suitable habitat within the BSA.

Mountain Lion

In July 2019, the Southern California/Central Coast Evolutionary Significant Unit of mountain lion (*Puma concolor*) was proposed for listing as threatened under CESA. In April 2020, the California Fish and Game Commission found the listing may be warranted and designated the Evolutionary Significant Unit as a candidate species. While the species is under review, it is considered a State candidate species and is afforded the full protection of a listed species. Mountain lion is a wide ranging species that feeds primarily on mule deer (*Odocoileus hemionus*) but it also will eat smaller mammals, including coyotes. It requires vast areas of connected lands for its long-term persistence in the landscape. Currently in Southern California, the species is constrained by urban development, and roadkill mortality is the leading cause of its death. Lack of connectivity, inbreeding depression, lack of recruitment from nearby populations, and urbanization all threaten the continued existence of mountain lion in Southern California. Although no mountain lion has been detected directly within the BSA during project-specific surveys, the National Park Service has documented several mountain lions crossing I-5 (likely under the bridge) at the Santa Clara River, based on global positioning system collared data (AECOM 2024d).

Southwestern Willow Flycatcher

Focused SWFL surveys were also conducted in spring and summer 2024. The survey areas were identical to those detailed above for LBVI and were split between Woodstar Biological and AECOM. Since Woodstar Biological was already conducting surveys throughout the mainstem

Santa Clara River, their survey area encompassed the entire BSA up to the west side of the I-5 Bridge including the Northern Drainage. AECOM conducted surveys east of I-5 within the 500-foot buffer. While migrant WIFL were detected in the Northern Drainage and other areas within the BSA, no SWFL were detected. Hence the 2024 surveys indicate that SWFL do not breed within the BSA. Furthermore, the recent Biological Opinion from the USFWS (USFWS 2024) for the proposed project did not include an analysis of potential effects on SWFL (only SWFL critical habitat) and hence the USFWS likely concludes the species is absent from the BSA.

Alternative 2: Build Alternative

Arroyo Toad

~~While The arroyo toad is unlikely to occur within the likely extirpated from the BSA, ; if present, arroyo toad may be affected by the proposed project in a variety of ways including direct injury and mortality during construction, loss of suitable aestivation and breeding habitat, increases or decreases in flows because of increased runoff or water impoundments, erosion and pollution from road runoff (which can reduce the water quality), and the removal of shade-providing vegetation, which can alter solar exposures and the thermal regime. Construction equipment within close proximity to Santa Clara River has the potential to introduce pollutants (from spills, fuel, grease and other lubricants) which can degrade the habitat quality for arroyo toad. Construction of the bridge abutments and demolition/removal of the existing bridge has the potential to cause bank/slope erosion/destabilization and further degrade the habitat. however, critical habitat is still present within the BSA.~~

~~Impacts on arroyo toad would occur through permanent and temporary disturbance to critical habitat. Approximately 52.73 acres of the BSA intersect arroyo toad critical habitat (see Table 2 56). The proposed project would result in approximately 0.8 acres 1.42 of temporary impacts on arroyo toad critical habitat associated with The Old Road Bridge expansion temporary work area. The proposed project would result in approximately 0.62 0.57 acres of permanent (ground-disturbing) impact on arroyo toad critical habitat associated with pile and riprap installation and 0.70 1.53 acres of permanent (non-ground-disturbing) impact associated with The Old Road Bridge span expansion.~~

Table 2-56: Temporary and Permanent Impacts on Designated Arroyo Toad Critical Habitat

Designated Critical Habitat	Total			
	BSA (Acres)	Temporary Impact (Acres)	Permanent Impact (Ground Disturbance) (Acres)	Permanent Impact (Bridge Span ¹) (Acres)
Arroyo Toad	52.73	<u>0.8</u> 1.42	<u>0.62</u> 0.57	<u>0.70</u> 1.53

Table 2-57: Temporary and Permanent Impacts on Southwestern Pond Turtle Habitat

	Total BSA (Acres)	Temporary Impact (Acres)	Permanent Impact (Ground Disturbance) (Acres)	Permanent Impact (Bridge Span ¹) (Acres)

Southwestern Pond Turtle	49.43	<u>1.69</u> ~~1.50~~	<u>1.38</u> ~~1.31~~	<u>0.88</u> ~~0.96~~

Table 2-58: Temporary and Permanent Impacts on Least Bell's Vireo and Southwestern Willow Flycatcher Designated Critical Habitat

Designated Critical Habitat	Total			
	BSA (Acres)	Temporary Impact (Acres)	Permanent Impact (Ground Disturbance) (Acres)	Permanent Impact (Bridge Span ¹) (Acres)
Least Bell's Vireo	<u>166.02</u> ~~113.30~~	<u>4.39</u> ~~3.12~~	<u>7.98</u> ~~4.60~~	<u>0.7</u> ~~0.00~~
Southwestern Willow Flycatcher	38.60	<u>0.65</u> ~~1.73~~	<u>0.18</u> ~~0.02~~	<u>1.05</u> ~~1.43~~

Mountain Lion

Temporary and permanent impacts on mountain lions may occur through habitat loss and removal and disturbance during construction. They are not restricted to any particular vegetation community and hence could use many of the vegetation communities detailed in Table 2-53. They are most likely to use habitat adjacent to Santa Clara River and less likely to use Other Cover Types (Agriculture, Bare Ground, Developed, Disturbed habitats, and Unpaved Roads). Therefore, the proposed project would permanently impact 4.8 acres and temporarily impact 4.1 acres of shrubland, herbaceous, and riparian alliances. Mountain lions may avoid using the area during construction; however, the proposed project would be conducted in two phases, and during phase 2 construction of The Old Road Bridge, the underside of the bridge would not be blocked off. Mountain lions would be able to pass under The Old Road Bridge as it is expanded, but may still avoid the area because of the presence of equipment, temporary security fencing, etc. Finally, the presence of street lights on The Old Road Bridge (where there are currently no lights) where it passes over the Santa Clara River may cause mountain lions to be more hesitant to cross under the bridge. However, to reduce potential impacts during construction and operations, LION-1 would be implemented and LION-2 will be implemented to ensure that lighting is directed downward and shielded to prevent light trespass into the Santa Clara River. Furthermore, per LION-3, pending the state listing status of mountain lion, impacts will be assessed by CDFW during the permitting process and any necessary avoidance and minimization measures will be implemented.

Least Bell's Vireo and Southwest Willow Flycatcher

Approximately 113.30 acres of the BSA intersects LBVI critical habitat within the Santa Clara River Critical Habitat unit (USFWS 1994) (Table 2-57). Much of the designated Critical Habitat does not represent suitable LBVI habitat as the mapping is broad and includes non-habitat types (developed, disturbed, and agriculture). The proposed project would result in approximately 3.58 acres of temporary impacts to LBVI critical habitat associated with The Old Road widening and Multi-Use Trail construction temporary work areas. The proposed project would result in approximately 7.36 acres of permanent (ground-disturbing) impact to LBVI Critical Habitat associated with The Old Road widening and Multi-Use Trail construction. Therefore, the proposed project would result in impacts to designated LBVI critical habitat.

Because the extent of critical habitat stops at the Valencia Water Reclamation Plant (Figure 15) and does not extend east to The Old Road Bridge, additional occupied LBVI habitat would be permanently and temporarily impacted from bridge expansion that is not included as critical habitat. Impacts to LBVI habitat from the bridge expansion and shading would be similar to those for arroyo toad critical habitat detailed in Table 2-56, above. The arroyo toad critical habitat abuts the eastern edge of LBVI critical habitat by the Valencia Water Reclamation Plant and continues east to include the area under and adjacent to The Old Road Bridge, which is also suitable and occupied LBVI habitat. Therefore, to estimate the acreage of LBVI occupied habitat that would be permanently and temporarily removed by the proposed project, the acreage of vegetation communities that represent LBVI habitat (Open Water and Fremont Cottonwood Forest and Woodland) is a more accurate estimator of impacts. Based on Table 2-47 (Vegetation Communities and Land Cover Types within the BSA), permanent and temporary impacts to LBVI habitat would be similar to that for impacts to riparian alliances (Fremont Cottonwood Forest and Woodland and Open Water) which occurs within the Northern Drainage and under The Old Road Bridge. Approximately 0.9 acres of these vegetation alliances would permanently be removed from ground disturbance and The Old Road Bridge span expansion. Approximately 0.5 acres of Fremont Cottonwood Forest and Woodland and Open Water would also be temporarily impacted by the proposed project and may impact LBVI.

While no SWFL have been historically detected within the BSA based on surveys from 2017-2022 and 2024, migrant willow flycatchers (which are state listed as endangered) are known to use Santa Clara River during migration. Based on the lack of breeding within the BSA, the proposed project is not anticipated to impact SWFL through construction activities. However, federally designated critical habitat for SWFL which contain some of the physical and biological features necessary to support the species would be removed (Table 2-58).

Approximately 38.60 acres of the BSA intersects SWFL critical habitat (Table 2-58). The proposed project would result in temporary impacts to 0.65 acres of SWFL Critical Habitat associated with The Old Road Bridge span expansion temporary work area. The proposed project would result in permanent (ground-disturbing) impacts to 0.18 acres of SWFL critical habitat associated with pile and riprap installation, as well as permanent (non-ground-disturbing) impacts to 1.05 acres of SWFL Critical Habitat associated with the proposed The Old Road Bridge span expansion. This Critical Habitat is primarily mature riparian forest which supports an insect prey base, cover, and important migratory stop-over habitat for migrant willow flycatchers. Therefore, the proposed project would result in impacts to designated SWFL Critical Habitat.

Chapter 3 California Environmental Quality Act Evaluation

3.1 CEQA Environmental Checklist

3.1.4 Biological Resources

Threshold A: Temporary, direct impacts would result from the use of upland and aquatic habitat for equipment and materials staging, grading, as well as from clearing and tree removal for construction activities and access to construction sites. Permanent impacts would result from direct removal of occupied habitat for multiple species. Operation of the proposed project would have minor effects on non-listed special-status wildlife species within the BSA. Impacts to non-listed special-status wildlife species would be avoided and minimized through a variety of

measures including GEN-1 through GEN-15, and species-specific measures: UTS-1 and UTS-2, WPT-1 and WPT-2, RIP-1 through RIP-3, and BAT-1 through BAT-3. Implementation of these measures would reduce impacts to less than significant for non-listed special-status wildlife species.

Threshold B: The proposed project would result in permanent and temporary impacts to riparian habitat and other sensitive natural communities. Implementation of the proposed project would result in permanent and temporary direct impacts to California Buckwheat Scrub, Fremont Cottonwood Forest and Woodland, and Elderberry Stand, which are summarized by acreage in Table 2-53. Indirect impacts to sensitive vegetation communities may also occur from construction and use Chapter 3 California Environmental Quality Act Evaluation 341 of the proposed project. Temporary indirect impacts, such as construction fugitive dust (which can coat vegetation and reduce photosynthesis), sedimentation and erosion, and construction generated trash/debris and unauthorized trespass could all adversely impact vegetation. The proposed project also has the potential for longer term impacts, such as the proliferation of invasive species through ground disturbing activities, which may indirectly degrade adjacent native vegetation communities. Indirect impacts may also occur in the form of increased potential for wildland fire and pollution in Santa Clara River. Both permanent and temporary impacts would be reduced to less than significant with implementation of avoidance and minimization measures VEG-5 and VEG-6

Threshold C: ~~Approximately 0.20 acre of permanent impacts and 0.13 acre of temporary impacts, as well as 0.94 acre of bridge shading and 0.014 acre of because of bridge columns, are expected to occur.~~

Permanent impacts are proposed to occur at three project features—the Santa Clara River, the Northern Tributary, and Drainage A. The proposed project may temporarily impact 0.15 acre and permanently impact up to 0.33 acre of WOTUS. The indirect impact from expanded bridge shading would be on 0.26 acre of WOTUS. The total impacts on CDFW-jurisdictional streambeds and riparian habitat would include approximately 1.07 acre of permanent impacts and 0.43 acre of temporary impacts, as well as 0.68 acre of new bridge shading and 0.02 acre because of the new bridge columns.

These measures would be incorporated into the project design and, therefore, would minimize potential impacts on areas under USACE and CDFW jurisdiction. Compensatory mitigation as detailed in AMMs WATERS-1 and WATERS-2 would consist of the restoration and compensation of wetland and riparian vegetation.

Threshold D: The proposed project would span areas of open water within the Santa Clara River and Northern Drainage thereby eliminating any impacts to surface water that is occupied by UTS and other aquatic species. Therefore, the proposed project would not substantially interfere with the movement of any native resident or migratory fish. However, the expanded road and The Old Road Bridge have the potential to increase the noise and artificial nighttime light over the Santa Clara River, which is a wildlife corridor. This has the potential to interfere with the movement of local wildlife along the Santa Clara River. With the incorporation of avoidance and minimization measures LION-1 through LION-3, impacts would be less than significant with the implementation of mitigation.

3.1.5 Cultural Resources

Threshold A: As discussed in Section 2.2.10 above, based on the results of the HRER (AECOM 2023e) and the HPSR (AECOM 2023f), it was determined that eight built environment resources were identified within the APE. Of these eight resources, three were previously determined ineligible for the NRHP (The Old Road over Santa Clara River Bridge (P-19-190315); The Old Road Bridge over the SPT Co. (CA53C0328); and the Route 5/126 Separation Bridge (CA532928), and four resources, P-19-186567, PD-1 concrete culvert, P-19-186541, Valencia Water Reclamation Plant, were determined ineligible for listing in the NRHP as a result of the current studies. One resource, the SPRR SBL/SPB is assumed eligible for the purpose of this project, however, the section of the SPRR SBL/SPB that is within the APE is not eligible as a contributing element. Therefore, the proposed project achieves a finding of No previously recorded Historic Properties Affected will be impacted by the proposed project.

~~In addition,~~ The ASR (AECOM 2023g), XPI investigation (AECOM 2023), and the Supplemental ASR/XPI (AECOM 2024) determined that the project does exhibit archaeological sensitivity but the potential to encounter intact archaeological deposits is low. With implementation of the AMMs discussed Section 2.2.10 the impact on unanticipated discoveries would be less than significant with mitigation incorporated.

Threshold B: As discussed in Section 2.2.10 above, the ASR (AECOM 2023g) determined that no significant unique archaeological resources have been previously recorded in the APE. While low potential exists to encounter previously unrecorded archaeological resources, AMM CR-1, CR-2, and CR-3 would further reduce the potential for impacts on archaeological resources during construction. Therefore, impacts would be less than significant with mitigation.

Threshold C: The interested parties outreach conducted in 2018 and reported in the 2023 HPSR (AECOM 2023f) indicated that the possible remains of a 1928 St. Francis Dam Disaster victim were identified near the river in proximity to Castaic Junction. However, there are no formal cemeteries or known burial sites in the proposed project area and the proposed project construction is not expected to disturb any human remains. AMM CR-3 would further reduce the potential for the disturbance of human remains and provides guidance in the event that any human remains are discovered during construction. Therefore, impacts would be less than significant with mitigation.

3.1.18 Tribal Cultural Resources

Threshold A and B:

Tribal cultural resources may include, but are not limited to, archaeological resources. As discussed in Section 2.2.10 the ASR (AECOM 2023g) determined that no precontact archaeological resources have been recorded previously in the APE. In addition, the ASR (AECOM 2023g) and XPI investigation (AECOM 2023) determined that the proposed project does exhibit archaeological sensitivity and would have a low potential to encounter intact archaeological deposits. These findings were supported by the Supplemental ASR/XPI (AECOM 2024b, 2024c).

Based on AB 52 consultation results, the proposed project would have the potential to impact previously unknown tribal cultural resources. Implementation of AMMs TCR-1, TCR-2, TCR-3, and TCR-4, developed through AB 52 consultation, would reduce the potential for impacts on tribal cultural resources during project construction. In addition, TCR-4 would further reduce the potential for the disturbance of human remains and provides guidance in the event that any human remains are discovered during construction. Based on the consultation and research

listed above, as well as the AMMs, impacts would be reduced to a less-than-significant level with the following mitigation measures incorporated:

TCR-1: Any and all archaeological documents created as a part of the project (e.g., isolate records, site records, survey reports, testing reports, monitoring reports) shall be provided to consulting tribes upon request.

TCR-2: The project applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians to observe the following ground-disturbing activities from the project limits at Henry Mayo Drive to the northernmost drainage improvement: grading, excavating, digging, or similar activity. Tribal monitoring services will continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to tribal monitoring are complete. If the project's scheduled ground-disturbing activities require intermittent tribal monitoring, notification shall be submitted to the consulting Tribe in writing with 5 days' notice (if possible) prior to the start of scheduled ground disturbing activities. If tribal cultural resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of the discovery, and an SOI-qualified archaeologist retained by the project applicant as well as the Tribal Monitor will assess the find.

TCR-3: The Lead Agency and/or project applicant shall, in good faith, consult with consulting tribes on the disposition and treatment of any tribal cultural resources encountered during all ground-disturbing activities.

TCR-4: If human remains and/or funerary object(s) are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the Los Angeles County Coroner will be contacted pursuant to Section 7050.5 of the Health and Safety Code, which will be enforced for the duration of the project. In accordance with Public Resources Code, Section 5097.98, the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the NAHC, should those discoveries be determined as Native American in origin.

3.2.3 Environmental Consequences – Wildfire

The proposed project does not include a proposed change in land use, the development of new habitable structures, or modifications to landscaping that would increase fire risk. The widening of roadways would benefit mobility and evacuation abilities in the area. In addition, the proposed project site is not located in a landslide area or adjacent to hillside areas that would be subject to instability or increased runoff as result of a wildfire. Current traffic demand in the proposed project area meets or exceeds roadway capacity for many arterial roadways. The Old Road and adjacent roadway system; in the proposed project area is heavily used and characterized by roadway congestion. Operationally, the proposed project improvements would enhance safety and increase capacity on roadways to provide for emergency overflow.

The urban nature of the project area and the type of proposed construction activities would not present a significant risk of increasing wildfires. Furthermore, the proposed project would comply with the regulatory standards in the California Fire Code, California Building Code, and as required by LA County Fire Department for project construction and operations within

VHFSZs, where applicable. These regulatory requirements are some of the most strenuous fire protection standards in the U.S. and are designed to avoid and minimize increased fire risks. Therefore, project operation would not exacerbate wildfire risks or result in temporary or ongoing impacts on the environment.

Chapter 4 *Comments and Coordination*

Requirements for Responding to Comments on a Draft EIR/EA

Global “DEIR” was replaced with “Final EIR/EA”

Appendix H. Required Consultation/Concurrence Documentation



U.S. Department
of Transportation
**Federal Highway
Administration**

California Division

May 6, 2025

650 Capitol Mall, Suite 4-100
Sacramento, CA 95814
(916) 498-5001
(916) 498-5008 (FAX)

In Reply, Refer To:
HDA-CA

ELECTRONIC CORRESPONDENCE ONLY

Andrew Yoon, PE, Senior Transportation
Engineer
California Department of Transportation,
District 7
100 South Main Street, Suite 100
Los Angeles, CA 90012

SUBJECT: Project Level Conformity Determination for the Old Road over Santa Clara River and Southern Pacific Transportation Company Bridge, et al. Project (CTIPS ID# 209-2001-1630, Federal Aid # BRLS-5953(601) and STPL-5953(682), FTIP ID LAF3136, RTP ID 1A1005)

Dear Mr. Yoon:

On April 10, 2025, the California Department of Transportation (Caltrans) submitted to the Federal Highway Administration (FHWA) a complete request for a project level conformity determination for the Old Road over Santa Clara River and Southern Pacific Transportation Company Bridge, et al. Project (CTIPS ID# 209-2001-1630, Federal Aid # BRLS-5953(601) and STPL-5953(682), FTIP ID LAF3136, RTP ID 1A1005). The project is in an area that is designated Nonattainment or Maintenance for Ozone, CO, PM₁₀, PM_{2.5}, and NO₂.

The project level conformity analysis submitted by Caltrans indicates that the project-level transportation conformity requirements of 40 CFR Part 93 have been met. The project is included in the Southern California Association of Governments (SCAG) current Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP), as amended. The design concept and scope of the preferred alternative have not changed significantly from those assumed in the regional emissions analysis.

As required by 40 CFR 93.116 and 93.123, the localized PM_{2.5} and PM₁₀ analyses are included in the documentation. In addition, the Carbon Monoxide Hot Spot Analysis is included. The analyses demonstrate that the project will not create any new violations of the standards or increase the severity or number of existing violations.

Based on the information provided, FHWA finds that the Old Road over Santa Clara River and Southern Pacific Transportation Company Bridge, et al. Project conforms with the State Implementation Plan (SIP) in accordance with 40 CFR Part 93.

If you have any questions pertaining to this conformity finding, please contact Antonio Johnson at (916) 498-5889 or antonio.johnson@dot.gov.

Sincerely,

ANTONIO
DESHAWN
JOHNSON

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Antonio D. Johnson
Director of Planning, Environment,
& Right of Way
Federal Highway Administration



Federal Highway Administration
[California Division](#)
650 Capitol Mall, Suite 4-100
Sacramento, CA 95814
(916) 498-5001 – Main

Federal Transit Administration
[Region 9](#)
888 S Figueroa St, Suite 440
Los Angeles, CA 90017
(213) 757-5999 – Main

December 16, 2024

In Reply, Refer To:
HDA-CA

ELECTRONIC CORRESPONDENCE ONLY

Mr. James R. Anderson
Chief, Division of Financial Programming, M.S. 82
California Department of Transportation
1120 N Street
Sacramento, CA 95814

SUBJECT: California 2025 FSTIP Approval

Dear Mr. Anderson:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have completed our review of the 2025 Federal Statewide Transportation Improvement Program (FSTIP), which was submitted by your letter dated November 15, 2024. As detailed in your letter, the 2025 FSTIP incorporates by reference the following 18 metropolitan planning organizations' (MPO) Federal Transportation Improvement Programs (FTIP):

- Association of Monterey Bay Area Governments (AMBAG)
- Butte County Association of Governments (BCAG)
- Fresno Council of Governments (FresnoCOG)
- Kern Council of Governments (KCOG)
- Kings County Association of Governments (KCAG)
- Madera County Transportation Commission (Madera CTC)
- Merced County Association of Governments (MCAG)
- Metropolitan Transportation Commission (MTC)
- Sacramento Area Council of Governments (SACOG)
- San Diego Association of Governments (SANDAG)
- San Joaquin Council of Governments (SJCOG)
- San Luis Obispo Council of Governments (SLOCOG)
- Santa Barbara County Association of Governments (SBCAG)
- Shasta County Regional Transportation Planning Agency (SRTA)
- Southern California Association of Governments (SCAG)
- Stanislaus Council of Governments (StanCOG)
- Tahoe Metropolitan Planning Organization (TMPO)
- Tulare County Association of Governments (TCAG)

We find that the FSTIP and FTIPs were developed through a continuing, cooperative, and comprehensive transportation planning process in accordance with the metropolitan planning provisions of 23 U.S.C. 134 and 49 U.S.C. Chapter 53, as amended by Public Law 117-58 of the Bipartisan Infrastructure Law (BIL), enacted as the Infrastructure Investment and Jobs Act.

In addition, the MPOs and State are required to meet the transportation conformity requirements. Transportation conformity is required by the Clean Air Act section 176(c) [42 U.S.C. 7506(c)] to ensure that federal funding and approval are given to highway and transit projects that are consistent with ("conform to") the air quality goals established by a state air quality implementation plan (SIP). The United States Environmental Protection Agency (EPA) has designated the following 14 planning areas in California as Nonattainment or Maintenance Areas for Criteria Pollutants:

- Butte County Association of Governments (BCAG)
- Fresno Council of Governments (FresnoCOG)
- Kern Council of Governments (KCOG)
- Kings County Association of Governments (KCAG)
- Madera County Transportation Commission (Madera CTC)
- Merced County Association of Governments (MCAG)
- Metropolitan Transportation Commission (MTC)
- Sacramento Area Council of Governments (SACOG)
- San Diego Association of Governments (SANDAG)
- San Joaquin Council of Governments (SJCOG)
- San Luis Obispo Council of Governments (SLOCOG)
- Southern California Association of Governments (SCAG)
- Stanislaus Council of Governments (StanCOG)
- Tulare County Association of Governments (TCAG)

As such, the above MPO Policy Boards made an initial conformity determination on the above FTIPs and associated Regional Transportation Plans (RTPs) and applicable RTP amendments. The FHWA and the FTA reviewed the conformity determinations and find that the FTIPs and the associated RTPs and RTP amendments conform to the applicable state implementation plan (SIP) in accordance with the provisions of 40 CFR Parts 51 and 93. This finding has been coordinated with Region 9 of the EPA pursuant to the Transportation Conformity Rule.

Based on our review of the information provided and our ongoing oversight of the statewide and metropolitan transportation planning processes, FHWA and FTA are approving the 2025 FSTIP. This approval is effective December 16, 2024. This approval is based on the understanding that an eligibility determination of individual projects for funding must be met, and the project sponsor must comply with all administrative and statutory requirements.

Included with this approval is the FHWA and FTA Federal Planning Finding (FPF). The FHWA and the FTA are required under 23 CFR 450.220(b) to document and issue an FPF in conjunction with the approval of the FSTIP. At a minimum, the FPF verifies that the development of the FSTIP is consistent with the provisions of both the Statewide and Metropolitan transportation

planning requirements. Furthermore, the FPF documents FHWA and FTA's recommendations for statewide and metropolitan transportation planning improvements.

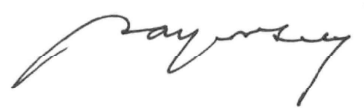
If you have questions or need additional information concerning our approval and the FPF, please contact Mr. Mervin Acebo of the FTA Region 9 office at (213) 202-3957, or by email at Mervin.Acebo@dot.gov; or Ms. Abby Jackson of the FHWA California Division office at (916) 498-5854, or by email at Abigail.Jackson@dot.gov.

Sincerely,

**Elissa K.
Konove**

Digitally signed by Elissa
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Elissa K. Konove
Division Administrator, FHWA, California



Ray Tellis
FTA Region 9 Regional Administrator

Enclosure

To:
James Anderson, Division Chief of Financial Programming, Caltrans
james.r.anderson@dot.ca.gov

CC (via email):

Brenda Caruso, Caltrans
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Erika Espinosa Araiza, Caltrans
Erin Thompson, Caltrans
Hannah Walter, Caltrans
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Kien Le, Caltrans
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Mervin Acebo, FTA
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Transportation Air Quality Conformity Findings Checklist

PROJECT INFORMATION

Project Name: The Old Road Over Santa Clara River and Southern Pacific Transportation Company Bridge, et. al Project

DIST-CO-RTE-PM: 07-LA- The Old Road from Magic Mountain Parkway north to Henry Mayo Drive

EA: Local **Federal Aid Number:** BRLS-5953(601) & STPL-5953(682)

Document Type: ☐ 23 USC 326 CE ☐ 23 USC 327 CE ☒ EA ☐ EIS

CHECKLIST

Step 1. Is the project located in a nonattainment or maintenance area for ozone, nitrogen dioxide, carbon monoxide (CO), PM_{2.5}, or PM₁₀ per [EPA's Green Book](#) listing of non-attainment areas?

☐ If no, go to Step 18. **Transportation conformity does not apply to the project.**

☒ If yes, go to Step 2.

Step 2. Is the project exempt from conformity per [40 CFR 93.126](#) or [40 CFR 93.128](#)?

☐ If yes, go to Step 18. **The project is exempt from all project-level conformity requirements (40 CFR 93.126 or 128)** (check one box below and identify the project type, if applicable).

☐ 40 CFR 93.126¹

Project type from Table 2: _____

☐ 40 CFR 93.128

☒ If no, **go** to Step 3.

Step 3. Is the project exempt from regional conformity per [40 CFR 93.127](#)?

☐ If yes, go to Step 8. **The project is exempt from regional conformity requirements (40 CFR 93.127)** (identify the project type).

Project type: _____

☒ If no, go to Step 4.

Step 4. Is the project located in a region with a currently conforming RTP and TIP?

☒ If yes, **the project is included in a currently conforming RTP and TIP per 40 CFR 93.115. The project's design and scope have not changed significantly from what was assumed in RTP conformity analysis (40 CFR 93.115[b])** Go to Step 8.

☐ If no and the project is located in an isolated rural area, go to Step 5.

¹ Please refer to [Clarifications on Exempt Project Determinations](#) to verify exempt project type from Table 2. Road diets, auxiliary lanes less than one-mile, and ramp metering may be exempt under "projects that correct, improve, or eliminate a hazardous location or feature."

- ☐ If no and the project is not located in an isolated rural area, STOP and do not proceed until a conforming RTP and TIP are adopted.

Step 5. For isolated rural areas, is the project regionally significant per 40 CFR 93.101, based on review by Interagency Consultation?

- ☐ If yes, go to Step 6.
- ☐ If no, go to Step 8. **The project, located in an isolated rural area, is not regionally significant and does not require a regional emissions analysis (40 CFR 93.101 and 93.109[e]).**

Step 6. Is the project included in another regional conformity analysis that meets the isolated rural area analysis requirements per 40 CFR 93.109, including Interagency Consultation and public involvement?

- ☐ If yes, go to Step 8. **The project, located in an isolated rural area, has met its regional analysis requirements through inclusion in a previously-approved regional conformity analysis that meets current requirements (40 CFR 93.109[e]).**
- ☐ If no, go to Step 7.

Step 7. The project, located in an isolated rural area, requires a separate regional emissions analysis.

- ☐ **Regional emissions analysis for regionally significant project, located in an isolated rural area, is complete. Regional conformity analysis was conducted that includes the project and reasonably foreseeable regionally significant projects for at least 20 years. Interagency Consultation and public participation were conducted. Based on the analysis, the interim or emission budget conformity tests applicable to the area are met (40 CFR 93.109[e] and 95.105).² Go to Step 8.**

Step 8. Is the project located in a CO nonattainment or maintenance area? (South Coast Air Basin only)

- ☐ If no, go to Step 9. **CO conformity analysis is not required.**
- ☒ If yes, **hot-spot analysis requirements for CO per the [CO Protocol](#) (or per EPA's modeling guidance, CAL3QHCR can be used with EMFAC emission factors³) have been met. Project will not cause or contribute to a new localized CO violation (40 CFR 93.116 and 93.123)⁴. Go to Step 9.**

Step 9. Is the project located in a PM₁₀ and/or a PM_{2.5} nonattainment or maintenance area?

- ☐ If no, go to Step 13. **PM_{2.5}/PM₁₀ conformity analysis is not required.**

² The analysis must support this conclusion before going to the next step.

³ Use of the CO Protocol is strongly recommended due to its use of screening methods to minimize the need for modeling. When modeling is needed, the Protocol simplifies the modeling approach. Use of CAL3QHCR must follow U.S. EPA's latest CO hot spot guidance, using EMFAC instead of MOVES; see: <http://www.epa.gov/otaq/stateresources/transconf/projectlevel-hotspot.htm#co-hotspot>.

⁴ As of October 1, 2007, there are no CO nonattainment areas in California. Therefore, the requirements to not worsen existing violations and to reduce/eliminate existing violations do not apply.

☒ If yes, go to Step 10.

Step 10. Is the project considered to be a Project of Air Quality Concern (POAQC), as described in EPA's [Transportation Conformity Guidance](#) for PM 10 and PM 2.5?

☒ If no, **the project is not a project of concern for PM10 and/or PM2.5 hot-spot analysis based on 40 CFR 93.116 and 93.123 and EPA's Hot-Spot Analysis Guidance. Interagency Consultation concurred with this determination on May 23, 2023.** Go to Step 12.

☐ If yes, go to Step 11.

Step 11. The project is a POAQC.

☐ **The project is a project of concern for PM10 and/or PM2.5 hot-spot analysis based on 40 CFR 93.116 and 93.123, and EPA's Hot-Spot Guidance. Interagency Consultation concurred with this determination on _____. Detailed PM hot-spot analysis, consistent with 40 CFR 93.116 and 93.123 and EPA's Hot-Spot Guidance, shows that the project would not cause or contribute to, or worsen, any new localized violation of PM10 and/or PM2.5 standards.** Go to Step 12.

Step 12. Does the approved PM SIP include any PM10 and/or PM2.5 control measures that apply to the project, and has a written commitment been made as part of the air quality analysis to implement the identified SIP control measures? [Control measures can be found in the applicable Federal Register notice at: <https://www.epa.gov/stateand-local-transportation/conformity-adequacy-review-region-9#ca>.]

☐ If yes, **a written commitment is made to implement the identified SIP control measures for PM10 and/or PM2.5 through construction or operation of this project (40 CFR 93.117).** Go to Step 14.

☒ If no, go to Step 13.

Step 13a. Have project-level mitigation or control measures for CO, PM10, and/or PM2.5, included as part of the project's design concept and scope, been identified as a condition of the RTP or TIP conformity determination? AND/OR

Step 13b. Are project-level mitigation or control measures for CO, PM10, and/or PM2.5 included in the project's NEPA document? AND

Step 13c (applies only if Step 13a and/or 13b are answered "yes"). Has a written commitment been made as part of the air quality analysis to implement the identified measures?

☐ If yes to 13a and/or 13b and 13c, **a written commitment is made to implement the identified mitigation or control measures for CO, PM10, and/or PM2.5 through construction or operation of this project. These mitigation or control measures are identified in the project's NEPA document and/or as conditions of the RTP or TIP conformity determination (40 CFR 93.125(a)).** Go to Step 14.

☒ If no, go to Step 14.

Step 14. Does the project qualify for a Categorical Exclusion pursuant to 23 USC 326?

☐ If yes, go to step 15.

☒ If no, the project requires preparation of a Categorical Exclusion, EA, or EIS pursuant to 23 USC 327. Go to Step 16.

Step 15. Is any analysis required by steps 1-13 of this form?⁵

- ☐ If yes, then Caltrans prepares the appropriate analysis and documentation for the project file and makes the conformity determination through its signature on the CE form. No FHWA involvement is required. See the AQCA Annotated Outline. Go to Step 18.
- ☐ If no, then Caltrans makes the conformity determination through its signature on the CE form. No FHWA involvement is required. Go to Step 18.

Step 16. Is the project located in a non-attainment/maintenance area for **ozone only and considered not regionally significant/non-exempt?**

- ☐ If yes, go to Step 18.⁶
- ☒ If no, then **an AQCA is needed**. See the AQCA Annotated Outline. Caltrans submits a conformity determination request to FHWA for FHWA's conformity determination. Go to Step 17.

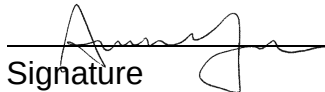
Step 17. Send FHWA Request for Conformity Determination package and [FHWA Submittal Package Checklist](#) to DOTP- Air Quality (rodney.tavitas@dot.ca.gov) and DEA-Air Quality (daisy.laurino@dot.ca.gov) for completeness review. Please direct technical questions to DOTP-Air Quality office. Headquarters staff will coordinate with FHWA on behalf of the district.

Date of FHWA air quality conformity determination: 5/6/25

Step 18. STOP as all air quality conformity requirements have been met.

SIGNATURE

Andrew Yoon, P.E.
Senior Transportation Engineer


Signature

5/6/25
Date

⁵ Please note that not all projects that qualify for a categorical exclusion will be exempt from air quality conformity requirements. Many types of projects that may qualify for a CE (such as the addition of auxiliary lanes less than one-mile, weaving lanes less than one-mile, turning lanes less than one-mile, climbing lanes less than one-mile, parking, road diets, ramp metering, and even many bridge projects) MAY require some level of project level conformity analysis and may even require interagency consultation. Additionally, please note that for ALL projects the project file must include evidence that one of the three following situations apply: 1) Conformity does not apply to the project area; or 2) The project is exempt from all conformity analysis requirements; or 3) The project is subject to project-level conformity analysis (and possibly regional conformity analysis) and meets the criteria for a conformity determination. The project file must include all supporting documentation and this checklist.

⁶ Project-level conformity analysis shows that the project will conform to the State Implementation Plan. Because the project area is Attainment/Unclassified for carbon monoxide (CO) and particulate matter (PM₁₀ and PM_{2.5}), no hot spot analysis is required for the project-level conformity determination by 40 CFR 93.116 and 93.123. The project comes from a conforming Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP). Include documentation of interagency consultation review in the final CE/EA/EIS, if applicable.