
Los Angeles Regional Water Quality Control Board

TENTATIVE WATER QUALITY ORDER NO. **R4-XXXX-XXXX** WASTE DISCHARGE REQUIREMENTS

Effective Date: **Date Signed**

Program Type: Fill/Excavation

Project Type: Mixed Use

Project: Entrada South Development Project (Project)

Applicant: The Newhall Land and Farming Company

Applicant Contact: Matt Carpenter
Vice President, Environmental Resources
The Newhall Land and Farming Company
25124 Springfield Court, Suite 300
Valencia, CA 91355
Phone: (661) 225-4000
Email: Matt.Carpenter@fivepoint.com

Applicant's Agent: Christopher Julian
Principal
Rincon Consultants, Inc
319 E Carrillo St. Suite 105
Phone: (805) 644-4455
Email: cjulian@rinconconsultants.com

Water Board Staff: Libby Lee
Engineering Geologist
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
Phone: 213-576-6705
Email: Libby.Lee@waterboards.ca.gov

Regulatory Measure ID: 464525
Place ID: 905880
WDID: 4WQC40126030
R4 File Number: 26-030

Table of Contents

TENTATIVE WATER QUALITY ORDER NO. R4-XXXX-XXXX WASTE DISCHARGE REQUIREMENTS	1
I. Order	3
II. Public Notice	3
III. Project Purpose	3
IV. Project Description	3
V. Project Location	10
VI. Project Impact and Receiving Waters Information	10
VII. Description of Direct Impacts to Waters of the State	10
VIII. Description of Indirect Impacts to Waters of the State	11
IX. Avoidance and Minimization	11
X. Compensatory Mitigation	12
XI. California Environmental Quality Act (CEQA)	12
XII. Human Right to Water Policy	13
XIII. Petitions for Reconsideration	13
XIV. Findings	13
XV. Conditions	14
A. Authorization	15
B. Reporting and Notification Requirements	15
C. Water Quality Monitoring	19
D. Standard Conditions	21
E. Fees Received	21
F. General Compliance	21
G. Administrative	22
H. Best Management Practices	23
I. On-site Mitigation for Temporary Impacts	26
J. Compensatory Mitigation for Permanent Impacts	27
XVI. Conclusion	30

Attachment A	Maps
Attachment B	Signatory Requirements
Attachment C	Report and Notification Requirements

Attachment D Alternatives Analysis**I. Order**

This Order for Waste Discharge Requirements (Order) is issued at the request of The Newhall Land and Farming Company (hereinafter Permittee) for the Entrada South Development Project (hereinafter Project). This Order is for the purpose described in the application and supplemental information submitted by the Permittee. The application was received on February 25, 2026. The application was deemed complete on August 11, 2026.

II. Public Notice

The Water Board complied with its applicable public notice requirements. The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) provided public notice of the draft order pursuant to Water Code section 13167.5 from September 8, 2026 to October 8, 2026.

III. Project Purpose

The purpose of the Project is to develop new residential and commercial areas in Unincorporated Los Angeles County near Valencia, California.

IV. Project Description

The Project is a 382.9 acres mixed-use master-planned community located in northwestern unincorporated Los Angeles County, west of I-5 and The Old Road, generally along Magic Mountain Parkway.

The development will include 1,574 residential units, consisting of single-family detached condominiums as well as attached townhomes and multi-family units, and approximately 690,000 square feet of commercial uses such as office spaces and retail commercial. The Project will also include a 27.2-acre Spineflower Preserve, a neighborhood park, a potential school site, recreational centers, and approximately 130 acres of open space.

Entrada South is part of a group of master-planned communities that are in varying stages of development by the Permittee (see Figure 2 in Attachment A). These include the Newhall Ranch Specific Plan (Specific Plan), where development is facilitated by the Newhall Ranch Resource Management and Development Plan (RMDP) for which the Regional Board issued Order No. R4-2012-0139 in 2012. The Project, along with the proposed Valencia Commerce Center, Entrada North and Legacy Village, is adjacent to the previously approved RMDP. The Specific Plan/RMDP area includes five development areas, or villages, which will function as interrelated communities:

Landmark Village, Confluence (formerly Mission Village), Homestead South, Homestead North, and Potrero Valley.

The Project and Valencia Commerce Center were approved by the County of Los Angeles in November 2025. Valencia Commerce Center is the subject of a pending application for water quality certification. Two additional development areas, Entrada North and Legacy Village, located adjacent to the RMDP and Spineflower Conservation Plan (SCP) areas, have applications for development entitlements pending with Los Angeles County.

The Specific Plan/RMDP area and two adjacent development areas, Entrada South and Valencia Commerce Center, are all subject to the SCP, which ensures the long-term conservation of the endangered San Fernando Valley Spineflower.

Regulatory Background

Resource Management and Development Plan (RMDP)

Order No. R4-2012-0139 (File No. 11-168), adopted on September 14, 2012 (2012 Order), authorized the Permittee's RMDP. The RMDP provides for development in an area encompassing 13,650.7 acres adjacent to the Project. The RMDP site includes the development of approximately 19,517 residential units within five villages. The 2012 Order authorized 47.9 acres of permanent impacts to waters of the state within the Santa Clara River and tributary drainages.

In particular, the 2012 Order authorized removal of waters to facilitate the extension of Magic Mountain Parkway within the RMDP project site. The waters impacted included all of the Magic Mountain Canyon drainage within the RMDP project site and portions of Unnamed Drainage 1 and Unnamed Drainage 2. Additional portions of the same streams listed above will also be impacted by the Project subject to this Order as described below. Note that impacts to these drainages that were authorized under the 2012 Order have already occurred as part of RMDP activities and are not considered in this Order.

The entire Project site is within the boundary of the SCP for the San Fernando Valley Spineflower (*Chorizanthe parryi* var. *fernandina*; spineflower), a plant listed as endangered under the California Endangered Species Act (CESA). The Project site also includes a 27.2-acre Spineflower preserve that will be permanently conserved and managed for the benefit of Spineflower, using an endowment funded by the Permittee. The California Department of Fish and Wildlife (CDFW) issued a CESA incidental take permit for the SCP, which authorizes take of Spineflower within the entire SCP area, including the portion of the Project site outside of the Spineflower Preserve, when take is incidental to otherwise lawful activities.

Westridge Development

In the area along the Project site's southern border where Unnamed Drainage 2 enters the Project site, a concrete spillway conveys flows from the adjacent Westridge development. This feature was constructed as part of the Westridge golf course and was previously permitted by the United States Army Corps of Engineers (U.S. Army Corps), the Los Angeles Water Board and CDFW under separate authorizations issued for the Westridge project (Corps File No. 98-0554-AOA, Water Quality Certification No. 99-148, and Streambed Alteration Agreement No. 5-329-99, respectively). The prior permit actions in this area authorized the permanent loss of waters of the state within Unnamed Drainage 2 to allow construction of the concrete spillway and required mitigation accordingly. Because this area still contains waters of the state, this Order and associated mitigation plan treats this area as permanently impacted due to the channel stabilization and correction of hydromodification within Unnamed Drainage 2. However, as mitigation was provided under the previous permits, no mitigation is required for this area.

Waters of the State within the Project Site

There are four state jurisdictional waterbodies within the Project site, as shown in Attachment A (Figures 4 – 10) and described below, of which two are impacted by the Project:

Unnamed Drainage 1

Unnamed Drainage 1 is the westernmost drainage in the Project site, with a total channel length of approximately 3,180 linear feet and area of 0.31 acres (including its tributaries). It is comprised of a primary ephemeral stream with several small ephemeral tributaries branching off the main channel within the Project site. This feature originates near the southern border of the Project site, at the terminus of a manufactured slope constructed as part of the adjacent Westridge Development, and carries storm flow northward to approximately the mid-point of the site where the channel intersects the RMDP boundary. The channel bottom is heavily vegetated, though flow is still apparent throughout the stream.

Portions of the stream located within the RMDP boundary were filled and eliminated as authorized by the 2012 Order. Under current conditions, water reaching the northern end of the channel at the RMDP boundary sheet flows overland. Surface flows that are not infiltrated eventually enter a stormwater basin located near Magic Mountain Parkway within the RMDP area, which discharges to a storm drain that carries flows through developed areas and eventually into the Santa Clara River. Thus, the flows to Unnamed Drainage 1 originate 1) on-site and 2) from the south of the Project site where the stream receives surface flow via two concrete channels from the existing Westridge development landscaped slope.

Unnamed Drainage 2

Unnamed Drainage 2 is the largest drainage within the Project site and contains 3.95 acres and 5,279 linear feet of waters of the state. The mainstem of this ephemeral feature flows in a south-north direction; with a tributary branch that contributes flow from the southwest and confluences with the mainstem in the center of the Project site. The main stem of this feature originates south of the Project site from the Westridge Golf Course. A concrete channel (the Westridge Area Storm Drain Facility) from the golf course carries flow into Unnamed Drainage 2.

Prior to 2002, Unnamed Drainage 2 functioned as a low-gradient swale conveying intermittent runoff from surrounding hillsides and the undeveloped upper watershed to downstream waters. It was a wide, shallow feature with moderately dense scrub vegetation and few visual signatures of scour. However, substantial upstream development associated with the Westridge Development and its engineered stormwater facilities altered the hydrologic regime, initiating a cascade of geomorphic changes typical of systems with modified hydrologic inputs.

The outflow structure associated with this stream is constructed of riprap and supports hydrophytic vegetation including cattails (*Typha* spp.). The mainstem channel contains steep banks and is deeply incised along most of its length, with bank heights averaging 20 feet in most areas. The low flow channel is braided with little vegetation, while the active channel supports scattered scale broom (*Lepidospartum squamatum*).

Currently, flows within Unnamed Drainage 2 enter a debris basin located south (upstream) of Magic Mountain Parkway. Flows exit the basin and enter a culvert under Magic Mountain Parkway, which discharges to an engineered open concrete channel that carries flow north to the Santa Clara River, with another culvert passing underneath Feedmill Road.

Unnamed Drainage 3

Unnamed Drainage 3 is the easternmost of the streams within the Project site and conveys flow that originates from the Westridge Golf Course in the south northward through the Project site and into a storm debris basin. Unnamed Drainage 3 contains 1.25 acres and 437 linear feet of non-wetland waters of the state within the Project site, and is comprised of one main ephemeral stream, heavily vegetated. Pondered storm flow exits the debris basin through a reinforced concrete pipe culvert where flow is conveyed for approximately 0.5 mile north underneath developed areas before converging with the Santa Clara River.

An unpaved access road intersects the stream along its upstream portion, with culverts allowing flow to pass underneath the road. Unnamed Drainage 3 will not be impacted by the Project.

Unnamed Wetland

A debris basin designated as Unnamed Wetland is located at the far downstream portion of Unnamed Drainage 3, near the northeastern boundary of the Project site. The basin contains 0.21 acres of wetland waters of the state. The constructed debris basin contained a previously mapped wetland that is now barren, and it has been designed such that water pools in this area during periods of normal flow to allow suspended particulates and bed material to settle prior to entering the storm drain system. During periods of high flow, water leaves the basin and enters the storm drain system through a pipe culvert. The debris basin receives flow from adjacent, developed upland areas through concrete erosion control channels located on hillsides abutting the feature to the northwest and southeast. Flow is also received from Unnamed Drainage 3 as described above. Unnamed Wetland will not be impacted by the Project.

Description of Work within Waters of the State

Grading and Site Preparation

Site preparation, including grading of the Project site, will require the removal of vegetation and grading/compaction of approximately 6.5 million cubic yards of existing material in a balanced cut and fill operation on the majority of the site. Grading will include mass grading for the development areas, along with fine grading for development pads. Mass grading will consist of rough grading operations that will provide for major roads and infrastructure, establish drainage patterns, and create building pads for the various land uses within the Project site. Remedial grading and custom grading may also be required in response to site-specific soils and geotechnical investigations.

Changes in Site Drainage

As required by state and County of Los Angeles standards, the Project will include a drainage system designed to ensure that post-construction peak flow rates will not exceed pre-construction peak, burned/bulked flow rates and will prevent off-site downstream flooding. On-site surface runoff will be intercepted by curb inlets, debris basins, and/or desilting basins and conveyed to a network of storm drains that will lead to a series of water quality facilities, including water quality basins, prior to discharge into existing drains that outlet off-site to the Santa Clara River. Catch basins will be provided to intercept flows larger than the 10-, 25-, and 50-year storms at strategic locations to minimize flooding at street intersections and sump locations. Debris basins will also be constructed at the downstream ends of natural areas to intercept runoff and debris flows from these areas prior to runoff discharge into the on-site storm drain system. Modifications to drainage patterns within the Project site, including modifications within two of the Project site's three unnamed drainage channels, are described below.

Impacts to Unnamed Drainage 1:

Impacts to Unnamed Drainage 1 include converting a majority of the stream to an underground storm drain, with the upstream portion to be channelized and armored to direct runoff from undeveloped areas to a new debris retention basin upstream of the development (Attachment A, Figure 11). Functions and values associated with this drainage will be lost for those portions converted to an underground storm drain, while the open channel and debris retaining inlet portions may provide limited functions and values.

The majority of this drainage (0.31 acres of waters of the state) will be permanently impacted by the Project. Temporary impacts of less than 0.01 acres waters of the state will result from the temporary work area.

Impacts to Unnamed Drainage 2:

Main Stem of Unnamed Drainage 2

To remove overly erosive flows from Unnamed Drainage 2 and to allow for the correction of hydromodification effects from off-site development, the off-site surface runoff to the soft-bottom stream will be partially collected and diverted to downstream stormwater structures. The minimum flow required to support vegetation and habitat in the stream (13 cfs) will remain in the channel and will flow to a debris basin at the downstream end of the Project reach. During larger storm events, a majority of the flow entering the channel will be diverted to an underground storm drain, bypassing the channel and flowing directly to the downstream debris basin. While peak flow rates in the Unnamed Drainage 2 drainage channel will be significantly reduced from existing conditions, the channel is designed to continue to convey smaller flow rates to sustain vegetation.

To further control erosion and prevent lateral migration of Unnamed Drainage 2, the Project will incorporate bank stabilization measures along both banks of Unnamed Drainage 2. New channel banks will be established by placing clean soil fill along portions of the main stem of Drainage 2. Turf reinforcement matting (TRM) will be placed over the soil at select locations. The TRM will be covered with clean soil and revegetated with native plant materials consistent with a natural channel. Access roads will be constructed on top of the new channel banks, outside of the streambed. The residential development will be further separated from the channel and access road by terraced landscape slopes.

In addition, the Project will install a series of eight grade-control/rock drop structures within the Unnamed Drainage 2 streambed, with rock rip-rap upstream and downstream of the drop structures, and a road crossing 4-foot-diameter culvert near the downstream end of the stabilized drainage course. To install these features, construction materials such as concrete and rock rip-rap will be discharged in portions of the streambed.

Near the southern end of the drainage, an existing 34-inch diameter gas pipeline that is currently suspended above the channel bed in excess of fifteen (15) feet, will be reconstructed in a buried condition - similar to the channel condition prior to

development of the Westridge tract nearly 30 years ago. The southern section of the channel will be permanently impacted through soil fill up to a previous channel bed elevation that will be conducive to establishment of a stable channel bed slope as well as providing for a stable soil fill with safer access conditions to enact the reconstruction and reburial of the 34-inch diameter gas pipeline.

After placement of fill in the eroded channel, the gas pipeline will be buried in its new location, and a concrete mat (i.e., Submar) will be placed above it as a protection measure. The final configuration of the gas pipeline and protective structure will function similarly to a grade control structure that prevents the pipe from becoming exposed again.

The mainstem of Unnamed Drainage 2 will have 1.56 acres of permanent impacts to stream channel waters of the state due to converting channels into underground storm drains, installing grade controls, bank protection, earthen fill and concrete to rebury and protect the gas pipeline, and a road crossing culvert. The mainstem of drainage 2 will have 1.75 acres of temporary impacts to stream channel waters of the state due to the work area.

West-fork Tributary of Unnamed Drainage 2

In the west-fork tributary of Unnamed Drainage 2, 0.64 acres of the waters of the state will be permanently impacted due to the mass grading associated with the buildout of the Project, including converting the drainage to an underground storm drain and creating a debris basin where the tributary enters the Project development footprint. Functions and values associated with this drainage will be lost when converted to an underground storm drain. Two debris basins and inlet structures will be installed in transition areas where natural areas of the watershed drain to buried storm drains. The two debris basins will be approximately 135-by-50-foot and 105-by-40-foot and will have associated approximately 845- and 315-foot-long concrete channels directing flows into the debris basins. The remaining portions of the tributary will be graded, filled, and converted to an underground storm drain, which will flow below the newly developed areas. The west tributary drainage will have no temporary impacts to waters of the state.

In total, the Project will permanently impact 2.20 acres of waters of the state and temporarily impact 1.75 acres of waters of the state within Unnamed Drainage 2. The impacts in drainage 2 are shown in Attachment A, Figure 12.

All avoided and temporarily impacted waters of the state within Unnamed Drainage 2 will be permanently conserved following completion of Project development by placing conservation easements over the areas.

Project Schedule

Complete buildout of the Project is assumed to take place within approximately eight years from receipt of all required approvals. The fill activities in waters of the state will occur during mass grading activities for the Project.

V. Project Location

The Project is located in Unincorporated Los Angeles County near Valencia, California, west of I-5 and The Old Road, generally along Magic Mountain Parkway (34.41611, -118.59197; Assessor's Parcel Number: 2826-008-045).

Latitude: 34.41611 and Longitude: -118.59197

Maps showing the Project location are found in Attachment A of this Order.

VI. Project Impact and Receiving Waters Information

The Project is located within the jurisdiction of the Los Angeles Water Board. Receiving waters and groundwater potentially impacted by this Project are protected in accordance with the applicable water quality control plan (Basin Plan) for the region and other plans and policies which may be accessed online at:

http://www.waterboards.ca.gov/plans_policies/. The Basin Plan includes water quality standards, which consist of existing and potential beneficial uses of waters of the state, water quality objectives to protect those uses, and the state and federal antidegradation policies.

Receiving Water: Santa Clara River Watershed – Santa Clara River Reach 6
(Hydrologic Unit Code: 180701020403)

Designated Beneficial Uses: MUN*, IND, PROC, AGR, GWR, FRSH, REC-1, REC-2, WARM, WILD, RARE, WET

*Conditional beneficial use

VII. Description of Direct Impacts to Waters of the State

Total Project fill/excavation quantities for all impacts are summarized in Table(s) 1, 2, and 3. Permanent impacts are categorized as those resulting in a physical loss in area and also those degrading ecological condition only. Permanent impacts are categorized as those resulting in a physical loss in area and also those degrading ecological condition only.

Table 1: Total Project Fill/Excavation Quantity for Temporary Impacts¹

Aquatic Resources Type	Acres	Cubic Yards	Linear Feet
Stream Channel	1.75		1,649

Table 2: Total Project Fill/Excavation Quantity for Permanent Physical Loss of Area Impacts

Aquatic Resources Type	Acres	Cubic Yards	Linear Feet
Stream Channel	1.99		6,891

Table 3: Total Project Fill/Excavation Quantity for Permanent Degradation of Ecological Condition Impacts

Aquatic Resources Type	Acres	Cubic Yards	Linear Feet
Stream Channel	0.52		1,795

VIII. Description of Indirect Impacts to Waters of the State

The Los Angeles Water Board recognizes the potential for indirect impacts to waters of the state associated with the Project.

The development of the Project will have indirect impacts to jurisdictional waters from altered hydrology and water quality (including pesticide runoff), invasive plant species, altered fire regime, and increased trash and debris. These impacts will be minimized, avoided, and mitigated to the extent feasible by Project design features and mitigation measures.

IX. Avoidance and Minimization**Alternatives Analysis**

The project qualified as a tier 3 project and the Project is the least environmentally damaging practicable alternative. (State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State, section IV.A.1.h). The alternatives considered for the Project are described in Attachment D.

LID Standards

¹ Includes only temporary direct impacts to waters of the state and does not include area of temporary disturbance which could result in a discharge to waters of the state. Temporary impacts, by definition, are restored to pre-project conditions and therefore do not include a physical loss of area or degradation of ecological condition.

Because the Project will disturb more than one acre of area and add more than 10,000 square feet of impervious surface area, this Project is categorized as a Designated Project according to LA County's LID Standards Manual (LA County, 2014). A Designated Project under the LID standards requires 1) retention of runoff from the 85th percentile 24-hour rain event² through infiltration, bioretention, and/or rainfall harvest or 2) biofiltration of 1.5 times the portion of the runoff from the 85th percentile 24-hour rain event that is not reliably retained onsite. By ensuring that site runoff is largely retained on-site (with the exception of areas draining to off-site Regional Basin D), the LID standards will minimize hydrologic changes to adjacent and downstream aquatic resources caused by the Project and protect existing channel characteristics and resource functions in those areas, while also protecting downstream water quality from pollutants potentially present in stormwater runoff from the Project site. Effectiveness of stormwater quality control measures depend on on-going inspection and maintenance, and the LID standards require the development and implementation of a project-specific maintenance plan.

The Project will create approximately 218 acres of impervious surfaces. The portion of Magic Mountain Parkway (approximately 12.5 acres), already constructed within the Project site will remain. No other significant areas of impervious surfaces currently exist within the Project site, and no significant areas of impervious surfaces would be reworked as part of Project development.

X. Compensatory Mitigation

The Permittee is required to provide compensatory mitigation described in section XV.I. for temporary impacts resulting in temporal loss, and/or degradation of ecological condition.

The Permittee is required to provide compensatory mitigation for direct impacts, described in section XV.J. for permanent impacts.

XI. California Environmental Quality Act (CEQA)

The LA County Regional Planning Department, as lead agency, certified an environmental impact report (EIR) (State Clearinghouse (SCH) No. 2000011025) for the Project on November 18, 2025, and filed a Notice of Determination (NOD) at the SCH on November 18, 2025. The Los Angeles Water Board is a responsible agency under CEQA (Pub. Res. Code, § 21069) and has reviewed and considered the environmental document. The Los Angeles Water Board finds that the environmental document prepared by the LA County Regional Planning Department adequately addresses all environmental effects for project activities that it is required to approve. The Project will not have significant adverse impacts on the environment, provided that mitigation, including the mitigation presented in the final EIR, is carried out as conditioned in this

² The 85th percentile, 24-hour storm depth is equal to 1.1 inches as determined from the Los Angeles County 85th Percentile 24-hr Rainfall Isohyetal Map.

Order. In adopting this Order, the Los Angeles Water Board has eliminated or substantially lessened the less-than-significant effects on water quality, and therefore approves the Project.

XII. Human Right to Water Policy

It is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. This Order promotes that policy by requiring discharges to meet contaminant levels designed to protect human health and ensure that water is safe for domestic use (Wat. Code § 106.3).

XIII. Petitions for Reconsideration

Any person aggrieved by this action of the Los Angeles Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and title 23, California Code of Regulations, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Note that filing a petition does not stay the requirements of this Order. Copies of the law and regulations applicable to filing petitions will be provided upon request or may be found on the Internet at:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality

XIV. Findings

1. This Order is adopted pursuant to the California Porter-Cologne Water Quality Control Act (Wat. Code § § 13000, et seq.). Discharges to waters of the state are prohibited except when in accordance with Water Code section 13264. Notwithstanding any determinations made by the U.S. Army Corps or other federal agency pursuant to 40 C.F.R. section 121.9, dischargers must comply with the entirety of this Order because the Order also serves as waste discharge requirements in accordance with State Water Board Water Quality General Order No. 2003-0017-DWQ. Discharges to waters of the state are prohibited except when in accordance with Water Code section 13264.
2. This Order also comports with section 401 of the Clean Water Act. In the event that federal definitions of Waters of the United States are amended to incorporate the waters of the state at issue in this Order, this Order may also constitute water quality certification for the proposed project.
3. Failure to comply with any condition of this Order shall constitute a violation of the Porter-Cologne Water Quality Control. The Permittee and/or discharger may then be subject to administrative and/or civil liability pursuant to Water Code section 13350.

4. In the event of any violation or threatened violation of the conditions of this Order, the violation or threatened violation shall be subject to any remedies, penalties, process, or sanctions as provided for under state and federal law.
5. In response to a suspected violation of any condition of this Order, the Water Board may require the holder of this Order to furnish, under penalty of perjury, any technical or monitoring reports the Water Boards deem appropriate, provided that the burden, including costs, of the reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The additional monitoring requirements ensure that permitted discharges and activities comport with any applicable effluent limitations, water quality standards, and/or other appropriate requirement of state law.
6. This Order does not provide coverage under the Construction General Permit. As applicable, dischargers shall maintain compliance with conditions described in, and required by, NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 20090009-DWQ; NPDES No. CAS000002 as amended by Order No. 2010-0014-DWQ, Order No. 2012-0006-DWQ, Order WQ 2022-0057-DWQ and any amendments thereto). Enrollment in the Construction General Permit may be required for construction activity resulting in a land disturbance of one acre or more, or less than one acre but part of a larger common plan of development or sale. For ground disturbing activities that do not require enrollment in Order No. 2009-0009-DWQ, project plans included with the application shall include appropriate erosion and sediment control measures as described in the *Best Management Practices* section below.
7. This Order does not authorize any act which results in the taking of a threatened, endangered or candidate species or any act, which is now prohibited, or becomes prohibited in the future, under either the California Endangered Species Act (Fish & G. Code, §§ 2050-2097) or the federal Endangered Species Act (16 U.S.C. §§ 1531-1544). If a “take” will result from any act authorized under this Order held by the Permittee, the Permittee must obtain authorization for the take prior to any construction or operation of the portion of the Project that may result in a take. The Permittee is responsible for meeting all requirements of the applicable endangered species act for the Project authorized under this Order.

XV. Conditions

The Los Angeles Water Board has independently reviewed the record of the Project to analyze impacts to water quality and designated beneficial uses within the watershed of the Project. In accordance with this Order, the Permittee may proceed with the Project under the following terms and conditions:

A. Authorization

Impacts to waters of the state shall not exceed quantities shown in Tables 1, 2, and 3.

B. Reporting and Notification Requirements

The following section details the reporting and notification types and timing of submittals. Requirements for the content of these reporting and notification types are detailed in Attachment C, including specifications for photo and map documentation during the Project. Written reports and notifications must be submitted using the Reporting and Notification Cover Sheet located in Attachment C, which must be signed by the Permittee or an authorized representative.

1. Project Reporting

- a. Annual Reporting:** The Permittee shall submit an Annual Report each year on the anniversary of Project effective date. Annual Reporting requirements are detailed in Attachment C. Annual reporting shall continue until a Notice of Project Complete Letter is issued to the Permittee.

2. Project Status Notifications

- a. **Commencement of Construction:** The Permittee shall submit a Commencement of Construction Report at least seven (7) days prior to start of initial ground disturbance activities and, if applicable, the corresponding Waste Discharge Identification Number (WDID#) issued under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order WQ 2022-0057-DWQ; NPDES No. CAS000002).
- b. **Request for Notice of Project Complete Letter:** The Permittee shall submit a Request for Notice of Project Complete Letter when construction and any post-construction monitoring is complete,³ and no further Project activities will occur. This request shall be submitted to Los Angeles Water Board staff within thirty (30) days following completion of all Project activities and any post-construction monitoring. Upon approval of the request, the Los Angeles Water Board staff shall issue a Notice of Project Complete Letter to the Permittee which will end the post discharge monitoring period and associated annual fees. Completion of post-construction monitoring shall be determined by Water Board staff and shall be contingent on successful attainment of restoration and mitigation performance criteria.

3. Conditional Notifications and Reports

The following notifications and reports are required as appropriate.

a. Accidental Discharges of Hazardous Materials⁴

Following an accidental discharge of a reportable quantity of a hazardous material, sewage, or an unknown material, the following applies (Wat. Code, § 13271):

³ Completion of post-construction monitoring shall be determined by Los Angeles Water Board staff and shall be contingent on successful attainment of restoration and mitigation performance criteria.

⁴ "Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment. (Health & Saf. Code, § 25501.)

- i. As soon as (A) Permittee has knowledge of the discharge or noncompliance, (B) notification is possible, and (C) notification can be provided without substantially impeding cleanup or other emergency measures then:
 - a. First call – 911 (to notify local response agency)
 - b. Then call – Office of Emergency Services (OES) State Warning Center at: (800) 852-7550 or (916) 845-8911
 - c. Lastly, follow the required OES procedures as set forth in the [Office of Emergency Services' Accidental Discharge Notification Web Page](https://www.caloes.ca.gov/office-of-the-director/operations/response-operations/fire-rescue/hazardous-materials/spill-release-reporting/) (https://www.caloes.ca.gov/office-of-the-director/operations/response-operations/fire-rescue/hazardous-materials/spill-release-reporting/)
- ii. Following notification to OES, the Permittee shall notify the Los Angeles Water Board, as soon as practicable (ideally within 24 hours). Notification may be via telephone, e-mail, or delivered written notice.
- iii. Within five (5) working days of notification to the Los Angeles Water Board, the Permittee must submit an Accidental Discharge of Hazardous Material Report.

b. Violation of Compliance with Water Quality Standards:

The Permittee shall notify the Los Angeles Water Board of any event causing a violation of compliance with water quality standards. Notification may be via telephone, e-mail, or delivered written notice.

- i. Examples of noncompliance events include: lack of any reporting in a timely manner, lack of storm water treatment following a rain event, discharges causing a visible plume in a water of the state, water contact with uncured concrete, and exceedances of limits for the analytes for In-Water Work or Diversions listed below.
- ii. This notification must be followed within three (3) working days by submission of a Violation of Compliance with Water Quality Standards Report.

c. In Water Work or Diversion

- i. If stream diversion will be necessary, the Permittee shall submit to Los Angeles Water Board staff a Stream Diversion Plan, with a diagram and a narrative description of the method to divert the stream and associated BMPs for acceptance, at least 30 days in advance of any stream diversion.
- ii. During in water work or stream diversion, water quality monitoring shall be conducted. Requirements for water quality monitoring are below.

- iii. The Permittee shall notify the Los Angeles Water Board at least forty-eight (48) hours prior to initiating work in water or stream diversions. Notification may be via telephone, e-mail, or delivered written notice.
- iv. Within three (3) working days following completion of work in water or stream diversions, an In-Water Work/Diversions Water Quality Monitoring Report must be submitted to Los Angeles Water Board staff.

d. Modifications to Project

Project modifications may require an amendment of this Order. The Permittee shall give advance notice to Los Angeles Water Board staff if Project implementation as described in the application materials is altered in any way or by the imposition of subsequent permit conditions by any local, state or federal regulatory authority by submitting a Modifications to Project Report. The Permittee shall inform Los Angeles Water Board staff of any Project modifications that will interfere with the Permittee's compliance with this Order.

e. Transfer of Property Ownership:

This Order is not transferable in its entirety or in part to any person or organization except after receiving certification for the Project from the Los Angeles Water Board. In addition:

- i. The Permittee must notify the Los Angeles Water Board of any change in ownership or interest in ownership of the Project area by submitting a Transfer of Property Ownership Report. The Permittee and purchaser must sign and date the notification and provide such notification to the Los Angeles Water Board at least 30 days prior to the transfer of ownership.
- ii. Until such time as a new Order has been issued, the Permittee shall continue to be responsible for all requirements set forth in this Order.

f. Transfer of Long-Term BMP Maintenance

If maintenance responsibility for post-construction BMPs such as debris basins is legally transferred, the Permittee must submit to the Los Angeles Water Board a copy of such documentation and must provide the transferee with a copy of a long-term BMP maintenance plan that complies with manufacturer or designer specifications. The Permittee must provide such notification to the Los Angeles Water Board with a Transfer of Long-Term BMP Maintenance Report at least 10 days prior to the transfer of BMP maintenance responsibility.

C. Water Quality Monitoring

1. General

If surface water is present, continuous visual surface water monitoring shall be conducted to detect accidental discharge of construction related pollutants (e.g. oil and grease, turbidity plume, or uncured concrete).

2. Accidental Discharges/Noncompliance

Upon occurrence of an accidental discharge of hazardous materials or a violation of compliance with a water quality standard, Los Angeles Water Board staff may require water quality monitoring based on the discharge constituents and/or related water quality objectives and beneficial uses.

3. In-Water Work or Diversions

For projects involving planned work in water or stream diversions, a water quality monitoring plan shall be submitted to Los Angeles Water Board staff for acceptance at least 30 days in advance of any discharge to the affected water body. Water quality monitoring shall be conducted in accordance with the approved plan.

During planned work in water or stream diversions any discharge(s) to waters of the state shall conform to the following water quality standards:

- a.** Oil and Grease. Waters shall not contain oils, greases, waxes or other materials in concentrations that result in a visible film or coating on the surface of the water or on objects in the water, that cause nuisance, or that otherwise adversely affect beneficial uses.
- b.** Dissolved Oxygen. At a minimum, the mean annual dissolved oxygen concentration of all waters shall be greater than 7 mg/L, and no single determination shall be less than 5.0 mg/L, except when natural conditions cause lesser concentrations.

The dissolved oxygen content of all surface waters designated as WARM shall not be depressed below 5 mg/L as a result of waste discharges.

- c.** pH. The pH of inland surface waters shall not be depressed below 6.5 or raised above 8.5 as a result of waste discharges. Ambient pH levels shall not be changed more than 0.5 units from natural conditions as a result of waste discharge.
- d.** Turbidity. Downstream TSS shall be maintained at ambient levels. Where natural turbidity is between 0 and 50 Nephelometric Turbidity Units (NTU), increases shall not exceed 20%. Where natural turbidity is greater than 50 NTU, increases shall not exceed 10%.

Sampling shall be conducted in accordance with Table 4 sampling parameters.⁵

Table 4: Sample Type and Frequency Requirements

Parameter	Unit of Measurement	Type of Sample	Minimum Frequency
Oil and Grease	N/A	Visual	Continuous
Dissolved Oxygen	mg/L and % saturation	Grab	Every 4 Hours
pH	Standard Units	Grab	Every 4 hours
Turbidity	NTU	Grab	Every 4 hours
Temperature	°F (or as °C)	Grab	Every 4 hours

Baseline sampling shall be conducted at a minimum of one location within the project boundary for each phase. All other sampling shall take place at a minimum of two locations. In streams or flowing water, the sample locations shall be upstream and downstream of the Project. Results of the analyses shall be submitted to this Regional Board by the 15th day of each subsequent sampling month. A map or drawing indicating the locations of sampling points shall be included with each submittal. A summary of results shall discuss the analysis. Every measurement not meeting the compliance limits shall be accompanied by an explanation, the actions taken to correct the degradation to waters, and addressed in *Violation of Compliance with Water Quality Standards* report described above.

4. Post-Construction

The Permittee shall visually inspect the Project site during the rainy season for 5 years to ensure excessive erosion, stream instability, or other water quality pollution is not occurring in or downstream of the Project site. If water quality pollution is occurring, contact the Los Angeles Water Board staff member overseeing the Project within three (3) working days. The Los Angeles Water Board may require

⁵ Pollutants shall be analyzed using the analytical methods described in 40 Code of Federal Regulations Part 136; where no methods are specified for a given pollutant, the method shall be approved by Los Angeles Water Board staff. Grab samples shall be taken between the surface and mid-depth and not be collected at the same time each day to get a complete representation of variations in the receiving water. A hand-held field meter may be used, provided the meter utilizes a U.S. EPA-approved algorithm/method and is calibrated and maintained in accordance with the manufacturer's instructions. A calibration and maintenance log for each meter used for monitoring shall be maintained onsite.

the submission of a Violation of Compliance with Water Quality Standards Report. Additional permits may be required to carry out any necessary site remediation.

D. Standard Conditions

1. This Order is subject to modification or revocation upon administrative or judicial review, including review and amendment pursuant to Water Code section 13330, and California Code of Regulations, title 23, chapter 28, Article 6 commencing with section 3867, inclusive. Additionally, the Los Angeles Water Board reserves the right to suspend, cancel, or modify and reissue this Order, after providing notice to the Permittee, if the Los Angeles Water Board determines that: the Project fails to comply with any of the conditions of this Order; or, when necessary to implement any new or revised water quality standards and implementation plans adopted or approved pursuant to the Porter-Cologne Water Quality Control Act (Wat. Code, § 13000 et seq.) or federal Clean Water Act section 303 (33 U.S.C. § 1313).

E. Fees Received

1. This Order is conditioned upon total payment of any fee required under title 23 of the California Code of Regulations.

The total fee amount required by the California Code of Regulations, title 23, sections 3833(b)(2) and 2200(a)(4), Category A - Fill & Excavation Discharges (Fee Code 84) is \$159,937.00. An application fee of \$4,212.00 was received on February 24, 2026. An additional fee of \$155,725 based on total Project impacts was received on August 27, 2026.

2. **Annual Fees:** This Order is subject to annual billing based on the fee schedule in effect at the time of billing. Annual billing will continue until the Project, including monitoring, is complete and the Los Angeles Water Board receives an acceptable request for a Notice of Project Complete Letter (see Attachment C). Invoices are usually sent out at the end of each calendar year.⁶

To stop annual billing, the Permittee must request a Notice of Project Complete Letter from the Los Angeles Water Board. Los Angeles Water Board staff will verify if the conditions of the Order are met and may conduct a site visit to confirm compliance

F. General Compliance

1. Permitted actions must not cause a violation of any applicable water quality standards, including impairment of designated beneficial uses for receiving waters as adopted in the Basin Plans by any applicable Los Angeles Water

⁶ Annual invoices are issued for projects active for any amount of time in the current fiscal year (July 1 – June 30).

Board or any applicable State Water Board (collectively Water Boards) water quality control plan or policy. The source of any such discharge must be eliminated as soon as practicable.

2. The Permittee must, at all times, fully comply with engineering plans, specifications, and technical reports submitted to support this Order; and all subsequent submittals required as part of this Order. The conditions within this Order and Attachments supersede conflicting provisions within Permittee submittals.
3. The Permittee shall adhere to all requirements in the mitigation monitoring and reporting program (MMRP) (Mitigation Monitoring and Reporting Program, October 2024) which is incorporated herein by reference.

G. Administrative

1. Signatory requirements for all document submittals required by this Order are presented in Attachment B of this Order.
2. **Site Access:** The Permittee shall grant Los Angeles Water Board staff, or an authorized representative (including an authorized contractor acting as a Water Board representative), upon presentation of credentials and other documents as may be required by law, permission to:
 - a. Enter upon the Project or compensatory mitigation site(s) premises where a regulated facility or activity is located or conducted, or where records are kept.
 - b. Have access to and copy any records that are kept and are relevant to the Project or the requirements of this Order.
 - c. Inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order.
 - d. Sample or monitor for the purposes of assuring Order compliance.
3. A copy of this Order shall be provided to any consultants, contractors, and subcontractors working on the Project. Copies of this Order shall remain at the Project site for the duration of this Order. The Permittee shall be responsible for work conducted by its consultants, contractors, and any subcontractors.
4. A copy of this Order must be available at the Project site(s) during construction for review by site personnel and agencies. All personnel performing work on the Project shall be familiar with the content of this Order and its posted location at the Project site.
5. Lake and Streambed Alteration Agreement – The Permittee shall submit a signed copy of the Department of Fish and Wildlife's lake and streambed

alteration agreement to the Los Angeles Water Board immediately upon execution and prior to any discharge to waters of the state.

6. This Order shall expire **five (5) years** from date of this Order. The Applicant shall submit a complete application at least 90 days prior to termination of this Order if renewal is requested.

H. Best Management Practices

The Permittee shall additionally mitigate the significant effects of the Project by implementing the following BMPs. The BMPs are intended to reduce erosion and manage the construction site in order to ensure water quality objectives are met in surface and groundwaters during construction. Low Impact Design (LID) BMPs are included in order to ensure water quality objectives are met in surface and groundwaters after construction.

1. Fugitive Dust

- a. The Permittee shall use water trucks during grading operation, as required, to dampen the soil and prevent wind erosion and deposition of dust onto public and private streets.
- b. The Permittee shall perform street sweeping, as necessary, to clean sand, dust, or debris from paved streets.

2. Site Management

- a. Waste and materials shall be managed by implementing covered storage and secondary containment for material storage areas, secondary containment for portable toilets, covered dumpsters, dedicated and lined concrete washout/waste areas, proper application of chemicals, and proper disposal of all manner of waste products, including solid, liquid, sanitary, concrete, hazardous, and equipment related wastes.
- b. The Permittee shall confine all trash and debris in appropriate enclosed bins and dispose of the trash and debris at an approved site at least weekly.
- c. All construction-related equipment, materials, and any temporary BMPs no longer needed shall be removed and cleaned from the site upon completion of the Project.
- d. Practices designed to reduce or eliminate the addition of pollutants to construction site runoff through analysis of pollutant sources, implementation of proper handling/disposal practices, employee education, water conservation practices, vehicle and equipment cleaning and fueling practices, and street sweeping shall be implemented.
- e. All work performed within waters of the state shall be completed in a manner that minimizes impacts to beneficial uses and habitat; measures shall be employed to minimize disturbances along the streams that will adversely impact the water quality of waters of the state. Disturbance or

removal of vegetation shall not exceed the minimum necessary to complete Project implementation.

- f. Fueling areas shall comply with design requirements.
- g. The Permittee shall locate areas for routine equipment maintenance, parking, and refueling away from storm drain inlets.
- h. The Permittee shall conduct major equipment repairs offsite.
- i. The Permittee shall store all construction materials and stockpiles in a manner that provides protection from rainfall and wind, including storing stockpiled materials and wastes under a roof of plastic sheeting.
- j. Construction site monitoring plans shall address leaks and spills of non-visible pollutants.
- k. Concrete or any cement product shall not be poured if measurable rain is forecasted within 15 days that could result in uncured concrete or concrete contact water entering any stream.
- l. Concrete shall completely be cured before coming into contact with waters of the state. Surface water that contacts wet concrete shall be pumped out and disposed of at an appropriate off-site commercial facility, which is authorized to accept concrete wastes.
- m. The Permittee shall perform decontamination of vehicles and other Project gear and equipment in a designated location where runoff can be contained and not allowed to pass into any river, lake, or stream and associated riparian areas and other sensitive habitat areas. Cleaning of equipment shall occur at a location that contains and recycles resulting wastewater.

2. Hazardous Materials

- a. The Permittee shall label all materials used for periodic equipment cleanup and maintenance appropriately as "Hazardous Waste." All onsite and temporary construction workers shall be informed of good housekeeping procedures and potential consequences of allowing even a small spill to go unattended.
- b. The Permittee shall ensure a Report of Waste Discharge (ROWD) be filed for the Project, should any person discharge waste, or propose to discharge waste, other than into a community sewer system, which could affect the quality of the waters of State per section 13260(a) of the Water Code. The Permittee shall file a complete RoWD/Form 200 with this Regional Board at least 120 days prior to commencing the discharge.
- c. Pesticides, fertilizers, paints, and other high-risk materials used for maintenance of common areas, parks, commercial areas, and multifamily residential common areas shall be kept in enclosed storage areas.

3. In Water Work

- a. No equipment shall be operated in areas of flowing or standing water.

- b. No fueling, cleaning, or maintenance of vehicles or equipment shall take place within any areas where an accidental discharge to waters of the state may occur;
- c. Construction materials and heavy equipment shall be stored outside of the active flow of water.
- d. When work within waters of the state is necessary, the entire stream flow shall be diverted around the work area.

4. Sediment Control and Stabilization/Erosion Control

- a. Vegetation and other materials (such as straw, fiber, stabilizing emulsion, etc.) shall be placed to stabilize areas of disturbed soils, reduce loss of soil due to the action of water or wind, and prevent water pollution.
- b. Where areas of bare soil are exposed during the rainy season, silt control measures shall be used where silt and/or earthen fill threaten may enter waters of the state. Silt control structures shall be monitored for effectiveness and shall be repaired or replaced as needed. Buildup of soil behind silt fences shall be removed promptly and any breaches of undermined areas repaired at once.

5. Wildlife and Special Status Species

- a. Before the start of daily Project activities, a Designated Biologist shall survey the Project area to ensure wildlife incidentally trapped due to Project activities are allowed to escape.
- b. The Permittee shall have the Designated Biologist conduct two pre-Project surveys within and adjacent to the proposed work area within a one-week period prior to the start of Project-related initial ground disturbance or vegetation removal, and again if worked is paused for five or more consecutive days or in areas where suitable habitat remains present and has not been cleared or secured. Pre-Project surveys shall include:
 - a. general surveys for botanical and wildlife resources;
 - b. the identification of any active burrows and/or woodrat nests (if active, they shall be recorded, monitored for species observations, and mapped);
 - c. visual surveys of work areas with flowing or standing water shall be visually surveyed for any aquatic species that may be impacted by Project activities; and,
 - d. surveys of culvert and bridge areas to determine if these structures are being used for nesting, roosting, or habitat refugia.
- c. Survey results, including negative findings, analysis, recommendations, and field notes shall be submitted to CDFW and the Los Angeles Water Board for review no later than 2 business days prior to the start of Project activities in the case that special status species are observed. If no

special status species are observed during surveys, then reports shall be submitted to CDFW and the Los Angeles Water Board for review within a week after surveys are completed. If any special status species not already covered by CDFW's Streambed Alteration Agreement or in an approved relocation plan are observed during the surveys, the Permittee shall report to the Los Angeles Water Board immediately.

- d. The Permittee shall avoid impacts to nesting birds anytime birds are nesting on site.

5. Stormwater

- a. The project shall comply with the local regulations associated with the Los Angeles Water Board's Municipal Stormwater Permit issued to Los Angeles and Ventura County and co-permittees under NPDES No. CAS004004 and Waste Discharge Requirements Order No. R4-2021-0105 or subsequent order.
- b. The project is enrolled under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order WQ 2022-0057-DWQ; NPDES No. CAS000002) (Construction General Permit), the Permittee shall comply with the requirements in the Construction General Permit.
- c. Individuals responsible for SWPPP implementation and permit compliance, including contractors and subcontractors, shall be trained.
- d. Site inspections shall be implemented before, during, and after storm events. A Rain Event Action Plan shall be implemented prior to qualifying storm events.
- e. All storm drain inlets and water quality inlets shall be stenciled or labeled.
- f. Direct connections to storm drains from depressed loading docks (truck wells) shall be prohibited.

I. On-site Mitigation for Temporary Impacts

- 1. The Permittee shall restore all areas of temporary impacts to waters of the state.
- 2. The restoration plan shall be submitted for written acceptance by Los Angeles Water Board staff within ninety days (90) of issuance of this Order. The restoration plan shall provide the following: a schedule; plans for grading of disturbed areas to pre-project contours; planting palette with plant species native to the Project area; seed collection location; invasive species management; performance standards; and maintenance requirements (e.g. watering, weeding, and replanting).
- 4. Restoration shall include grading of disturbed areas to pre-project contours and revegetation with native species. Restored areas shall be monitored and maintained with native species as necessary for five years.

3. The Los Angeles Water Board may extend the monitoring period upon a determination by the Los Angeles Water Board Executive Officer that the performance standards have not been met or are not likely to be met within the monitoring period.
4. If restoration of temporary impacts to waters of the state is not implemented within 270 days subsequent to completion of work causing the impacts, or if the performance standards under the approved restoration plan are not met within 5 years and the Permittee does not make reasonable efforts to rectify the temporal loss, compensatory mitigation may be required to offset temporal loss of waters of the state.

Table 5: Required Project Mitigation Quantity for Temporary Impacts by Method⁷

Aquatic Resource Type	Mitigation Type	Units	Est.	Re-est.	Reh.	Enh.	Pres.
Stream Channel	Permittee Responsible	Acre			1.75		

J. Compensatory Mitigation for Permanent Impacts

1. Compensatory Mitigation Plan

- a. The Permittee has submitted an approved draft compensatory mitigation plan (Waters of the State Mitigation and Monitoring Plan Entrada South Project, August 2026) as part of a complete application. The Permittee proposed onsite and off-site permittee responsible mitigation including 5.55 acres of stream channel establishment, and 1.98 acres of stream channel re-establishment at a total mitigation ratio of 3.25:1. In addition, the Permittee will manage invasive plant species, plant native vegetation, and implement a 5-year maintenance and monitoring period to ensure the successful enhancement of 1.75 acres of waters of the state on-site at Unnamed Drainage 2.

The Permittee shall provide a final compensatory mitigation plan for written acceptance by Los Angeles Water Board staff. Impacts to waters of the state are not authorized and shall not occur until a compensatory mitigation plan has been accepted by Los Angeles Water Board staff. Upon acceptance by Los Angeles Water Board staff, the Permittee shall implement the approved plan.

- b. The final compensatory mitigation plan shall include all plan elements as outlined in 40 Code of Regulations section 230.94(c).

⁷ Methods: establishment (Est.), reestablishment (Re-est.), rehabilitation (Reh.), enhancement (Enh.), preservation (Pres.).

- c. Permittees fulfilling their compensatory mitigation obligations by securing credits from an approved mitigation bank or in-lieu fee program, need only include the items described in 40 Code of Federal Regulations section 230.94(c)(5)-(6), and the name of the specific mitigation bank or in-lieu fee program to be used.

2. Permittee-Responsible Compensatory Mitigation Responsibility

- a. Permittee responsible compensatory mitigation shall be implemented within 270 days of authorized impacts, except that the 1.98 acres of re-established waters of the state on-site at Unnamed Drainage 2 required by Condition J.3.a.4 of this Order shall be implemented within 270 days of completion of authorized Project drainage modification activities within Unnamed Drainage 2.
- b. The Permittee is responsible for the required compensatory mitigation in perpetuity. However, the Permittee may transfer the compensatory mitigation requirements associated with long-term management when the following conditions have been met:
 - i. Performance standards are met.
 - ii. A Transfer Agreement to a third party has been approved by Los Angeles Water Board staff.
 - iii. An endowment fund has been provided by the Permittee to a third party for management in perpetuity of the mitigation site.
 - iv. A conservation easement, deed restriction, or other appropriate restrictive covenant for the mitigation site has been recorded and approved by Los Angeles Water Board staff.
- c. Transfer of Long-Term Permittee-Responsible Compensatory Mitigation and Management Responsibility
 - i. A transfer agreement shall be submitted from an authorized representative of the new party (transferee) for acceptance by Los Angeles Water Board staff. This agreement shall demonstrate acceptance and understanding of the responsibility to comply with and fully satisfy the required compensatory mitigation and long-term management conditions. Failure to comply with the mitigation conditions and associated requirements may subject the transferee to enforcement by the Los Angeles Water Board under Water Code section 13385, subdivision (a).
 - ii. Notification of transfer of responsibilities meeting the above condition must be provided to the Los Angeles Water Board staff. A draft transfer agreement is due to Los Angeles Water Board staff no less than thirty (30) days prior to the transfer of the mitigation responsibility. A final transfer

agreement is due to Los Angeles Water Board staff within 30 days of the completion of the transfer.

3. Total Required Compensatory Mitigation

- a.** The Permittee is required to provide compensatory mitigation for the authorized permanent impact to stream channels at a minimum 3.25:1 area replacement ratio (7.53 acres) as follows:

 - 1.** The Permittee is required to provide 1.35 acres of established waters of the state from the Mayo Crossing Advance Mitigation Site. Stream channel waters of the state were previously established at the Mayo Crossing Advance Mitigation Site located on the north bank of the Santa Clara River, approximately 7 miles West of the Project site. In order to create new waters at the site, the elevation of upland habitat was lowered and native vegetation was planted, allowing for the reclamation of the Santa Clara River. The Mayo Advance Mitigation Site was deemed successful and completed the 5-year maintenance and monitoring program in 2020. The Site is identified as permanent open space preservation lands in the Newhall Ranch Specific Plan and the RMDP.
 - 2.** The Permittee is required to provide 3.2 acres of established waters of the state from the Onion Fields Mitigation Site. The Onion Field Mitigation site is located along the south bank of Santa Clara River, immediately south of State Route 126, approximately 4 miles west of the junction between State Route 126 and Interstate 5 and approximately 6 miles west of the Project site. The Permittee will establish waters by grading existing agriculture fields at an elevation that will promote surface flows, planting appropriate riparian vegetation, installing temporary irrigation to support establishment of target vegetation, and implementing a 5-year maintenance and monitoring period to ensure the successful establishment of waters of the state.
 - 3.** The Permittee is required to provide 1.0 acre of established waters of the state from the Potrero Valley Oak Grassland (VOG) Mitigation Site. The Potrero VOC Mitigation Site is located at the west (downstream) end of Potrero Canyon, approximately 0.5 mile from the confluence with the Santa Clara River, approximately 0.87 mile east of the Ventura County boundary, and 5.9 miles west of I-5. The Permittee will establish waters by grading and establishing swales and planting native vegetation. A 5-year maintenance and monitoring period will be implemented to ensure the successful establishment of waters of the state.
 - 4.** The Permittee is required to provide 1.98 acres of re-established waters of the state on-site at Unnamed Drainage 2. The Permittee will re-establish waters on-site along Unnamed Drainage 2 by grading the bank slopes to the streambed elevation, planting vegetation, managing flow conditions to support

vegetation, managing the re-established waters in perpetuity through a conservation easement, and implementing a 5-year maintenance and monitoring period to ensure the successful establishment of waters of the state.

- b. Total required Project compensatory mitigation information for permanent physical loss of area, ecological degradation and temporal loss is summarized in Table 6.

Table 6: Total Required Project Compensatory Mitigation Quantity for Permanent Physical Loss of Area⁸

Aquatic Resource Type	Mitigation Type	Units	Est.	Re-est.	Reh.	Enh.	Pres.
Stream Channel	Permittee-Responsible	Acres	5.55	1.98			

XVI. Conclusion

I hereby issue the Order for the Entrada South Development Project 4WQC40126030 certifying that as long as all of the conditions listed in this Order are met, any discharge from the referenced Project will comply with the applicable provisions of Water Code section 13264 and Clean Water Act sections 301 (Effluent Limitations), 302 (Water Quality Related Effluent Limitations), 303 (Water Quality Standards and Implementation Plans), 306 (National Standards of Performance), and 307 (Toxic and Pretreatment Effluent Standards).

Except insofar as may be modified by any preceding conditions, all Order actions are contingent on: (a) the discharge being limited and all proposed mitigation being completed in strict compliance with the conditions of this Order and the attachments to this Order; and, (b) compliance with all applicable requirements of Statewide Water Quality Control Plans and Policies, the Regional Water Boards' Water Quality Control Plans and Policies.

CERTIFICATION

I, Susana Arredondo, do hereby certify that the foregoing is a full, true, and correct copy of waste discharge requirements adopted by WATER QUALITY ORDER NO. [R4-

⁸ Methods include: establishment (Est.), reestablishment (Re-est.), rehabilitation (Reh.), enhancement (Enh.), preservation (Pres.). Unknown applies to advance credits with an unknown method and or location.

Entrada South Development Project

Reg. Meas. ID: 464525

Place ID: 905880

File No. 26-030

XXXX-XXXX] (WDID No. 4WQC40126030) adopted by the Los Angeles Water Board
on DATE.

Susana Arredondo
Executive Officer
Los Angeles Water Quality Control Board

Entrada South Development Project
Attachment A

Reg. Meas. ID: 464525
Place ID: 905880
File No. 26-030

Attachment A
Project Maps

Figure 1 Regional Location

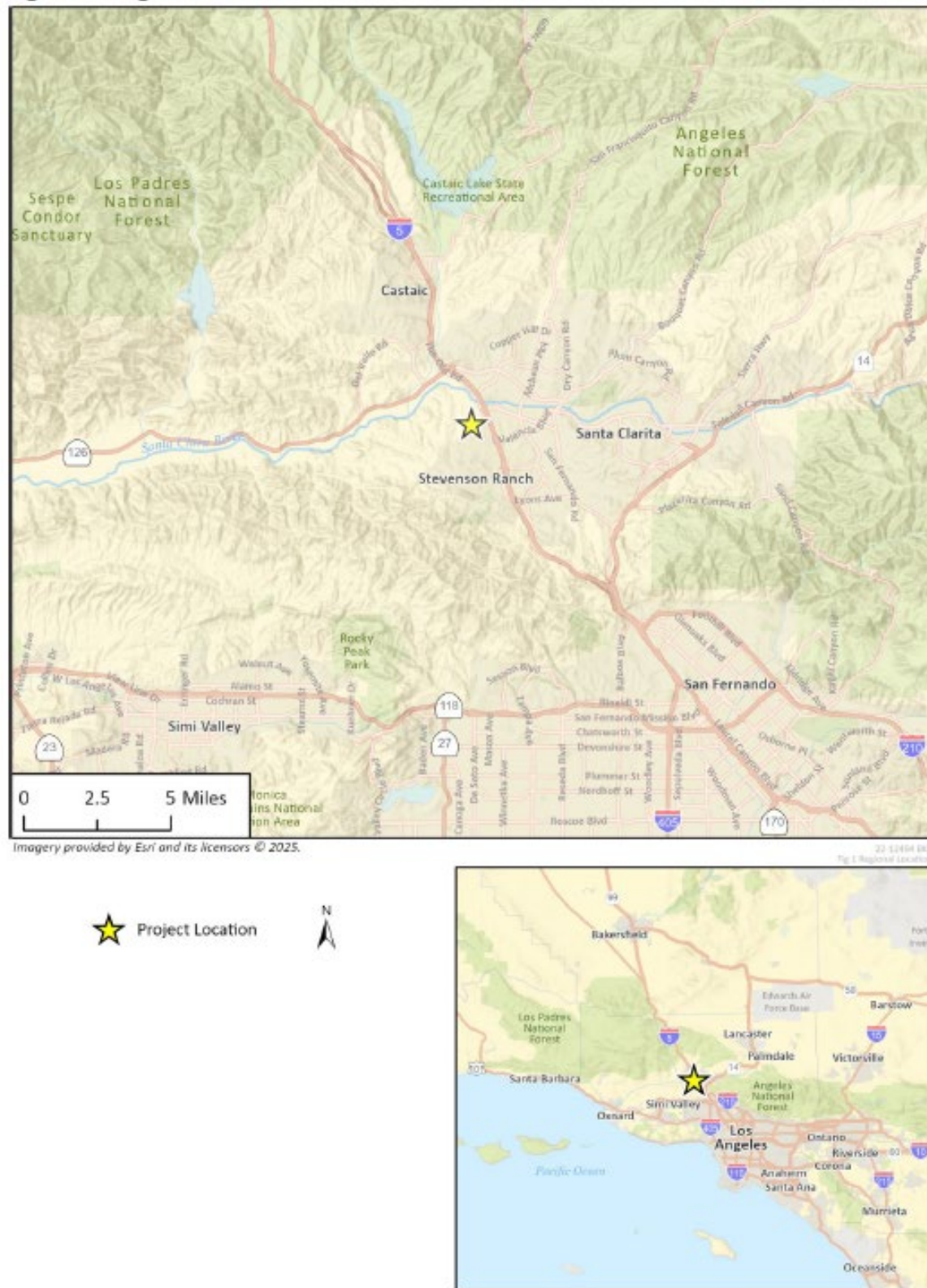


Figure 1. Regional Location

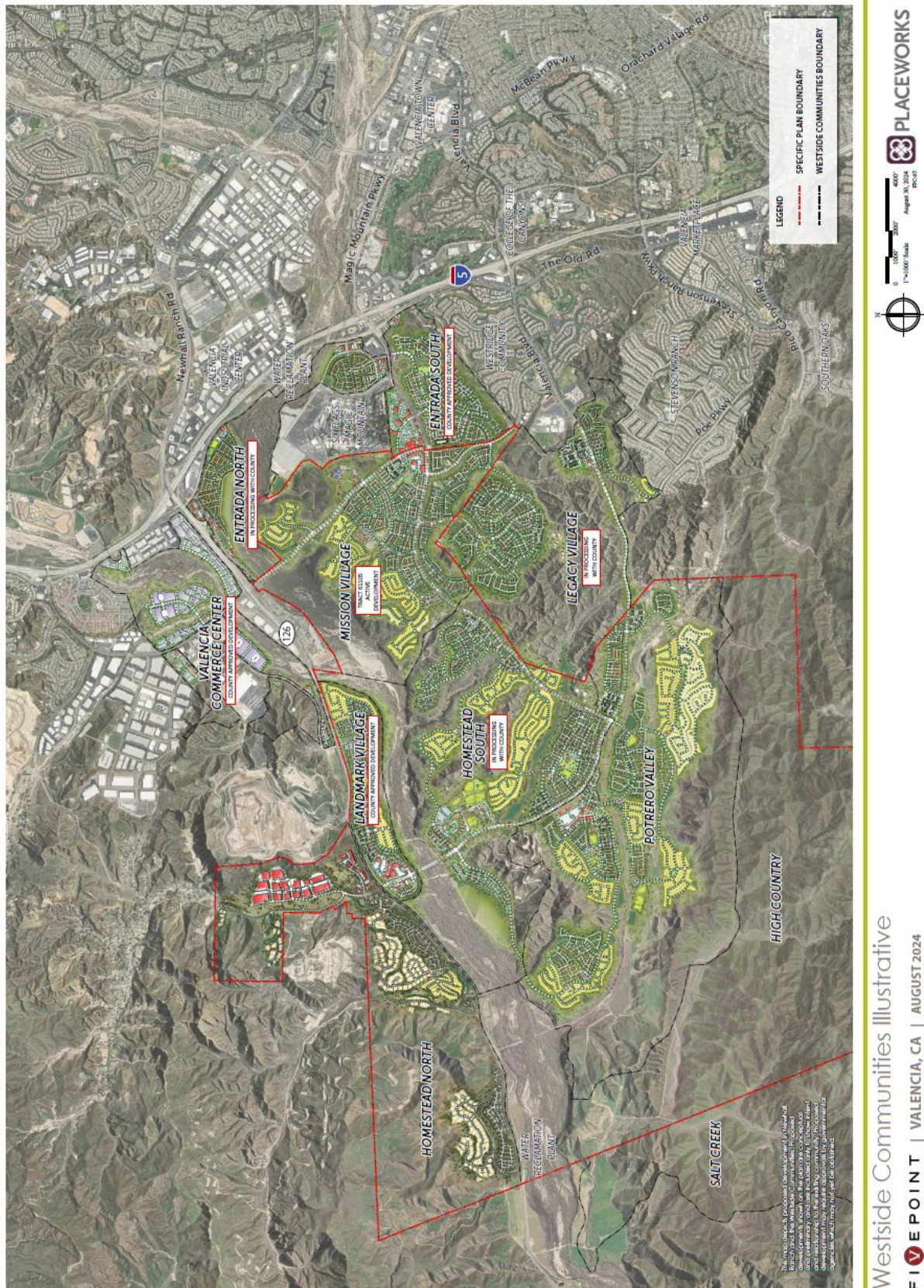


Figure 2. Westside Communities Overview



Figure 3. Project Site

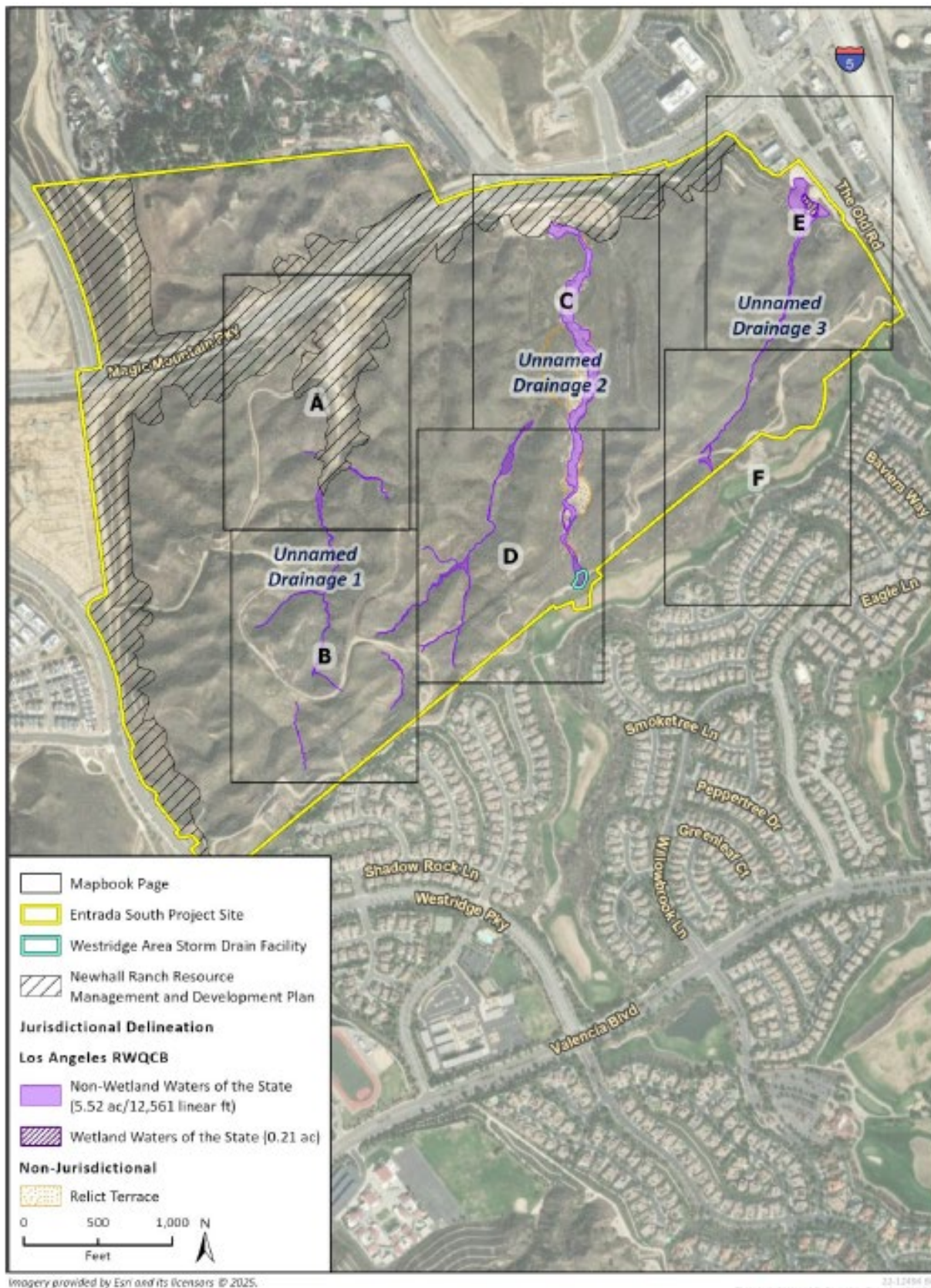


Figure 4. Waters of the State Delineation Overview

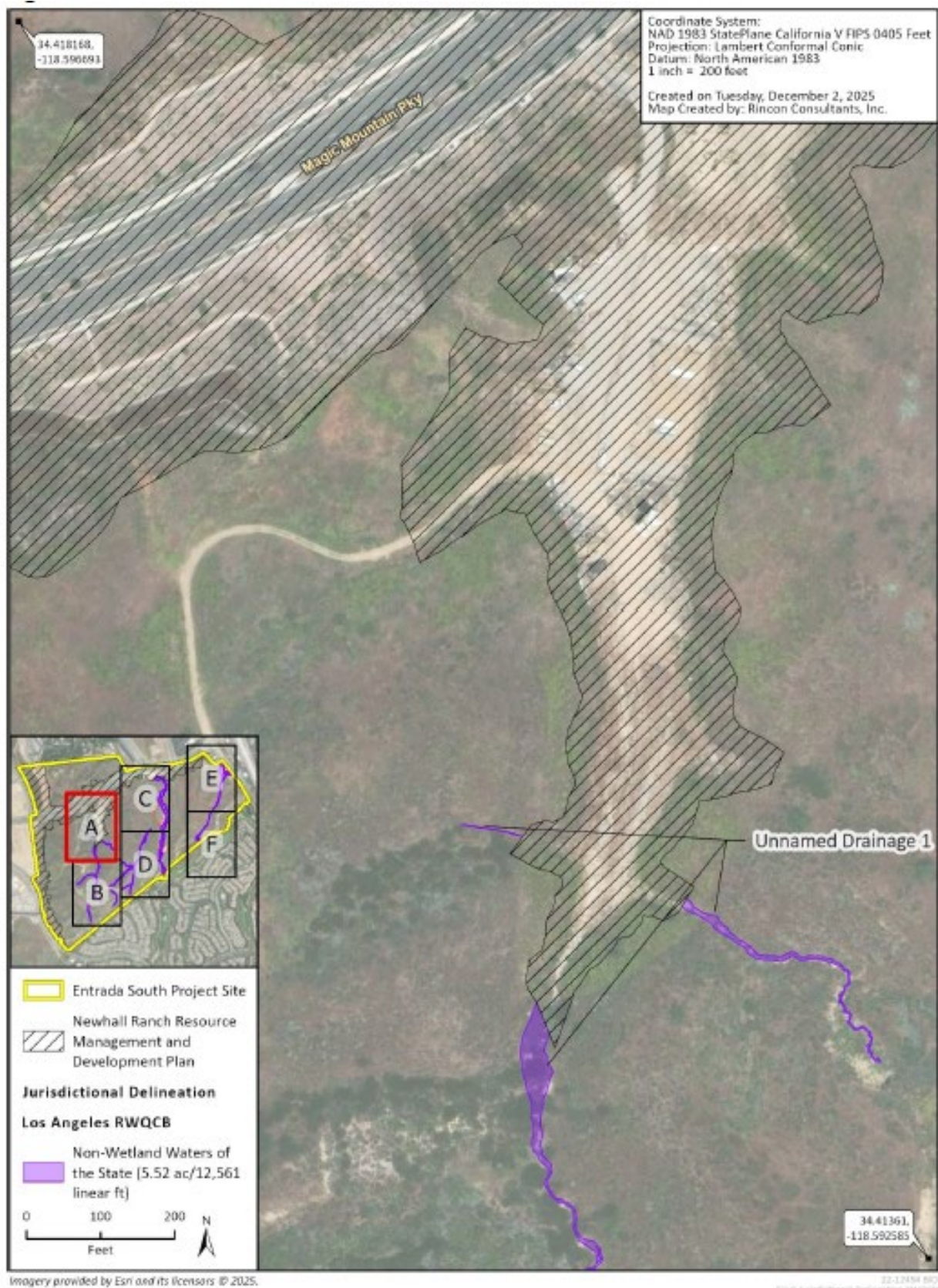


Figure 5. Waters of the State Delineation – Panel A



Figure 6. Waters of the State Delineation – Panel B

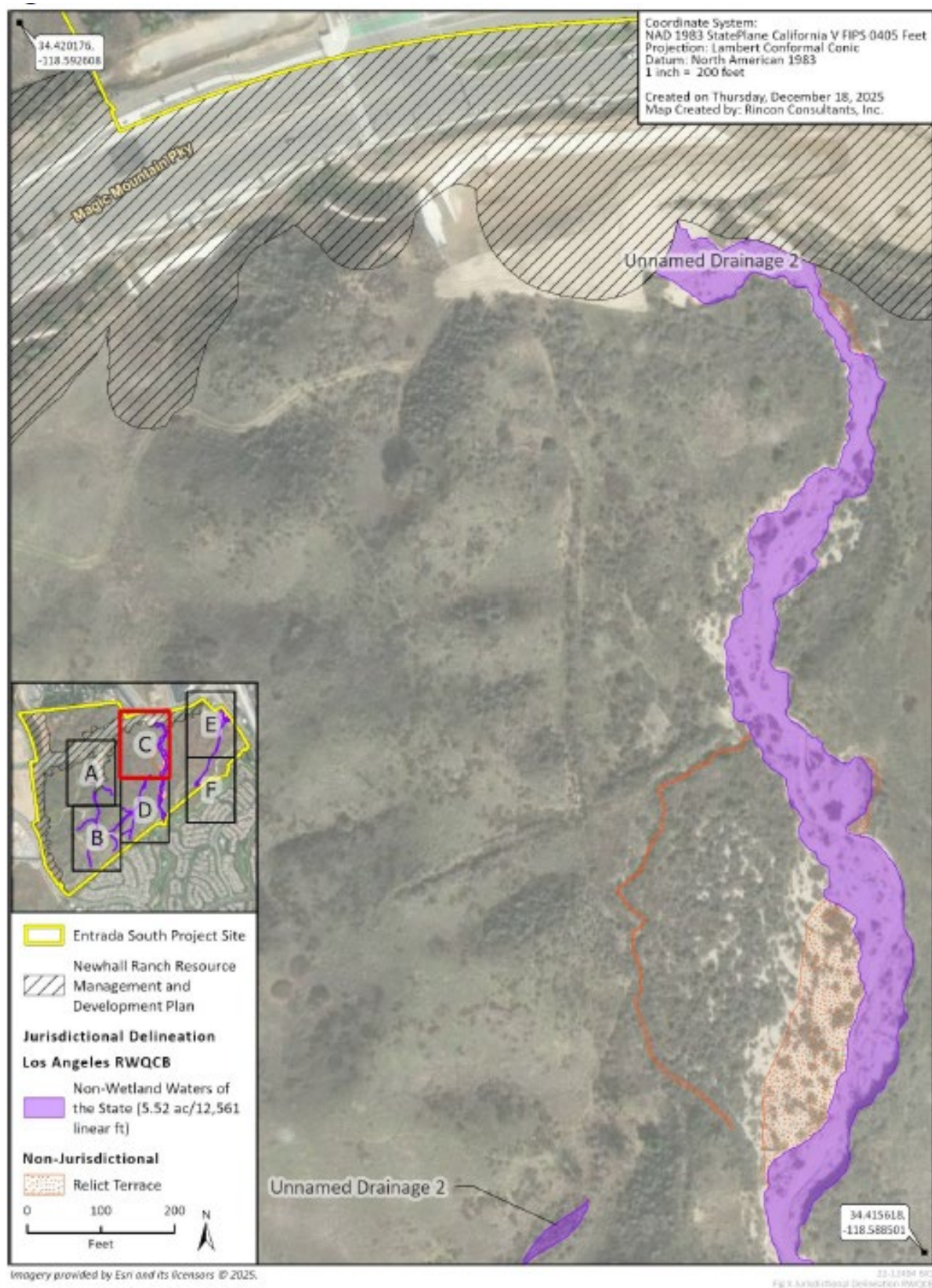


Figure 7. Waters of the State Delineation – Panel C

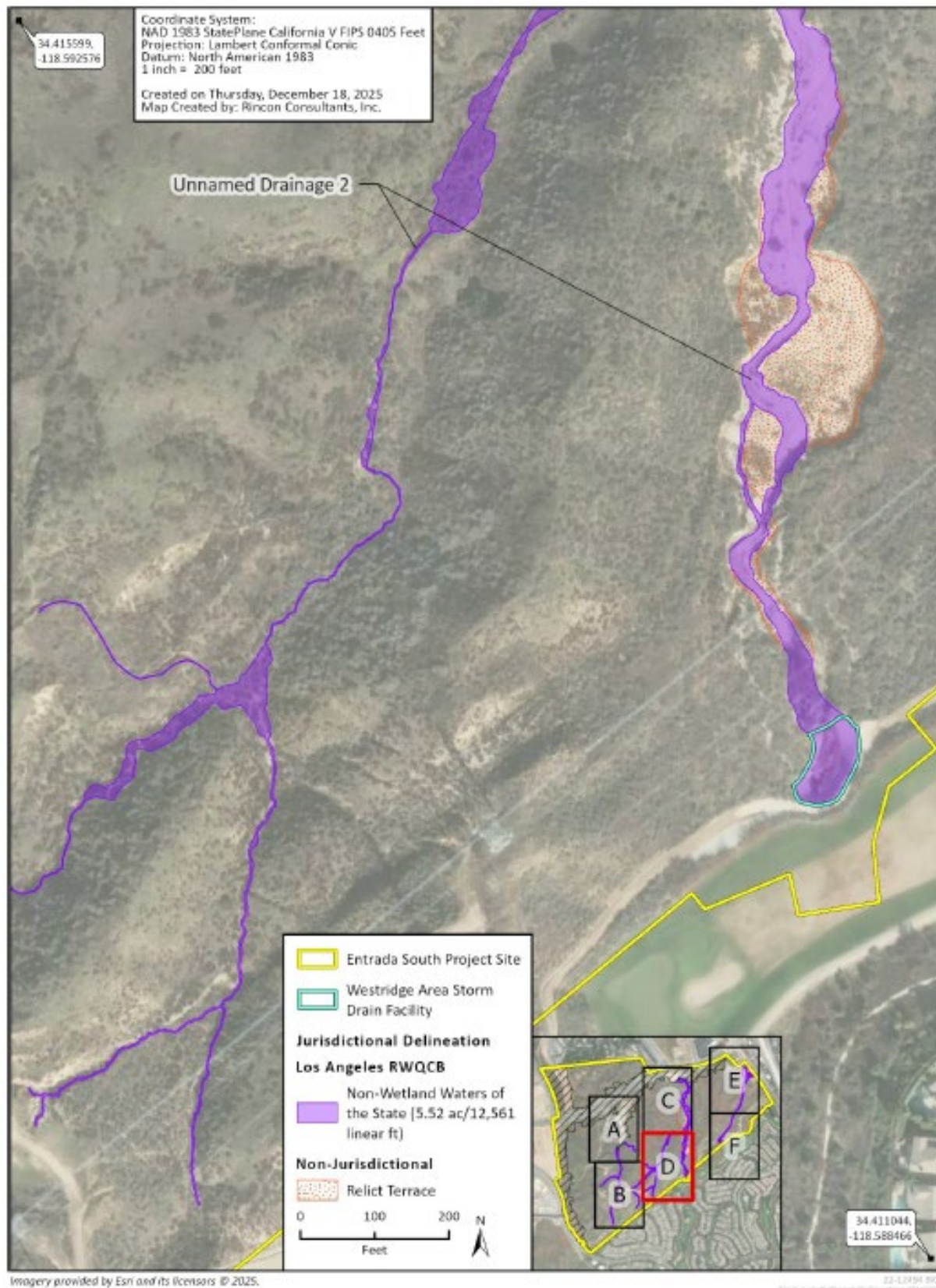


Figure 8. Waters of the State Delineation – Panel D



Figure 9. Waters of the State Delineation – Panel E



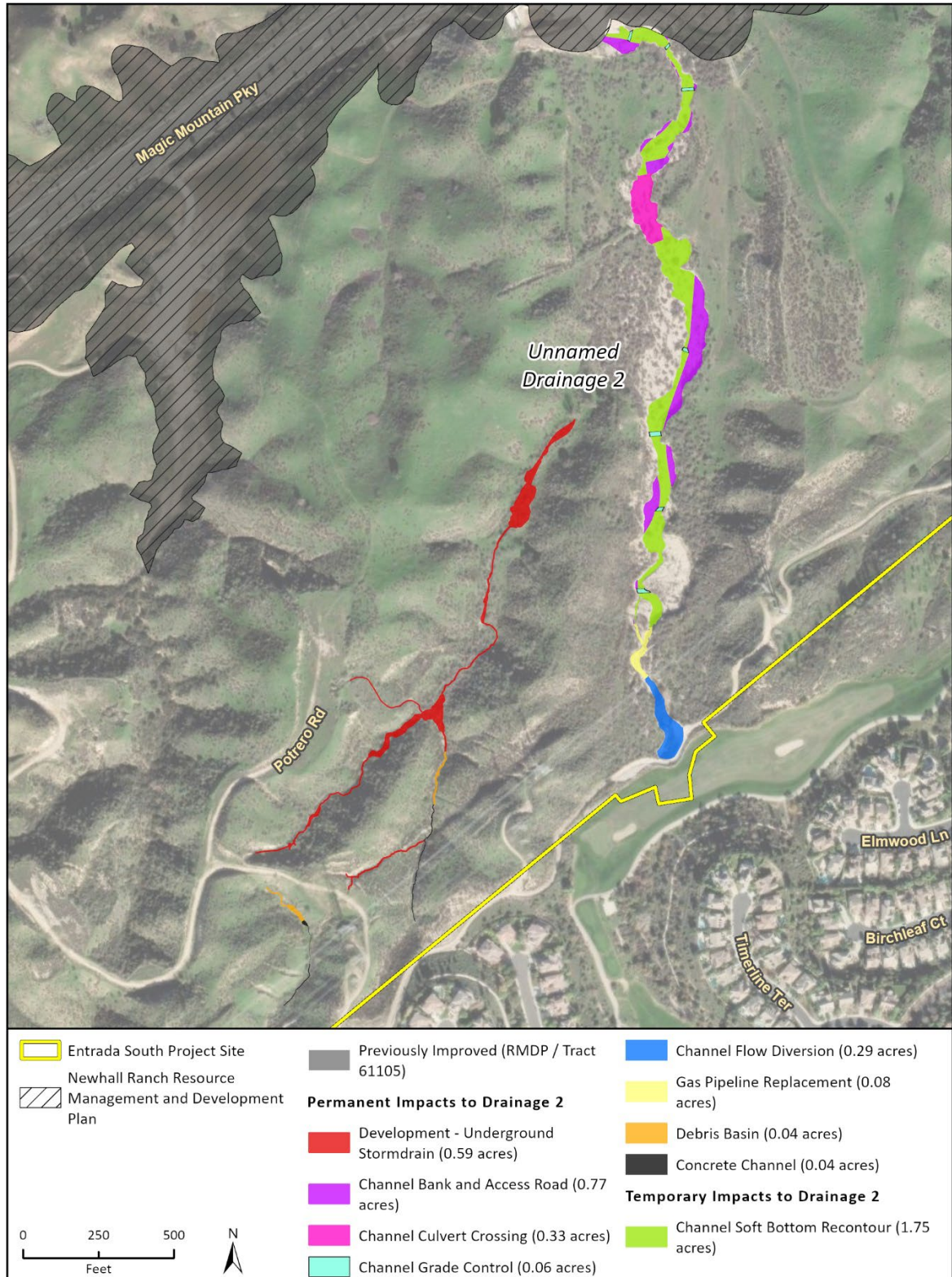
Figure 10. Waters of the State Delineation – Panel F



Imagery provided by Esri and its licensors © 2026.

22-12494 B10
Fig X Jurisdictional Delineation Impacts RWQCB Drainage 1

Figure 11. Impacts to Drainage 1



Imagery provided by Esri and its licensors © 2026.

22-12494 B10
Fig X Jurisdictional Delineation Impacts RWQCB Drainage 2

Figure 12. Impacts to Drainage 2

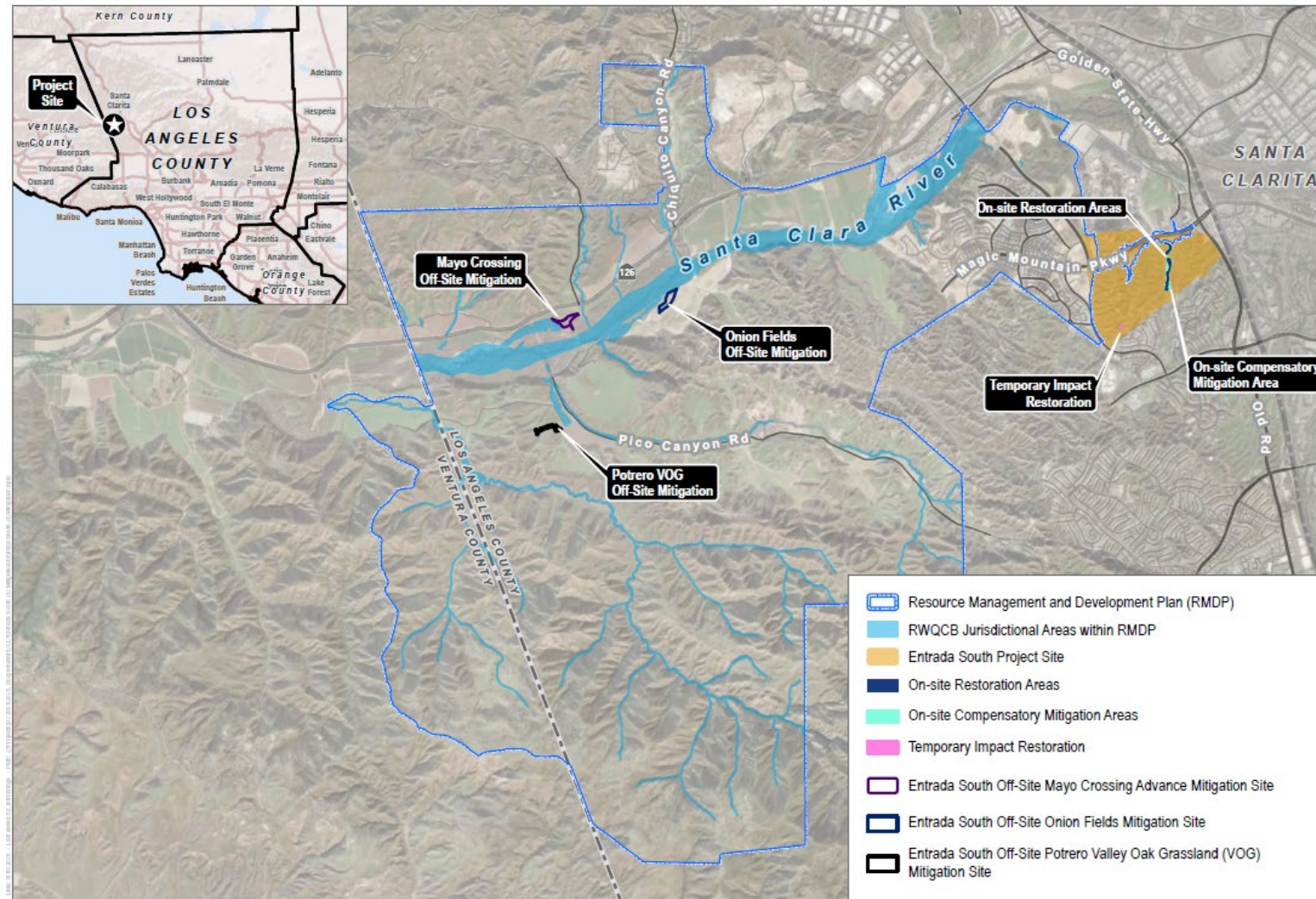


FIGURE 1

Project Location

Waters of the State Habitat Mitigation and Monitoring Plan for the Entrada South Project

Figure 13. Overview of Mitigation Sites

Attachment B
Signatory Requirements

SIGNATORY REQUIREMENTS

*All Documents Submitted In Compliance With This Order
Shall Meet The Following Signatory Requirements:*

1. All applications, reports, or information submitted to the Los Angeles Water Quality Control Board (Los Angeles Water Board) must be signed and certified as follows:
 - a) For a corporation, by a responsible corporate officer of at least the level of vice-president.
 - b) For a partnership or sole proprietorship, by a general partner or proprietor, respectively.
 - c) For a municipality, or a state, federal, or other public agency, by either a principal executive officer or ranking elected official.
2. A duly authorized representative of a person designated in items 1.a through 1.c above may sign documents if:
 - a) The authorization is made in writing by a person described in items 1.a through 1.c above.
 - b) The authorization specifies either an individual or position having responsibility for the overall operation of the regulated activity.
 - c) The written authorization is submitted to the Los Angeles Water Board Staff Contact prior to submitting any documents listed in item 1 above.
3. Any person signing a document under this section shall make the following certification:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Report and Notification Requirements

Copies of this Form: Include a copy of the Project specific Cover Sheet below with your report. Please retain a copy for your records.

Report Submittal Instructions:

1. Check the box on the Report and Notification Cover Sheet next to the report or notification you are submitting.
 - a) **Annual Report:** This report will be submitted annually from the anniversary of Project effective date until a Notice of Project Complete Letter is issued.
 - b) **Project Status Notifications:** Used to notify the Los Angeles Water Board of the status of the Project schedule that may affect Project billing.
 - c) **Conditional Notifications and Reports:** Required on a case-by case basis for accidental discharges of hazardous materials, violation of compliance with water quality standards, notification of in-water work, or other reports.
2. Sign the Report and Notification Cover Sheet and attach all information requested for the Report Type.
3. **Electronic Report Submittal Instructions:**
 - a) Submit signed Report and Notification Cover Sheet and required information via email to: RB4-401Certification@waterboards.ca.gov.
 - b) Include in the subject line of the email: Subject: ATTN: Libby Lee; File No: 26-030, Reg. Measure ID: 464525 Report

Definition of Reporting Terms:

Active Discharge Period: The active discharge period begins with the effective date of this Order and includes all elements of the Project including site construction and restoration, and any Permittee responsible compensatory mitigation construction.

Request for Notice of Completion of Discharges Letter: This request by the Permittee to the Los Angeles Water Board staff pertains to projects that have post construction monitoring requirements, e.g. if site restoration was required to be monitored for 5 years following construction. Los Angeles Water Board staff will review the request and send a Completion of Discharges Letter to the Permittee upon approval. This letter will initiate the post-discharge monitoring period and a change in fees from the annual active discharge fee to the annual post-discharge monitoring fee.

Post-Discharge Monitoring Period: The post-discharge monitoring period begins when all elements of the Project including site construction and restoration, and any Permittee responsible compensatory mitigation construction have taken place. The Post-Discharge Monitoring Period includes continued water quality monitoring of compensatory mitigation monitoring.

Request for Notice of Project Complete Letter: This request by the Permittee to the Los Angeles Water Board staff pertains to projects that have completed construction and/or any post-construction monitoring and achieved performance standards, and no further Project activities are planned. Los Angeles Water Board staff will review the request and send a Project Complete Letter to the Permittee upon approval. Termination of annual invoicing of fees will correspond with the date of this letter.

Effective Date: Date of Order issuance.

Map and Photo Documentation Information:

When submitting maps or photos, please use the following formats.

1. **Map Format Information:** preferred map formats of at least 1:24000 (1" = 2000') detail (listed in order of preference):
 - a. **GIS shapefiles.** The shapefiles must depict the boundaries of all protected areas and extent of aquatic resources impacted. Each shape should be attributed with the extent/type of aquatic resources impacted. Features and boundaries should be accurate to within 33 feet (10 meters). Identify datum/projection used and if possible, provide map with a North American Datum of 1983 (NAD38) in the California Teale Albers projection in feet.
 - b. **Google KML files** saved from Google Maps: My Maps, or Google Earth Pro. Maps must show the boundaries of all project areas and extent/type of aquatic resources impacted. Include URL(s) of maps. If this format is used, include a spreadsheet with the object ID and attributed with the extent/type of aquatic resources impacted.
 - c. **Other electronic format** (CAD or illustration format) that provides a context for location (inclusion of landmarks, known structures, geographic coordinates, or USGS DRG or DOQQ). Maps must show the boundaries of all project areas and extent/type of aquatic resources impacted. If this format is used, include a spreadsheet with the object ID and attributed with the extent/type of aquatic resources impacted.
 - d. Aquatic resource maps marked on paper **USGS 7.5 minute topographic maps** or **Digital Orthophoto Quarter Quads (DOQQ)** printouts. Maps must show the boundaries of all project areas and extent/type of aquatic resources impacted. If this format is used include a spreadsheet with the object ID and attributed with the extent/type of aquatic resources impacted.
2. **Photo-Documentation:** Include a unique identifier, date stamp, written description of photo details, and latitude/longitude (in decimal degrees) or map indicating location of

photo. Successive photos should be taken from the same vantage point to compare pre/post construction conditions.

Project Reporting

A. Annual Report

Report Purpose:

Notify the Los Angeles Water Board staff of Project status during both the active discharge and post-discharge monitoring periods.

When to Submit:

Annual reports shall be submitted each year on the anniversary of Project effective date. Annual reports shall continue until a Notice of Project Complete Letter is issued to the Permittee.

Report Contents:

The contents of the annual report shall include the topics indicated below for each project period. Report contents are outlined in Annual Report Topics below.

During the Active Discharge Period:

- **Topic 1: Construction Summary**
- **Topic 2: Mitigation for Temporary Impacts Status**
- **Topic 3: Compensatory Mitigation for Permanent Impacts Status**

During the Post-Discharge Monitoring Period

- **Topic 1: Mitigation for Temporary Impacts Status**
- **Topic 2: Compensatory Mitigation for Permanent Impacts Status**

B. Annual Reporting Topics

1. Topic 1 – Construction Summary

When to Submit:

With the annual report during the Active Discharge Period

Report Contents:

- Project progress and schedule including initial ground disturbance, site clearing and grubbing, road construction, site construction, and the implementation status of construction storm water best management practices (BMPs¹). If construction has not started, provide estimated start date and reasons for delay.
- Color photos, pre-project and current.
- Map showing general Project progress.
- If applicable:
 - a. Summary of any conditional reports sent during the year such as “Accidental Discharge of Hazardous Material Report” or “Violation of Compliance with Water Quality Standards Report”.
 - b. Copies of revised permits from other agencies.
 - c. Compilation of all water quality monitoring results for the year in a spreadsheet format.

2. Topic 2 – Mitigation for Temporary Impacts Status

¹ Best Management Practices (BMPs) is a term used to describe a type of water pollution or environmental control.

When to Submit:

With the annual report during both the Active Discharge Period and Post-Discharge Monitoring Period.

Report Contents: *(If not applicable, report N/A)*

- Planned date of initiation and map showing locations of mitigation for temporary impacts to waters of the state and all upland areas of temporary disturbance which could result in a discharge to waters of the state.
- If mitigation for temporary impacts has already commenced, provide a map and information concerning attainment of mitigation success.

3. Topic 3 – Compensatory Mitigation for Permanent Impact Status

When to Submit:

With the annual report during both the Active Discharge Period and Post-Discharge Monitoring Report.

Report Contents: *(If not applicable, report N/A)*

Part A – Permittee Responsible

- Planned date of initiation of compensatory mitigation site installation.
- If installation is in progress, a map of what has been completed to date.
- If the compensatory mitigation site has been installed, provide a final map and information concerning attainment of performance standards contained in the compensatory mitigation plan.

Part B – Mitigation Bank or In-Lieu Fee

- Status or proof of purchase of credit types and quantities.
- Include the name of bank/ILF Program and contact information.
- If ILF, location of project and type if known.

Project Status Notifications

A. Commencement of Construction

Report Purpose:

Notify Los Angeles Water Board staff prior to the start of construction.

When to Submit:

Must be received at least seven (7) days prior to start of initial ground disturbance activities.

Report Contents:

- Date of commencement of construction.
- Anticipated date when discharges to waters of the state will occur.
- Project schedule milestones including a schedule for onsite compensatory mitigation, if applicable.

B. Request for Notice of Project Complete Letter

Report Purpose:

Notify Los Angeles Water Board staff that construction and/or post-construction monitoring is complete, or is not required, and no further Project activity is planned.

When to Submit:

Must be received by Los Angeles Water Board staff within thirty (30) days following completion of all Project activities.

Report Contents:

Part A – Project Construction

- Pre- and post-photo documentation of all Project activity sites where the discharge of dredge and/or fill/excavation was authorized.

Part B – Mitigation for Temporary Impacts

- A report establishing that areas of temporary impacts to waters of the state, and upland areas of temporary disturbance which could result in a discharge to waters of the state, have been successfully restored and all identified success criteria have been met. Pre- and post-photo documentation of all restoration sites.

Part C – Permittee Responsible Compensatory Mitigation

- A report establishing that the performance standards outlined in the compensatory mitigation plan have been met.
- Status on the implementation of the long-term maintenance and management plan and funding of endowment.
- Pre- and post-photo documentation of all compensatory mitigation sites.
- Final maps of all compensatory mitigation areas (including buffers).

Part D – Post-Construction Storm Water BMPs

- Date of storm water permit Notice of Termination(s), if applicable.
- Report status and functionality of all post-construction BMPs.

Conditional Notifications and Reports

A. Accidental Discharge of Hazardous Material Report

Report Purpose:

Notifies Los Angeles Water Board staff that an accidental discharge of hazardous material has occurred.

When to Submit:

Within five (5) working days following the date of an accidental discharge. Continue reporting as required by Los Angeles Water Board staff.

Report Contents:

- The report shall include the OES Incident/Assessment Form, a full description and map of the accidental discharge incident (i.e. location, time and date, source, discharge constituent and quality, aerial extent, and photo documentation). If applicable, the OES Written Follow-Up Report may be substituted.
- If applicable, any required sampling data, a full description of the sampling methods including frequency/dates and times of sampling, equipment, locations of sampling sites.

- Locations and construction specifications of any barriers, including silt curtains or diverting structures, and any associated trenching or anchoring.

B. Violation of Compliance with Water Quality Standards Report

Report Purpose:

Notifies Los Angeles Water Board staff that a violation of compliance with water quality standards has occurred.

When to Submit:

The Permittee shall report any event that causes a violation of water quality standards within three (3) working days of the noncompliance event notification to Los Angeles Water Board staff.

Report Contents:

The report shall include: the cause; the location shown on a map; and the period of the noncompliance including exact dates and times. If the noncompliance has not been corrected, include: the anticipated time it is expected to continue; the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance; and any monitoring results if required by Los Angeles Water Board staff.

C. In-Water Work and Diversions Water Quality Monitoring Report

Report Purpose:

Notifies Los Angeles Water Board staff of the completion of in-water work.

When to Submit:

Within three (3) working days following the completion of in-water work. Continue reporting in accordance with the approved water quality monitoring plan.

Report Contents:

As required by the approved water quality monitoring plan.

D. Modifications to Project Report

Report Purpose:

Notifies Los Angeles Water Board staff if the Project, as described in the application materials, is altered in any way or by the imposition of subsequent permit conditions by any local, state, or federal regulatory authority.

When to Submit:

Prior to any alteration or modification of Project activities.

Report Contents:

A description and location of any alterations of Project activities. Identify any Project modifications that will interfere with the Permittee's compliance with the Order. Any alteration may require an Amendment, to be determined by Los Angeles Water Board staff.

E. Transfer of Property Ownership Report

Report Purpose:

Notifies Los Angeles Water Board staff of change in ownership of the Project or Permittee-responsible mitigation area.

When to Submit:

At least 10 working days prior to the transfer of ownership.

Report Contents:

- A statement that the Permittee has provided the purchaser with a copy of this Order and that the purchase understands and accepts:
 - a) the Order's requirements and the obligation to implement them or be subject to administrative and/or civil liability for failure to do so; and
 - b) responsibility for compliance with any long-term BMP maintenance plan requirements in this Order.
- A statement that the Permittee has informed the purchase to submit a written request to the Los Angeles Water Board to be named as the permittee in a revised order.

F. Transfer of Long-Term BMP Maintenance Report

Report Purpose:

Notifies Los Angeles Water Board staff of transfer of long-term BMP maintenance responsibility.

When to Submit:

At least 10 working days prior to the transfer of BMP maintenance responsibility.

Report Contents:

A copy of the legal document transferring maintenance responsibility of post-construction BMPs.

Report and Notification Cover Sheet*

Project: Entrada South Development Project
Permittee: The Newhall Land and Farming Company
Reg. Measure ID: 464525 **Place ID:** 905880

File No: 26-030

Report Type Submitted

Project Reporting

☐ Annual Report

Project Status Notifications

☐ Commencement of Construction
☐ Request for Notice of Project Complete Letter

Conditional Notifications and Reports

☐ Accidental Discharge of Hazardous Material Report
☐ Violation of Compliance with Water Quality Standards Report
☐ In-Water Work/Diversions Water Quality Monitoring Report
☐ Modifications to Project Report
☐ Transfer of Property Ownership Report
☐ Transfer of Long-Term BMP Maintenance Report

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Print Name²

Affiliation and Job Title

Signature

Date

²STATEMENT OF AUTHORIZATION (include if authorization has changed since application was submitted)

I hereby authorize _____ to act in my behalf as my representative in the submittal of this report, and to furnish upon request, supplemental information in support of this submittal.

Permittee's Signature

Date

***This Report and Notification Cover Sheet must be signed by the Permittee or a duly authorized representative and included with all written submittals.**

Alternatives Analysis

The Procedures for Discharges of Dredged or Fill Material to Waters of the State (Procedures) section IV.B.3.a states that the permitting authority must establish that the proposed project alternative is the least environmentally damaging practicable alternative (LEDPA) in light of all potential direct, secondary (indirect), and cumulative impacts on the physical, chemical, and biological elements of the aquatic ecosystem. The State Supplemental Dredge or Fill Guidelines, section 230.10(a) further states that “No discharge of dredge or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences.”

To objectively evaluate each alternative for LEDPA, evaluation criteria are developed, as discussed in the next section.

Evaluation Criteria

For off-site alternative analysis, sites that are under the Permittee's ownership, or control, or be reasonably available for acquisition, are considered. A site that is not presently owned by the Permittee but can reasonably be obtained, used, and managed to fulfill the overall purpose of a proposed activity, can still be considered as a practicable alternative.

Alternatives should consider existing technology available and incorporate the most efficient and least impacting construction methods. Implementation of state-of-the-art technologies should be considered, if applicable. However, alternatives requiring technology that is currently nonexistent or unproven are not considered practicable.

In the context of the Project, Project alternatives were evaluated using the following criteria:

- **Cost:** Cost is analyzed in the context of the overall scope of the Project. The primary metric used to evaluate cost is the development cost per net developable acre. Net developable acreage includes all sellable land, including residential, commercial and sellable public facilities such as schools and fire stations. Sellable land, usually in the form of finished lots ready for construction, is the “product” that the applicant, as a land developer, produces and sells. Vertical construction is performed by others, who buy the lots and build homes, offices and other commercial space for sale to end users. Development costs include all the costs of obtaining the site and making it ready for vertical construction, including land costs, planning, engineering, grading, utilities, infrastructure, etc. Thus, development cost per net developable acre is a scalable metric that captures the relationship between an alternative’s cost and its development potential, or the “product” it yields.
- **Logistics:** Logistics associated with the Project, such as, but not limited to, the placement of facilities within a specified distance to existing conveyance infrastructure,

utilization of existing storage or staging areas, connectivity and/or safety concerns that cannot be overcome.

- Overall Project Purpose: The Overall Project Purpose requires consideration of size (i.e., the amount of development provided, as measured by net developable acreage), location (i.e., the ability to integrate with existing land uses, infrastructure and amenities in the Santa Clarita Valley), configuration (the ability to provide an interconnected community), sustainability (including the ability to provide transportation alternatives that reduce vehicle miles traveled, and the ability to achieve net-zero greenhouse gas emissions), and other relevant factors. Alternatives that meet some, but not all elements of the Overall Project Purpose may be considered in the analysis, but these limitations will be considered when making the overall determination as to whether the alternative is practicable.
- Environmental Impacts: Adverse impacts, both temporary and permanent on the aquatic ecosystem. These impacts are compared to the impacts from the proposed Project to identify LEDPA. To analyze this screening criteria, various environmental databases were consulted including the National Wetlands Inventory online mapper (USFWS 2025a), the Critical Habitat for Threatened and Endangered Species online mapper (USFWS 2025b), and the California Natural Diversity Database (CDFW 2025).

Overall Project Purpose

The Overall Project Purpose is to create a sustainable mixed-use community that provides interconnected housing, commercial and industrial/business park uses, recreational areas, public facilities, and economic opportunities that integrate with existing land uses, amenities and employment opportunities in the Santa Clarita Valley. Creating a sustainable community includes, among other things, configuring development to encourage multi-modal transportation within and among the new land uses and between the new development and existing adjacent land uses, through means including, but not limited to, pedestrian travel, bicycles, and neighborhood electric vehicles. The Overall Project Purpose also includes the following applicable Project objectives defined by the County of Los Angeles, which exercises plenary authority over planning, zoning and the development of land within its jurisdiction, in its Final Supplemental EIR for the Project:

- Incorporate enhanced environmental benefits into the design of the on-site drainage channels to reduce permanent habitat impacts compared to the Initial Project as analyzed in the RMDP/SCP EIS/EIR.
- Implement development of the Entrada South Planning Area consistent with the Santa Clarita Valley Area Plan: *One Valley One Vision 2012*.
- Promote sustainable development by implementing the RMDP/SCP EIS/EIR's greenhouse gas (GHG) mitigation program to achieve net zero GHG emissions for the Entrada South Planning Area.
- Provide additional housing opportunities in furtherance of the goals of the County's Housing Element and the County's Regional Housing Needs Assessment allocation, and which serve the surrounding area by providing housing in a range of unit types, affordability levels and sizes near major employment centers, transportation corridors, and transit centers.

Off-Site Alternatives

The Permittee conducted an evaluation of potential alternative sites within the Project site vicinity that might reasonably be acquired and used to develop land uses comparable to those proposed for the Project and could be less environmentally damaging than developing the Project on the Project site. These potential sites are referred to as off-site alternatives.

This section evaluates seven off-site alternatives to determine whether any could reasonably achieve the Overall Project Purpose. Each site was preliminarily assessed based on its Size, Location, Planning feasibility, and Environmental Impacts. Any alternatives meeting these screening criteria would be carried forward for further analysis. As summarized below, none of the off-site alternatives are capable of meeting the Project's objectives while also reducing environmental impacts.

Site 1: 13136–13284 Sierra Highway

Size: The 160-acre parcel is too small to provide sufficient developable area to meet the Overall Project Purpose.

Location: The site is located in a remote rural area at the northeastern end of the Santa Clara Valley, far from urban uses, amenities, and employment centers. Development would induce leapfrog growth and require substantial extension of utilities and infrastructure.

Planning: Approximately 98% of the site is designated Agriculture and zoned A-1. Nearly the entire site lies within the Santa Clara River Significant Ecological Area (SEA), where development consistent with the Project Purpose is effectively prohibited.

Environmental Impacts: The site lies entirely within the SEA, contains at least six mapped blue-line streams, and supports sensitive biological resources. Impacts from development would be similar to or greater than those at the Project site and may affect species such as coastal California gnatcatcher, California legless lizard, and prairie falcon.

Site 2: Peña Ranch

Size: The 189-acre parcel is too small; only 101 acres lie within Los Angeles County, with the remainder in Ventura County. Development in Ventura County would not support Los Angeles County's housing and economic development goals.

Location: The site is located several miles from existing or planned urban uses. It is surrounded by open space, agriculture, and oil and gas activities, and is not served by paved roads. Leapfrog development and major utility extensions would be required.

Planning: The LA County portions of the site are designated Rural Land 20 and zoned A-2. The Ventura County portions are designated Open Space and subject to Save Open Space and Agricultural Resources (SOAR) voter approval, which is not feasible. Plan amendments for both counties would be required and are not practicable.

Environmental Impacts: Canyon landscapes and vegetation similar to the Project site suggest impacts to habitat and sensitive plant species such as slender mariposa lily and Ojai navarretia would occur.

Site 3: VAC Sierra Highway

Size: The site provides 242 acres, though one 41-acre parcel connects at a single point and is not practically contiguous. The remaining 201 acres could potentially support development.

Location: The site is located in a rural area at the northeastern end of the Valley, far from employment centers and urban amenities. Development would prompt leapfrog growth and require substantial utility extensions.

Planning: The site is designated Rural Land 10 and zoned A-1/A-2, permitting only agricultural and very low-density uses. An Area Plan amendment would be required and is not feasible. The Los Angeles Aqueduct bisects the property, further fragmenting developable areas.

Environmental Impacts: The site contains several blue-line streams and likely supports sensitive species such as coastal California gnatcatcher and California legless lizard. Impacts would be comparable to or greater than those at the Project site.

Site 4: 28499 San Martinez Grande Canyon Road

Size: Although 302 acres in total, the property consists of two non-contiguous parcels (164 and 138 acres) separated by a canyon, preventing development of a connected mixed-use community.

Location: The site is located in a remote area of western Los Angeles County, far from urban land uses. Access would require extending roads and utilities for several miles through rugged terrain.

Planning: The site is designated Rural Land 20 and Rural Land 5, allowing only agriculture and very low-density residential uses. Zoned A-1/A-2. Amendments required to allow urban development are not feasible.

Environmental Impacts: Several blue-line streams and sensitive habitat typical of the region are present. Potential sensitive species include western spadefoot, slender mariposa lily, and Ojai navarretia. Impacts would likely match or exceed those at the Project site.

Site 5: 25933 Sand Canyon Road – Sable Ranch

Size: The site is large enough at approximately 399 acres.

Location: The site is situated in a rural area in the southeastern portion of Santa Clarita, distant from urban centers and similar amenities found near the Project site. Development would constitute leapfrog growth and require major infrastructure extensions.

Planning: The site is designated Open Space under the City's General Plan and zoned OS-A with a Movie Ranch overlay. Urban development is not allowed, and an amendment to the General Plan is not feasible. The entire site lies within the Santa Clara River SEA, which effectively prohibits development.

Environmental Impacts: The site lies entirely within the SEA, a high-priority conservation area supporting sensitive species such as western spadefoot, coastal California gnatcatcher, Crotch's bumblebee, and California legless lizard. Impacts would be substantial.

Site 6: Vasquez Canyon Road – Combs Ranch

Size: The site provides sufficient acreage (approximately 456 acres).

Location: The site is in a remote rural location at the northern edge of Santa Clarita, far from urban amenities. Leapfrog development and substantial utility expansion would be required.

Planning: The site is designated Rural Land 1 and zoned A-1, accommodating only very low-density rural uses. Amendments necessary to allow intense mixed-use development are not feasible.

Environmental Impacts: The site contains multiple blue-line streams and sensitive

biological resources. Species likely include Peirson's morning-glory, western spadefoot, and coastal whiptail. Impacts would be comparable to or greater than those at the Project site.

Site 7: Castaic Mesa

Size: Although 407 acres, 312 acres are now restricted by Spineflower conservation covenants and cannot be developed.

Location: The site is in rural northern Santa Clarita Valley, far from urban land uses and employment centers. Infrastructure extensions would be required, resulting in leapfrog development.

Planning: The site is restricted by a Candidate Conservation Agreement protecting Spineflower habitat across most of the site. Development consistent with the Project Purpose is prohibited.

Environmental Impacts: The site is adjacent to a Spineflower preserve; development would threaten protected Spineflower populations. The site contains at least one blue-line stream and supports sensitive species such as Peirson's morning-glory, short-joint beavertail, and slender mariposa lily. Impacts would be significant.

Off-Site Alternative Summary

None of the off-site alternatives provide a viable or environmentally superior option. Each site is constrained by one or more factors including insufficient size, remote location, inconsistency with adopted land-use plans, or substantial environmental impacts—often equal to or greater than those associated with the Project site. As a result, none of the off-site alternatives are capable of meeting the Overall Project Purpose or represent a practicable or less environmentally damaging alternative.

On-Site Alternatives

Five on-site alternatives have been identified and analyzed: Alternative 1: County-Approved Project, Alternative 2: Full Avoidance (the no-discharge alternative), Alternative 3: Partial Avoidance of Unnamed Drainage 1 and 3, Alternative 4: Initial Project (submitted with the application), and Alternative 5: Proposed Project. The alternatives are evaluated considering the evaluation criteria discussed above.

Alternative 4, Initial Project, describes the Project as analyzed in the RMDP/SCP EIS/EIR and authorized under the Spineflower Conservation Plan approved by CDFW in 2010. Alternative 1, the County-Approved Project, represents a revised version of the Initial Project, with reduced impacts to waters of the state. Alternatives 2, 3 and 5 reflect alternative Project designs that would further reduce impacts compared to Alternative 1.

Alternatives 1, 2, 3 and 4 were evaluated in the Permittee's initial alternatives analysis, submitted with its permit application; Alternative 1 being the Permittee's Preferred Alternative at the time. After reviewing the Permittee's initial alternatives analysis, Regional Board staff requested that the Permittee consider an additional alternative focused on avoidance of the Unnamed Wetland at the downstream end of Unnamed

Drainage 3. The Permittee developed Alternative 5 in response to the Regional Board's request. Alternative 5 would facilitate development similar to Alternative 1 but would entirely avoid impacts to Unnamed Drainage 3 and the Unnamed Wetland by eliminating the commercial development area in and adjacent to the Unnamed Wetland. After evaluating this alternative, the Permittee determined that Alternative 5 is feasible and requested that the Regional Board move forward with Alternative 5 as the Permittee preferred alternative and Proposed Project.

Alternative 1: County-Approved Project

Alternative 1 is a refined version of the Initial Project (Alternative 4) that would reduce impacts to waters of the state and provide additional environmental benefits by stabilizing Unnamed Drainage 2 as a natural, soft-bottomed drainage, rather than converting that drainage to an underground storm drain, while meeting the County's goals for housing and commercial development. Alternative 1 describes the Project as approved by the Los Angeles County Board of Supervisors in November 2025, which would provide a total of 193.5 net developable acres, including 137.1 acres of residential development and 56.4 acres of commercial development.

Alternative 1 would develop a mixed-use community on land already owned by the Permittee, with no need for site acquisition, and is feasible in terms of logistics, available technology, and cost. The site has been re-zoned to support mixed-use development, and the project layout provides sufficient space for residential, commercial, and associated infrastructure consistent with County planning documents. Construction costs (\$1,454,815 per net developable acre), are marginally less (by <0.1 percent) than the Proposed Project and therefore assumed to be reasonable.

Environmentally, Alternative 1 would result in 1.79 acres of temporary and 3.60 acres of permanent impacts to non-wetland and wetland waters of the state—primarily affecting portions of Unnamed Drainages 1, 2, and 3, as well as the Unnamed Wetland.

This alternative accomplishes the overall purpose and objectives of the Project and is practicable. Alternative 1 is less environmentally damaging than the Initial Project (Alternative 4). It preserves and enhances on-site natural resources, particularly in Unnamed Drainage 2. It has approximately 27 percent greater impacts to waters of the state overall than the Permittee's Proposed Project (Alternative 5), with an additional 0.21 acre of permanent impacts to wetland waters of the state and 1.09 acre of permanent impacts to non-wetland waters of the state, all in Unnamed Drainage 3.

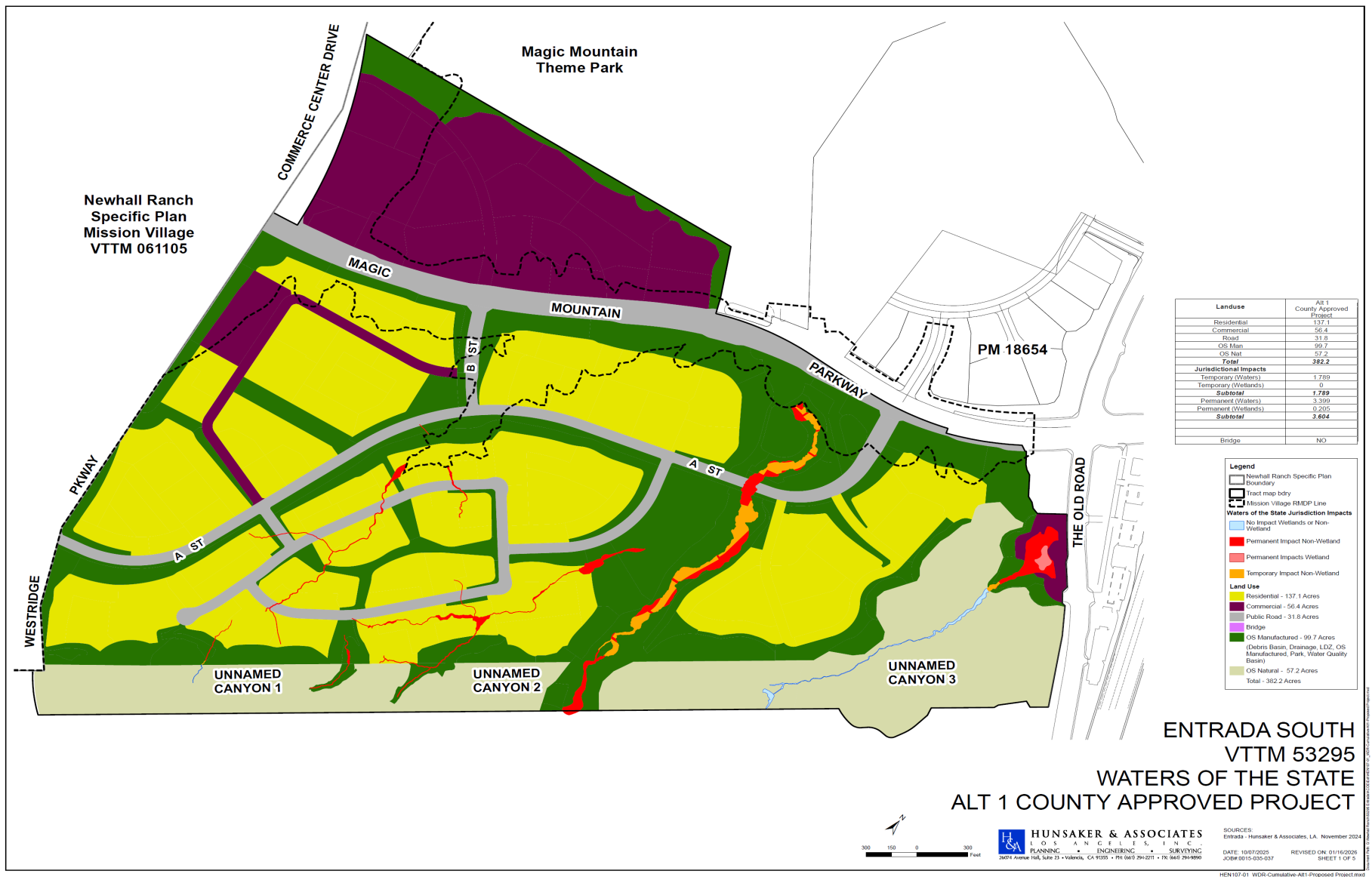


Figure 1. Alternative 1: County-Approved Project

Alternative 2: Full Avoidance of Aquatic Resources

Alternative 2 was designed to provide a scenario that would avoid all temporary and permanent impacts to waters of the state. Under this alternative, the Los Angeles Water Board would not issue WDRs for the Project, and therefore no impacts to the 5.73 acres of waters of the state within the Project site would be authorized. No development would occur within waters of the state.

The alternative would be constructed on land already owned by the Permittee and is feasible in terms of site availability, logistics, zoning consistency, and use of standard construction technology. Costs would be similar to the Proposed Project at \$1,455,450 per acre (marginal reduction of <0.1 percent), and therefore are presumed to be reasonable. Alternative 2 would provide a total of 169.9 net developable acres, including 116.2 acres of residential development and 53.7 acres of commercial development.

Alternative 2 would not meet the Overall Project Purpose, as avoiding all waters would reduce net developable acreage by approximately 11 percent overall (from 190.8 acres to 169.9 acres) and residential acreage by approximately 15 percent (from 137.1 acres to 116.9 acres) compared to the Proposed Project. The avoidance configuration would fragment neighborhood connectivity, limit opportunities for pedestrian, bicycle, and NEV (neighborhood electric vehicle) travel, and force most intra-community travel onto major roads, undermining sustainability and net-zero GHG objectives. It would not achieve the core land-use, housing, economic development, and circulation goals of the Project and would not address the existing degraded condition of Unnamed Drainage 2 caused by hydromodification, and hence does not represent a practicable alternative.

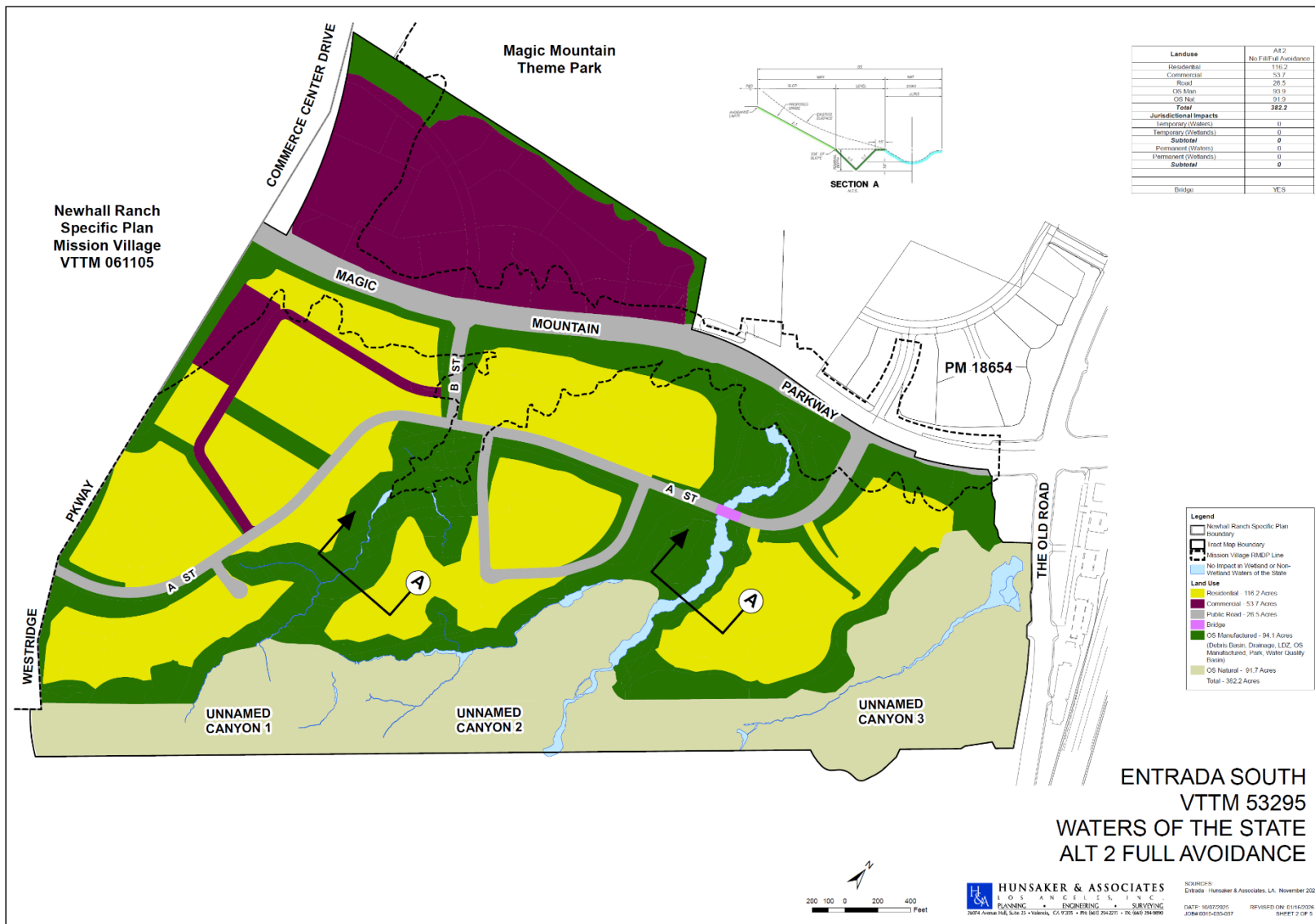


Figure 2. Alternative 2: Full Avoidance

Alternative 3: Partial Avoidance of Unnamed Drainages 1 and 3

Alternative 3 was designed to provide a scenario that would minimize temporary and permanent impacts to waters of the state while still allowing for stabilization and restoration of Unnamed Drainage 2. This Alternative avoids impacts to Unnamed Drainages 1 and 3, and decreases residential and commercial development in comparison to the Proposed Project. Alternative 3 would provide a total of 184.8 net developable acres, including 131.1 acres of residential development and 53.7 acres of commercial development.

This Alternative substantially reduces residential and commercial development and prevents the Project from meeting the Overall Project Purpose of creating a mixed-use, interconnected community. Alternative 3 reduces net developable acreage by 3.1 percent compared to the Proposed Project, i.e. from 190.8 acres to 184.8 acres. This includes reducing the residential acreage by approximately 4.4 percent (6 acres). Due to the constraints of County standards that limit developments served by a single point of access to a maximum of 75 residential units, Alternative 3's configuration would result in a reduction of 235 homes, or 14.9% of the 1,574 homes for which the Project was designed.

In addition, Alternative 3 would reduce interior neighborhood interconnectivity, hamper emergency access, decrease walkability, limit opportunities for pedestrian, bicycle, and NEV travel, and result in increased community fragmentation. Although Alternative 3 meets minimum Los Angeles County requirements for emergency access, fragmentation will eliminate interior roadways, paths and infrastructure in the vicinity of Unnamed Drainage 1, which are necessary to connect neighborhoods within the Project site and provide multiple routes for ingress and egress from interior areas.

The use of bridges to increase connectivity is not a feasible solution in this case because the roadways eliminated by the avoidance of Unnamed Drainage 1 do not simply cross the drainage; one of them parallels the drainage (east of, and parallel to, "A" Street) for most of its length. This road lies within the area where construction would require placement of fill within the jurisdictional waters at the bottom of the canyon in order to support engineered slopes and development pads. Replacing the entire length of this road with an elevated roadway is not logistically feasible because it would overlie an unstable canyon bottom subject to flooding and geotechnical instability, and would be prohibitively expensive. Alternatively, relocating the road with an alternative configuration to promote access would sacrifice even more residential development, further impacting neighborhood contiguity and density. This is because avoiding fill of Unnamed Drainage 1 would require development to be set back far enough that engineered slopes could be constructed in the Unnamed Drainage 1 canyon without placing fill in the jurisdictional waters at the canyon bottom. Even if practicable, the use of bridges would not address the fire risks and other issues created by retaining Unnamed Drainage 1 in an undeveloped condition, creating an extensive additional

urban-wildlands boundary within the Project site. Therefore, bridge construction or similar methods to increase neighborhood connectivity would not render the alternative practicable.

Alternative 3 would be built entirely on applicant-owned land, is compatible with existing zoning, uses similar construction technology as the Proposed Project, and has a cost of \$1,459,363 per net developable acre (a marginal increase of approximately 0.2 percent relative to the Proposed Project).

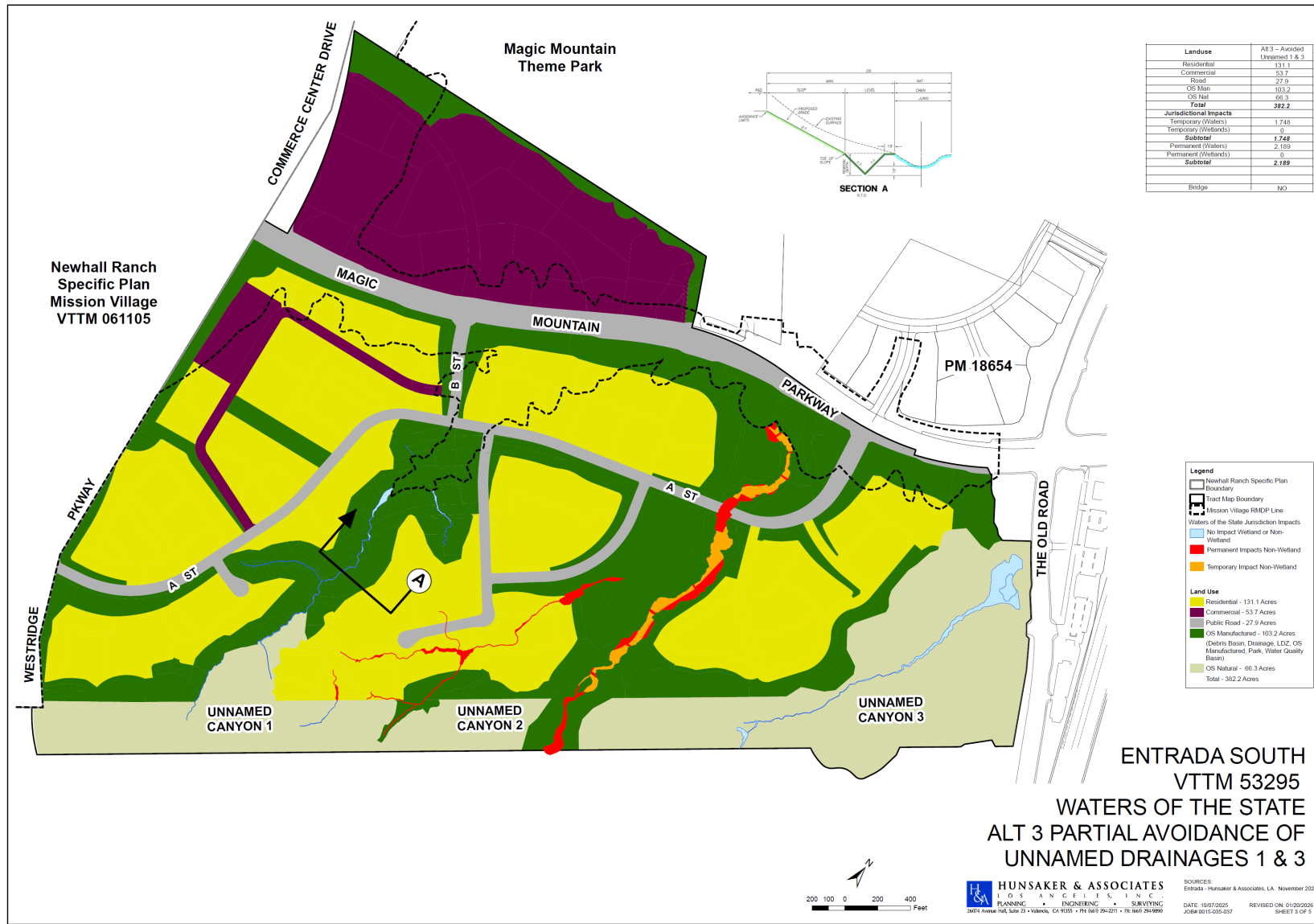
Alternative 3 would reduce impacts to waters of the state by approximately 7.5 percent compared to the Proposed Project, resulting in 3.94 total acres of impact (1.75 acres temporary and 2.19 acres permanent) and, like the Proposed Project, avoiding all impacts to wetland waters of the state. Out of the reduced impacts, 0.31 acres are in the Unnamed Drainage 1. As discussed below, Unnamed Drainage 1 currently exhibits limited resource values due to impacts that have occurred upstream and downstream of the Project site, and within the site as part of RMDP activities. Project implementation would further reduce the watershed of this feature, even if fill of the drainage were avoided, leaving an isolated stream reach with limited habitat value, bounded by development on all sides.

Unnamed Drainage 1 would have a reduced watershed area limited primarily to manufactured slopes on either side of the channel, which would be stabilized with landscaping, irrigated to minimize fire risk and drained with bench drains. The urban development area above these slopes would not drain to drain to Unnamed Drainage 1 but to storm drains. The Unnamed Drainage 1 watershed area upstream of the Project site was previously developed by the Westridge project and is now limited to a manufactured slope to the immediate south of the Project site boundary.

The downstream (northern) portion of Unnamed Drainage 1 within the Project site was previously filled during the extension of Magic Mountain Parkway through the site as part of RMDP activities (see RMDP boundary on attached figure depicting Alternative 3). When the avoided portion of Unnamed Drainage 1 reached the RMDP boundary within the Project site, it would discharge into a debris basin before entering an underground storm drain. This storm drain would convey flows northward through the remainder of the Project site, under Magic Mountain Parkway and eventually into an engineered concrete-lined channel located offsite, which eventually discharges to the Santa Clara River.

Additionally, in order to comply with County fire safety standards, the avoided area on either side of Unnamed Drainage 1 would be subject to fuel modification, extending approximately to the lateral limits of waters of the state. This activity, consisting of vegetation removal and thinning, would reduce any habitat values present within the drainage.

Although Alternative 3 lessens aquatic impacts, it does not achieve the required land-use, housing, economic development, and connectivity objectives and therefore does not meet the Overall Project Purpose.



Alternative 4: Initial Project

This alternative is the Initial Project that was described in the RMDP EIS/EIR and Final Additional Environmental Analysis for the RMDP/SCP (CDFW 2017)¹. This alternative is analyzed here primarily to highlight ways in which the Alternative 1: County-Approved Project and current Proposed Project were modified from the Initial Project.

Alternative 4 would provide a total of 208.5 net developable acres, including 161.1 acres of residential development and 47.4 acres of commercial development. Although Alternative 4 would provide mixed-use development generally consistent with County plans, it meets the Overall Project Purpose to a lesser degree because commercial development would be reduced by 12 percent compared to the Proposed Project, limiting job creation, local services, and economic opportunities. It would also not incorporate the enhanced environmental protections for on-site drainage channels, as in the Proposed Project. In particular, Alternative 4 would involve permanent impacts to substantially all Unnamed Drainage 2 by converting it to an underground storm drain, rather than reconstructing and preserving it as a natural, soft-bottomed drainage.

Alternative 4 would occur entirely on applicant-owned land, is compatible with surrounding land uses, uses standard construction technology, and has costs comparable to the Proposed Project, making it reasonable from a practicability standpoint.

Alternative 4 would cause substantially greater impacts to waters of the state relative to both the Alternative 1 and the Proposed Project (Alternative 5), resulting in 5.25 acres of permanent impact and 0.04 acres of temporary impact. Alternative 4 would have 52 percent greater permanent impacts than the Proposed Project. It would also not provide an opportunity to reduce permanent drainage impacts and provide environmental enhancements, particularly within Unnamed Drainage 2, as required by the Overall Project Purpose.

Alternative 4 achieves Project objectives to a lesser degree and is not less environmentally damaging than the Proposed Project.

¹ County-Approved Project (Alternative 1) is the result of minor changes and refinements to this Alternative (Alternative 4). The changes were made to increase environmental protections for jurisdictional waters and associated biological resources.

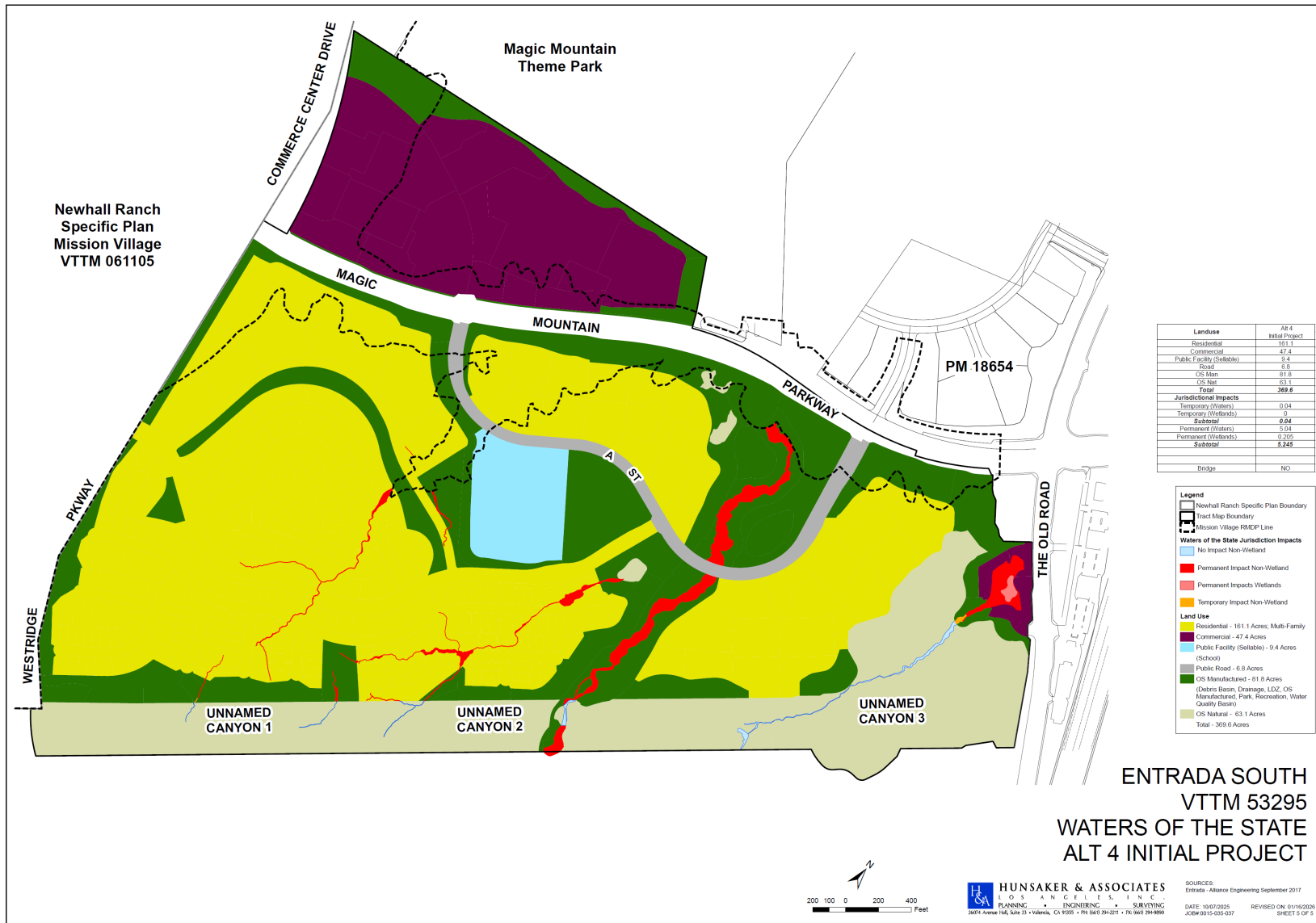


Figure 4. Alternative 4: Initial Project

Alternative 5: Proposed Project

Alternative 5 was created to evaluate a scenario that would avoid impacts to the Unnamed Wetland located at the upstream end of Unnamed Drainage 3, which is a special aquatic site as defined in Section 230.41 of the state Supplemental Dredge or Fill Guidelines. Under Section 230.10(a)(3) of the Guidelines, if a proposed activity that would involve a discharge to a special aquatic site is not water-dependent, practicable alternatives that do not require a discharge to a special aquatic site are presumed to be available. The Project is not water dependent. After evaluating Alternative 5, the Permittee determined that it is feasible and requested that the Regional Board move forward with consideration of Alternative 5 as the Permittee's Proposed Project.

Alternative 5 would be similar to Alternative 1: County-Approved Project except that it would avoid all impacts to Unnamed Drainage 3 and the Unnamed Wetland by eliminating the commercial development in and adjacent to the wetland at the eastern edge of the Project site next to The Old Road. Fill of waters within Unnamed Drainage 1 and Unnamed Drainage 2 would be the same as for Alternative 1. By avoiding all wetland impacts, Alternative 5 would reduce impacts to wetland waters of the state by 0.21 acres, as compared to Alternative 1. It would reduce impacts to non-wetland waters of the state by 1.09 acres by avoiding all non-wetland waters within Unnamed Drainage 3, as compared to Alternative 1. Total impacts to waters of the state under Alternative 5 would be 2.51 acres of permanent impacts and 1.75 acres of temporary impacts, compared to 3.60 acres of permanent impacts and 1.79 acres of temporary impacts for Alternative 1.

Alternative 5 would provide a total of 190.8 net developable acres, including 137.1 acres of residential development and 53.7 acres of commercial development. Total net developable acreage would be reduced by 2.7 acres, or 1.4 percent, compared to Alternative 1: County-Approved Project. The residential development acreage would be the same as Alternative 1. Alternative 5 would reduce commercial development by 2.7 acres, or 4.8 percent, compared to Alternative 1, but this commercial development area is located at the perimeter of the Project site and is served by The Old Road, an existing arterial roadway outside the Project site, and not directly connected to other infrastructure and development within the Project site. Thus, it is not intended primarily as a Project neighborhood-serving commercial use, and its elimination would not affect the circulation system, drainage system or other infrastructure within the Project site. Eliminating this development therefore would have minimal effect on neighborhood connectivity, walkability and community amenities and other objectives related to the Overall Project Purpose.

Because residential development would remain unchanged under Alternative 5 compared to Alternative 1, this alternative would still achieve the County's goals for housing, and because the circulation and neighborhood configuration within the balance of the site would remain unchanged, it would not limit neighborhood interconnectivity,

hamper emergency access, decrease walkability, limit opportunities for pedestrian, bicycle, and NEV travel, or result in increased community fragmentation. In addition, Alternative 5 would meet the objective of incorporating enhanced environmental benefits into the design of the on-site drainage channels, including the stabilization and enhancement of Unnamed Drainage 2, and would reduce permanent habitat impacts compared to Alternative 4: Initial Project as analyzed in the RMDP/SCP EIS/EIR to an even greater extent than Alternative 1.

Alternative 5 would be built entirely on applicant-owned land, is compatible with existing zoning, uses similar construction technology as the Proposed Project, and has a cost of \$1,455,884 per net developable acre, which is high but essentially the same Alternative 1 (difference of \$1,069 per net developable acre, or <0.1 percent) and presumed to be reasonable.

Alternative 5 would reduce permanent impacts to waters of the state by approximately 30 percent compared to Alternative 1 and would reduce total impacts by approximately 20 percent, resulting in 4.26 total acres of impact (1.75 acres temporary and 2.51 acres permanent) while avoiding all impacts to wetland waters of the state.

Alternative 5 significantly lessens aquatic impacts compared to Alternative 1 and Alternative 4: Initial Project, avoids impacts to special aquatic sites and achieves the required land-use, housing, economic development, and connectivity objectives to meet the Overall Project Purpose.

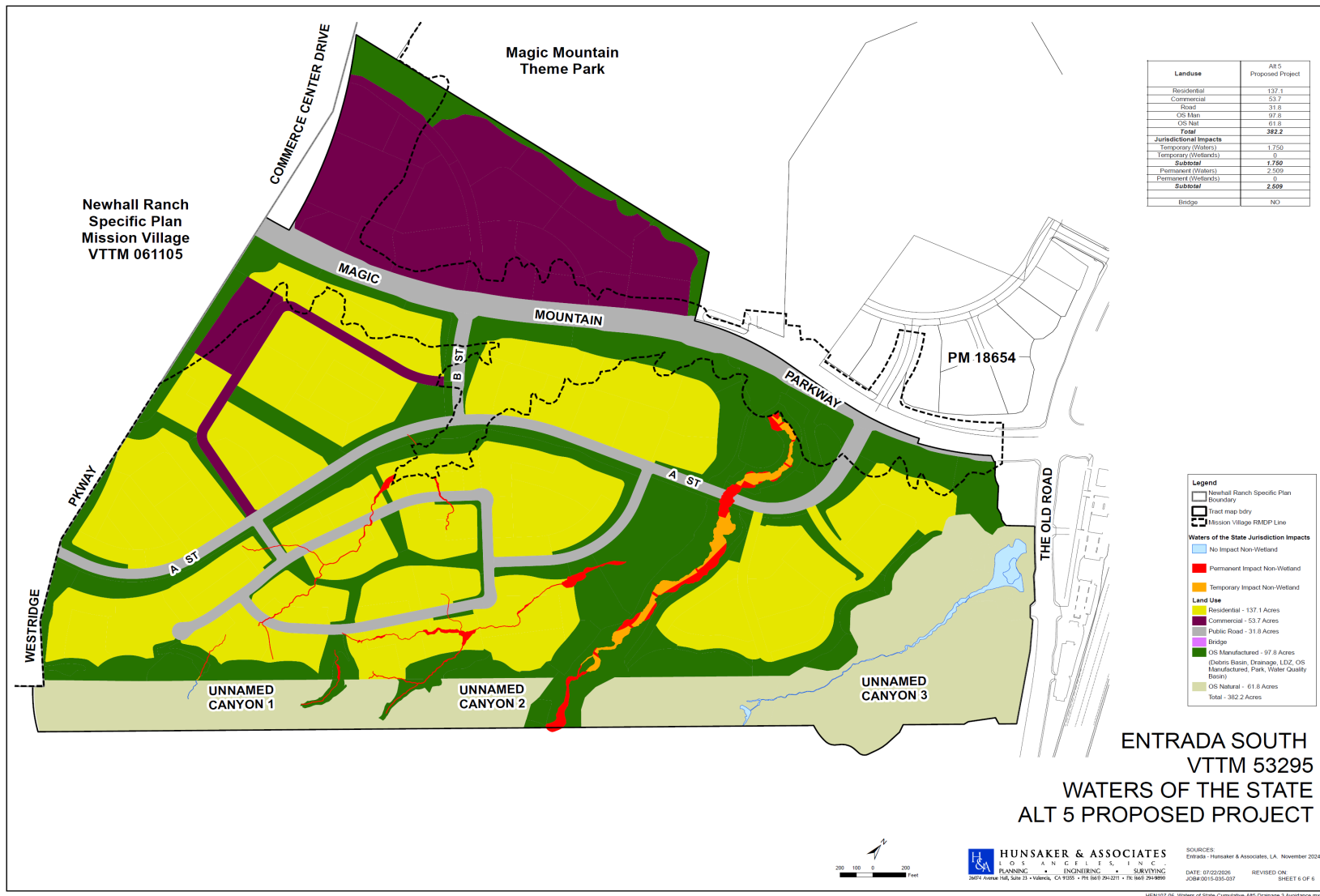


Figure 5. Alternative 5: Proposed Project

Table 1. Comparison of On-Site Alternatives

Category	Alternative 1: County- Approved Project	Alternative 2: Full Avoidance	Alternative 3: Partial Avoidance	Alternative 4: Initial Project	Alternative 5: Proposed Project
Overall Project Purpose	Provides an interconnected mixed-use community with substantial residential and commercial development.	Avoidance of all aquatic resources reduces developable acreage and prevents compact, connected, mixed-use development.	Reduced residential/commercial acreage; infeasible roadway connections prevent creation of an integrated community.	Provides mixed-use development but lacks enhanced drainage protections and reduces commercial acreage compared to Alternative 5.	Provides an interconnected mixed-use community with substantial residential and commercial development.
Logistics & and Cost	Compatible with land use plans and zoning; cost similar to Proposed Project at \$1,454,815 per acre.	Compatible with surrounding land uses; cost similar to Proposed Project at \$1,455,450/acre.	Meets land-use and zoning requirements; slightly higher cost than Proposed Project at \$1,459,363/acre.	Compatible with zoning; costs similar to Proposed Project.	Compatible with surrounding land uses; cost practicable at \$1,455,884/acre.
Environmental Impacts	1.79 acres temporary + 3.60 acres permanent impacts; reduced impacts compared to Initial Project but 27% higher than Alternative 5.	No temporary or permanent impacts to waters of the state.	1.75 acres temporary + 2.19 acres permanent impacts; 7.5% reduction compared to Alternative 5.	0.04 acres temporary + 5.25 acres permanent impacts; 52% increase in permanent impacts compared to Alternative 5.	1.75 acres temporary + 2.51 acres permanent impacts; 20% reduction compared to Alternative 1.

Category	Alternative 1: County- Approved Project	Alternative 2: Full Avoidance	Alternative 3: Partial Avoidance	Alternative 4: Initial Project	Alternative 5: Proposed Project
Conclusion	Practicable; achieves Overall Project Purpose; not the least environmentally damaging among practicable options.	Avoids all impacts but reduces development and connectivity. Does not meet Overall Project Purpose and therefore is not practicable.	Reduces aquatic impacts but does not meet project purpose due to reduced development and lack of feasible roadway connectivity. Does not meet Overall Project Purpose and therefore is not practicable.	Meets fewer project objectives and increases impacts to waters compared to other alternatives. Meets overall project purpose to a lesser degree and is not the least environmentally damaging among practicable options.	Practicable; achieves the Overall Project Purpose to a similar extent as Alternative 1; least environmentally damaging practicable alternative ; recommended project.

Conclusion

The State Supplemental Dredge or Fill Guidelines provide that the permitting authority may issue a permit only for a project that is the LEDPA. As summarized in Table 1, this analysis concludes that Alternatives 2 and 3 are not practicable and therefore cannot be the LEDPA. Alternatives 1, 4 and 5 are practicable alternatives. Among these practicable alternatives, Alternative 5, the Permittee's current Proposed Project, has the least impacts to waters of the state by a significant margin, particularly with respect to permanent impacts, as depicted in Figure 7, below. In addition, Alternative 5 is the only one of the practicable alternatives that would avoid impacts to special aquatic sites. Therefore, Alternative 5 is the LEDPA.

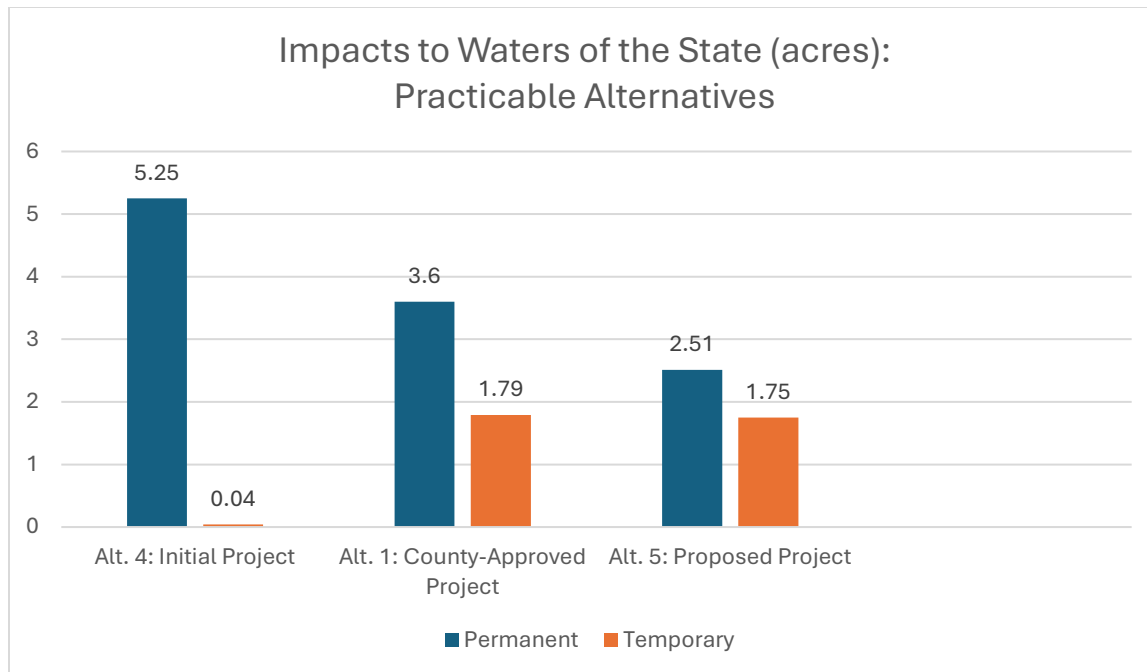


Figure 6. Impacts to Waters of the State for Practicable Alternatives