City of Rolling Hills INCORPORATED JANUARY 24, 1957

2 PORTUGUESE BEND ROAD
ROLLING HILLS, CA 90274
(310) 377-1521

AGENDA | **CITY COUNCIL** | **CITY OF ROLLING HILLS**
Regular City Council Meeting | **Monday, May 23, 2022** | **7:00 PM**

The meeting agenda is available on the City's website. The City Council meeting will be live-streamed on the City's website. Both the agenda and the live-streamed video can be found here: https://www.rolling-hills.org/government/agenda/index.php

Members of the public may submit written comments in real-time by emailing the City Clerk's office at cityclerk@cityofrh.net. Your comments will become part of the official meeting record. You must provide your full name, but please do not provide any other personal information that you do not want to be published.

Recordings to City Council meetings can be found here: https://www.rolling-hills.org/government/agenda/index.php

Next Resolution No. 1300 *Next Ordinance No. 376*

1. CALL TO ORDER

2. ROLL CALL

3. PLEDGE OF ALLEGIANCE

4. PRESENTATIONS/PROCLAMATIONS/ANNOUNCEMENTS

5. BLUE FOLDER ITEMS (SUPPLEMENTAL)

Blue folder (supplemental) items are additional back up materials to administrative reports, changes to the posted agenda packet, and/or public comments received after the printing and distribution of the agenda packet for receive and file.

6. PUBLIC COMMENT ON NON-AGENDA ITEMS

*This is the appropriate time for members of the public to make comments regarding items**not** listed on this agenda. Pursuant to the Brown Act, no action will take place on any items not on the agenda.*

7. CONSENT CALENDAR

Business items, except those formally noticed for public hearing, or those pulled for discussion are assigned to the Consent Calendar. The Mayor or any Councilmember may request that any Consent Calendar item(s) be removed, discussed, and acted upon separately. Items removed from the Consent Calendar will be taken up under the "Excluded Consent Calendar" section below. Those items remaining on the Consent Calendar will be approved in one motion. The Mayor will call on anyone wishing to address the City Council on any Consent Calendar item on the agenda, which has not been pulled by Councilmembers for discussion.

7.A. APPROVE AFFIDAVIT OF POSTING FOR THE CITY COUNCIL REGULAR MEETING OF MAY 23, 2022

RECOMMENDATION: Approve.
CL_AGN_220523_CC_AffidavitofPosting.pdf

7.B. APPROVE MOTION TO READ BY TITLE ONLY AND WAIVE FURTHER READING OF ALL ORDINANCES AND RESOLUTIONS LISTED ON THE AGENDA
RECOMMENDATION: Approve.

7.C. APPROVE THE FOLLOWING CITY COUNCIL MINUTES: MAY 9, 2022
RECOMMENDATION: Approve as presented.
CL_MIN_220509_CC_F.pdf

7.D. PAYMENT OF BILLS
RECOMMENDATION: Approve as presented.
CL_AGN_220523_PaymentOfBills.pdf

7.E. REPUBLIC SERVICES RECYCLING TONNAGE REPORT FOR APRIL 2022.
RECOMMENDATION: Receive and file.
CL_AGN_220523_Rolling Hills YTD Tonnage Report.pdf

7.F. APPROVE COUNTY OF LOS ANGELES DEPARTMENT OF AGRICULTURAL COMMISSIONER/WEIGHTS AND MEASURES FY 2022/2023 PEST CONTROL AGREEMENT NO. 779 FOR PEST CONTROL SERVICES.
RECOMMENDATION: Approve as presented.
CL_AGN_220523_CC_LA_Co.PestControlAgreemtNo.779.pdf

7.G. APPROVE AND AUTHORIZE THE CITY MANAGER TO EXECUTE A PROFESSIONAL SERVICES AGREEMENT WITH BOLTON ENGINEERING CORPORATION TO PERFORM A TOPOGRAPHIC SURVEY AT THE CITY HALL CAMPUS TO SUPPORT THE IMPROVEMENTS REQUESTED BY THE NEEDS OF SENIOR COMMITTEE
RECOMMENDATION: Approve as presented.
CL_AGN_220509_Bolton_CHCampus_SurveyProposal.pdf
CA_AGR_220518_PSA_BoltonEng_TopographicSurvey.pdf

7.H. PENINSULA EMERGENCY WATERSHED MANAGEMENT PROJECT (EWMP) RESPONSE TO REGIONAL BOARD COMMENTS
RECOMMENDATION: Receive and file.
PVP EWMP Cover Letter (Mass-Based Approach) 22.05.13.pdf
PVP EWMP Response to RB Comments Table 22.05.13.pdf
PVP EWMP 22.05.13.pdf

7.I. APPROVE ROLLING HILLS COMMUNITY ASSOCIATION'S APPLICATION TO LOS ANGELES COUNTY DEPARTMENT OF PUBLIC HEALTH FOR REPLACEMENT OF SEPTIC TANK SERVING THE MAIN GATE AND AUTHORIZE CITY MANAGER TO SIGN
RECOMMENDATION: Approve as presented.
CL_AGN_220523_RHCA_LACoDPH_Application_Septic.pdf
CL_AGN_220523_RHCA_GeoTech_Septic.pdf

7.J. ACCEPT EMERGENCY STORM DRAIN REPAIR AT 1 MIDDLERIDGE LANE

NORTH AS COMPLETE, FILE NOTICE OF COMPLETION, AND RELEASE RETENTION AFTER 30 DAY LIEN PERIOD TO EC CONSTRUCTION
RECOMMENDATION: Approve as presented.
PW_STW_220303_SDRepair_1MiddleridgeLaneN.pdf
PW_STW_220418_MiddleridgeLaneN_INV 19092_revised.pdf
PW_STW_220430_MiddleridgeLaneN_Inv 19111_Retention.pdf
PW_STW_220418_MiddleridgeLaneN_CP_Release.pdf

7.K. ADOPT RESOLUTION NO. 1299 ACCEPTING CALRECYCLE SB1383 GRANT
RECOMMENDATION: Approve as presented.
Revised 1383 Award RFA 001.pdf
Exhibit A: 2022Jan3SB1383LocalAssistTermsConditions.pdf
Exibit B: 2022Apr25ProcsReqsAmended.pdf
ResolutionNo1288_SB1383_Grant_F_E.pdf
ResolutionNo1299_CalRecycle_SB1383_GrantAcceptance.pdf

7.L. REPORT BY BUDGET/AUDIT/FINANCE COMMITTEE ON MEETING HELD ON MAY 9, 2022
RECOMMENDATION: Receive and File

7.M. ADOPT RESOLUTION NO. 1298 MEMORIALIZING A REDUCTION IN THE SELF-INSURANCE FUND RESERVES FROM $500,000 TO $250,000
RECOMMENDATION:

Approve as presented.

ResolutionNo1298_AdministrativeFinancialPolicy.pdf
FN_POL_220518_AdminProcedures_BudgetDebtPolicies.pdf

7.N. UPDATE ON RESTRICTED TRANSPORTATION FUND PROJECTS
RECOMMENDATION: Receive and file.

8. EXCLUDED CONSENT CALENDAR ITEMS

9. COMMISSION ITEMS

10. MATTERS FROM THE CITY COUNCIL

10.A. DISCUSS 2022 SCE RELIABILITY REPORT AND WILDFIRE DETECTION CAMERAS ON THE PENINSULA (DIERINGER)
RECOMMENDATION: None.

10.B. DISCUSS EXISTING CELLULAR SERVICE ISSUES (BLACK)
RECOMMENDATION: None.

11. BUDGET WORKSHOP

11.A. CITY COUNCIL FISCAL YEAR 2022-23 BUDGET WORKSHOP
RECOMMENDATION: Review the proposed Fiscal Year 2022/23 budget and provide staff with comments and direction.
CL_AGN_220523_FY2023_Revenue Budget Recommendations.pdf

CL_AGN_220523_FY2023_Recommended Budget_General Fund Exp.pdf
CL_AGN_220523_FY2023 Summary of Sources and Uses of Funds_General Fund.pdf
CL_AGN_220523_Twelve Year History_ Rev Exp and Reserves.pdf
CL_AGN_FY22-23_OptionsToCloseBudgetDeficit_v2.pdf
CL_AGN_220523_FY2023 Recommended Budget - Other Funds.pdf

12. NEW BUSINESS

12.A. PRESENTATION OF EDUCATIONAL VIDEOS ON FIRE FUEL MANAGEMENT IN THE CANYON; RECOGNIZE LEAD BLOCK CAPTAIN GENE HONBO, BLOCK CAPTAIN DEBRA SHRADER, AND LOS ANGELES COUNTY FIRE DEPARTMENT FORESTRY DIVISION TREVOR MOORE FOR THEIR LEADERSHIP IN COMPLETING THE PROJECT; AND DIRECT STAFF TO DISSEMINATE THE VIDEOS THROUGH THE BLOCK CAPTAIN PROGRAM.
RECOMMENDATION: Approve as presented.

12.B. APPROVE AMENDED PROFESSIONAL SERVICES AGREEMENT WITH CHAMBERS GROUP TO PREPARE A CEQA DOCUMENT FOR THE 6TH CYCLE HOUSING ELEMENT TO ADDRESS COMMENTS FROM THE DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDATION: Authorize the preparation of a contract amendment approved to form by the City Attorney in a not to exceed amount of $60,000; and authorize the City Manager to execute such an agreement.
Agreement for Planning Services - Chambers-EXECUTED.pdf

12.C. ADOPT RESOLUTIONS NOS. 1295 AND 1296 PERTAINING TO A GENERAL MUNICIPAL ELECTION CONSOLIDATED WITH THE STATEWIDE GENERAL ELECTION TO BE HELD ON TUESDAY, NOVEMBER 8, 2022
RECOMMENDATION:

Adopt Resolution Nos. 1295 and 1296 pertaining to the General Municipal Election to be held on November 8, 2022 as presented.

ResolutionNo1295_CallElection2022_CountyServices.pdf
ResolutionNo1296_EstablishRegulations_CandidateStatement.pdf

13. PUBLIC HEARINGS

13.A. SUBMITTAL OF "ADOPTION DRAFT" 2021-2029 ROLLING HILLS HOUSING ELEMENT TO HCD
RECOMMENDATION: Authorize staff to submit the revised Draft Housing Element to HCD for their second review, along with the responses to HCD's comments.
A. April 11, 2022 Comment letter from HCD
B. May 9, 2022 City Responses to HCD Comments
C. Tracked Change Adoption Draft Housing Element

14. MATTERS FROM STAFF

15. RECESS TO CLOSED SESSION

16. RECONVENE TO OPEN SESSION

17. ADJOURNMENT

Next regular meeting: Monday, June 13, 2022 at 7:00 p.m. in the City Council Chamber, Rolling Hills City Hall, 2 Portuguese Bend Road, Rolling Hills, California, 90274.

Notice:

Public Comment is welcome on any item prior to City Council action on the item.

Documents pertaining to an agenda item received after the posting of the agenda are available for review in the City Clerk's office or at the meeting at which the item will be considered.

In compliance with the Americans with Disabilities Act (ADA), if you need special assistance to participate in this meeting due to your disability, please contact the City Clerk at (310) 377-1521 at least 48 hours prior to the meeting to enable the City to make reasonable arrangements to ensure accessibility and accommodation for your review of this agenda and attendance at this meeting.

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 7.A
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH,**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **APPROVE AFFIDAVIT OF POSTING FOR THE CITY COUNCIL REGULAR MEETING OF MAY 23, 2022**

DATE: **May 23, 2022**

BACKGROUND:
None.

DISCUSSION:
None.

FISCAL IMPACT:
None.

RECOMMENDATION:
Approve.

ATTACHMENTS:
CL_AGN_220523_CC_AffidavitofPosting.pdf

Administrative Report

7.A., **File #** 1206 **Meeting Date**: 05/23/2022

To: MAYOR & CITY COUNCIL

From: Christian Horvath, City Clerk

TITLE

APPROVE AFFIDAVIT OF POSTING FOR THE CITY COUNCIL REGULAR MEETING OF MAY 23, 2022

EXECUTIVE SUMMARY

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) SS
CITY OF ROLLING HILLS)

AFFIDAVIT OF POSTING

In compliance with the Brown Act, the following materials have been posted at the locations below.

Legislative Body	City Council	
Posting Type	Regular Meeting Agenda	
Posting Location	2 Portuguese Bend Road, Rolling Hills, CA 90274 City Hall Window	
Meeting Date & Time	May 23, 2022	7:00pm Open Session

As City Clerk of the City of Rolling Hills, I declare under penalty of perjury, the document noted above was posted at the date displayed below.

Christian Horvath, City Clerk

Date: May 19, 2022

Agenda Item No.: 7.B
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH,**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **APPROVE MOTION TO READ BY TITLE ONLY AND WAIVE FURTHER READING OF ALL ORDINANCES AND RESOLUTIONS LISTED ON THE AGENDA**

DATE: **May 23, 2022**

BACKGROUND:
None.

DISCUSSION:
None.

FISCAL IMPACT:
None.

RECOMMENDATION:
Approve.

ATTACHMENTS:

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 7.C
Mtg. Date: 05/23/2022

TO: HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL

FROM: CHRISTIAN HORVATH,

THRU: ELAINE JENG P.E., CITY MANAGER

SUBJECT: APPROVE THE FOLLOWING CITY COUNCIL MINUTES: MAY 9, 2022

DATE: May 23, 2022

BACKGROUND:
None.

DISCUSSION:
None.

FISCAL IMPACT:
None.

RECOMMENDATION:
Approve as presented.

ATTACHMENTS:
CL_MIN_220509_CC_F.pdf

Minutes
Rolling Hills City Council
Monday, May 9, 2022
Regular Meeting 7:00 p.m.

1. CALL TO ORDER

The City Council of the City of Rolling Hills met in person on the above date at 7:00 p.m. Mayor James Black presiding.

2. ROLL CALL

Councilmembers Present:	Dieringer, Pieper, Mirsch, Mayor Pro Tem Wilson, Mayor Black
Councilmembers Absent:	None
Staff Present:	Elaine Jeng, City Manager
	Jane Abzug, City Attorney
	John Signo, Planning & Community Services Director
	Christian Horvath, City Clerk / Executive Assistant to the City Manager

3. PLEDGE OF ALLEGIANCE – Councilmember Dieringer

4. PRESENTATIONS/PROCLAMATIONS/ANNOUNCEMENTS – NONE

5. BLUE FOLDER ITEMS (SUPPLEMENTAL)

Motion by Councilmember Pieper, seconded by Mayor Black to receive and file supplemental items for 9A and 13A. Motion carried unanimously with the following vote:

AYES:	Dieringer, Pieper, Mirsch, Wilson, Mayor Black
NOES:	None
ABSENT:	None

6. PUBLIC COMMENT ON NON-AGENDA ITEMS – NONE

7. CONSENT CALENDAR

7.A. APPROVE AFFIDAVIT OF POSTING FOR THE CITY COUNCIL REGULAR MEETING OF MAY 9, 2022

7.B. APPROVE MOTION TO READ BY TITLE ONLY AND WAIVE FURTHER READING OF ALL ORDINANCES AND RESOLUTIONS LISTED ON THE AGENDA

7.C. APPROVE THE FOLLOWING CITY COUNCIL MINUTES: APRIL 25, 2022

7.D. PAYMENT OF BILLS

7.E. RECEIVE AND FILE SOUTHERN CALIFORNIA EDISON'S 2022 CIRCUIT RELIABILITY REVIEW

7.F. PULLED BY COUNCILMEMBER DIERINGER

7.G. PULLED BY COUNCILMEMBER MIRSCH

7.H. PULLED BY COUNCILMEMBER MIRSCH

7.I. PULLED BY COUNCILMEMBER MIRSCH

Motion by Councilmember Pieper, seconded by Councilmember Dieringer to approve Consent Calendar excluding Items 7F, 7G, 7H and 7I. Motion carried unanimously with the following vote:

AYES: Dieringer, Pieper, Mirsch, Wilson, Mayor Black
NOES: None
ABSENT: None

8. EXCLUDED CONSENT CALENDAR ITEMS

7.F. APPROVE THIRD AMENDMENT TO PROFESSIONAL SERVICES AGREEMENT WITH PACIFIC ARCHITECTURE AND ENGINEERING INC. COVERING CONSTRUCTION DOCUMENTS FOR CITY HALL ADA IMPROVEMENTS PROJECT

Motion by Councilmember Dieringer, seconded by Councilmember Mirsch to approve and direct staff to provide Pacific Architecture and Engineering with hash-marks added to the existing Option 3 diagram to denote and re-iterate the direction provided at the 4/25/22 Council meeting requesting a solution for the back south wall of the council chambers allowing for access by overflow public meeting attendees." Motion carried unanimously with the following vote:

AYES: Dieringer, Pieper, Mirsch, Wilson, Mayor Black
NOES: None
ABSENT: None

7.G. APPROVE BOLTON ENGINEERING CORPORATION TO PERFORM A TOPOGRAPHIC SURVEY AT THE CITY HALL CAMPUS TO SUPPORT THE IMPROVEMENTS REQUESTED BY THE NEEDS OF SENIOR COMMITTEE

Motion by Councilmember Mirsch, seconded by Councilmember Pieper to approve as presented and direct staff to prepare a Professional Services Agreement with Bolton Engineering Corporation. Motion carried unanimously with the following vote:

AYES: Dieringer, Pieper, Mirsch, Wilson, Mayor Black
NOES: None
ABSENT: None

7.H. REPORT BY BUDGET/AUDIT/FINANCE COMMITTEE ON MEETING HELD ON APRIL 25, 2022

7.I. INVESTMENT POLICY, FINANCIAL, BUDGET AND DEBT POLICIES AND RESOLUTION NO. 953 - ASSET CAPITALIZATION POLICY

Motion by Councilmember Mirsch, seconded by Councilmember Dieringer to receive and file 7H; and review and confirm the Investment Policy, the Financial, Budget and Debt Policies, with changes as recommended and Resolution No. 953 – Asset Capitalization Policies, and direct staff to prepare a resolution memorializing the reduction in the Self-Insurance Fund Reserves for 7I. Motion carried unanimously with the following vote:

AYES: Dieringer, Pieper, Mirsch, Wilson, Mayor Black
NOES: None
ABSENT: None

9. COMMISSION ITEMS

9.A. ZONING CASE NO. 21-10: REQUEST FOR APPROVAL FOR A MAJOR MODIFICATION TO A SITE PLAN REVIEW FOR THE CONSTRUCTION OF A NEW 6,094-SQUARE-FOOT RESIDENCE, 4,491-SQUARE-FOOT BASEMENT, 987-SQUARE-FOOT ATTACHED GARAGE, COVERED PORCHES, SWIMMING POOL AND SPA, 1,000-SQUARE-FOOT ACCESSORY DWELLING UNIT, AND OTHER IMPROVEMENTS FOR A PROPERTY LOCATED AT 8 MIDDLERIDGE LANE SOUTH (LOT 254-UR), ROLLING HILLS, CA 90274 (CIMMARUSTI)

Presentation by John Signo, Planning & Community Services Director

Public Comment: Chris Gunderson, Project Architect

Motion by Councilmember Pieper, seconded by Councilmember Dieringer to receive and file Resolution No. 2022-04 and Zoning Case No. 21-10 for a property located at 8 Middleridge Lane South. Motion carried unanimously with the following vote:

AYES: Dieringer, Pieper, Mirsch, Wilson, Mayor Black
NOES: None
ABSENT: None

10. PUBLIC HEARINGS – NONE

11. OLD BUSINESS – NONE

12. NEW BUSINESS

12.A. CONSIDER THE ROLLING HILLS COMMUNITY ASSOCIATION'S REQUEST TO ADOPT THE VEHICLE CODE SECTION 25279

Presentation by Elaine Jeng, City Manager

Public Comment: Jim Aichele, Alfred Visco

Motion by Councilmember Pieper, seconded by Mayor Pro Tem Wilson to follow the City Attorney's suggested Option 2 authorizing the City Attorney to draft a resolution regulating RHCA's use of a security vehicle with amber lights and provide input on the posting of signs to make the rule effective. Motion carried unanimously with the following vote:

AYES: Dieringer, Pieper, Mirsch, Wilson, Mayor Black
NOES: None
ABSENT: None

12.B. CONSIDER ROLLING HILLS COMMUNITY ASSOCIATION'S REQUEST TO REPLACE SEPTIC TANK SERVING THE MAIN GATE

Presentation by Elaine Jeng, City Manager

Mayor Black directed staff to communicate with the RHCA that the Council is in support and request they provide a copy of the latest plans including the location of the new septic tank at the May 23, 2022 City Council meeting. Without objection, so ordered.

12.C. APPROVE RECLASSIFICATION OF THE CODE ENFORCEMENT OFFICER POSITION TO A PLANNER POSITION

Presentation by John Signo, Planning & Community Services Director

Motion by Councilmember Dieringer to defer the item until the Council is provided more information about the Budget and what monies are available for staff positions. Motion failed for lack of a second.

Motion by Mayor Black, seconded by Councilmember Mirsch to approve the reclassification of the Code Enforcement officer position to a Planner position. Motion carried with the following vote:

AYES: Pieper, Mirsch, Wilson, Mayor Black
NOES: Dieringer
ABSENT: None

12.D. REVIEW FINANCE/AUDIT/BUDGET COMMITTEE'S RECOMMENDATION TO UPDATE THE CONSOLIDATED TAX AND FEE SCHEDULE

Presentation by John Signo, Planning & Community Services Director

Motion by Mayor Black to decrease Committee on Trees and Views Processing fee to $1,000 for complaints against one property and charge additional $1,000 per property for complaints against multiple properties. Motion failed for lack of a second.

Motion by Councilmember Dieringer, seconded by Mayor Pro Tem Wilson to approve staff recommendation of raising Committee on Trees and Views Processing fee to $6,000 for complaints against one property and $10,000 for complaints against multiple properties. Motion carried with the following vote:

AYES: Dieringer, Mirsch, Wilson
NOES: Pieper, Mayor Black
ABSENT: None

12.E. APPROVE UPDATED CITY COUNCIL COMMITTEE ASSIGNMENTS FOR 2022-2023

Presentation by Christian Horvath, City Clerk / Executive Assistant to the City Manager

Motion by Mayor Black, seconded by Mayor Pro Tem Wilson to leave Councilmember Mirsch on the Fire Fuel Committee. Motion carried unanimously with the following vote:

AYES: Dieringer, Pieper, Mirsch, Wilson, Mayor Black
NOES: None
ABSENT: None

Motion by Councilmember Pieper, seconded by Mayor Pro Tem Wilson to approve the City Council committee assignments as presented. Motion carried unanimously with the following vote:

AYES: Pieper, Mirsch, Wilson, Mayor Black
NOES: Dieringer
ABSENT: None

12.F. CONSIDER SUPPORT FOR FORMATION OF PROPOSED SOUTH BAY HOUSING TRUST; AND INTEREST IN PARTICIPATING

Presentation by Christian Horvath, City Clerk / Executive Assistant to the City Manager

Public Comment: Jim Aichele, Alfred Visco

Motion by Councilmember Pieper, seconded by Mayor Black to take no action until more information is provided. Motion carried unanimously with the following vote:

AYES: Dieringer, Pieper, Mirsch, Wilson, Mayor Black
NOES: None
ABSENT: None

13. MATTERS FROM THE CITY COUNCIL

13.A. RECEIVE AND FILE REPORT ON THE MARCH 30, 2022 FIRE FUEL COMMITTEE MEETING

Motion by Councilmember Pieper, seconded by Mayor Pro Tem Wilson to receive and file the report. Motion carried unanimously with the following vote:

AYES: Dieringer, Pieper, Mirsch, Wilson, Mayor Black
NOES: None
ABSENT: None

14. MATTERS FROM STAFF

14.A. REVIEW OPTIONS FOR STATE OF THE CITY EVENT

Presentation by Christian Horvath, City Clerk / Executive Assistant to the City Manager

Mayor Black directed staff to work with the Mayor to write a letter to go out to the residents. Without objection, so ordered.

City Manager Jeng reported that the Canyon Management Videos were finalized and will be presented at the May 23, 2022 City Council meeting

Public Comment: Marcia Schoettle

15. RECESS TO CLOSED SESSION

Mayor Black recessed the City Council to Closed Session at 8:34 p.m.

15.A. CONFERENCE WITH LEGAL COUNSEL: ANTICIPATED LITIGATION GOVERNMENT CODE SECTION 54956.9(d)(2)

16. RECONVENE TO OPEN SESSION

The City Council reconvened to Open Session at 9:46 p.m. and there was no reportable action.

17. ADJOURNMENT: 9:46 P.M.

The meeting was adjourned at 9:46 p.m on May 9, 2022 in the memory of Rolling Hills resident Dr. Elliott Brunner who passed away. The next regular meeting of the City Council is scheduled to be held on Monday, May 23, 2022 beginning at 7:00 p.m. in the City Council Chamber at City Hall, 2 Portuguese Bend Road,

Rolling Hills, California. It will also be available via City's website link at: https://www.rolling-hills.org/government/agenda/index.php

All written comments submitted are included in the record and available for public review on the City website.

Respectfully submitted,

_____
Christian Horvath, City Clerk

Approved,

_____
James Black, M.D., Mayor

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 7.D
Mtg. Date: 05/23/2022

TO: HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL

FROM: CHRISTIAN HORVATH,

THRU: ELAINE JENG P.E., CITY MANAGER

SUBJECT: PAYMENT OF BILLS

DATE: May 23, 2022

BACKGROUND:
None.

DISCUSSION:
None.

FISCAL IMPACT:
None.

RECOMMENDATION:
Approve as presented.

ATTACHMENTS:
CL_AGN_220523_PaymentOfBills.pdf

CITY OF ROLLING HILLS
AP22-071, ACH22-076-077
Check Run 05-10-2022 through 05-23-2022

Check No.	Check Date	Payee	Description	Amount
027599	5/23/2022	Best Best & Krieger LLP	General Services & Undergrounding Services- April 2022	7,956.00
027599	5/23/2022	Best Best & Krieger LLP	Land Use-Professional Services April 2022	2,128.00
027599	5/23/2022	Best Best & Krieger LLP	View Preservation - April 2022	475.00
CHECK TOTAL			**10,559.00**	
027600	5/23/2022	California JPIA	All Risk Property Insurance July 1,2022 to July 1, 2023	7,197.00
027601	5/23/2022	Delta Dental	Dental Coverage May 2022_Add'tl	79.23
027602	5/23/2022	Elaine Jeng	Reimbursement Expenses 3.23.22 - 5.10.22	214.47
027603	5/23/2022	Evan Smith	Landscape Architect Bennett Broken Main	3,630.00
027604	5/23/2022	Frontier Communications	Deposit Project 5304422 Underground Crest Rd/ Eastfield Dr.	9,000.00
027605	5/23/2022	Konica Minolta Business Solutions USA Inc.	Monthly Maintenance 04-11-22 to 05-10-22	412.18
027606	5/23/2022	LA County Sheriff's Department	April 2022 Law Enforcement Services	31,696.73
027606	5/23/2022	LA County Sheriff's Department	April 2022 LMT Traffic Enforcement Special Event	1,312.35
CHECK TOTAL			**33,009.08**	
027607	5/23/2022	MV CHENG AND ASSOCIATES	Monthly Accounting Services April 2022	12,052.50
027608	5/23/2022	NV5, INC.	April 2022 Services- CORH-209641 MS4 Monitoring	4,006.50
027609	5/23/2022	Providence Health & Services	New Employee	35.00
027610	5/23/2022	Palos Verdes Security Sys, Inc.	June 2022 CCTV Lease 06-01-2022 to 06-30-2022	168.00
027611	5/23/2022	City of Rancho Palos Verdes	7% Monthly ALPR Camera Cnctvty - February 2022	67.50
027612	5/23/2022	SIR SPEEDY	Information Brochures	211.99
ACH-043	5/6/2022	Vantagepoint Transfer Agents - 306580	ICMA PR ENDING 05-03-22	1550.89
ACH-044	5/6/2022	CalPERS	CALPERS PR ENDING 05-03-22	3149.54
ACH-045	5/23/2022	California Water Service Co.	Water Usage 03 26 2022 to 4 27 22 Rancho	659.93
ACH-046	5/23/2022	California Water Service Co.	Water Usage 03 26 2022 to 4 27 2022 Rolling	692.03
ACH-047	5/23/2022	Daily Breeze	March 2022 Safety Element	372.16
ACH-048	5/23/2022	Daily Breeze	March 2022 Advertising 23 Crest Rd East	572.34
ACH-049	5/23/2022	Daily Breeze	March 2022 Advertising 29 Crest Rd West	553.89
ACH-050	5/23/2022	Daily Breeze	March 2022 Advertising Tamayo Juge View	414.49
ACH-051	5/23/2022	Southern California Edison	Electricity Usage 03 24 2022 ot 4 24 2022	1,265.49
ACH-052	5/23/2022	The Gas Company	Gas Usage from 04-11-2022 to 05-10-2022	52.44
ACH-053	5/23/2022	ELAN Cardmember Services	Credit Card Payment 4-5-2022 to 5-3-2022	216.77
Report Total				90,142.42

I, Elaine Jeng, City Manager of Rolling Hills, California certify that the above demands are accurate and there is available in the General Fund a balance of
90,142.42 for the payment of above items.

5/19/2022

Elaine Jeng, P.E., City Manager

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 7.E
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH,**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **REPUBLIC SERVICES RECYCLING TONNAGE REPORT FOR APRIL 2022.**

DATE: **May 23, 2022**

BACKGROUND:
None.

DISCUSSION:
None.

FISCAL IMPACT:
None.

RECOMMENDATION:
Receive and file.

ATTACHMENTS:
CL_AGN_220523_Rolling Hills YTD Tonnage Report.pdf

CITY OF ROLLING HILLS RESIDENTIAL FRANCHISE

2022

Year 2022
Franchise Y/N Y

Month	Commodity	Tons Collected	Tons Recovered	Tons Disposed	Diversion %
Jan	Greenwaste	98.26	98.26	-	100.00%
	Trash	156.54	-	156.54	0.00%
Jan Total		254.80	98.26	156.54	38.56%
Feb	Greenwaste	93.00	93.00	-	100.00%
	Trash	134.41	-	134.41	0.00%
Feb Total		227.41	93.00	134.41	40.90%
Mar	Greenwaste	111.44	111.44	-	100.00%
	Trash	183.40	-	183.40	0.00%
Mar Total		294.84	111.44	183.40	37.80%
Apr	Greenwaste	100.44	100.44	-	100.00%
	Trash	156.07	-	156.07	0.00%
Apr Total		256.51	100.44	156.07	39.16%
Grand Total		1,033.56	403.14	630.42	39.00%

Contract Requires 30% Household - 111.44

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 7.F
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CONNIE VIRAMONTES , ADMINISTRATIVE ASSISTANT**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **APPROVE COUNTY OF LOS ANGELES DEPARTMENT OF AGRICULTURAL COMMISSIONER/WEIGHTS AND MEASURES FY 2022/2023 PEST CONTROL AGREEMENT NO. 779 FOR PEST CONTROL SERVICES.**

DATE: **May 23, 2022**

BACKGROUND:
Historically, the City of Rolling Hills maintains an annual agreement with the Los Angeles County Agricultural Commissioner/Weights & Measures Department for pest control services. These services are provided on an daily and/or on an on-call basis at the rates listed in the agreement and the city has used the agreement for services such as coyote trapping, as well as pest control including rodents and weeds. The attached agreement for Fiscal Year 2022-2023 is presented for City Council consideration. Of note, most of the hourly rates have increased over last year's rates.

Labor Increase:
Agri/Weight & Measures Inspector III: 5.88%
Agricultural Chemical Sprayer: 5.54%
Pest Control Worker: 6.17%
Warehouse Worker I: 6.82%
Weed Haz & Pest Abatement Worker: 10.26%

DISCUSSION:
None.

FISCAL IMPACT:
None.

RECOMMENDATION:
Approve the agreement as presented and authorize the City Manager to execute the agreement.

ATTACHMENTS:
CL_AGN_220523_CC_LA_Co.PestControlAgreemtNo.779.pdf

COUNTY OF LOS ANGELES

Department of Agricultural Commissioner/ Weights and Measures

Kurt E. Floren
Agricultural Commissioner
Director of Weights and Measures

12300 Lower Azusa Road
Arcadia, California 91006-5872
http://acwm.lacounty.gov

Protecting Consumers and the Environment Since 1881

RECEIVED
MAY 10 2022
City of Rolling Hills
By _____

May 01, 2022

City of Rolling Hills
2 Portuguese Bend Rd.
Rolling Hills CA 90274

Dear Customer:

RE: PEST CONTROL AGREEMENT NO. 779

Enclosed for your approval is a Renewal Pest Control Agreement.

Please review, SIGN AND RETURN THE COMPLETE AGREEMENT TO OUR OFFICE. Our address is: 12300 Lower Azusa Road, Arcadia, CA 91006. Attention Integrated Pest Management Division.

When requesting service, please call (626) 575-5462 or (661) 974-8801. Our office hours are from 7:00 a.m. to 5:30 p.m., Monday through Thursday. Our fax number is (626) 350-7077.

Weed Hazard and Integrated Pest Management Bureau
Pest Management Division

ATTN: Integrated Pest Management Division
County of Los Angeles
Agricultural Commissioner/Weights & Measures
12300 Lower Azusa Road
Arcadia, CA 91006

No. 779

AGREEMENT

PEST CONTROL

This agreement, dated May 01, 2022, is made by and between the COUNTY OF LOS ANGELES, ("County") and City of Rolling Hills ("City").

RECITALS:

Whereas, the County is authorized by the Los Angeles County Board of Supervisors and by Section 5405 of the Food and Agricultural Code and Section 25842 of the Government Code, to provide varied pest control services; and,

Whereas, the City is desirous of contracting with the County for the performance of pest control services, acting through its Agricultural Commissioner/Director of Weights and Measures; and,

Whereas, the County is agreeable to rendering such pest control services on the terms and conditions set forth below.

THEREFORE, THE PARTIES AGREE AS FOLLOWS:

SECTION 1. County Obligations.

(a) The County, through the Agricultural Commissioner/Director of Weights and Measures, agrees to provide pest control services in accordance with the provisions of Section 25842 of the Government code, and Section 5405 of the Food and Agricultural Code.

(b) Such services shall encompass the pest control duties including control and destruction of pests of the type coming within the jurisdiction of and customarily rendered by the Agricultural Commissioner/Weights and Measures Department of the County of Los Angeles under the Charter of said County and the Statutes of the State of California.

(c) The level of service shall be that same basic level of pest control service that is and shall be hereinafter during the term of this agreement provided for unincorporated areas of the County of Los Angeles by said Agricultural Commissioner/Director of Weights and Measures.

(d) The rendition of such services, the standard of performance, and other matters incidental to the performance of such services, and the control of personnel, so employed shall remain in the County.

(e) For the purpose of performing said functions, County shall furnish and supply all necessary labor, supervision, equipment, and supplies necessary to maintain the level of service to be rendered hereunder.

(f) The County hereby agrees to engage in the control and destruction of:

_X_ Rodents _X_ Others (Coyote)

_X_ Weeds

SECTION 2. Owner Obligations.

(a) To facilitate the performance of such functions, it is hereby agreed that the County shall have full cooperation and assistance from the City council and other City officers, agents, and employees.

(b) All persons employed in the performance of such services and functions for said City shall be County employees as such shall be taken over by said County, and no person employed hereunder shall have any City pension, civil service, or any status or right.

(c) For the purpose of performing such services and functions, and for the purpose of giving official status to the performance thereof where necessary, every County officer and employee engaged in the performance of any service hereunder shall be deemed to be an officer or employee of said City while performing services for said City, which services are within the scope of this agreement and are purely municipal functions.

(d) City shall not be called upon to assume any liability for the direct payment of any salaries, wages, or other compensation to any County personnel performing services hereunder for said County, or any liability other than that provided for in this agreement.

Except as herein otherwise specified, the City shall not be liable for compensation or indemnity to any County employee for injury or sickness arising out of his employment.

(e) In consideration of said services, City agrees to pay the County for actual costs for services, labor, and materials in the performance of the work in accordance with the rates and provisions listed in Exhibit A of this agreement.

(f) City consents to the County's use, upon lands owned, leased, or otherwise controlled by City, to the use of pesticides and devices listed in Exhibit A, to control the pest listed in Section 1 (f), of this agreement.

(g) City has been informed of the methods and the manner in which the control materials will be used and of the hazards and dangers involved to persons, domestic animals, and vegetation in treated area.

SECTION 3. Assumption of Liability Agreement.

The assumption of liability agreement executed by the parties of this agreement and approved by the Board of Supervisors on December 27, 1977, currently in effect is hereby made a part of and incorporated into this agreement as if set out in full herein unless said Assumption of Liability agreement is expressly superseded by subsequent agreement hereafter entered into between the parties hereto.

SECTION 4. Subject Property.

The address of the property or premise where said pest control services shall be provided as described in Exhibit B of this agreement.

SECTION 5. Termination

(a) Unless sooner terminated as provided for herein, this agreement shall be effective July 01, 2022 and shall extend to June 30, 2023.

(b) Either party may terminate this agreement upon ten (10) days written notice to the other party.

City of Rolling Hills

SIGNED: _____

Print Name: Blaine Jeng

DATE: _____

Billing Address:

2 Portuguese Bend Rd., Rolling Hills, CA 90274

Phone No.

(310) 377-1521

_____

Kurt E. Floren

Agricultural Commissioner

Director of Weights and Measures

12300 Lower Azusa Road

Arcadia, CA 91006

(626) 575-5462

Exhibit A

WORK TO BE DONE AS REQUESTED.

TOTAL NOT TO EXCEED $25,000.00

PAYMENT TO BE RECEIVED UPON MONTHLY BILLING.

ONLY THOSE MATERIALS APPLICABLE TO THIS AGREEMENT WILL BE UTILIZED.

*THERE IS NO CHARGE FOR TRAPS OR BAIT STATIONS UNLESS THEY ARE DAMAGED OR STOLEN.

THESE RATES ARE SUBJECT TO CHANGE WITHOUT NOTICE.

Labor:

Agric/Wts & Meas Inspector III	$146.78 HR
Agricultural Chemical Sprayer	$124.22 HR
Pest Control Worker	$94.13 HR
Warehouse Worker I	$90.84 HR
Weed Haz & Pest Abatement Worker	$74.48 HR

Materials:

Bullseye Ind. Dye	$0.41 oz
Dimension Ultra	$12.90 pkt
Foam Fighter	$0.21 oz
Fusilade II	$1.49 oz
Gallery 75DF	$8.10 oz
Gallery SC	$4.83 oz
Garlon 3A	$86.46 gal
Garlon 4	$90.33 gal
Habitat Herbicide	$0.62 oz
Landmark	$7.14 oz
Manage Turf Herbicide	$2.36 scp
Milestone VM	$2.40 oz
Milestone VM Plus	$37.66 gal
No Foam A	$13.29 gal
Oust	$4.01 oz
Pathfinder II	$54.66 gal
Portfolio 4FCA	$737.50 gal
Pro Spreader Activator	$15.31 gal

Telar XP	$16.92 oz
Transline	$2.70 oz
Box Trap	$8.08 ea
Diphacinone Rodent bait (.005%)	$1.27 lb
Diphacinone Rodent bait (.01%)	$1.40 lb
Fumitoxin Tablet	$0.08 ea
Gas Cartridge	$2.87 ea
Maki Block	$4.07 lb
Omega Gopher Grain Bait .5% Strychnine	$0.48 oz
PCQ Pro Rodent Bait	$0.31 oz
Talpirid	$2.10 ea
Weevil-Cide Tablets	$0.04 ea
Advion Fire Ant Bait	$24.11 lb
Astro Insecticide	$0.86 oz
Bee Catcher Trap-Bee Master	$6.82 ea
Corn Scratch	$0.29 lb
Extinguish Plus	$12.48 lb
M-Pede (insecticide)	$0.17 oz
Merit 75 WSP (pkt)	$19.02 pkt
Siesta Fire Ant Bait	$1.04 oz
Termidor	$1.04 oz

Vehicles:

Spray Rig Vehicle-IV	$64.23 hr

EXHIBIT B

AREAS TO BE TREATED:

Various areas as requested by the Rolling Hills City.

Agenda Item No.: 7.G
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH,**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **APPROVE AND AUTHORIZE THE CITY MANAGER TO EXECUTE A PROFESSIONAL SERVICES AGREEMENT WITH BOLTON ENGINEERING CORPORATION TO PERFORM A TOPOGRAPHIC SURVEY AT THE CITY HALL CAMPUS TO SUPPORT THE IMPROVEMENTS REQUESTED BY THE NEEDS OF SENIOR COMMITTEE**

DATE: **May 23, 2022**

BACKGROUND:
At the April 11, 2022 City Council meeting, Council received a presentation from the Rolling Hills Community Association Needs of Seniors Committee on suggested improvements to the City Hall Campus. Council directed staff to work with the city's landscape architect (hired previously to inventory the existing City Hall campus irrigation system) on the suggested improvements and report back at the May 23, 2022 City Council meeting.

At the May 9, 2022 City Council meeting, the Council directed staff to prepare a Professional Services Agreement with Bolton Engineering Corporation.

DISCUSSION:
Staff held a kick off meeting with the landscape architect, Evan Smith and is awaiting his initial report and findings on the irrigation system. Landscape architect Evan Smith expressed at the kick-off meeting the need for a topographic survey of the City Hall campus to ensure the inventoried irrigation system is properly recorded. One of the improvement suggested by the Needs of the Seniors Committee is to level the grassy area between the Rolling Hills Community Association office building and City Hall. To do so appropriate, a topographic survey would be needed.

Previously, the city hired Bolton Engineering Corporation (Bolton) to survey the tennis courts, and to provide civil engineering plans to bring the accessible paths of the tennis courts to comply with the American with Disability Act (ADA). In light of the conversation with the landscape architect Evan Smith, staff reached out to Bolton to find out if topographic survey was available for the City Hall campus at the time the company was commissioned for

engineering work at the tennis courts. Bolton confirmed that they did not furnish a topographic survey for the City Hall campus, only the tennis courts. Bolton was asked to provide a proposal to for a topographic survey for the campus. With both sets of data provided by the same company, there is an opportunity to merge the data to have topographic information for the campus and tennis courts to approach the planning holistically.

Additionally, to offset potential General Fund expenditures, staff submitted a future project request using Metro Measure R and M monies to re-imagine and refurbish the parking lot and outer ring of the campus to include Active Transportation elements as well as resurface the asphalt.

FISCAL IMPACT:
Bolton's proposal to provide a topographic survey for the City Hall campus is $5,000. If the City Council should approve to engage for services, there is sufficient budget in the FY 2021-2022 adopted budget in account 890 Consulting Fees to fund Bolton's professional services fee.

RECOMMENDATION:
Approve as presented.

ATTACHMENTS:
CL_AGN_220509_Bolton_CHCampus_SurveyProposal.pdf
CA_AGR_220518_PSA_BoltonEng_TopographicSurvey.pdf

Bolton Engineering Corporation

25834 Narbonne Ave. Suite 210
Lomita, CA 90717
tel (310) 325-5580 fax (310) 325-5581

April 19, 2022

Client: City of Rolling Hills
2 Portuguese Bend Road
Rolling Hills, Ca

Ordered By: Christian Horvath
chorvath@cityofrh.net

Subject: Topographic Survey Proposal – 2 Portuguese Bend Rd.

I. Scope of Work

- Topographic Survey: Locate all structures, hardscape, fences, walls, observable above ground utilities, trees greater than 6" in diameter and spot elevations.
- Prepare drawing showing property lines and topography with contours at 1 foot intervals.

Proposed Fee: $ 5,000.00
Required Retainer: $ 1,500.00

II. Deliverables

Pdf copy and stamped hard copy of topographic survey.

III**. Exclusions:**

- Fee estimates for surveying are based on the following assumptions. All parts of the property will be reasonably free of visually obstructing vegetation or objects. The subject site will be open and readily available for our entry without delay. The dimensions of the subject property, legal descriptions, and surrounding surveys will close mathematically. The controlling survey monuments will be readily available and in their proper locations.
- Project revisions, additions, and other services not included in the scope of work above are in addition. Meetings and personal appearances are included only to the extent outlined above.
- All fees or levies required by government agencies will be assumed by the client and are not included in the fee proposal. Reproduction and other incurred costs on the client's behalf are additional.
- Easement plotting not included in proposed fee.
- Property line staking not included in proposed fee.

Hourly Rates are as follows:

Principal-	$290.00	Reg. Land Surveyor -	$160.00	Drafting -	$ 100.00
Reg. Chief Engineer -	$195.00	1 Person Survey Party -	$150.00	Messenger -	$ 75.00
Reg. Civil Engineer -	$160.00	2 Person Survey Party -	$245.00		
Staff Engineer-	$130.00	Surveyor Office -	$120.00		

Approximate cost, where indicated, is neither a maximum nor a fixed price unless so stated. Retainers are credited to final billing. Interest rate shall be 12 percent. The undersigned client authorizes BOLTON ENGINEERING CORPORATION (BEC) to perform the above described work. Reproduction costs and Government fees are not included in the fee and shall be paid for by the client. The fee or balance of the fee is due and payable upon completion of the work. Work performed over an extended period will be invoiced monthly and due and payable the 10th of the month following date of invoice. Client acknowledges services are relating to improvement of real property. Accounts unpaid over 30 days will be charged a service charge of one and one half percent per month (18% per annum), not to exceed 5 percent over the rate charged by the Federal Reserve Bank of San Francisco to member banks on the 25th of the month preceding this contract.

If a suit or other legal action is instituted to collect fees, client agrees to pay, in addition, all costs of collection and reasonable attorney's fees. Hourly rates will be adjusted annually. Work may be canceled before completion by written request by either party, and invoiced on an hourly basis to point of cancellation. Client acknowledges this as a "preliminary 20 day notice" and understands that if bills are not paid in full for services furnished, the improved property may be subject to mechanics liens. Any controversy or claim arising out of or relating to this contract, or the breach thereof, shall be settled by arbitration in accordance with the Rules of the American Arbitration Association, and judgment upon the award rendered by the Arbitrator's may be entered in any Court having jurisdiction thereof. In event that BEC is required to appear in any legal action relating to any work performed under this agreement, client agrees to pay BEC prevailing hourly rates for such appearance, reasonable attorney's fees and costs.

To authorize work under the outlined terms, please sign and initial one copy of this document and return to our offices. Thank you for the opportunity to propose on this project.

Regards,

BOLTON ENGINEERING CORP.

Accepted By:

_____ _____

Signature Date

_____

Title

PROFESSIONAL SERVICES AGREEMENT

This Agreement is made and entered into this 23rd day of May 2022 in the City of Rolling Hills, County of Los Angeles, State of California, by and between the City of Rolling Hills, a municipal corporation, (hereinafter, "City") and Bolton Engineering Corporation, a California corporation, (hereinafter, "Consultant")

RECITALS.

A. The City desires to retain Consultant to perform a topographic survey and prepare a drawing showing property lines and topography for 2 Portuguese Bend Rd. The scope of the project is defined in Exhibit A, attached hereto and incorporated herein by reference.

B. Consultant is well-qualified by reason of education and experience to perform such services; and

C. Consultant is willing to render such professional services as hereinafter defined.

NOW, THEREFORE, in consideration of the mutual covenants and conditions herein contained, City hereby engages Consultant to perform the services set forth in this Agreement and Consultant agrees to perform those services.

1. SCOPE OF WORK.

Consultant shall perform all work necessary to complete, in a manner satisfactory to the City, the services set forth in the scope of work in Exhibit A, attached hereto and incorporated into this Agreement by reference.

2. COST.

The City agrees to pay Consultant for all the work or any part of the work performed under the Agreement at the rates and in the manner established in Exhibit A.

A. Compensation. Total expenditure made under this Agreement shall not exceed the sum of $5,000. This fee includes all expenses, consisting of all incidental blueprinting, photography, travel, attendance at meetings and miscellaneous costs, estimated to be accrued.

B. Written Approval Required. Any increase in the compensation or scope of work shall be by express written amendment, approved by the City Manager and the Consultant.

3. METHOD OF PAYMENT.

Upon full execution of the Agreement, City shall issue payment to Consultant in the amount of $1,500 as a retainer for Consultant's services. The Consultant shall thereafter submit to the City, by no later than the 10th day of each month, its bill for services describing the services and the date services were performed and itemizing the fees and costs incurred during the previous month. Such services shall initially be charged against the $1,500 retainer. The City

shall pay the Consultant all uncontested amounts set forth in the Consultant's bill within 30 days after it is received. Consultant shall submit an invoice in duplicate addressed to the City at:

c/o Planning Department
2 Portuguese Bend Road
Rolling Hills, CA 90274

4. SUBCONTRACTING.

Consultant shall not be permitted to subcontract any portion of this Agreement without the express written consent of the City.

5. COMMENCEMENT OF WORK.

Consultant shall commence the work described herein upon full execution of this Agreement.

6. ACCOUNTING RECORDS.

Consultant must maintain accounting records and other evidence pertaining to costs Consultant incurs in carrying out its obligations under this Agreement. The records and evidence must be kept available in Consultant's California office during the Term of Agreement (defined in paragraph 8 of this Agreement) and thereafter for five years from the date of final payment. In the event such records must be moved from that location, Consultant shall notify the City at the address of the Planning Department provided in paragraph 4 of this Agreement.

7. OWNERSHIP OF DATA.

All data, maps, photographs, and other material collected or prepared under the Agreement shall belong to the City and shall not be withheld from the City for any reason.

8. TERM OF AGREEMENT.

This Agreement shall be valid for one year from the date the Agreement is executed by the parties. The City Manager may extend this contract with proof of a good cause. Such extension shall be made in writing by the City Manager to the Consultant.

9. TERMINATION.

A. Breach. This Agreement may be terminated at any time for breach. A breach occurs when Consultant fails to meet an obligation or condition required by this Agreement or the scope of work set out in Exhibit A.

B. Unilateral Termination. The City may terminate unilaterally and without cause upon seven (7) days written notice to the Consultant. All work satisfactorily performed pursuant to this Agreement and prior to the date of termination may be claimed for reimbursement. To the extent any portion of the retainer has not been expended on services provided by Consultant to

City, Consultant shall return any and all unexpended funds to City within 30 days of receipt of City's written notice to terminate.

10. ASSIGNABILITY.

Consultant shall not assign or transfer interest in this Agreement without the prior written consent of the City.

11. AMENDMENT.

It is mutually understood and agreed that no alteration or variation of the terms of this Agreement shall be valid unless made in writing, signed by the parties, and approved by all parties.

12. NON-SOLICITATION CLAUSE.

The Consultant warrants that he or she has not employed or retained any company or persons, other than a bona fide employee working solely for the Consultant, in exchange for any fee, commission, percentage, brokerage fee, gifts, or any other consideration, contingent upon or resulting from the award or making of this Agreement. For breach or violation of this warranty, the City shall have the right to annul this Agreement without liability, or, in its discretion, to deduct from the agreed price or consideration, or otherwise recover the full amount of such fee, commission, percentage, brokerage fee, gift, or contingent fee.

13. INDEMNITY.

Consultant shall indemnify, defend with counsel approved by City, and hold harmless City, its officers, officials, employees and volunteers from and against all liability, loss, damage, expense, cost (including without limitation reasonable attorneys' fees, expert fees and all other costs and fees of litigation) of every nature arising out of or in connection with Consultant's performance of work hereunder or its failure to comply with any of its obligations contained in this Agreement, regardless of City's passive negligence, but excepting such loss or damage which is caused by the sole active negligence or willful misconduct of the City. Should City in its sole discretion find Consultant's legal counsel unacceptable, then Consultant shall reimburse the City its costs of defense, including without limitation reasonable attorneys' fees, expert fees and all other costs and fees of litigation. The Consultant shall promptly pay any final judgment rendered against the City (and its officers, officials, employees and volunteers) covered by this indemnity obligation. It is expressly understood and agreed that the foregoing provisions are intended to be as broad and inclusive as is permitted by the law of the State of California and will survive termination of this Agreement.

14. INSURANCE.

A. Insurance Required. Without limiting Consultant's obligations arising under paragraph 14 - Indemnity, Consultant shall not begin work under this Agreement until it obtains policies of insurance required under this section. The insurance

shall cover Consultant, its agents, representatives and employees in connection with the performance of work under this Agreement, and shall be maintained throughout the term of this Agreement. Insurance coverage shall be as follows:

i. Automobile Liability Insurance, with minimum coverage of $300,000 for property damage, $300,000 for injury to one person/single occurrence, and $300,000 for injury to more than one person/single occurrence.

ii. General Liability Insurance insuring City of Rolling Hills, its elected and appointed officers, agents, and employees from claims for damages for personal injury, including death, as well as from claims for property damage which may arise from Consultant's actions under this Agreement, whether or not done by Consultant or anyone directly or indirectly employed by Consultant. Such insurance shall have a combined single limit of not less than $1,000,000.

iii. Worker's Compensation Insurance, for all Consultant's employees to the extent required by the State of California.

iv. Professional Liability Coverage for professional errors and omissions liability insurance for protection against claims alleging negligent acts, errors, or omissions which may arise from the Consultant's operations under this Agreement, whether such operations are by the Consultant or by its employees, subcontractors, or subconsultants. The amount of this insurance shall not be less than one million dollars ($1,000,000) on a claims-made annual aggregate basis, or a combined single-limit-per-occurrence basis. When coverage is provided on a "claims made basis," Consultant will continue to renew the insurance for a period of three (3) years after this Agreement expires or is terminated. Such insurance will have the same coverage and limits as the policy that was in effect during the term of this Agreement, and will cover Consultant for all claims made by City arising out of any errors or omissions of Consultant, or its officers, employees, or agents during the time this Agreement was in effect.

B. Deductibility Limits for policies referred to in subparagraphs A (i) and (ii) shall not exceed $5,000 per occurrence.

C. Additional Insured. City, its elected and appointed officers, agents, and employees shall be named as additional insured on policies referred to in subparagraphs A (i) and (ii).

D. Primary Insurance. The insurance required in paragraphs A (i) and (ii) shall be primary and not excess coverage.

E. Evidence of Insurance. Consultant shall furnish City, prior to the execution of this Agreement, satisfactory evidence of the insurance required, issued by an insurer

authorized to do business in California, and an endorsement to each such policy of insurance evidencing that each carrier is required to give City at least 30 days prior written notice of the cancellation of any policy during the effective period of the Agreement. All required insurance policies are subject to approval of the City Attorney. Failure on the part of Consultant to procure or maintain said insurance in full force and effect shall constitute a material breach of this Agreement .

15. NOTICES.

Any notice required to be given hereunder shall be deemed to have been given by depositing said notice in the United States mail, postage prepaid, and addressed as follows:

CITY:	CONSULTANT:
Elaine Jeng, P.E.,	Dan Bolton
City Manager	Bolton Engineering Corporation
2 Portuguese Bend Road	25834 Narbonne Ave., Suite 210
Rolling Hills, CA 90274	Lomita, CA 90717
TEL (310) 377-1521	TEL: (310) 325-5580
FAX (310) 377-2866	FAX: (310)325-5581

16. ENFORCEMENT OF AGREEMENT.

In the event that legal action is commenced to enforce or declare the rights created under this Agreement, the prevailing party shall be entitled to an award of costs and reasonable attorneys' fees in the amount to be determined by the court.

17. CONFLICT OF INTEREST.

The Consultant represents that it presently has no interest and shall not acquire any interest, direct or indirect, in any real property located in the City which may be affected by the services to be performed by the Consultant under this Agreement. The Consultant further represents that in performance of this Agreement, no person having any such interest shall be employed by it.

A. The Consultant represents that no City employee or official has a material financial interest in the Consultant's business. During the term of this Agreement and as a result of being awarded this contract, the Consultant shall not offer, encourage, or accept any financial interest in the Consultant's business by any City employee or official.

B. If a portion of the Consultant's services called for under this Agreement shall ultimately be paid for by reimbursement from and through an agreement with a developer of any land within the City or with a City franchisee, the Consultant warrants that it has not performed any work for such developer/franchisee within the last 12 months, and shall not negotiate, offer, or accept any contract or request to perform services for that identified developer/franchisee during the term of this Agreement.

18. INDEPENDENT CONSULTANT.

The Consultant is and shall at all times remain as to the City a wholly independent contractor. Neither the City nor any of its agents shall have control over the conduct of the Consultant or any of the Consultant's employees, except as herein set forth. The Consultant shall not at any time or in any manner represent that it or any of its agents or employees are in any manner agents or employees of the City.

19. ENTIRE AGREEMENT OF THE PARTIES.

This Agreement supersedes any and all other agreements, either oral or in writing, between the parties hereto with respect to the employment of Consultant by City and contains all the covenants and agreements between the parties with respect to such employment in any manner whatsoever. Each party to this Agreement acknowledges that no representations, inducements, promises or agreements, orally or otherwise, have been made by any party, or anyone acting on behalf of any party, which are not embodied herein, and that no other agreement or amendment hereto shall be effective unless executed in writing and signed by both City and Consultant.

20. GOVERNING LAW.

This Agreement shall be governed by and construed in accordance with the laws of the State of California, and all applicable federal statutes and regulations as amended.

21. GENERAL TERMS AND CONDITIONS.

A. Non-Discrimination. The Consultant shall not discriminate as to race, creed, gender, color, national origin or sexual orientation in the performance of its services and duties pursuant to this Agreement, and will comply with all applicable laws, ordinances and codes of the federal, state, county and city governments.

B. Compliance with Applicable Law. The Consultant and the City shall comply with all applicable laws, ordinances and codes of the federal, state, county, and city governments.

C. Copyright. No reports, maps, or other documents produced in whole or in part under this Agreement shall be the subject of an application for copyright by or on behalf of the Consultant.

D. Legal Construction. This Agreement shall be construed without regard to the identity of the persons who drafted its various provisions. Each and every provision of this Agreement shall be construed as though each of the parties participated equally in the drafting of same, and any rule of construction that a document is to be construed against the drafting party shall not be applicable to this Agreement. The article and section, captions and headings herein have been inserted for convenience only and shall not be considered or referred to in resolving questions or interpretation or construction. Whenever in this Agreement the context may so

require, the masculine gender shall be deemed to refer to and include the feminine and neuter, and the singular shall refer to and include the plural.

E. Counterparts. This Agreement may be executed in counterparts and as so executed shall constitute an agreement which shall be binding upon all parties hereto.

F. Final Payment Acceptance Constitutes Release. The acceptance by the Consultant of the final payment made under this Agreement shall operate as and be a release of the City from all claims and liabilities for compensation to the Consultant for anything done, furnished or relating to the Consultant's work or services. Acceptance of payment shall be any negotiation of the City's check or the failure to make a written extra compensation claim within ten (10) calendar days of the receipt of that check. However, approval or payment by the City shall not constitute, nor be deemed, a release of the responsibility and liability of the Consultant, its employees, sub-consultants, and agents for the accuracy and competency of the information provided or work performed; nor shall such approval or payment be deemed to be an assumption of such responsibility or liability by the City for any defect or error in the work prepared by the Consultant, its employees, sub-consultants, and agents.

G. Corrections. In addition to the above indemnification obligations, the Consultant shall correct, at its expense, all errors in the work which may be disclosed during the City's review of the Consultant's report or plans. Should the Consultant fail to make such correction in a reasonably timely manner, such correction shall be made by the City, and the cost thereof shall be charged to the Consultant.

H. Waiver; Remedies Cumulative. Failure by a party to insist upon the performance of any of the provisions of this Agreement by the other party, irrespective of the length of time for which such failure continues, shall not constitute a waiver of such party's right to demand compliance by such other party in the future. No waiver by a party of a default or breach of the other party shall be effective or binding upon such party unless made in writing by such party, and no such waiver shall be implied from any omissions by a party to take any action with respect to such default or breach. No express written waiver of a specified default or breach shall affect any other default or breach, or cover any other period of time, other than any default or breach or period of time specified. All of the remedies permitted or available to a party under this Agreement, or at law or in equity, shall be cumulative and alternative, and invocation of any such right or remedy shall not constitute a waiver or election of remedies with respect to any other permitted or available right of remedy.

I. Mitigation of Damages. In all such situations arising out of this Agreement, the parties shall attempt to avoid and minimize the damages resulting from the conduct of the other party.

J. Partial Invalidity. If any provision in this Agreement is held by a court of competent jurisdiction to be invalid, void or unenforceable, the remaining provisions will nevertheless continue in full force without being impaired or invalidated in any way.

K. Attorneys' Fees. The parties hereto acknowledge and agree that each will bear his/her or its own costs, expenses, and attorneys' fees arising out of and/or connected with the negotiation, drafting and execution of the Agreement, and all matters arising out of or connected therewith except that, in the event any action is brought by any party hereto to enforce this Agreement, the prevailing party in such action shall be entitled to reasonable attorneys' fees and costs in addition to all other relief to which that party or those parties may be entitled.

L. Warranty of Authorized Signatories. Each of the signatories hereto warrants and represents that he or she is competent and authorized to enter into this Agreement on behalf of the party for whom he or she purports to sign.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement on the date and year first above written.

CITY OF ROLLING HILLS	CONSULTANT
CITY MANAGER:	BOLTON ENGINEERING CORP.
_____	_____
ELAINE JENG	DAN BOLTON

ATTEST:

_____
CHRISTIAN HORVATH, CITY CLERK

APPROVED AS TO FORM:

_____
MICHAEL JENKINS, CITY ATTORNEY

Exhibit A
Scope of Work

I. Scope of Work

- Topographic Survey: Locate all structures, hardscape, fences, walls, observable above ground utilities, trees greater than 6" in diameter and spot elevations.
- Prepare drawing showing property lines and topography with contours at 1 foot intervals.

II. Deliverables

Pdf copy and stamped hard copy of topographic survey.

III. Exclusions:

- Reproduction and other incurred costs on the client's behalf are additional.
- Easement plotting not included in proposed fee.
- Property line staking not included in proposed fee.

Hourly Rates are as follows:

Principal-	$290.00	Reg. Land Surveyor -	$160.00	Drafting -	$ 100.00
Reg. Chief Engineer -	$195.00	1 Person Survey Party -	$150.00	Messenger -	$ 75.00
Reg. Civil Engineer -	$160.00	2 Person Survey Party -	$245.00		
Staff Engineer-	$130.00	Surveyor Office -	$120.00		

Agenda Item No.: 7.H
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **JOHN SIGNO, DIRECTOR OF PLANNING & COMMUNITY SERVICES**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **PENINSULA EMERGENCY WATERSHED MANAGEMENT PROJECT (EWMP) RESPONSE TO REGIONAL BOARD COMMENTS**

DATE: **May 23, 2022**

BACKGROUND:
On May 13, 2022, the Cities of Rancho Palos Verdes, Palos Verdes Estates, Rolling Hills Estates, Rolling Hills, and the County of Los Angeles (Unincorporated County), along with the Los Angeles County Flood Control District (LACFCD), collectively referred to as the Peninsula WMG, submitted its updated Palos Verdes Peninsula Enhanced Watershed Management Program (Peninsula EWMP) including an updated Reasonable Assurance Analysis (RAA), to the California Regional Water Quality Control Board (Water Board). The updated Peninsula EWMP and RAA have been prepared in accordance with the requirements of the 2021 LA MS4 Permit1, the Los Angeles Regional Water Quality Control Board Guidelines for Conducting RAA (March 2014), and the State Water Board Order WQ 2020-0038 (2020 State Board Order).

The updated Peninsula EWMP and RAA includes the City of Rolling Hills and is consistent with the 2020 State Board Order:

- Explains how information considered in the source assessment was used (EWMP Section 2 and Appendix 4.1 RAA Report).
- Identifies unavailable, needed information and the assumptions made to substitute for that information along with commitment to acquire the information through the Peninsula CIMP for incorporation in the next adaptive management milestone (EWMP Appendix 4.1 RAA Report 7.1.3 Mercury and Arsenic).
- Utilizes all relevant, available data2 to update the EWMP and RAA, including updates to the water body pollutant combination (WBPC) prioritization and source assessment, TMDL milestone achievement, and RAA calibration and validation. Data not used in the RAA has been identified, with explanation as to why this data was disregarded.
- Models each WBPC and therefore does not utilize or necessitate justification of a limiting pollutant approach. Table 4-2 in Section 4 of the Updated EWMP provides the results of this analysis for each WBPC supported by the detailed RAA Report in Appendix 4.1.

- Includes 24-hour management volumes as a clear metric for demonstrating progress in attaining load reduction targets – Table 5-1 in Section 5 of the Updated EWMP provides the implementation schedule for demonstrating progress in attaining these volumetric reductions by subwatershed and analysis region. Water body/pollutant milestones are also included in this table.
- Considers ongoing CIMP monitoring data which is sufficient to evaluate attainment of milestones.

EWMP Addendum to include Rolling Hills
On January 31, 2022, an Addendum to the Palos Verdes Peninsula Enhanced Watershed Management Program (EWMP Addendum) to include Rolling Hills as an 85th%, 24-hour runoff retention area was submitted to the Water Board. On April 6, 2022, the Water Board provided the City with comments on the EWMP Addendum that the City. On April 26, 2022, the City responded to those comments and is currently awaiting the Water Board's response.

Although the City is not officially part of the Peninsula EWMP, if the Addendum is approved by the Water Board, the updated Peninsula EWMP will apply to the City.

DISCUSSION:
The Water Board regulates discharges from municipal separate storm sewer systems (MS4s) through the Municipal Separate Storm Sewer System Permit (MS4 Permit). The purpose of the MS4 Permit is to protect the beneficial uses of the receiving waters in the Los Angeles County region by regulating municipal stormwater and non-stormwater discharges from the permittees' MS4s. The overarching goal of these requirements is to reduce the discharge of pollutants from MS4s to the maximum extent practicable. The Permit allows permittees the flexibility of developing an Enhanced Watershed Management Program (EWMP) to implement the requirements of the Permit.

The City of Rolling Hills has elected to join the Peninsula WMG and the status is currently pending the Water Board's decision. In response the the Water Board's comments, Rolling Hills has been incorporated into the revised EWMP and identified as a full 85th percentile, 24-hour storm retention area as demonstrated through monitoring. Continuous flow monitoring was conducted in Sepulveda Canyon in Rolling Hills for two complete wet-weather seasons, from October 26, 2020 through April 2022. Stormwater run-off that is not contained on properties is conveyed through Rolling Hills via natural, soft-bottom, vegetated drainage courses/canyons providing disconnection of impervious developed areas and ample opportunity for natural bio-retention and infiltration. The no-flow results observed during three 85th%, 24-hr rainfall events as well as the numerous smaller rainfall events that occurred throughout the monitoring period provide evidence that the strategies, control measures and BMPs implemented by Rolling Hills cumulatively retain stormwater runoff up to and including runoff from the 85th percentile, 24-hour storm event, as well as any conditionally exempt non-stormwater discharges.

FISCAL IMPACT:
Costs for McGowan Consulting to revise the EWMP to include Rolling Hills is $23,550 funded by the Stormwater account in the Planning Department.

RECOMMENDATION:
Receive and file.

ATTACHMENTS:
PVP EWMP Cover Letter (Mass-Based Approach) 22.05.13.pdf
PVP EWMP Response to RB Comments Table 22.05.13.pdf
PVP EWMP 22.05.13.pdf

Palos Verdes Peninsula
Enhanced Watershed Management Group

June 30, 2021 (Revised May 13, 2022)

Transmitted electronically via
FTP site link: https://ftp.watersboards.ca.gov

Renee Purdy, Executive Officer
Regional Water Quality Control Board, Los Angeles Region

Attention: Ivar Ridgeway

Subject: Submittal of the Updated Palos Verdes Peninsula Enhanced Watershed Management Program

Dear Ms. Purdy,

The Cities of Rancho Palos Verdes, Palos Verdes Estates, Rolling Hills Estates, Rolling Hills, and the County of Los Angeles (Unincorporated County), along with the Los Angeles County Flood Control District (LACFCD), collectively referred to as the Peninsula WMG, are pleased to submit the updated Palos Verdes Peninsula Enhanced Watershed Management Program (Peninsula EWMP) including an updated Reasonable Assurance Analysis (RAA). The updated Peninsula EWMP and RAA have been prepared in accordance with the requirements of the 2021 LA MS4 Permit[1], the Los Angeles Regional Water Quality Control Board Guidelines for Conducting RAA (March 2014), and consistent with State Water Board Order WQ 2020-0038 (2020 State Board Order).

The updated RAA was conducted using the newly released, LACFCD-developed Watershed Management Modeling System 2.0 (WMMS 2.0), for general consistency with other RAA modeling efforts across Los Angeles County. The default WMMS 2.0 LSPC model has been calibrated by LACFCD on a regional basis using data through September 2018. The updated RAA also incorporated Peninsula Coordinated Integrated Monitoring Program (Peninsula CIMP) water quality and flow data collected through June 2020 (the latest complete Peninsula CIMP reporting year data set subjected to QA/QC validation), and as appropriate, utilized this data to calibrate and validate the revised RAA model to best reflect the baseline hydrology and water quality conditions within the Palos Verdes Peninsula EWMP area. Detailed information on the model calibration can be found in Section 5 of the Appendix 4.1 RAA Report.

Consistent with the 2020 State Board Order, the updated Peninsula EWMP and RAA:

[1] Order No. R4-2012-0105, NPDES Permit No. CAS00400 Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles and Ventura Counties.

- Explains how information considered in the source assessment was used (EWMP Section 2 and Appendix 4.1 RAA Report).
- Identifies unavailable, needed information and the assumptions made to substitute for that information along with commitment to acquire the information through the Peninsula CIMP for incorporation in the next adaptive management milestone (EWMP Appendix 4.1 RAA Report 7.1.3 Mercury and Arsenic).
- Utilizes all relevant, available data[2] to update the EWMP and RAA, including updates to the water body pollutant combination (WBPC) prioritization and source assessment, TMDL milestone achievement, and RAA calibration and validation. Data not used in the RAA has been identified, with explanation as to why this data was disregarded.
- Models each WBPC and therefore does not utilize or necessitate justification of a limiting pollutant approach. Table 4-2 in Section 4 of the Updated EWMP provides the results of this analysis for each WBPC supported by the detailed RAA Report in Appendix 4.1.
- Includes 24-hour management volumes as a clear metric for demonstrating progress in attaining load reduction targets – Table 5-1 in Section 5 of the Updated EWMP provides the implementation schedule for demonstrating progress in attaining these volumetric reductions by subwatershed and analysis region. Water body/pollutant milestones are also included in this table.
- Considers ongoing CIMP monitoring data which is sufficient to evaluate attainment of milestones.

Modifications to Peninsula EWMP including Special Study for Mass-Based Compliance for Machado Lake Nutrient TMDL

The 2020 State Water Board Order (p. 29) recognizes that "Additional fine-tuning to develop more tailored pollutant levels and control plans…will often require updates to regional water quality control plans" and that "water body-specific special studies can provide adequate protections for beneficial uses at reduced compliance costs to local jurisdictions". Furthermore, Part C.3.b of Attachment N to the 2012 LA MS4 Permit pertaining to the Machado Lake Nutrient TMDL states, "Permittees may be deemed in compliance with water quality-based effluent limitations by demonstrating reduction of total nitrogen and total phosphorous on an annual mass basis measured at the storm drain outfall of the Permittee's drainage area where approved by the Regional Water Board Executive Officer based on the results of a special study by the Permittee."

The County of Los Angeles previously completed a special study to establish annual mass-based WQBELs for total nitrogen and total phosphorus under the Machado Lake Nutrient TMDL for its unincorporated areas, including those within the Peninsula EWMP area, which was developed

[2] "Available data" includes all data collected through June 30, 2020 by the Peninsula WMG. This date marks the end of the 2019-2020 reporting year of CIMP monitoring results, which includes data that has been analyzed and verified according to the Peninsula CIMP QAPP standard for quality assurance and quality control (QA/QC). Monitoring data collected after this time has not yet been verified for QA/QC in accordance with this protocol, and so has not been used in the updated RAA and EWMP, but will be used in the next update.

following approval of the Special Study Workplan by the Los Angeles Water Quality Control Regional Board[3]. The updated Peninsula EWMP RAA establishes mass-based loading estimates and WLAs for the entire Peninsula EWMP area, consistent with and following the same approach established in the approved Los Angeles County Machado Lake Nutrient TMDL Special Study[4].

The updated RAA utilizes a mass-based approach to assess the annual average loading estimates and the waste load allocations (WLAs) for constituents of concern associated with the Machado Lake Nutrient TMDL.[5] The approach is based on and consistent with the Los Angeles County Machado Lake Nutrient TMDL Special Study, which was previously approved by the Regional Board. The implemented approach utilizes both monitoring data and modeling results to estimate the dry and wet weather total nitrogen and total phosphorus loads to Machado Lake during the average annual year. Consistent with the Los Angeles County Special Study, water year 2010 was used as the critical year.

A summary of the approach used to establish the mass-based WLAs for both pollutants of concern is as follows:

1. The average water year was used as the critical year, consistent with the County Special Study.

2. The allowable annual average pollutant load was calculated as the Water Quality Based Effluent Limit (WQBEL) concentration multiplied by the annual average inflow to Machado Lake (8.45 HM^3/year) apportioned to the Peninsula EWMP area (directly or via Wilmington Drain). The table below shows the resultant pollutant loads for the Peninsula EWMP area. Allowable annual average pollutant loads applicable to Unincorporated Los Angeles County (taken directly from the approved Special Study) are also included to demonstrate consistency in the approach.

[3] LARWQCB (Los Angeles Regional Water Quality Control Board). 2010. *Machado Lake Nutrient TMDL – Conditional Approval of the Special Study Work Plan for the Unincorporated Areas of Los Angeles County within the Machado Lake Watershed.* May.

[4] LACDPW (Los Angeles County Department of Public Works). 2011. *Machado Lake Nutrient TMDL Special Study: Characterization of Water Quality Conditions in the Unincorporated Areas of Los Angeles County within the Machado Lake Watershed Final Report*. September.

[5] The Machado Lake Nutrient TMDL allows permittees to assess compliance with TMDL WLAs on a mass basis for total nitrogen and total phosphorous by submitting a special study to the LARWQCB.

		Unincorporated County	Peninsula EWMP Area[2]
Calculation input			
Machado Lake watershed (sq-mi)		22.5	
Annual average flow condition approved in the Special Study (hm3/day)		8.45	
Interim Concentration Based WQBELs (mg/L)	TP	1.25	
	TN	2.45	
Final Concentration Based WQBELs (mg/L)	TP	0.1	
	TN	1	
Compute annual average flow apportioned to the permittees			
Area tributary to Machado Lake (Directly or Via Wilmington Drain)	sq-mi	1.89	4.95
	% of Machado Lake Watershed	8.4%	22.0%
Flow apportioned to the permittees (hm3/day)		**0.71**	**1.86**
Compute the annual WLAs as concentration WQBELs multiplied by apportioned annual average flow			
Interim WLA (kg/year)	**TP**	**887[1]**	**2,322**
	TN	**1,739[1]**	**4,550**
Final WLA (kg/year)	**TP**	**71[1]**	**186**
	TN	**710[1]**	**1,857**

[1]All numbers presented for the Unincorporated County are consistent with the approved WLAs by the LARWQCB.
[2]The Peninsula EWMP area includes unincorporated Los Angeles County within the EWMP area, but does not include the City of Rolling Hills, which is a full 85th percentile, 24-hour storm retention area.

3. The baseline annual mass-based loads were computed as the summation of annual dry weather and wet weather mass-based loads during the critical year. The dry weather mass-based load was based on dry weather flow and water quality monitoring data collected through the Peninsula CIMP from June 2016 to June 2020. The wet weather mass-based load was obtained using the calibrated WMMS 2.0 model, including Peninsula CIMP data collected through June 2020.

4. The difference between the annual baseline load (step 3) and the annual WLA (step 2) resulted in the target load reduction required to meet the allowable TMDL limits.

Utilizing this approach, the RAA demonstrates that annual mass-based loading for total nitrogen from the Peninsula EWMP Area is less than the WLA for the critical condition, while annual mass-based loading for total phosphorus from the area is slightly higher than the WLA. Appendix 4.1 of the EWMP provides the details of these RAA results and Chapter 3 of the EWMP describes the projects that have been identified to reduce pollutant loads to achieve the WLAs.

Prior and Current Milestones and Associated Work

The updated EWMP demonstrates achievement of past and current milestones, consistent with the requirements of the 2020 State Board Order. For the Santa Monica Bay subwatershed areas of the Peninsula EWMP, attainment of the final receiving water limitations (RWLs) was established in the previously approved EWMP and no additional milestones were due on or before June 30, 2021. Monitoring data evaluated in this revision of the EWMP/RAA continues to show that TMDL RWLs and/or water quality based effluent limitations (WQBELs) are being met for pollutants of concern in the Santa Monica Bay subwatershed of the Peninsula WMG.

For the Inner Harbor and Cabrillo Marina water bodies of the Los Angeles Harbor to which the Peninsula EWMP areas are tributary, monitoring data demonstrates compliance with relevant Greater Los Angeles Harbor Toxics TMDL interim WQBELs in the bed sediment over a three-year averaging period consistent with TMDL provisions translated into Order No. R4-2012-0175 Attachment N, E.4.a.ii. This is addressed in Table 4-1 in Section 4 of the updated Peninsula EWMP as well as Section 7.6 of the Appendix 4.1 RAA Report. Thus, applicable prior and current milestones are being met within the Los Angeles Harbor subwatershed areas of the Peninsula EWMP and no other work associated with prior or current milestones was due in the previously approved Peninsula EWMP on or before June 30, 2021.

For the Machado Lake subwatershed areas of the Peninsula EWMP, the updated RAA demonstrates that interim WQBELs for Total Nitrogen and Total Phosphorus are being met in all the analysis regions of the Machado Lake subwatershed as discussed in Section 4 of the EWMP and in Section 7.6 of the Appendix 4.1 RAA Report. Final WQBELs are also being met in all analysis regions within the Machado Lake subwatershed of the Peninsula EWMP for Total Nitrogen, Total PCBs, Dieldrin and DDT (all congeners) as demonstrated in the RAA and shown by zero final target load reductions in Table 11 of the Appendix 4.1 RAA Report. The final WQBELs for Total Chlordane, DDE congeners and DDD congeners have not yet been attained within all analysis regions of the Machado Lake subwatershed and additional load reductions are also necessary for indicator bacteria in the Wilmington Drain analysis regions of the Machado Lake Subwatershed to address the 303(d) listing. The updated RAA quantifies the additional capture volume (expressed as 24-hour management volume) needed in each analysis region to satisfy the unmet final target load reductions.

Some of the prior and current action-based milestones have been completed in the Machado Lake subwatershed, including completion of two regional projects identified in the previously approved EWMP. The two remaining regional projects identified in the previously approved Peninsula EWMP have not been completed as planned since feasibility studies were conducted

and these projects were determined to be technically or environmentally infeasible. Alternative projects in various stages of implementation (feasibility study, planning or design) have been identified in the updated EWMP and incorporated into the RAA to address the remaining target load reductions. Completion of the additional projects identified in Table 5-1 in Section 5 of the Peninsula EWMP within five years of approval of the updated Peninsula EWMP will provide the needed capture volumes and attain the final WQBELs for the remaining unmet final WQBELs for Machado Lake as well as the RWLs for bacteria in Wilmington Drain. Timely requests for Time Schedule Orders have been submitted by the Peninsula WMG for the Machado Lake Nutrients and Pesticides & PCBs TMDLs to allow time for completion of these additional projects.

Thank you for consideration of our updated Peninsula EWMP and RAA. Please don't hesitate to contact me should Regional Board staff have any questions or require additional information.

Sincerely,



Charles Eder, PE
Senior Engineer, City of Rancho Palos Verdes
Chair of Palos Verdes Peninsula Watershed Management Group

cc: Renee Purdy, Executive Officer, LARWQCB, Renee.Purdy@waterboards.ca.gov
Jenny Newman, LARWQCB, Assist. Exec. Officer, Jenny.Newman@waterboards.ca.gov
Ivar Ridgeway, LARWQCB, Chief of Municipal Stormwater Permitting Unit, Ivar.Ridgeway@waterboards.ca.gov
Carolynn Petru, Interim Director of Public Works, City of Palos Verdes Estates, CPetru@PVEstates.org
David Wahba, Director of Community Development and Public Works, City of Rolling Hills Estates, DavidW@RollingHillsEstatesCA.gov
Mercedes Passanisi, Associate Civil Engineer, Los Angeles County Public Works MPassanisi@dpw.lacounty.gov

Comment #	Comment	Response
RAA Comments		
1	In the revised RAA, a 39.1% reduction in the baseline copper loading to the Los Angeles Harbor sub-watershed was calculated. This load reduction was calculated based on a 2013 Draft Study conducted by TDC Environmental for CASQA that described the expected percent reduction of copper as a result of the passage of SB 346. Was this load reduction used as an assumption in the watershed baseline conditions or as a model input? If this is correct, staff have concluded the WMP did not provide a sufficiently robust justification to support the specified pollutant load reduction. In addition, since the RAA was updated to included outfall and receiving water monitoring data through June 2020, it's likely any copper load reductions would have been accounted for as part of the model calibration. For these reasons a 39.1% baseline copper load reduction may not be appropriate and may require the RAA to be re-run.	The EWMP and RAA has been updated accordingly. See Section 4 and Appendix 4.1.
2	Another concern with the model and/or RAA is the use of the wrong criteria for the Machado Lake Nutrients TMDL. The cities of Palos Verdes Estates, Ranch Palos Verdes and Rolling Hills Estates were not approved for annual mass-based effluent limitations for total nitrogen and total phosphorus discharges. The Machado Lake Nutrients TMDL allows for annual mass-based loading, only after a Permittee has demonstrated total nitrogen and total phosphorous load reductions will be achieved in accordance with a special study workplan approved by the Executive Officer (EO). The County of Los Angeles submitted a special study workplan for the unincorporated County areas within the Machado Lake watershed, which was approved by the EO. The PVP WMG used the County's approval and applied it to the entire PVP WMP area. While this approach may be acceptable; the cities of Palos Verdes Estates, Rancho Palos Verdes, and Rolling Hills Estates didn't submit the required workplan to receive approval for this approach as outlined in the Machado Lake Nutrients TMDL. It may be possible for these cities to use the RAA in order to receive approval for the mass-based loads. Be advised, management has not provided clarification to staff at this time, which is important as the deadline specified in the TMDL allowing a mass-based load option has past.	Additional justification for using the annual mass-based effluent limitations method of compliance added to the cover letter. Also see Appendix 4.1.
3	Additionally, the model and/or RAA may have used the wrong bacteria criteria for *E. coli*. The data analysis of *E. coli* indicator bacteria densities discharged to Wilmington Drain used the LREC-1 single sample maximum receiving water limitation of 576/100 mL. However, the new REC-1 bacteria objectives for the geometric mean (100 cfu/100 mL) and the statistical threshold value (320 cfu/100 mL) for *E. coli* should have been used to evaluate discharges to Wilmington Drain. What criteria was used in the modeling and RAA?	The EWMP and RAA has been updated accordingly. See Section 4, Section 5, and Appendix 4.1.
EWMP Comments		
1	Section 5.2.2, Table 5-1, page 5-5, lists the structural targeted control measures to be implemented. However, not all the modeled projects listed in Table 3-1 are included in Table 5-1. The two distributed projects, Rolling Hills Road Street Improvement, 0.06 ac-ft and Palos Verdes Drive East Street Improvement, 0.04 ac-ft are not listed in Table 5-1. These two distributed projects are included in Figures 5-1 and 5-2. If	The EWMP has been updated accordingly. See Section 3 and 5.

Comment #	Comment	Response
	these projects will be relied on to meet compliance, then these projects need to be included in Table 5-1 and an implementation schedule needs to be provided.	
2	Section 5.2.2, Figures 5-1, 5-2, and 5-3, pages 5-6 to 5-8, presents the projects by WMG member. Do these figures include all the responsible Permittees for each project or just the lead WMG member as listed in Table 5-1? If these figures do not include all responsible Permittees then the WMP needs to include this information.	The EWMP has been updated accordingly. See Section 5. The responsible Permittees are listed in Figures 5-1, 5-2, and 5-3.
3	In Section 3.5.1.1.3 Proposed Regional BMPs, on page 3-25, the Palos Verdes Drive East Street Improvement is listed as a proposed project in the Machado Lake Watershed. However, there is no description of this project in this section. In Section 3.5.1.1.4 Potential Regional BMPs, there is a description of the Palos Verdes Drive East **Green** Street project. Are these the same project? If so, then the WMP needs to specify whether this is a "proposed" or "potential" project. If these are two different projects then provide a description in Section 3.5.1.1.3. In addition, clarify which project was modeled as listed in Table 3-1 on page 3-11.4. Assess 1st year of CIMP data to verify existing load assumptions and assess the group's contribution of coliform bacteria by July 1, 2016 (Wilmington Drain).	The EWMP has been updated accordingly. See Section 3. The Palos Verdes Drive East Street Improvement is the same project as the Palos Verdes Drive East Green Street project. The project is "potential".
4	In Section 3.1.2.6, for the Public Information and Participation Program, include the metrics for measuring the effectiveness in achieving each objective listed in Part VIII.D.2 of the Order, as required in Part VIII.D.4.a of the Order.	The EWMP has been updated accordingly. See Section 3.
5	Per Part IX.G.3.a of the Order, update the Peninsula WMP to be consistent with the requirements of the Regional MS4 Permit and update all references to the previous permit.	The EWMP and RAA have been updated accordingly.
6	Update the Peninsula WMP to include the Addendum from the City of Rolling Hills.	The EWMP and RAA have been updated accordingly.
7	Where necessary, update links and references to the 2018 303(d) list, which is the current 303(d) list (e.g., Sections 1.3.1 and 2.2 of the EWMP).	The EWMP has been updated accordingly.
8	Table 2-11, page 2-21, the Sediment Target unit is incorrect it should be micrograms/kg not nanograms/kg.	The units have been corrected.
9	Section 2.2.3, page 2-23, second paragraph, in the sentence "Thus, there appears to have been no degradation in sediment quality in these **three** water bodies since adoption of the TMDL." Besides Los Angeles Harbor and Cabrillo Marina, what is the third water body this sentence is referencing?	The EWMP has been updated accordingly. The Peninsula drains to two waterbodies in the Los Angeles Harbor Watershed: Inner Harbor and Cabrillo Marina.
10	Section 2.3, page 2-26, tenth bullet, Figure 1-1 does not show the Peninsula agencies' MS4s, major outfalls, or major structural controls.	The EWMP has been updated accordingly. Figure 1-1 shows the Peninsula agencies' MS4s and major outfalls. Figure 3-1 shows the structural controls modeled in the RAA.
11	Section 2.3.1, page 2-28, Table 2-14 is not consistent with the narrative that follows. For example, sanitary sewer, septic systems, and RV waste are sources of bacteria, and wildfires are sources of PAHs and increase	The EWMP has been updated accordingly. Sources have been

Comment #	Comment	Response
	TSS. Does Table 2-14 present only the MS4 sources of priority pollutants that the Peninsula WMP will be addressing? If so, then this needs to be clarified in the WMP.	updated to be consistent with the narrative.
12	Section 2.3.2, Table 2-17, page 2-42: According to the Addendum to the Palos Verdes Peninsula EWMP submitted by the City of Rolling Hills, "The Portion of the Peninsula WMG with drainage tributary to Santa Monica Bay consists of approximately 14.8 square miles, which is about 3.6% of the Santa Monica Bay Watershed (414 sq. mi.)." Therefore, the calculation of the percentage of the Santa Monica Bay DDT and PCBs TMDL annual mass-based wasteload allocation should be based on 3.6% not 3.8%. Update, the Santa Monica Bay TMDL Annual Mass-Based WLA in Table 2-17, to 0.97 g/year and 5.05 g/year for DDT and PCBs, respectively.	The EWMP has been updated accordingly. The SMB TMDL Annual Mass-Based WLA has been updated in Table 2-17.
13	In the second column of Table 2-18, page 2-43 there is an asterisk on the units, is there a missing footnote?	The EWMP has been updated accordingly. A footnote has been added in Table 2-18
14	Update Figure 2-12, on page 2-50, to use the E. coli STV of 320 cfu/100 mL as the receiving water criteria.	The EWMP has been updated accordingly. Figure 2-12 has been removed. Narrative reflects the change of receiving water criteria.
15	Footnote (c) of Table 3-1, page 3-11, states, “Does not include non-Peninsula EWMP drainage area.” Is this statement still valid now that Rolling Hills is joining the WMP?	The EWMP and RAA has been updated accordingly. Rolling Hills is now a part of the Peninsula EWMP.
16	Section 3.5.1.1.1, San Ramon Canyon, page 3-14: Water Conservation/Supply is listed as one of the benefits of the San Ramon Canyon project. Does this project retain stormwater onsite?	The EWMP has been updated accordingly. Additional details about project water supply benefit has been added to Section 3.5.1.1.1.
17	In Table 4-3, page 4-6, the final target load reduction value of 1.5 ac-ft for analysis region LAH-CM has footnote 1. Footnote 1 does not seem to apply, should this be a different footnote reference?	The EWMP and RAA have been updated accordingly. Footnote has been revised in Table 4-3.
18	In Table 5-1, page 5-5, the "Final TLR Equivalent 24-hour Management Volume” values for analysis regions WD-Solano and LAH-IH do not match the values in Table 4-3 and Appendix 4.1 RAA, Section 7.6, Table 11.	The EWMP and RAA has been updated accordingly. See consistent values from Section 4, Section 5, and Appendix 4.1.
19	In Section 10.1, page 10-1, the annual reporting period is from July 1st through June 30th of the following year. Correct footnote 87 to reflect these dates not June 1st through July 30th.	The EWMP has been updated accordingly. Footnote corrected.
20	Per Part IX.A.4.l of the Order, identify the lead agency for the Peninsula WMG.	The EWMP has been updated accordingly. See Section 1 identifying the City of RPV as the lead agency for the Peninsula WMG.
21	Remove any statements intended to make implementation of actions contingent on funding or information-gathering. While such issues may be cited in a separate request for a scheduling change to the Los Angeles	The EWMP has been updated accordingly.

Comment #	Comment	Response
	Water Board Executive Officer, they cannot be used to create a contingency. To the extent that any contingency statements remain in the WMP, the Board gives them no effect.	



PALOS VERDES PENINSULA ENHANCED WATERSHED MANAGEMENT PROGRAM

Submitted By:

Palos Verdes Peninsula Watershed Management Group

Revised: May 13, 2022

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1. INTRODUCTION AND BACKGROUND

1.1. INTRODUCTION

The Los Angeles Regional Water Quality Control Board (Regional Board) regulates discharges from municipal separate storm sewer systems (MS4s) through the Municipal Separate Storm Sewer System Permit (MS4 Permit). The purpose of the MS4 Permit is to protect the beneficial uses of the receiving waters in the Los Angeles County region by regulating municipal stormwater and non-stormwater discharges from the permittees' MS4s. The overarching goal of these requirements is to reduce the discharge of pollutants from MS4s to the maximum extent practicable.[1] The Permit allows permittees the flexibility of developing an Enhanced Watershed Management Program (EWMP) to implement the requirements of the Permit. Implementation is to be achieved on a watershed basis through customized strategies, control measures, and BMPs to ensure that discharges from the permittees' MS4s:

i. Achieve applicable WQBELs,
ii. Do not cause or contribute to exceedances of receiving water limitations, and
iii. Do not include non-storm water discharges that are effectively prohibited.

Following the adoption of the 2012 MS4 Permit, the Cities of Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills Estates, along with the County of Los Angeles (Unincorporated County), and Los Angeles County Flood Control District (LACFCD), collectively referred to as the Peninsula WMG, began to collaborate on the initial development of an Enhanced Watershed Management Program (EWMP) to implement the requirements of the MS4 Permit on a watershed scale and address the water quality priorities for the Palos Verdes Peninsula watersheds. The Peninsula WMG coordinated with other agencies and watershed management groups in the initial development of the 2016 EWMP, including the City of Los Angeles, the Dominguez Channel EWMP Group, and the Beach Cities EWMP Group. The initial Peninsula EWMP was approved by the Regional Board in April 2016. The City of Rolling Hills has elected to join the Peninsula WMG and has been incorporated into this revised EWMP. The City of Rancho Palos Verdes is the lead agency for the Peninsula WMG.

This revised EWMP reevaluates the Peninsula WMG's water quality priorities identified during the initial development of the 2016 EWMP in Section 2, presents an updated program of BMPs intended to achieve these water quality priorities in Section 3The results of the revised EWMP are significantly different than the initial EWMP due to availability of Coordinated Integrated Monitoring Program (CIMP) monitoring data and continuous flow monitoring data within the Peninsula WMG area used to calibrate the updated Reasonable Assurance Analysis (RAA) model. The updated Reasonable Assurance Analysis (RAA) results are summarized in Section 4 and the BMP implementation schedule is summarized in Section 5. The financial strategy incorporating new sources of funding for implementation is detailed in Section 6, Section 7 provides the Legal Authority language, Section 8 refers to the Coordinated Integrated Monitoring Program, Section 9 summarizes the Adaptive Management process, and Section 10 summarizes the Reporting Program.

[1] Reference: http://www.swrcb.ca.gov/water_issues/programs/stormwater/municipal.shtml

1.2. PENINSULA WATERSHED

The geographic scope of the Peninsula EWMP (as shown in **Figure 1-1**) is comprised of the incorporated Cities of Rancho Palos Verdes, Palos Verdes Estates, Rolling Hills, Rolling Hills Estates, and unincorporated areas of the County of Los Angeles and LACFCD facilities (See Appendix 1.0 for a description of the LACFCD and its responsibilities within the Peninsula WMG).

The Palos Verdes Peninsula is situated in the southwestern portion of Los Angeles County atop the Palos Verdes Hills, which are bounded to the north by the cities of Torrance and Lomita, to the east by the San Pedro area of the City of Los Angeles, and to the south and west by the Pacific Ocean. The Peninsula WMG area is divided into two HUC-12 equivalent watersheds: 1) Santa Monica Bay (SMB) Watershed and 2) the Greater Dominguez Channel Watershed Management Area, which is subdivided into two subwatersheds, the Los Angeles Harbor Subwatershed and the Machado Lake Subwatershed. A change in drainage divides the Peninsula WMG from the northeast to the southwest with the westerly and southwesterly portion draining into Santa Monica Bay and the northeasterly portion draining to Machado Lake and the Los Angeles Harbor. The SMB Watershed accounts for 58% (14.8 square miles) of the total Peninsula WMG area, and includes portions of the cities of Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills, and Rolling Hills Estates. The Los Angeles Harbor Subwatershed accounts for 18% (4.5 square miles) of the total Peninsula WMG area and includes portions of the cities of Rancho Palos Verdes, Rolling Hills, and Rolling Hills Estates. The Machado Lake Subwatershed accounts for 24% (6.2 square miles) of the total Peninsula WMG area, and includes portions of the cities of Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills, Rolling Hills Estates, and the unincorporated areas of the County of Los Angeles. Drainage from the Peninsula WMG agencies is conveyed via natural soft bottom canyons in conjunction with structured storm drain systems. Table 1-1 provides the Peninsula EWMP area identified by watershed and agency, and **Figure 1-1** provides a map of the Peninsula EWMP watershed and jurisdictional boundaries, including existing water quality monitoring sites in the Peninsula EWMP area.

Table 1-1: Jurisdictional Areas within Each Peninsula EWMP Watershed

Permittee	Rancho Palos Verdes	Palos Verdes Estates	Rolling Hills	Rolling Hills Estates	County of Los Angeles	Total
Land Area within Santa Monica Bay Watershed (Square Miles)	9.35	4.35	0.64	0.46	0	**14.8**
Land Area within Machado Lake Subwatershed (Square Miles)	1.07	0.39	1.3	2.78	0.7	**6.2**
Land Area within Los Angeles Los Angeles Harbor Subwatershed (Square Miles)	3.02	0	1.1	0.34	0	**4.5**
Total EWMP Area	**13.5**	**4.8**	**3.0**	**3.6**	**0.7**	**25.6**

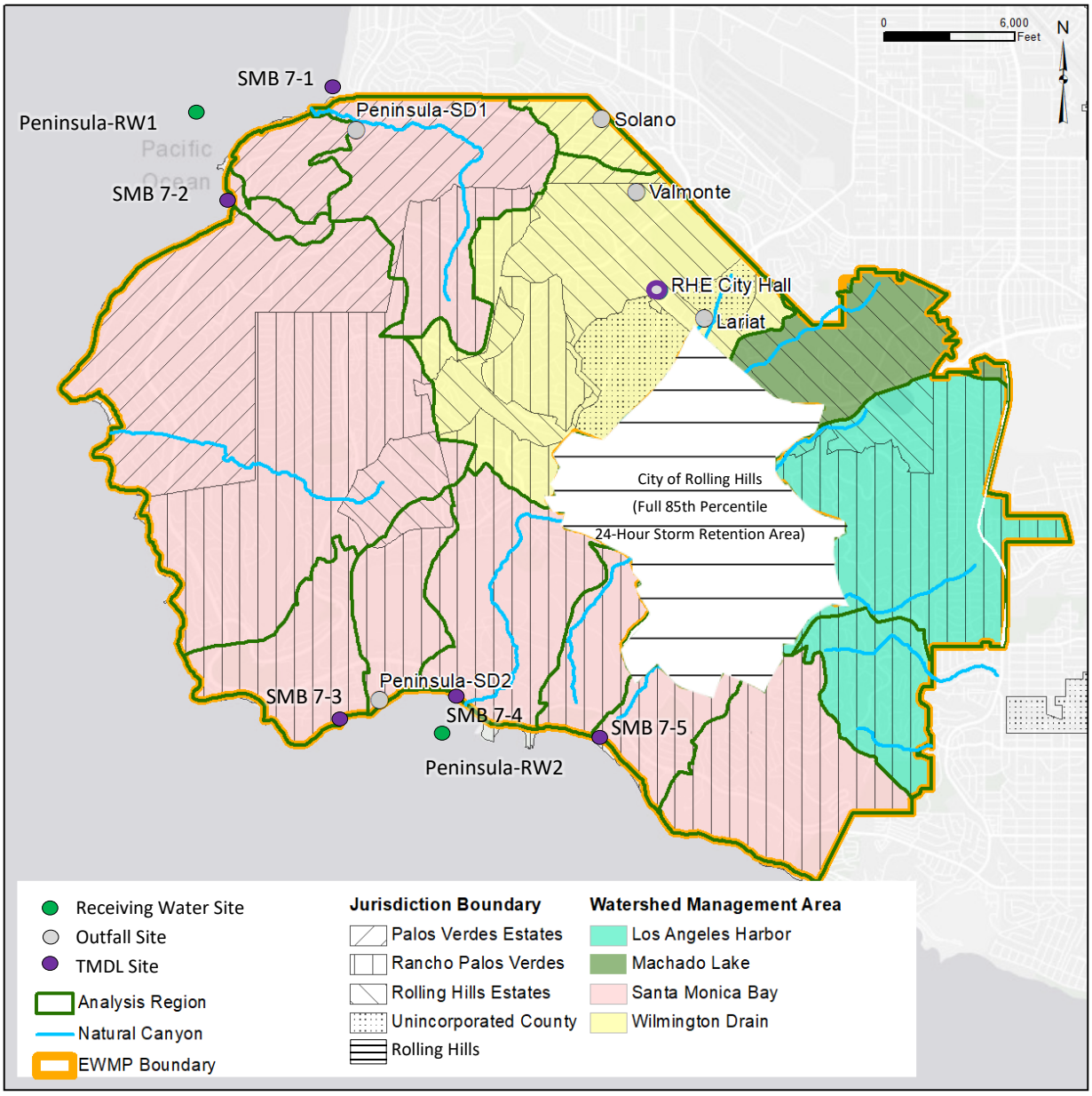


Figure 1-1: Peninsula EWMP Area and Existing Monitoring Locations

1.3. WATER QUALITY ISSUES AND THE HISTORY OF WATER QUALITY REGULATIONS

1.3.1. FEDERAL LAW, STATE LAW, AND REGULATORY FRAMEWORK

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for all inland surface waters, estuaries, and coastal waters. The federal Environmental Protection Agency (EPA) is ultimately responsible for implementation of the CWA and its associated regulations. In 1972 the National Pollution Discharge Elimination System (NPDES) was created through Section 402 of the Federal Clean Water Act. The NPDES prohibits discharges of pollutants from any point source, including the MS4 system, into the nation's waters except as allowed under an NPDES permit. The MS4 system includes curbs and gutters, man-made channels, catch basins and storm drains.

The CWA allowed the federal EPA to authorize the NPDES Permit Program to state governments, enabling states to perform many of the permitting, administrative, and enforcement aspects of the NPDES Program. California, like other states, implements the CWA by promulgating its own water quality protection laws and regulations. As long as this authority provides equivalent protections as the federal CWA, EPA can delegate CWA responsibilities to the state while retaining oversight responsibilities. In some cases, California has established requirements that are more stringent than federal requirements.

The 1970, the Porter-Cologne Water Quality Control Act granted the California State Water Resources Control Board (SWRCB) broad powers to protect water quality. The SWRCB chartered nine Regional Water Quality Control Boards (Regional Boards) with regulatory responsibility for developing and enforcing water quality objectives and implementation plans to best protect the beneficial uses of local waterbodies. To protect clean water at the local level, municipalities in Los Angeles County and the County of Los Angeles unincorporated areas are required to obtain a discharge permit from the Regional Board to discharge stormwater through the MS4 into Waters of the United States, hence the MS4 Permit. The Los Angeles Regional Water Quality Control Board (Regional Board) is the governing regulatory agency for water quality within the Peninsula WMG area.

Section 303(d) of the CWA requires states to regularly identify waterbodies not meeting water quality objectives. These waters are often referred to as "303(d) listed" or "impaired" waters. Development and approval of the 303(d) list is a lengthy state and federal process. A list is not effective until the USEPA approves the list. The current 303(d) list for California was approved by USEPA on April 6th, 2018. Changes from the previous 303(d) list include removal of sediment toxicity for the Santa Monica Bay Offshore/Nearshore, and revising the list of Category 2 Water Body Pollutant Combinations by adding arsenic and mercury impairments for the Santa Monica Bay Offshore/Nearshore.

Waterbodies that are listed on the 303(d) list typically require development of a Total Maximum Daily Load (TMDL) for the pollutant(s) impairing the use of water. A TMDL establishes the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards. Depending on the nature of the pollutant, TMDL implementation requires limits on the contributions of pollutants from point sources (waste load allocation), nonpoint sources (load allocation), or both.

Adoption of a TMDL requires an amendment to the Water Quality Control Plan (known as the Basin Plan) for the Los Angeles Region. The Regional Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of regional waters. Specifically, the Basin Plan (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be

attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy, and (iii) describes implementation programs to protect all waters in the Region. The Basin Plan is reviewed and updated as necessary (Regional Board 1994, as amended). Following adoption by the Regional Board, the Basin Plan and subsequent amendments are subject to approval by the State Board, the State Office of Administrative Law (OAL), and the Environmental Protection Agency (EPA). The MS4 Permit includes effluent limitations, receiving water limitations, minimum control measures (MCMs), and TMDL provisions, and outlines the process for developing watershed management programs, including the EWMP. Development of an EWMP is one of the options outlined in the MS4 Permit to address effluent limitations, receiving water limitations, and TMDLs. The EWMP must also incorporate MCMs, which are programs required to be implemented to address water quality issues.

1.3.2. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The stormwater structural controls that will be implemented as a result the EWMP may require discretionary approval subject to review under the California Environmental Quality Act (CEQA). The LACFCD has prepared a Programmatic Environmental Impact report (PEIR) for all EWMP groups in which they are a part. This PEIR covers CEQA requirements for the EWMPs as a whole. The Peninsula WMG intends to comply with CEQA when implementing structural BMPs contained in this updated EWMP. Public agencies responsible for carrying out or approving stormwater structural controls are identified as the lead agency. The environmental review required imposes both procedural and substantive requirements. At a minimum, the lead agency will adhere to the consultation and public notice requirements set forth in the CEQA Guidelines, make determinations whether the proposed stormwater structural control is a “project”, and if so, conduct an initial review of the project and its environmental effects. The lead agency will identify and document the potential environmental impacts of the proposed project in accordance with CEQA, (Public Resources Code Section 21000 et seq.), and the CEQA Guidelines (Title 14 of the California Code of Regulations, Section 15000, et seq.).

Certain classes of projects have been determined not to have significant effect on the environment and are exempt from the provisions of CEQA by statute or category. When a public agency decides that a project is exempt from CEQA, and the public agency approves or determines to carry out the project, the agency may file a Notice of Exemption. For projects deemed not exempt, the lead agency will prepare an Initial Study and decide whether a Negative Declaration is applicable for the project, or depending on the potential effects, a further, and more substantial review may be conducted in the form of an Environmental Impact Report (EIR). A project may not be approved as submitted if feasible alternatives or Mitigation Measures are not able to substantially lessen the significant environmental effects of the project. Moreover, environmental review must include provisions for wide public involvement, formal and informal, in order to receive and evaluate public reactions to environmental issues, and when deciding the matter, the lead agency must consider all comments it receives (Cal. Pub. Res. Code § 21091(d)(1); 14 CCR § 15074(b)). The lead agency will use the EIR in determining the environmental effects of the proposed storm water project, and whether or not to approve the proposed project. If the proposed project is approved, all conditions and mitigations made in the adopted EIR will become part of any subsequent actions taken by the lead agency. The CEQA process will also be used by permitting agencies, funding agencies and the public to support proposed project decisions.

The National Environmental Policy Act (NEPA) comes into play less often than CEQA, but may be included for storm water projects involving federal funding. A joint NEPA and CEQA review process is encouraged to improve coordination and avoid redundancies. Like CEQA, the NEPA process provides opportunities to address issues related to proposed projects early in the planning stages. NEPA was codified under Title 42 of the United States Code sections 4331 et seq. (42 U.S.C. 4331 et seq.).

1.4. WATER QUALITY REQUIREMENTS

The Regional Board designates "beneficial uses" for waterbodies in the watersheds that it governs and adopts water quality objectives to protect these uses through the Basin Planning process[2]. In some cases, EPA may also promulgate objectives where it makes a finding that the state's objectives are not protective enough to protect the beneficial use. The nature of the objectives is directly related to the type of beneficial use. For example, the freshwater warm habitat beneficial use protects aquatic organisms resident in warm-water streams. The associated water quality objectives are for those constituents known to affect both the growth and reproduction of aquatic life. These objectives range from physical characteristics such as temperature, dissolved oxygen, and pH to potential toxic constituents including metals and organics. In California, the objectives for metals and a number of organic compounds have been established by the federal EPA rather than the state (California Toxics Rule, 2000). The EPA promulgated numeric water quality criteria for priority toxic pollutants and other water quality standards provisions based on the determination that the numeric criteria were necessary (since the state had been without numeric water quality criteria for many priority toxic pollutants as required by the CWA) to protect human health and the environment. These Federal criteria are legally applicable in the state for inland surface waters, enclosed bays and estuaries for all purposes and programs under the CWA. The State Water Resources Control Board (State Water Board) adopted the Water Quality Control Plan for Ocean Waters in California, California Ocean Plan in 1972 and adopted the most recent amended Ocean Plan on February 4, 2019. The Ocean Plan also establishes water quality objectives and a program of implementation to protect beneficial uses at all MS4 discharge points within Los Angeles County coastal watersheds. See Chapter 2 for more details.

[2] See Regional Board's Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, accessed May 07, 2021.

1.5. THE ENHANCED WATERSHED MANAGEMENT PROGRAM

1.5.1. WATERSHED MANAGEMENT GOALS AND PRIORITIES

Addressing MS4 discharges on a watershed scale allows permittees to meet the requirements of the Permit and address water quality priorities in an integrated and collaborative way. The conditions of the receiving waters drive management actions, which in turn focus on the measures to address pollutant contributions to and from the MS4.

The ultimate goals of the EWMP is to ensure that discharges from the MS4:

1. Achieve applicable Water Quality Based Effluent Limitations (WQBELs) that implement TMDLs,
2. Do not cause or contribute to exceedances of receiving water limitations,
3. Non-stormwater discharges from the MS4 are not a source of pollutants to receiving waters.

1.5.2. WATER QUALITY MANAGEMENT APPROACH

Development of an EWMP is one of the options outlined in the MS4 Permit held by Permittees to address effluent limitations, receiving water limitations, and TMDLs. The EWMP includes an evaluation of existing water quality conditions, including characterization of storm water and non-storm water discharges from the MS4 and receiving water quality to support identification and prioritization/sequencing of management actions. At a minimum, water quality priorities within each Watershed Management Area must include achieving applicable water quality-based effluent limitations and/or established receiving water limitations.

The MS4 permit requires that this EWMP identify strategies, control measures, and BMPs to implement on a watershed scale, with the goal of creating an efficient program to focus collective resources on meeting watershed priorities and effectively controlling the source of pollutants to and from the MS4.

See Chapter 2 of this EWMP for an evaluation of existing water quality conditions and classification of waterbody pollutant combinations as Category 1 (Highest Priority), Category 2 (High Priority), and Category 3 (Medium Priority).

This EWMP has incorporated State agency input from various sources on priority setting and implementation issues. Specific priorities incorporated include, but are not limited to, the following:

- The EWMP is consistent with priorities listed in SB 985 and is in accordance with the Storm Water Resource Plan Guidelines[3] for all categories with the exception of those which are more applicable to the Peninsula Coordinated Integrated Monitoring Plan and the California Water Service Urban Water Management Plan.
- The Peninsula WMG lies within the South Bay subregion of the LA IRWMP and will include its regional projects in the LA IRWMP database.
- The Stormwater Strategic Initiative[4] identifies prioritization of projects to address issues facing the storm water program. Efforts described within this EWMP have used the same priorities in mind,

[3] Storm Water Resource Plan Guidelines. State Water Resources Control Board. December 15, 2015.
[4] Stormwater Strategic Initiative. State Water Resources Control Board. June 25, 2015.

including, but not limited to optimizing the use of stormwater as a resource and providing consistent and widespread messaging to broaden the understanding of the value of stormwater.

- The Strategy to Optimize Resource Management of Storm Water[5] identifies four main goals, all of which the EWMP has incorporated: 1) Change the Perspective that Storm Water is a Waste or Hazard, and Treat it as a Valuable Water Resource; 2) Manage Storm Water to Preserve Watershed Processes and Achieve Desired Water Quality and Environmental Outcomes; 3) Implement Efficient and Effective Regulatory Programs; and 4) Collaborate in order to Solve Water Quality and Pollutant Problems with an Array of Regulatory and Non-Regulatory Approaches
- The California Water Action Plan[6] describes several actions to address the drought in California. The actions which this EWMP has incorporated include: making conservation a California way of life; increasing regional self-reliance and integrated water management across all levels of government; protecting and restoring important ecosystems; managing and preparing for dry periods; expanding water storage capacity and improving groundwater management; and providing safe water for all communities.
- The EWMP has incorporated goals in line with the California Stormwater Quality Association's 2019Strategic Plan[7] and 2020 Vision for Sustainable Stormwater Management[8], including:
  - **Collaboration** – Advance collaboration to address water quality problems in California;
  - **Education/Outreach** – Advance the knowledge of stormwater quality professionals and increase the awareness and knowledge of policy-makers and regulators in California regarding stormwater issues;
  - **Implementation Guidance** – Advance the quality of implementation guidance for environmentally beneficial and cost-effective adaptive management approaches to improving stormwater quality in California that emphasize true source control and operational source control over treatment;
  - **Regulatory Review** – Advance the development of consistent, proactive, and flexible stormwater policy and regulations consistent with the maximum extent practicable (MEP) standard of pollutant reduction through the incorporation of the latest scientific and economic information to promote the protection of water quality of beneficial uses; and
  - **Scientific Assessment** – Advance the understanding of pollutants of concern and their sources, fate, and transport, and the effectiveness of best management practices (BMPs) to control them.

In order to achieve the goals of the MS4 Permit, the approach of the EWMP is to:

- Prioritize water quality issues resulting from stormwater and non-stormwater discharges from the MS4 to receiving waters,
- Identify and implement strategies, control measures, and BMPs that:
  - Achieve applicable water quality-based effluent limitations[9]
  - Prevent exceedances of receiving water limitations[10]

[5] Strategy to Optimize Resource Management of Storm Water. State Water Resources Control Board. December 11, 2015.
[6] California Water Action Plan. California Natural Resources Agency, California Department of Food and Agriculture, and the California Environmental Protection Agency (Cal/EPA). January 14, 2016.
[7] CASQA Strategic Plan and Organizational Goals (April 2019) accessed May 26, 2021..
[8] Vision for Sustainable Stormwater Management – October 2020. California Stormwater Quality Association (CASQA). October 2020.
[9] Pursuant to Part VI.B and Attachments J through S of the Permit pursuant to corresponding compliance schedules
[10] Pursuant to Parts V and X and Attachments J through S of the Permit

- Cumulatively retain the runoff volume from the 85th%, 24-hour storm event for the drainage area tributary to the applicable receiving water
- Prevent non-stormwater discharges that are effectively prohibited[11]
- Reduce the discharge of pollutants to the maximum extent practicable[12]

- Execute an integrated monitoring program and assessment program[13] to determine progress towards achieving applicable limitations and/or action levels.
- Modify strategies, control measures, and BMPs as necessary based on analysis of monitoring data collected pursuant to the Monitoring and Reporting Program (MRP) to ensure that applicable water quality-based effluent limitations and receiving water limitations and other milestones set forth in the EWMP are achieved in the targeted timeframes.

The overall approach is adaptive, whereby BMPs will be implemented, their effectiveness monitored and modifications to this EWMP will be made as needed. These modifications will maintain consistency with the assumptions and requirements of applicable TMDL Waste Load Allocations.

[11] Pursuant to Part III.A of the Permit
[12] Pursuant to Part IV.A.1 of the Permit
[13] Pursuant to Attachment E – MRP of the Permit

1.6. REASONABLE ASSURANCE ANALYSIS AND WATERSHED CONTROL MEASURES

As part of the initial EWMP development, a Reasonable Assurance Analysis (RAA) was conducted on a watershed level, to determine through quantitative analysis or modeling, the target load reductions (TLRs) necessary for each of the Peninsula EWMP priority pollutants in order to achieve water quality objectives for areas of the EWMP not addressed through retention of the 85th%, 24-hr storm event. As a part of the Peninsula EWMP's adaptive management process, the Peninsula WMG is required to submit a revised EWMP to the Regional Board, including an updated RAA, by June 30, 2021.

Building upon the original EWMP, the Revised RAA has been updated to include recent CIMP monitoring data, project planning and implementation, and modeling advances over the past five years. The updated wet weather RAA was conducted using the Watershed Management Modeling System 2.0 (WMMS 2.0), the latest modeling tool developed by LACFCD, to determine a cost-effective implementation strategy to meet applicable water quality priorities. For dry weather, a revised semi-quantitative approach was implemented to update the dry weather portion of the revised RAA.

A suite of Watershed Control Measures (i.e. BMPs) to be implemented to achieve the necessary TLRs is described in Chapter 3 of this revised EWMP. Watershed Control Measures are subdivided into 1) Minimum Control Measures, 2) Non-Stormwater Discharge Measures 3) TMDL Control Measures and 4) other control measures. A schedule has also been developed in Chapter 5 for the strategies, control measures and BMPs to be implemented by each individual Permittee within its jurisdiction and for those that will be implemented by multiple Permittees on a watershed scale. The schedules will measure progress on a semi-regular basis during permit term(s) and incorporate:

1) Deadlines occurring within the permit term for all applicable interim and/or final water quality-based effluent limitations and/or receiving water limitations to implement TMDLs,

2) Interim deadlines and numeric milestones within the permit term for any applicable final water quality-based effluent limitation and/or receiving water limitation to implement TMDLs, where deadlines within the permit term were not otherwise specified, and

3) Watershed priorities related to addressing exceedances of receiving water limitations.

1.7. ADAPTIVE MANAGEMENT

An adaptive management process will continue to be implemented to further refine and adapt the EWMP to become more effective, based on, but not limited to the following:

1. Progress toward achieving the outcome of improved water quality in MS4 discharges and receiving waters through implementation of the watershed control measures,
2. Progress toward achieving interim and/or final water quality-based effluent limitations and/or receiving water limitations, or other numeric milestones where specified, according to established compliance schedules,
3. Achievement of interim milestones;
4. Reopening of TMDLs and new 303(d) listings;
5. Re-evaluation of the highest water quality priorities identified for the Watershed Management Area based on more recent water quality data for discharges from the MS4 and the receiving water(s) and a reassessment of sources of pollutants in MS4 discharges,
6. Availability of new information and data from sources other than the Permittees' monitoring program(s) within the Watershed Management Area that informs the effectiveness of the actions implemented by the Permittees,
7. Regional Water Board recommendations; and
8. Recommendations for modifications to the EWMP solicited through a public participation process.

Based on the results of the adaptive management process, modifications necessary to improve the effectiveness of the EWMP will be reported in the Annual Report, and as part of the Report of Waste Discharge (ROWD). Any necessary modifications to the EWMP will be implemented upon acceptance by the Regional Water Board Executive Officer within 60 days of submittal if the Regional Water Board Executive Officer expresses no objections.

2. IDENTIFICATION OF WATER QUALITY PRIORITIES

This updated Enhanced Watershed Management Program (EWMP) re-evaluates water quality priorities identified for the Palos Verdes Peninsula Watershed Management Group (Peninsula WMG) during the initial development of the EWMP. Water quality priorities have been revised based on updated information and recent water quality data collected in the receiving water and re-assessment of sources of pollutants in the watershed based on discharge water quality data collected from Peninsula WMG outfalls since the initial development of the EWMP.

During the initial development of the EWMP, an evaluation of existing water quality conditions was conducted in order to evaluate and prioritize water quality issues. Available data from applicable Total Maximum Daily Loads (TMDLs), the State's 303(d) list of impaired water bodies, and available monitoring data collected between 2003-2015 were analyzed. For this update, recent information as well as four years of receiving water and outfall water quality monitoring data collected between 2016 and 2020 under the Palos Verdes Peninsula Coordinated Integrated Monitoring Program (Peninsula CIMP) have been assessed as summarized below in Section 2.2 Receiving Water Characterization and Section 2.3 Source Assessment.

2.1. WATER QUALITY CHARACTERIZATION AND PRIORITIZATION

The updated receiving water characterization in Section 2.2 has been used to identify pollutants of concern for the Peninsula WMG and to classify them into the following three waterbody-pollutant combination categories:

CATEGORY 1: Waterbody-pollutant combinations for which water quality-based effluent limitations and/or receiving water limitations are established pursuant to a Total Maximum Daily Load (TMDL) as identified in Part VI.B TMDL Provisions and Attachments J through S of the MS4 Permit.

CATEGORY 2: Pollutants for which data indicate water quality impairment in the receiving water according to the State Board's Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (State Listing Policy) and for which MS4 discharges may be causing or contributing to the impairment but for which a TMDL has not been established.

CATEGORY 3: Pollutants for which there are insufficient data to indicate water quality impairment in the receiving water according to the State's Listing Policy but for which data indicating exceedances of applicable receiving water limitations may be occurring and for which MS4 discharges may be causing or contributing to the exceedance.

This categorization forms the basis for prioritizing pollutants to be addressed by the EWMP. All of the identified Peninsula WMG's pollutants of concern fall into either Category 1 or 2 classification. There are no Category 3 pollutants identified based on the receiving water characterization. **Table 2-1** summarizes the priority pollutant categorization for the Peninsula EWMP. As shown, Category 1 and Category 2 pollutants are considered with Highest and High Priority, respectively, in identifying control measures to be implemented in each watershed. Highest priority pollutants include those with water quality-based effluent limitations and/or receiving water limitations established pursuant to a TMDL. High priority pollutants include those for which data indicate impairment of receiving water limitations and for which the source assessment detailed in Section 2.3 has identified MS4 discharges as a potential source.

Table 2-2: Peninsula EWMP Priority Pollutants

Category	Priority	Pollutant	Waterbody					
			Santa Monica Bay	Santa Monica Bay Beaches	Machado Lake	Wilmington Drain	Inner Los Angeles Harbor	Cabrillo Marina
1	Highest	Chlordane (water, sediment, fish tissue)			x			
		Copper (water and sediment)					x	x
		DDT (water, sediment, fish tissue)	x	x	x		x	x
		Dieldrin (water, sediment, fish tissue)			x			
		Indicator Bacteria		x				
		Lead (water and sediment)					x	x
		Total Nitrogen			x			
		Total PAHs					x	x
		PCBs (water, sediment, fish tissue)	x	x	x		x	x
		Total Phosphorus			x			
		Trash	x		x			
		Zinc (water and sediment)					x	x
2	High	Arsenic	x					
		Indicator Bacteria				x		
		Mercury	x					

2.2. RECEIVING WATER CHARACTERIZATION

The Peninsula WMG area encompasses portions of the drainage area tributary to three receiving waterbodies: the Santa Monica Bay, Machado Lake (which includes Wilmington Drain), and the Greater Los Angeles Harbor. Existing water quality is characterized for each of these receiving waters using the following information:

- Water Quality Control Plans
  - Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan)[14]
  - California Ocean Plan[15]
- Applicable TMDLs
  - Santa Monica Bay Bacteria Dry and Wet Weather TMDLs
  - Santa Monica Bay Marine Debris TMDL
  - Santa Monica Bay DDT and PCBs TMDL
  - Machado Lake Trash TMDL
  - Machado Lake Pesticides and PCBs TMDL
  - Machado Lake Nutrient TMDL
  - Long Beach and Greater Los Angeles Harbor Toxics TMDL[16]
- California Water Quality Control Board Surface Water Quality Assessment Integrated Reports
  - 2014/2016 303(d) List of Impaired Waterbodies
  - 2018 303(d) List of Impaired Waterbodies
- Monitoring Data and Reports
  - PVP CIMP Water Quality Data
  - Machado Lake Water Quality Monitoring Data collected by City of Los Angeles
  - Greater Los Angeles Harbor Waters Coordinated Compliance Monitoring and Reporting Water Quality Monitoring Data collected by the Greater Harbor Waters Regional Monitoring Coalition

The sections below provide more details on the updated information utilized to evaluate existing water quality for the Peninsula WMG's three receiving waters: Santa Monica Bay, Machado Lake and Greater Los Angeles Harbor waters.

WATER QUALITY CONTROL PLANS

The Peninsula WMG watersheds are subject to both the Basin Plan and California Ocean Plan, which set water quality objectives and implementation provisions to protect the quality of surface and marine

[14] Los Angeles Regional Water Quality Control Board. Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. Last accessed online on March 26, 2021. https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html

[15] State Water Resources Control Board, 2019. Water Quality Control Plan for Ocean Waters in California, California Ocean Plan effective February 4, 2019.

[16] As recognized by the footnote in Attachment K-4 of the 2012 LA MS4 Permit, the Peninsula WMG members have entered into an Amended Consent Decree with the United States and the State of California, including the Regional Board, pursuant to which the Regional Board has released the Peninsula WMG members from responsibility for Toxic pollutants in the Dominguez Channel and the Greater Los Angeles and Long Beach Harbors. Accordingly, no inference should be drawn from the submission of this EWMP or from any action or implementation taken pursuant to it that the Peninsula WMG has waived any rights under the Amended Consent Decree.

waters, respectively, and to ensure that the beneficial uses of these waters are maintained. For this EWMP update, the most recent versions of the Basin Plan and Ocean Plan available as of the preparation of this document were consulted to determine beneficial uses and water quality objectives applicable to the Peninsula WMG. The beneficial uses of the Peninsula WMG's receiving waters as designated in the Basin Plan are summarized in **Table 2-2**, and the beneficial use acronyms used in the table are defined as follows:

MUN – Municipal and Domestic Supply
IND – Industrial Service Supply
GWR – Groundwater Recharge
NAV – Navigation
COMM – Commercial and Sport Fishing
REC1 – Water Contact Recreation
REC2 – Non-Contact Water Recreation
WARM – Warm Freshwater Habitat
MAR – Marine Habitat
WILD – Wildlife Habitat
BIOL – Preservation of Biological Habitats
RARE – Rare, Threatened, or Endangered Species aquatic habitat
MIGR – Migration of Aquatic Organisms
SPWN – Spawning, Reproduction, and/or Early Development
SHELL – Shellfish Harvesting
WET – Wetland Habitat

Table 2-3: Peninsula EWMP Area Water Bodies and Beneficial Uses Designated in the Basin Plan

Water Body	MUN	IND	GWR	NAV	COMM	REC1	REC2	WARM	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
Los Angeles County Coastal Nearshore Zone^		E		E	E	E	E		E	E	E	E[e]	E[f]	E[f]	E[ar]	
Los Angeles County Coastal Offshore Zone		E		E	E	E	E		E	E		E[e]	E[f]	E[f]	E	
Machado Lake	P*					E	E	E		E		E				E
Coastal Streams of Palos Verdes	P*		I			I	I	I		E		E				
Canyon Streams of Palos Verdes	P*		I			I	I	I		E		E				
Point Vicente Beach				E	E	E	E		E	E				P	E	
Los Angeles Harbor – Other Inner Areas		E		E	E	P	E		E			E[e]			P	
Los Angeles Harbor – Marinas (Cabrillo)		E		E	E	E	E		E			E			P	

E: Existing beneficial use; P: Potential beneficial use; I: Intermittent beneficial use
* Asterisked MUN designations are designated under SB 88-63 and RB 89-03. Some designations may be considered for exemption at a later date.
[b] Water bodies designated as WET may have wetlands habitat associated with only a portion of the water body. Any regulatory action would require a detailed analysis of the area.
^ Nearshore is defined as the zone bounded by the shoreline and a line 1000 feet from the shoreline or the 30-foot depth contours, whichever is further from the shoreline. Longshore extent is from Rincon Creek to the San Gabriel River Estuary.
[e] One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
[f] Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
[ar] Areas exhibiting large shellfish populations include Malibu, Point Dume, Point Fermin, White Point and Zuma Beach.

TOTAL MAXIMUM DAILY LOADS (TMDLS) AND 303(D) LISTINGS

Waterbodies or waterbody segments that do not meet water quality standards consistent with beneficial uses are considered impaired and placed on the State Water Resources Control Board's 303(d) list of impaired waters which includes identification of the specific pollutant(s) causing the impairment, i.e., waterbody/pollutant combinations. TMDLs are required to be developed for pollutants that are causing impairment for each listed waterbody or waterbody segment. Where appropriate, TMDLs assign waste

load allocations (WLAs) to MS4 dischargers to ensure that the total amount of a particular pollutant entering a receiving waterbody from the MS4 will not cause the water quality objectives in that water body to be exceeded and thereby impair its beneficial uses. **Table 2-3** shows existing TMDLs applicable to the Peninsula WMG that were evaluated to identify Category 1 water body pollutant combinations.

Table 2-4: TMDLs Applicable to the Peninsula EWMP

TMDL	Water Body Segments Addressed by TMDL	Pollutants Addressed by TMDL	Regional Board Resolution Number	Effective Date
Santa Monica Bay Beaches Bacteria Wet and Dry Weather TMDLs	Santa Monica Bay Beaches	Indicator Bacteria (Total Coliform Fecal Coliform Enterococcus)	2002-022 (Wet TMDL) & 2002-004 (Dry TMDL); Amended by R12-007	July 15, 2003; R12-007 effective July 2, 2014
Santa Monica Bay Nearshore and Offshore Debris TMDL	Santa Monica Bay	Trash	R10-010 Amended by R19-004	March 20, 2012 R19-004 effective date pending
Santa Monica Bay DDT and PCBs TMDL	Santa Monica Bay Santa Monica Bay Beaches	DDT PCBs	Established by USEPA	March 26, 2012
Machado Lake Trash	Machado Lake	Trash	2007-006 Amended by R19-14	March 6, 2008 R19-14 effective date pending
Machado Lake Pesticides and PCBs (Toxics) TMDL	Machado Lake	Chlordane Dieldrin PCBs DDT	R10-008	March 20, 2012
Machado Lake Nutrient TMDL	Machado Lake	Algae Total Nitrogen Total Phosphorus Ammonia Chlorophyll a Dissolved Oxygen Odor	2008-006	March 11, 2009
Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL	Inner Harbor Cabrillo Marina	DDT PCBs Copper Lead Zinc PAHs	R11-008	March 23, 2012

The State's 2014/2016 and 2018 303(d) lists have been reviewed to identify waterbody impairments applicable to the Peninsula WMG that are not yet being addressed by a TMDL. **Table 2-4** below summarizes the waterbody pollutant combinations identified on these 303(d) lists that are the basis for Peninsula EWMP Category 2 water body pollutant combinations.

Table 2-5: 303(d) Listed Pollutants in Peninsula EWMP Watersheds

Impaired Waterbody Segment	Pollutant Causing Impairment
Santa Monica Bay	Arsenic
Santa Monica Bay	Mercury
Wilmington Drain	Coliform Bacteria

WATER QUALITY MONITORING DATA

The Peninsula WMG, implements the Palos Verdes Peninsula Coordinated Integrated Monitoring Program (CIMP). The data collected by the CIMP are used to assess water quality priorities and effectiveness of EWMP projects and programs. The CIMP established two (2) new near-shore monitoring locations in the Santa Monica Bay (approximately 1000 feet offshore) for collection of receiving water monitoring data during three (3) wet weather events and two (2) dry weather events per year. The CIMP also includes weekly indicator bacteria monitoring conducted in accordance with the Santa Monica Bay Beaches Bacteria TMDL at five (5) historical Santa Monica Bay shoreline locations.

In addition, some CIMP receiving water data evaluated in this water quality prioritization has been collected by other agencies or groups including:

- Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL data collected under the Coordinated Compliance Monitoring and Reporting Plan (CCMRP) implemented by the Regional Monitoring Coalition (RMC) for the Greater Harbor Waters, and
- Machado Lake in-lake water quality, sediment and fish tissue data collected by the City of Los Angeles under the Machado Nutrient and Pesticides and PCBs TMDLs.

The following sections are organized by watershed and include a characterization of each receiving water body based on applicable TMDLs, 303(d) listings and recently collected water quality data.

2.2.1. SANTA MONICA BAY

The Palos Verdes Peninsula is known for its steep cliffs and rocky intertidal coastal habitat and tidepools. Sandy beaches on the Peninsula are few and small, most with difficult access. The portion of the Peninsula WMG with drainage tributary to Santa Monica Bay consists of approximately 14.8 square miles, which is about 3.6% of the Santa Monica Bay Watershed (414 sq. mi.).

INDICATOR BACTERIA

The Santa Monica Bay Beaches (SMB Beaches) were first designated as impaired due to fecal indicator bacteria on the State's 1998 303(d) list of impaired waters. The Regional Board subsequently issued the SMB Beaches Bacteria TMDLs (SMBBB TMDLs) for wet and dry weather conditions, which became effective on July 15, 2003 and were subsequently amended on July 2, 2014. All of the Peninsula shoreline monitoring sites have been delisted from the 2014/16 and 2018 303(d) lists in accordance with the State Water Resources Control Board's delisting criteria, however the SMBBB TMDLs continue to remain in effect.

The SMBBB TMDLs include single-sample and six-week rolling geometric mean numeric objectives for total coliform, fecal coliform and enterococcus densities measured in most probable number per 100 milliliters (MPN/100mL). The TMDLs set waste load allocations (WLAs) based on the single sample objectives as an allowable number of days on which the single sample bacteria objectives could be exceeded at shoreline monitoring sites along the Santa Monica Bay (allowable exceedance days). The TMDLs divide the calendar year into three separate periods, each with specified numbers of allowable single-sample exceedance days:

- Summer dry-weather (April 1 – October 31),
- Winter dry weather (November 1 – March 31), and
- Wet weather (Year-round)

The six-week rolling geometric mean applies year-round during all weather conditions.

Table 2-5 shows the single sample and geometric mean bacteria objectives for the three types of indicator bacteria and **Table 2-6** presents the allowable number of exceedance days at each monitoring location along the Peninsula WMG's shoreline.

Table 2-6: SMBBB TMDL Bacteria Objectives

Constituent	Six-Week Rolling Geometric Mean	Single Sample
Total Coliform*	1,000 MPN/100 mL	10,000 MPN/100 mL
Fecal Coliform	200 MPN/100 mL	400 MPN/100 mL
Enterococcus	35 MPN/100 mL	104 MPN/100 mL
*Total Coliform density shall not exceed a daily maximum of 1,000/100 mL if the ratio of total to fecal coliform exceeds 0.1		

Table 2-7: Allowable Exceedance Day(s) by Period and Monitoring Location

Shoreline Monitoring Location	Period		
	Winter Dry Weather [b]	Summer Dry Weather [c]	Wet Weather [d] [e]
SMB 7-1 (Malaga Cove)	1	0	2
SMB 7-2 (Bluff Cove)	1	0	0
SMB 7-3 (Long Point)	1	0	1
SMB 7-4 (Abalone Cove)	0	0	1
SMB 7-5 (Portuguese Bend Cove)	1	0	1

(a) Allowable Exceedance days based on weekly sampling;
(b) Final period beginning July 15, 2009;
(c) Final period beginning July 15, 2006;
(d) Wet weather days include days with rain events of ≥ 0.1 inches of precipitation and the three days following the end of the rain event;
(e) Final period beginning July 15, 2021

To meet the monitoring requirements of these TMDLs, a SMB Beaches Bacteria TMDLs Coordinated Shoreline Monitoring Plan was developed by a committee of responsible agencies including representatives from the Peninsula WMG. The five shoreline monitoring sites established for the Peninsula WMG area (SMB 7-1 through 7-5) are shown on **Figure 1-1**. These five shoreline monitoring sites historically demonstrated fewer exceedance days than the reference beach (Leo Carrillo) used in the TMDL and were therefore considered anti-degradation sites which were required to maintain their existing high quality. The five Peninsula shoreline monitoring sites have historically and continue to be sampled for indicator bacteria along the Palos Verdes Peninsula shoreline on a weekly basis. The data summarized in **Table 2-7** and **Table 2-8** indicate that exceedances of the single sample and rolling six-week geometric mean receiving water limitations are infrequent at these shoreline monitoring sites and even during the 2016-17 rainy season, which exceeded the number of wet days for the critical 90th percentile wet year, there were very few exceedances.

Table 2-8: Number of Exceedance Days Above Allowable Receiving Water Limitations

Station ID	SMB 7-1			SMB 7-2			SMB 7-3			SMB 7-4			SMB 7-5		
Season*	Dry Summer	Dry Winter	Wet Weather	Dry Summer	Dry Winter	Wet Weather	Dry Summer	Dry Winter	Wet Weather	Dry Summer	Dry Winter	Wet Weather	Dry Summer	Dry Winter	Wet Weather
Reporting Year	Number of Exceedances of Annual Allowable Exceedance Days														
2019-20	0	0	1	0	0	0	0	0	0	1	0	0	1	0	0
2018-19+	0	0	0	0	0	1	0	0	1	0	1	0	1	0	0
2017-18	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0
2016-17*	0	0	2	0	0	0	0	0	2	0	0	2	0	0	0

+ From 11/19/18 through 1/14/19 enterococcus samples were run with 0:0 dilution rather than standard 1:10 dilution in an attempt to lower the detection limits for enterococcus following changeover in laboratories and method of analysis from EPA 1600 membrane filtration to IDEXX Enterolert® which may have resulted in increase in false positive exceedances.

* The number of wet days during the 2016-17 rainy season exceeded the number of wet days during the critical 90th percentile rain year

Table 2-9: Number of Year-Round Rolling Six-Week Geomean Exceedances of Receiving Water Limitations

Station ID	SMB 7-1	SMB 7-2	SMB 7-3	SMB 7-4	SMB 7-5
Reporting Year	Number of Rolling Six-Week Geomean Exceedances				
2019-20	1	0	0	0	0
2018-19 +	2	0	0	0	1
2017-18	0	0	0	0	0
2016-17*	2	0	0	1	0

+ From 11/19/18 through 1/14/19 enterococcus samples were run with 0:0 dilution rather than standard 1:10 dilution in an attempt to lower the detection limits for enterococcus using IDEXX Enterolert® analytical method which may have resulted in an increase in false positive results and geomean exceedances

* The number of wet days during the 2016-17 rainy season exceeded the number of wet days during the critical 90th percentile rain year

In addition, two nearshore receiving water monitoring stations located approximately 1,000 feet offshore in the Santa Monica Bay are being used to assess the effects of stormwater discharges on Santa Monica Bay receiving water quality. Each of these stations is situated directly in line with one of the two (2) CIMP outfall monitoring locations and wet weather nearshore receiving water sampling occurs in the Santa Monica Bay as soon as safety allows following outfall sampling. Four complete years of wet and dry-weather data from these receiving water sites have been collected beginning with reporting year 2016-17. Out of the forty (40) samples collected offshore in the Santa Monica Bay during this four-year period, only three (3) samples, or 7.5% of samples, exhibited elevated indicator bacteria results above Ocean Plan objectives. **Figure 2-1**, **Figure 2-2**, **Figure 2-3** show fecal indicator bacteria concentrations observed in receiving water samples collected under the PVP CIMP between 2016 and 2020. The horizontal line in each graph represents the Ocean Plan target for each respective species. As can be seen in these graphs, indicator bacteria concentrations in the Santa Monica Bay receiving water are consistently well below the 2012 Ocean Plan targets[17].

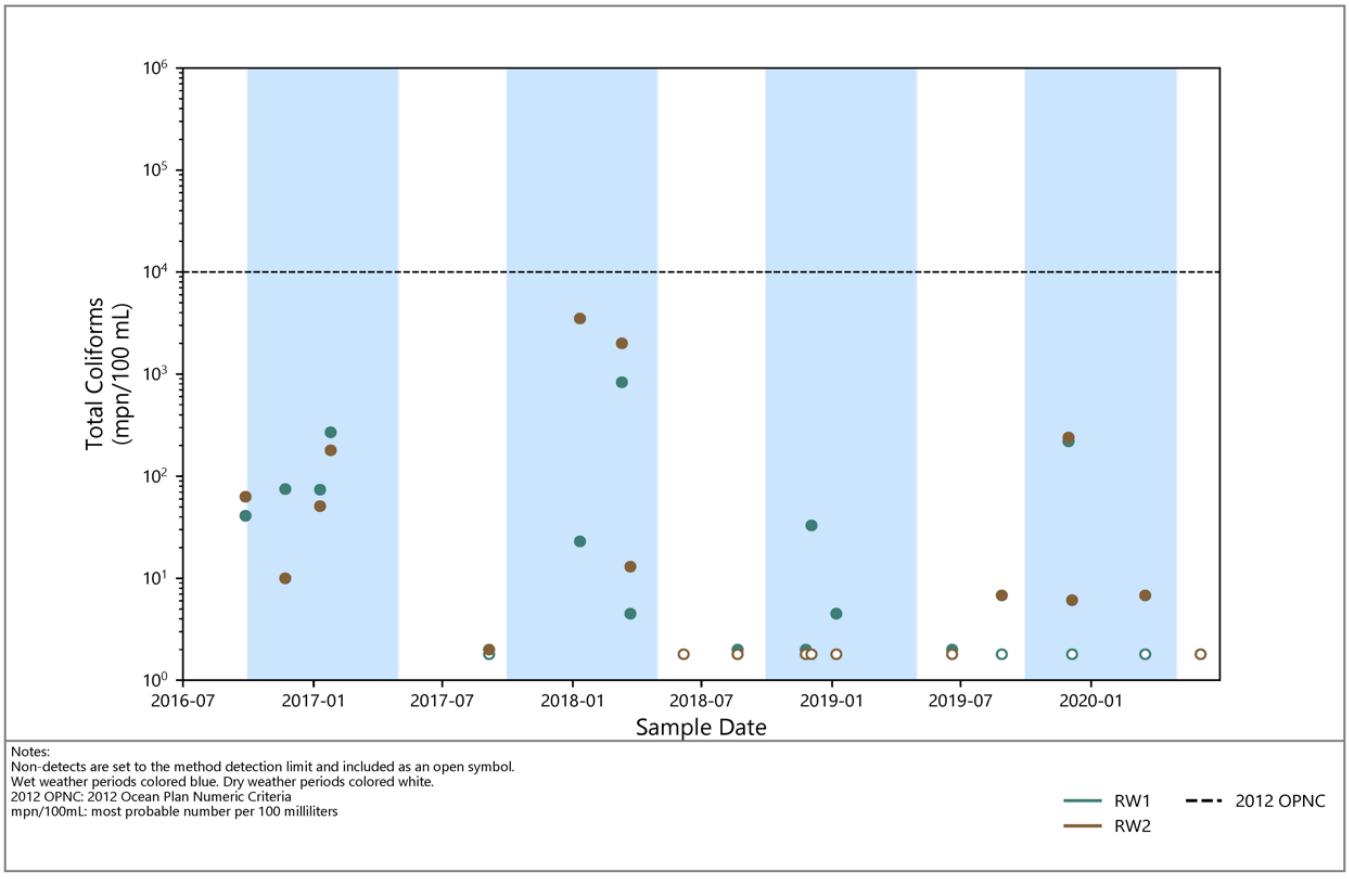


Figure 2-2: Santa Monica Bay Total Coliform Concentrations 2016-2020

[17] While these graphs compare data to the 2012 Ocean Plan, bacteria targets in the most recent (2019) Ocean Plan are consistent with the 2012 Ocean Plan.

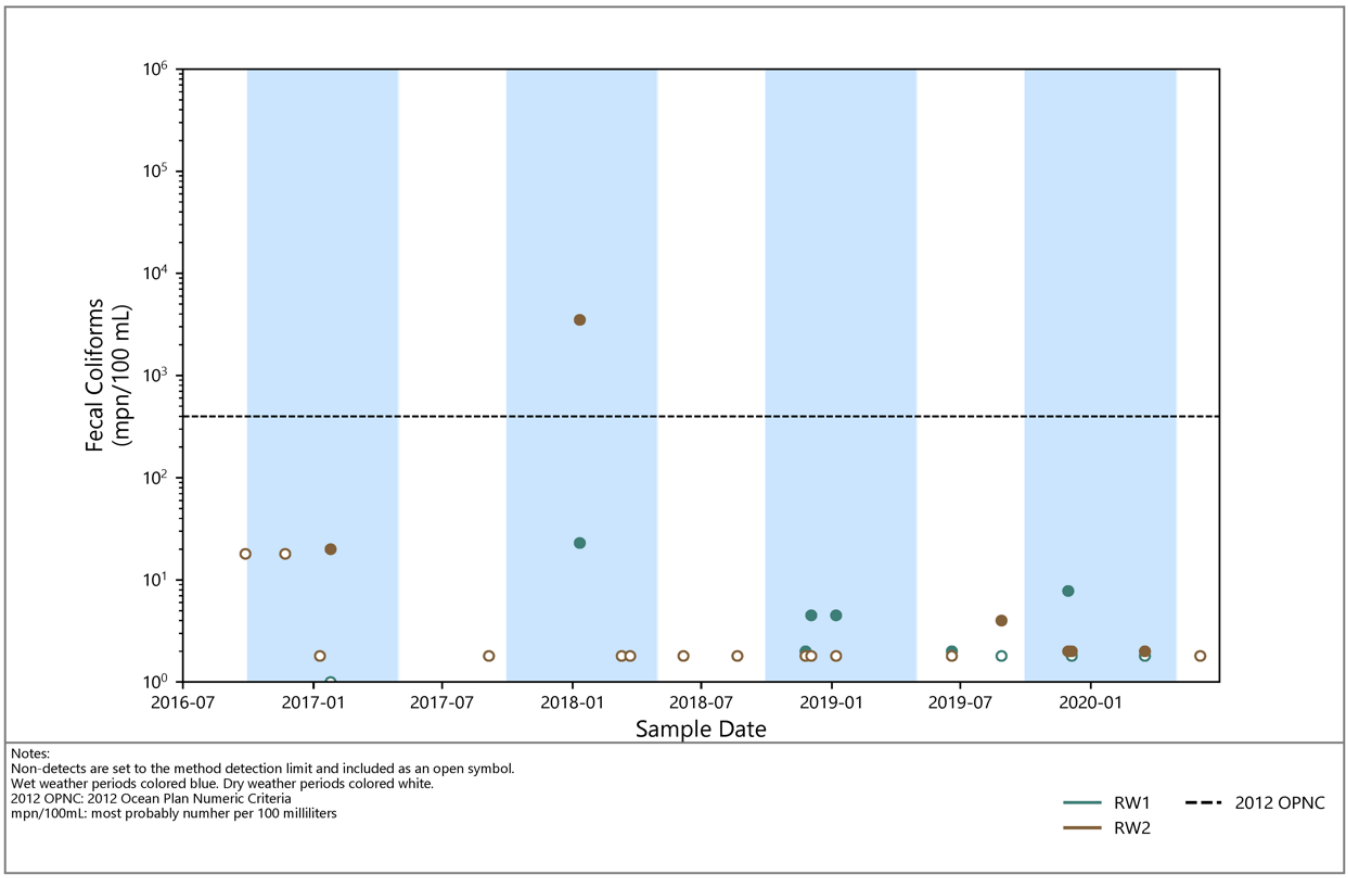


Figure 2-3: Santa Monica Bay Fecal Coliform Concentrations 2016-2020



Figure 2-4: Santa Monica Bay Enterococci Concentrations 2016-2020

PCBs AND DDTs

The Palos Verdes Shelf portion of Santa Monica Bay is an active EPA Superfund site that is subject to Superfund Remedial Action Objectives which include institutional controls, natural recovery, capping, and monitored attenuation, and are expected to result in improved water quality.[18] From 1947 to 1971 large quantities of DDT were discharged from the Montrose Chemical plant in Los Angeles to the Los Angeles County Joint Water Pollution Control Plant (JWPCP) which discharges to the Palos Verdes Shelf. PCBs also entered the JWPCP from several industrial sources in the Los Angeles area. These DDT and PCBs discharges passed through the JWPCP and were deposited on the Palos Verdes Shelf. There have also been reports of recently discovered illegal offshore dumping of waste barrels containing DDT acid sludge between Catalina Island and the Palos Verdes coast[19]. There is also concern that the rate of erosion on the southwest portion of the Palos Verdes Shelf could bring previously buried deposits to the surface.

[18] USEPA: Santa Monica Bay DDT and PCBs TMDL

[19] https://www.latimes.com/projects/la-coast-ddt-dumping-ground/#nt=1col-7030col1-mainnt=00000173-4a29-dafc-a977-dabb7b330001-liA9promoSmall-1col-7030col1-main

Concentrations of DDT and PCBs deposited in the surface sediments of the Santa Monica Bay have decreased substantially since the early 1970s and during this time period the benthic communities in the Palos Verdes shelf and Santa Monica Bay have improved substantially to the point where impairments to benthic communities are not seen; however, DDT and PCBs are still present at levels of concern for bioaccumulation and human health[20]. This contamination of DDT and PCBs in the sediments of Santa Monica Bay, largely centered on the Palos Verdes shelf, has led to a large number of fish advisories for much of Santa Monica Bay and a commercial fishing ban in the area around the Palos Verdes Shelf. As a result, the US EPA issued the Santa Monica Bay DDT and PCBs TMDL in 2012 and the TMDL objectives were established to meet fish concentrations for human consumption.

Four complete years of nearshore receiving water quality data have been collected under the PVP CIMP in the Santa Monica Bay and analyzed for total DDT and PCBs. Of these dry and wet-weather samples collected over the past four years, only one (1) out of forty (40) samples or 2.5% resulted in detection of 4,4'- DDT at a concentration between the method detection limit and the reporting limit. This sample was collected during a summer dry weather sampling event in the fourth year of CIMP monitoring. None of the forty (40) receiving water samples collected over the past four years have resulted in detections of Total PCBs above the Ocean Plan objective for total PCBs.

TRASH

The Santa Monica Bay nearshore beneficial uses are impaired by the accumulation of suspended and settleable debris. In 2008 and 2009, Regional Board staff conducted site visits along beaches in the southern and northern parts of the Santa Monica Bay to document the trash problem, though no beaches along the Peninsula WMG area were included in these site visits. Common items found on every beach evaluated included: plastic bags, candy wrappers, cigarette butts, styrofoam, beverage containers, straws, and paper. To address this impairment, the Regional Board issued the Santa Monica Bay Nearshore and Offshore Marine Debris TMDL (SMB Marine Debris TMDL), which went into effect on Mar 20, 2012. The SMB Marine Debris TMDL established a numeric target of zero trash and zero plastic pellets in the Santa Monica Bay based on the narrative water quality objectives in both the Basin Plan and the Ocean Plan.

ARSENIC & MERCURY

The Santa Monica Bay is listed on the State's 2014/16 and 2018 303(d) Lists as being impaired by arsenic and mercury based on sediment and fish tissue data collected under the Hyperion Treatment Plant NPDES Permit no. CA0109991 between January 2006 and June 2010. Nineteen (19) of 19 fish tissue samples collected in the Santa Monica Bay exceeded the USEPA Guidance for Assessing Chemical Contaminant Data for Use in Fish Advisories Volume 1: Fish Sampling and Analysis[21] for arsenic in fish tissue of 0.0034 ppm. Two (2) of thirty-two (32) sediment samples exceeded the Basin Plan narrative objective for mercury based on the effects range median for saline waters (predictive of sediment toxicity) for mercury of 0.71

[20] USEPA: Santa Monica Bay DDT and PCBs TMDL

[21] USEPA. Office of Science and Technology Office of Water**.** Guidance for Assessing Chemical Contaminant Data for Use In Fish Advisories Volume 1: Fish Sampling and Analysis. EPA 823-B-00-007 (November 2000).

mg/Kg dry weight[22]. In addition, two (2) of nineteen (19) fish tissue samples exceeded the OEHHA fish contaminant goal of 0.22ppm[23].

TOXICITY

The Santa Monica Bay Offshore/Nearshore water body was removed from the 2014/16 and 2018 303(d) lists for sediment toxicity at the recommendation of USEPA, indicating that Peninsula shoreline waters are no longer considered to be impaired for sediment toxicity.

Some intermittent water column toxicity has been observed in the nearshore receiving water quality monitoring data collected under the PVP CIMP. One (1) out of twenty-four (24) wet weather nearshore receiving water samples collected under the PVP CIMP over the past four years has indicated toxicity, however the toxic effect was not sufficiently elevated to require the performance of a toxicity identification evaluation (TIE) and subsequent follow up wet-weather sampling showed no further toxic effects during wet weather.

During the third and fourth years of PVP CIMP dry weather monitoring, three (3) of four (4) dry weather receiving water samples collected in the Santa Monica Bay at receiving water site RW-1 off Malaga Cove in Palos Verdes Estates indicated low-level persistent toxicity. A TIE was performed on the initial receiving water sample showing toxicity collected at RW-1. The result of this TIE was inconclusive, though divalent cationic metals were suggested as the potential constituents causing the observed effects during that dry weather receiving water monitoring event. Follow up sampling at an 'upstream' shoreline monitoring found no toxicity present closer to the shoreline nor were metals observed above Ocean Plan limits in either the nearshore or shoreline receiving water sites. Based on monitoring data collected to date, there is no evidence that MS4 discharges have caused or contributed to these intermittent nearshore toxicity results nor has a cause of the toxicity been identified.

2.2.2. MACHADO LAKE

Machado Lake is located in the Ken Malloy Harbor Regional Park, which is a 231-acre Los Angeles City Park serving the Wilmington and Harbor City communities. Machado Lake was created by damming one of the last wetland systems in Los Angeles in 1971. The lake was intended for boating and fishing but over the years water quality generally declined, boating was stopped, and signs were posted warning of the risk of eating fish from the lake.

The Peninsula WMG areas do not drain directly into Machado Lake. The portion of the Peninsula WMG which contributes runoff to Machado Lake consists of approximately 6.2 square miles, which is about 27% of the Machado Lake watershed drainage area (approximately 22.6 sq. mi. in total). Drainage from the Peninsula WMG areas exits the Palos Verdes Peninsula in an easterly or northeasterly direction where it

[22] Long, E.R., D.D. MacDonald, S.L. Smith, and F.D. Calder. Incidence of adverse biological effects within ranges of chemical concentrations in marine and estuary sediments. Environmental Management. 19, (1): 81-97 (1995).

[23] Klasing, S. and Brodberg, R. Development of Fish Contaminant Goals and Advisory Tissue Levels for Common Contaminants in California Sport Fish: Chlordane, DDTs, Dieldrin, Methylmercury, PCBs, Selenium, and Toxaphene. Pesticide and Environmental Toxicology Branch Office of Environmental Health Hazard Assessment California Environmental Protection Agency. (June 2008).

is comingled with drainage from the cities of Torrance and Lomita prior to flowing into three of the four major drainage systems entering Machado Lake: Wilmington Drain, Project 77 and Project 510 (**Figure 2-4**). As shown in **Table 2-3,** Machado Lake is impaired for organochlorine pesticides, PCBs, nutrients, and trash. Over 80% of the Peninsula WMG's Machado Lake watershed drains to Machado Lake through Wilmington Drain. Wilmington Drain is listed on the State's 303(d) List for indicator bacteria.

Machado Lake underwent renovations as part of the City of Los Angeles's Machado Lake Ecosystem Rehabilitation Project funded by Prop O which was completed in 2017. The primary goal of the Rehabilitation Project was to improve water quality in Machado Lake while also enhancing natural habitat and recreational features of the park. The project consisted of in-lake improvements that included dredging approximately 239,000 cubic yards of lake sediment and capping the lake bottom with an AquaBlok bio-layer cap, constructing an oxygenation system, and rehabilitating the dam structure at the south end of the lake. Storm drain facility improvements included installing five (5) Continuous Deflection Separation (CDS) systems at the major storm drain inlets to treat storm water before it enters the lake. The vegetation, habitat, and park improvements included invasive plant removal, replanting of native species, and installation of fencing and walkways. The project has been undergoing an optimization period since the project was completed, and the City of Los Angeles began conducting receiving water monitoring in Machado Lake on September 11, 2017. The Machado Lake Ecosystem and Rehabilitation Project optimization period is expected to last between three to five years to allow for control measures such as vegetation for water quality treatment to be fully established. As part of the City of Los Angeles' Machado Lake Ecosystem and Rehabilitation Project, planning efforts are underway to pump treated water from Terminal Island's Advanced Water Purification Plant to Machado Lake to offset impacts of evapotranspiration. This is expected to lower pollutant concentrations to below the required levels for Machado Lake TMDLs.

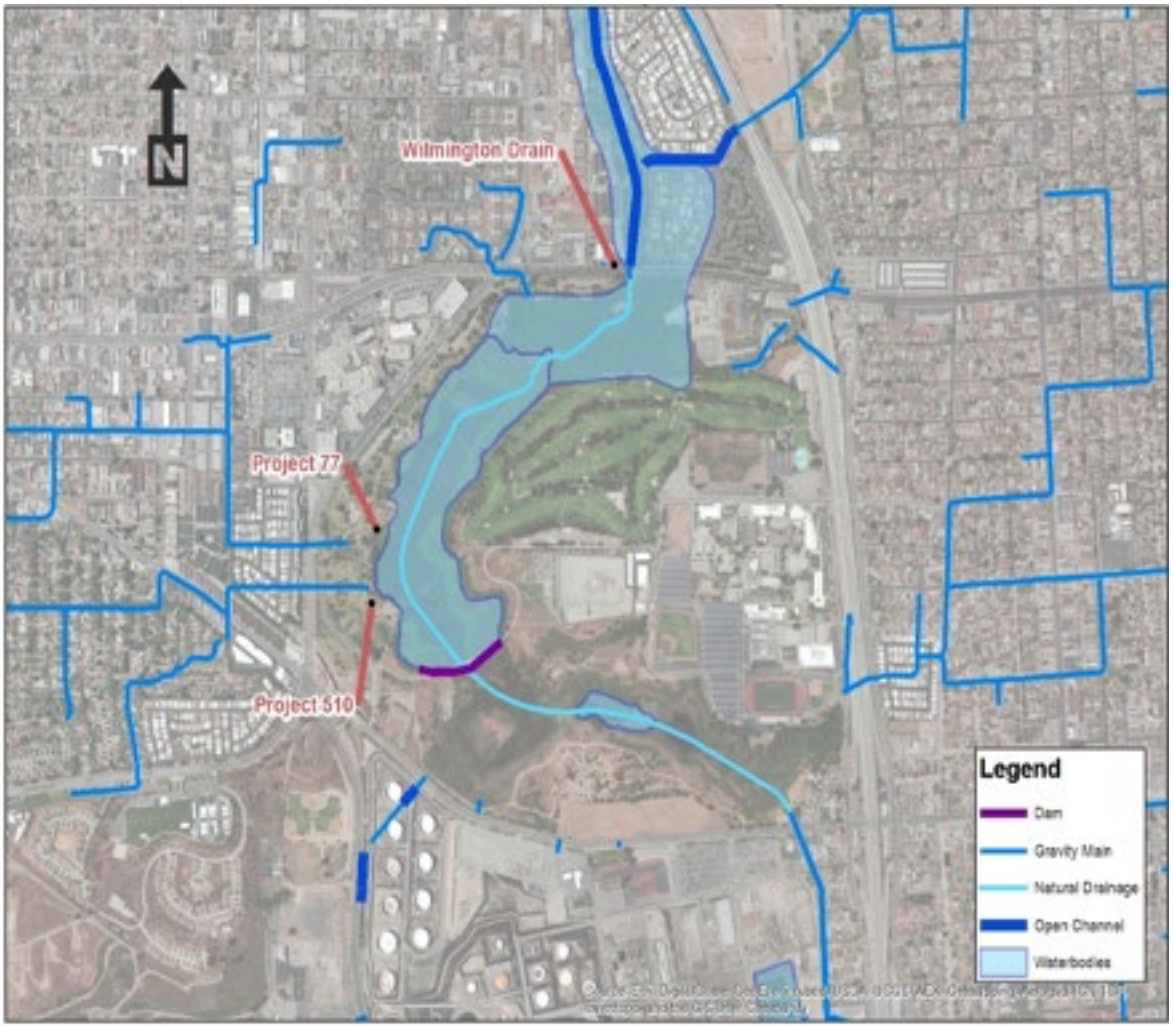


Figure 2-5: Storm Drains Entering Machado Lake

NUTRIENTS

Machado Lake is identified on the State's 303(d) list of impaired water bodies due to eutrophic conditions, algae, ammonia, and odors. Eutrophication is defined by increased nutrient loading to a waterbody and the resulting increased growth of biota, phytoplankton and other aquatic plants. To address these impairments, the Regional Board issued the Machado Lake Eutrophic, Algae, Ammonia, and Odors (Nutrient) TMDL, which became effective March 11, 2009. The chemical pollutants that most stimulate excessive aquatic vegetative growth and stimulate eutrophication are nitrogen and phosphorus, thus numeric receiving water limitations were set for these constituents in the Machado Lake Nutrient TMDL. **Table 2-9** presents numeric targets and interim and final load and waste load allocations for Machado Lake.

Table 2-10: Nutrient TMDL Numeric Targets and Load Allocations for Machado Lake

Date	Numeric Target	WLAs and LAs (Monthly Average Concentration)
March 11, 2009 (1st Interim)	-	Total Phosphorus 1.25 mg/L Total Nitrogen 3.5 mg/L
March 11, 2014 (2nd Interim)	-	Total Phosphorus 1.25 mg/L Total Nitrogen 2.45 mg/L
September 11, 2018 (Final)	Total Phosphorus 0.1 mg/L (monthly average) Total Nitrogen 1.0 mg/L (monthly average) Ammonia 5.95 mg/L (hourly average) 2.15 mg/L (30-day average) Dissolved Oxygen* 5 mg/L (single sample minimum) *Measured at 0.3-m above the sediment) Chlorophyll-*a* 20 µg/L (monthly average)	Total Phosphorus 0.1 mg/L Total Nitrogen 1.0 mg/L

Just over two years of in-lake water quality data have been collected by City of Los Angeles following completion of the Machado Lake Ecosystem Rehabilitation Project[24]. Nutrient data is collected via grab sampling from two in-lake monitoring stations: ML-1 and ML-2 (**Figure 2-5),** and a thirty-day rolling average in-lake concentration is calculated on a monthly basis for Total Nitrogen and Total Phosphorus.

[24] Water quality monitoring data collection began September 2017, following completion of the Machado Lake Ecosystem Rehabilitation Project, and was available through June 2020 at the time of this update.

Table 2-10 below shows monthly average Total Nitrogen and Total Phosphorus concentrations calculated for Machado Lake. With the exception of Total Nitrogen monthly average concentration in January and April 2020, all in-lake monthly average concentrations of Total Nitrogen and Total Phosphorous have been higher than applicable receiving water limitations established in the TMDL.

Table 2-11: Monthly Average TN and TP Concentration in Machado Lake

Month/Year	Total Nitrogen Monthly Average (mg/L, calculated)	Total Phosphorus Monthly Average (mg/L, calculated)
September 2017	-	**0.2**
October 2017	-	**0.18**
November 2017	**1.70**	**0.17**
December 2017	**1.35**	**0.14**
January 2018	**1.24**	**0.27**
February 2018	-	**0.28**
March 2018	**1.14**	**0.42**
April 2018	**1.98**	**0.29**
May 2018	**3.65**	**0.38**
June 2018	**2.70**	**0.27**
July 2018	**2.88**	**0.38**
August 2018	**4.43**	**0.54**
September 2018	**2.30**	**0.27**
October 2018	**2.78**	**0.32**
November 2018	**3.10**	**0.33**
December 2018	**1.58**	**0.32**
January 2019	**1.56**	**0.38**
February 2019	**1.14**	**0.28**
March 2019	-	**0.28**
April 2019	-	**0.30**
May 2019	**1.45**	**0.31**
June 2019	**1.38**	**0.33**
July 2019	**1.8**	**0.3**
August 2019	**2.2**	**0.3**
September 2019	**2.2**	**0.3**
October 2019	**2.3**	**0.3**
November 2019	**2**	**0.2**
December 2019	**1.4**	**0.4**
January 2020	0.8	**0.28**
February 2020	**1.3**	**0.28**
March 2020	**1.2**	**0.21**
April 2020	1	**0.19**
May 2020	**1.5**	**0.21**
June 2020	**1.6**	**0.26**



Figure 2-6: Machado Lake Monitoring Stations

ORGANOCHLORINE PESTICIDES AND PCBS

Machado Lake is identified on the State's 303(d) List of impaired water bodies as impaired due to Chlordane, Dieldrin, Chem A, DDT and PCBs in fish tissue[25]. The Machado Lake Pesticides and PCBs TMDL (Machado Lake Toxics TMDL) was issued by the Regional Board to address these impairments and became effective March 20, 2012. Polychlorinated Biphenyls (PCBs) and organochlorine pesticides belong to a broad group of synthetic chlorinated hydrocarbons. PCBs include up to 209 different chlorinated chemical compounds which are called congeners. Chlordane, Dieldrin and DDT are organochlorine pesticides that were widely used until the late 1970s and 1980s. Organochlorine pesticides and PCBs are highly lipophilic and will accumulate in the fatty tissues of exposed wildlife and bioaccumulate as they move through the food chain. Chem A (abbreviation for chemical group A) is a suite of bio-accumulative pesticides that includes chlordane and dieldrin. The 1998 303(d) listing (and subsequent listings) for Chem A was predominately based on fish tissue concentrations of chlordane and dieldrin while the other Chem A pollutants have not been detected in tissue in over 25 years. Therefore, the Machado Lake Toxics TMDL addresses the Chem A listing by establishing water quality, sediment and fish tissue targets for chlordane and dieldrin.

The Machado Lake Pesticide and PCBs TMDLs established numeric targets for pesticides and PCBs in water, sediment, and fish tissue to protect aquatic life, fishing, and other recreational uses in the lake. The California Toxics Rule (CTR) criteria for human health (including protection for consumption of organisms) are the numeric targets for the water column, while the sediment numeric targets are based on the freshwater Threshold Effect Concentration guidelines compiled by NOAA, and the fish tissue targets are based on OEHHA Fish Contaminant Goals. **Table 2-11** presents these water column, sediment, and fish tissue numeric targets for the Machado Lake organochlorine pesticides and PCBs.

Table 2-12: Machado Lake Toxics TMDL In-Lake Numeric Targets

Pollutant	Water Column Target (ng/L)	Sediment Target (µg/kg dry weight)	Fish Tissue Target (ng/g wet weight)
Total PCBs	0.17	59.8	3.6
DDT (all congeners)	0.59*	4.16	No target
DDE (all congeners)	0.59*	3.16	No target
DDD (all congeners)	0.84	4.88	No target
Total DDT	--	5.28	21.0
Chlordane	0.59	3.24	5.6
Dieldrin	0.14	1.9	0.46

*Water column targets for 4,4' DDT, 4,4' DDE and 4,4' DDD only

Since September 2017, following completion of the Machado Lake Ecosystem Rehabilitation Project, water quality, sediment and fish tissue samples have been collected by City of Los Angeles in Machado Lake. Sediment grab samples collected in October 2017 showed non-detects for all constituents listed in **Table 2-11**. Results of in-lake water column monitoring conducted via grab sampling in March 2018 showed one exceedance of the CTR criteria for protection of human health for Total Chlordane (the calculated for Total Chlordane of 2ng/L was the result of the gamma-Chlordane analysis). Fish tissue grab and composite samples collected in May 2019 showed multiple exceedances of the OEHHA fish tissue targets for Total Chlordane and Total PCBs.

[25] Machado Lake Pesticides and PCBs TMDL

TRASH

Machado Lake is identified on the State's 303(d) List of impaired water bodies due to trash[26]. Consequently, the Regional Board issued the Machado Lake Trash TMDL, which became effective March 6, 2008. Existing beneficial uses impaired by trash in Machado Lake are Water Contact Recreation (REC-1), Non-contact Water Recreation (REC-2), Warm Freshwater Habitat (WARM), Wildlife Habitat (WILD), Rare, Threatened, or Endangered Species (RARE), and Wetland Habitat (WET). Common items that have been observed in Machado Lake include styrofoam cups, styrofoam food containers, glass and plastic bottles, paper cartons, packaging materials, plastic bags, and cans. Heavier debris can be transported during storms as well. The numeric target for this TMDL is zero trash in Machado Lake and on the shoreline. The TMDL assigns limits on point sources of trash, such as discharges from the MS4, and nonpoint sources of trash, such as direct discharges from areas of Ken Malloy Harbor Regional Park adjacent to the lake such as parking lots, recreational, and picnic areas. Dischargers can comply with WLAs through structural trash capture devices installed in the storm drain system or through nonstructural source control BMPs.

2.2.3. GREATER LOS ANGELES HARBOR

The Peninsula WMG areas do not drain directly into the Greater Los Angeles Harbor. Drainage from the Peninsula EWMP area exits the cities of Rancho Palos Verdes and Rolling Hills Estates in an easterly or southeasterly direction via storm drains and becomes comingled with MS4 discharges from the City of LA. The portion of the Peninsula EWMP area which contributes runoff to Greater Los Angeles Harbor consists of approximately 4.5 square miles, which is about 4.1% of the Dominguez Channel Watershed Management Area (approximately 109.4 sq. mi. total) that drains to the Los Angeles Harbor[27]. Specific Los Angeles Harbor water segments to which the Peninsula WMG contributes runoff include the Inner Harbor and Cabrillo Marina (**Figure 2-6**). These segments are listed on the State's 303(d) list as impaired by copper, lead, zinc, Polycyclic Aromatic Hydrocarbons (PAH) compounds, DDT and PCBs. These impairments exist in the water, sediments and fish tissue within the Los Angeles Harbor waters. Fish consumption advisories also currently exist for DDT and PCBs in certain fish species in all of the Los Angeles Harbor waters.

The Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL (Harbor Toxics TMDL) was issued by the Regional Board to address the constituents causing water quality impairment and became effective on March 23, 2012. The applicable water quality objectives for this TMDL are narrative objectives for Chemical Constituents, Bioaccumulation, Pesticides, and Toxicity in the Basin Plan and the numeric water quality criteria promulgated in 40 CFR section 131.38 (the California Toxics Rule (CTR)). In addition, marine sediment targets were determined for the Dominguez Channel and Greater Los Angeles and Long Beach Harbor waters using the narrative standards of the Basin Plan, State Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1 Sediment Quality (SQO Part 1) and the sediment quality guidelines recommended by the State Listing Policy[28].

The following **Table 2-12** provides the marine sediment targets for the Dominguez Channel and Greater Los Angeles and Long Beach Harbor waters applicable to the Peninsula WMG priority pollutants.

[26] Machado Lake Trash TMDL

[27] Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL

[28] Long, ER, LJ Field and DD MacDonald. 1998. *Predicting Toxicity in Marine Sediments with Numerical Sediment Quality Guidelines*, *Environ. Toxicol. Chem*. **17**:4, 714-727. MacDonald, DD, CG Ingersoll and TA Berger. 2000. *Development and evaluation of consensus-based sediment quality guidelines for freshwater ecosystems*. Arch. Environ. Contam. Toxicol. **39**:20-31.

Table 2-13: Greater Harbor Toxics TMDL Marine Sediment Targets

Pollutant	Marine Sediment Target
Copper	34 mg/kg
Lead	46.7 mg/kg
Zinc	150 mg/kg
Total PCBs	22.7 ug/kg
Total PAHs	4,022 ug/kg
Total DDT	1.58 ug/kg

The Harbor Toxics TMDL requires monitoring by the responsible parties under the Coordinated Compliance Monitoring and Reporting Plan[29]. The Coordinated Compliance Monitoring and Reporting program includes sampling for both water quality and sediment quality within 12 distinct water quality groups, each water quality group representing a water body within the greater harbor waters, as well as fish tissue sampling at four different locations (**Figure 2-6**).

In 2019, an assessment of bed sediment quality over a three-year averaging period in comparison with interim TMDL objectives provided in Attachment N Part E.2.a. of the 2012 LA MS4 Permit was performed under the Coordinated Compliance Monitoring Program. Most water bodies within the Greater Los Angeles Harbor were found to have met the interim three-year average concentration-based sediment objectives including the two water bodies to which stormwater from the Peninsula WMG is tributary: Inner Los Angeles Harbor and Cabrillo Marina. Thus, there appears to have been no degradation in sediment quality in these two water bodies since adoption of the TMDL. In evaluating progress toward attainment of the final objectives, sediment quality in the Los Angeles Harbor was assessed using California's Sediment Quality Objectives (SQO) for aquatic life benthic community based on multiple lines of evidence: sediment chemistry, sediment toxicity, and benthic community condition. Per this methodology, the qualitative sediment conditions of Unimpacted or Likely Unimpacted are protective of the benthic community. Based on the analysis incorporating monitoring events in 2013, 2016, and 2018, the Inner Los Angeles Harbor, including Cabrillo Marina, was determined to be Not Protective.

As shown in **Table 2-13** receiving water data collected over the past four years in the two Greater Los Angeles Harbor water bodies to which the Peninsula WMG is tributary indicates that the CTR criteria for the protection of aquatic life is consistently exceeded for dissolved copper in the Cabrillo Marina while there have been some exceedances of the CTR criteria for dissolved copper as well total DDx in the Los Angeles Outer Harbor.

[29] Anchor QEA. Coordinated Compliance Monitoring and Reporting Plan for the Greater Harbor Waters Regional Monitoring Coalition. August 2019.

Table 2-14: Water Quality Exceedances in Greater Los Angeles Harbor Waters to which Peninsula WMG is Tributary

Total Water Quality Exceedances of CTR Aquatic Life Criteria/Total Samples Collected Between 2016 and 2020		
Constituent	Los Angeles Inner Harbor	Cabrillo Marina
Copper (Dissolved)	8/51	8/10
Lead (Dissolved)	0/51	0
Zinc (Dissolved)	0/51	0
4.4' - DDT	0/51	0
Total DDx	7/51	1/10
Total PCBs	3/51	0

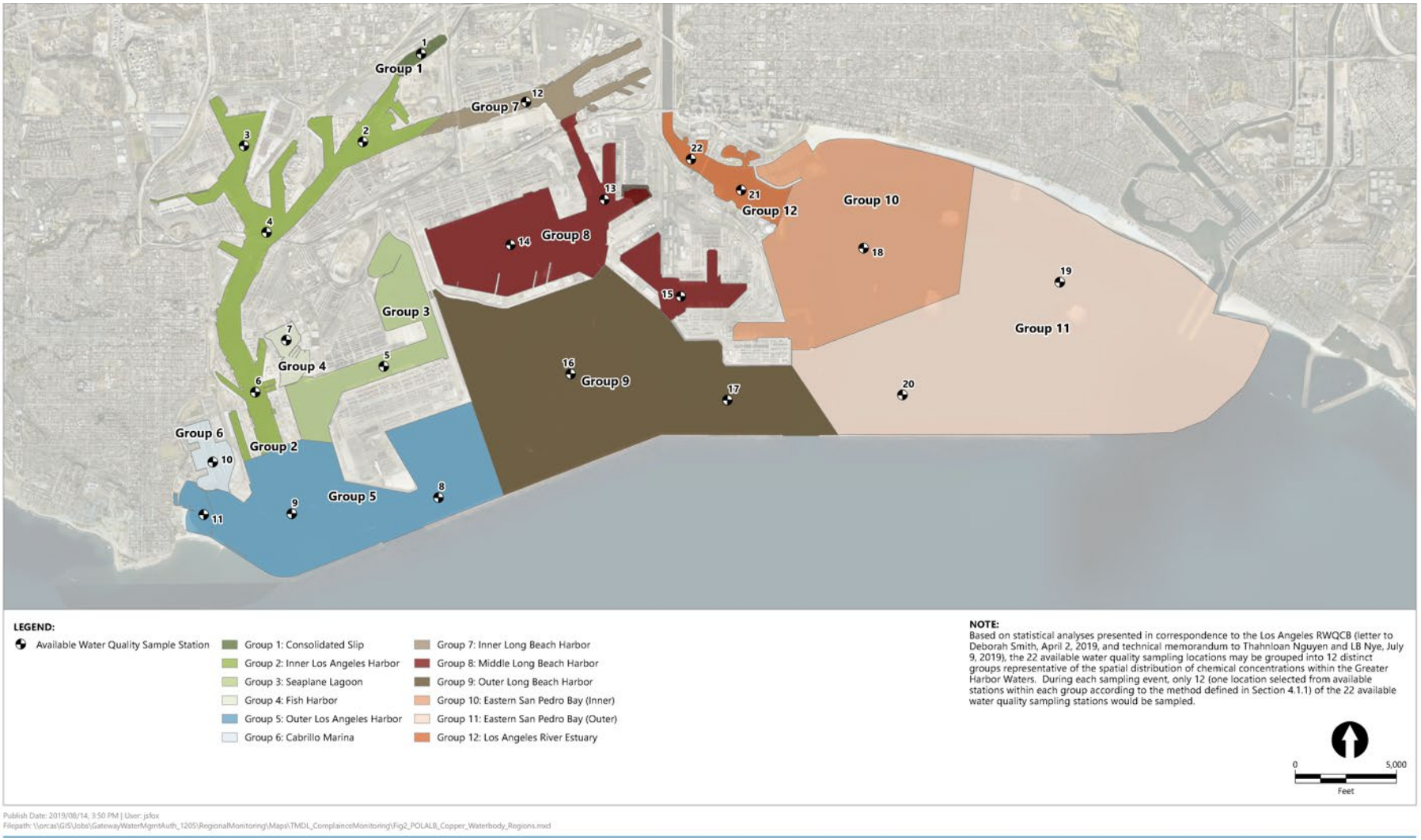


Figure 2-7: Greater LA Harbor Waters and Monitoring Stations

2.3. SOURCE ASSESSMENT

The focus of this Source Assessment is on watershed sources contributing to the presence of pollutants in stormwater discharges conveyed through the MS4.

A source assessment was conducted with the initial development of the EWMP to identify potential sources in discharges to the MS4 and from the MS4 to receiving waters and other potential stressors related to MS4 discharges causing or contributing to the WBPCs classified as Category 1, 2, or 3. Per the MS4 Permit, the following available data and documents were considered in the identification of known and suspected sources of the Peninsula WMG's priority pollutants:

- Findings from the Peninsula WMG's Illicit Connections and Illicit Discharges Elimination Programs
- Findings from the Peninsula WMG's Industrial/Commercial Facilities Control Programs
- Findings from the Peninsula WMG's Development Construction Programs
- Findings from the Peninsula WMG's Public Agency Activities Programs
- TMDL Implementation Plans
- TMDL Source Investigations
- Findings from MS4 Permittees' monitoring programs
- Watershed model results
- Other pertinent data, information, or studies related to pollutant sources and conditions that contribute to the highest water quality priorities
- Locations of the Peninsula Agencies' MS4s including, at a minimum, all major outfalls and major structural controls for stormwater and non-stormwater that discharge to receiving waters
- Other known and suspected sources of pollutants in non-stormwater or stormwater discharges from the MS4 to receiving waters within the EWMP area

This source assessment has been updated based on outfall monitoring data collected via the Coordinated Integrated Monitoring Program (CIMP) as well as updated information on potential watershed sources of priority pollutants.

2.3.1. WATERSHED SOURCES OF PRIORITY POLLUTANTS

There are two general categories of stormwater pollutant sources, point sources and non-point sources. Non-point sources, by definition, include pollutants that reach receiving waters via routes other than a defined conveyance/point source and are not regulated by the MS4 Permit nor included in the reasonable assurance analysis. An example of such a non-point source could be trash deposited on the beach by recreational use which is then transported into the receiving water by wind or tide action. Point source discharges are regulated through NPDES permits and include stormwater and urban runoff (also referred to as non-stormwater discharges) through the MS4. Stormwater runoff in the watershed is regulated through one of several types of National Pollutant Discharge Elimination System (NPDES) permits, including MS4 permits, a statewide MS4 permit for Caltrans; a statewide Construction General Permit (CGP) for construction sites disturbing 1 acre or more of land; and a statewide Industrial General Permit (IGP).

This section will first consider historical and current land uses in the Peninsula WMG watersheds, identify key pollutant fate and transport mechanisms characteristic of the watersheds, and then consider relevant point and non-point sources of priority pollutants that may be present in the watersheds based on land uses. This source assessment will help to shape appropriate pollutant control measures in subsequent chapters of this EWMP.

Potential sources of the priority pollutants in the watershed and potential fate and transport mechanisms that could cause these pollutants to reach the MS4 are summarized in **Table 2-14.**

Table 2-15: Potential Watershed Sources of Palos Verdes Peninsula Priority Pollutants

Potential Source	Pollutants						
	OC Pesticides	PAHs	Bacteria	Nutrients	Metals	TSS/Turbidity	Trash
WATERSHED SOURCES							
Residential land areas	●		●	●	●	●	●
Agricultural activities (e.g., animal husbandry)			●	●		●	
Construction activities					●	●	●
Landscaping, gardening				●	●		
Pet waste			●	●			
Wildlife			●				
Native geology					●	●	
Land surface erosion	●				●	●	
Commercial activity		●	●	●	●		●
Car washing				●		●	
Transportation sources (e.g., brake and tire wear)		●			●		●
Pavement erosion		●			●	●	
Sanitary sewer			●	●	●	●	
FATE AND TRANSPORT MECHANISMS							
Atmospheric Deposition		●		●	●		
Wildfires		●		●	●	●	
Resuspension in soil particles	●		●		●		
Land surface erosion	●		●	●	●	●	
Sanitary sewer overflows			●	●		●	

Watershed Land Uses

Understanding historical and current land uses in the watershed helps to identify potential sources of priority pollutants in stormwater runoff. Following the arrival of Europeans to the Los Angeles Basin, the lands of the Palos Verdes Peninsula were first used for cattle ranching and then later for dry farming of barley, hay, grain and garbanzo beans.[30] Residential development on the Palos Verdes Peninsula began in 1913 when J.P. Morgan purchased 16,000 acres of ranch land, however major development was delayed until after World War I and thereafter growth of residential development proceeded at a modest pace until the 1950s when growth accelerated and then grew explosively during the 1960s. [31]

Today the Palos Verdes Peninsula is effectively built-out and is dominated by single-family residential (55.6%) and open space (32.8%) land uses, limited multi-family residential (2.8%) and commercial areas (2.2%), and does not include any industrial land uses. There are also locations where horse uses exist in designated semi-rural residential areas of the Peninsula. There are no IGP facilities within the PVP EWMP area. Construction sites are by nature transitory pollutant sources and are subject to oversight by MS4 agencies through their issuance of building permits – the impact of construction sources of pollutants are indirectly incorporated into the CIMP monitoring data and therefore captured in the reasonable assurance modeling. Caltrans' MS4 permit incorporates TMDL WLAs and as such it is assumed that Caltrans land uses will meet their WLAs individually and such areas have been excluded from the reasonable assurance modeling exercise.

A breakdown of land uses by watershed is shown in **Table 2-15.** Drainage within the Peninsula WMG area is conveyed via natural, soft-bottom canyons and engineered storm drain networks.

Table 2-16: Land Use Distribution within the Palos Verdes Peninsula Watersheds

Watershed	COM	EDU	OS	OTHER	OTHER (R)	PUB	MFR	SFR
Dominguez Channel: Machado Lake & Harbor Watersheds	3.10%	5.00%	18.40%	3.90%	1.40%	0.40%	2.90%	64.80%
Santa Monica Bay	1.60%	3.30%	41.20%	0.30%	0.00%	0.50%	2.70%	50.20%
Total	2.20%	3.90%	32.80%	1.60%	0.50%	0.40%	2.80%	55.60%

COM: Commercial

EDU: Educational facility

OS: Open space (i.e., park, recreational facility (i.e., stable, golf course), preserved land, and vacant)

Other: Churches, cemetery

Other (R): Covered Reservoir

PUB: Public facility (i.e., fire, police, city hall)

MFR: Multi-family residential

SFR: Single-family residential

Note: A total of 0.2% are zoned as roads and are not included in this table.

[30] Gales, Donald M. 1988. Handbook of Wildflowers, Weeds, Wildlife, and Weather of the South Bay and Palos Verdes Peninsula. Third Edition.
[31] Gales 1988.

POLLUTANT FATE AND TRANSPORT MECHANISMS WITHIN THE WATERSHED

Pollutant fate and transport mechanisms should also be considered in source characterization to the extent they contribute or reduce pollutant loading to receiving waters.

ROAD INFRASTRUCTURE

Roadways with curb and gutter are considered part of the MS4 system and as such serve to transport pollutants from the watershed to receiving waters. However, transportation activities on the roadways also generate pollutant. Pollutants originate from cars, roadway degradation, and landscaping along the roadways. Typical contaminants associated with these include sediment, heavy metals, oils and grease, debris, fertilizers, and pesticides, among others[32]. The use and wear of cars is one of the most prevalent sources of roadway pollutants. Vehicle brake pads constitute the single largest source of copper[33]. Tires and engine parts are also a source of metals pollutants—tire wear accounts for over 50 percent of the total cadmium and zinc loads in urban runoff[34]. Roadways can also be a source of nutrients from atmospheric deposition of nitrogen and from fertilizers and pesticides used during parkway landscaping activities.

ATMOSPHERIC DEPOSITION

Atmospheric (or air) deposition is the transfer of pollutants from air to land. Pollutants in the atmosphere deposit onto solid surfaces and are then washed off by rain, becoming entrained in the stormwater runoff that reaches receiving waters. Atmospheric deposition of pollutants to developed and undeveloped surfaces in the watershed can be a major source of pollutants, especially in major metropolitan areas. Typical pollutants associated with atmospheric deposition are metals, PAHs, PCBs, and nitrogen. These pollutants enter the atmosphere from point sources (i.e., an industrial facility emitting metals and PAHs into the air) and mobile sources such as trucks and automobiles.

WILDFIRES

The Palos Verdes Peninsula is in a very high fire hazard severity zone and, when they occur, wildfires can mobilize pollutants and thereby increase stormwater pollutant loading due to several factors including: increased runoff associated with soil hydrophobicity which results from fire, increased mobility of contaminants from soil, release of previously bound contaminants in vegetation, and higher erosion rates. Total suspended solids (TSS) concentrations in stormwater runoff often increase by orders of magnitude in post-fire systems thereby increasing the transport of particulate bound pollutants. Combustion of plants and natural materials has also been reported to release metals which are then mobilized by storms.[35]

Southern California Coastal Water Research Project (SCCWRP) conducted a study comparing post-fire stormwater runoff data from five wildfires in natural open space between 2003 and 2009 in comparison

[32] Caltrans (California Department of Transportation). 2003. *Discharge characterization study report*. California Department of Transportation, Sacramento, CA.
[33] TDC Environmental 2004, Copper Sources in Urban and Shoreline Activities. San Francisco, CA.
[34] Davis A.P., M. Shokouhian, and S. Ni. 2001. Loading estimates of lead, copper, cadmium, and zinc in urban runoff from specific sources. Chemosphere.
[35] Burke, M.P., T.S. Hogue, A. Kinoshita, J. Barco, C. Wessel, E.D. Stein 2013. Environmental Monitoring and Assessment 185:10131–10145. Pre- and post-fire pollutant loads in an urban fringe watershed in Southern California.

with stormwater runoff data from sixteen unburned natural areas and six developed areas. The study found average copper, lead and zinc fluxes were hundreds of times higher from burned areas than unburned areas.[36] Even more striking, the flux of PAHs from natural burned areas was four times greater than from adjacent unburned urban areas. Ash fallout on unburned watersheds produced three times greater flux of PAHs and metals. Prior to the wildfires, most of the burned areas were dominated by sage scrub [similar to natural plant communities on the Palos Verdes Peninsula], or chaparral plant communities. It is also notable that the study did not address potential toxic effects from flame retardants commonly used in combatting wildfires.[37]

SCCWRP conducted a more recent study of the 2009 Station Fire which consumed 660 square kilometers of the Angeles National Forest. Much of the area had not burned in over 60 years which meant there was a potentially large store of anthropogenic lead contamination resident in vegetation and soil due to air deposition during the time that lead additives were still used in gasoline. Stormwater quality sampling was conducted from four storm events post-fire at two-hour intervals for a total of 54 grab samples. These results were compared with 131 grab samples from four storm events during the storm year preceding the Station Fire. Post-fire peak stormwater flows during two of the storm events post-fire were 15 and 17 times the largest storm during the preceding pre-fire year and yet these post-fire peak flows were produced with only 80% and 65% of the pre-fire storm precipitation depth. The sediment volume delivered during the post-fire storm year was ten times the total volume deposited in the preceding fifteen years at Devil's Gate Reservoir. Mean seasonal total suspended solids concentration in stormwater increased 100-fold following the fire. Median concentrations of lead increased by more than 100 times the magnitude post-fire, while median concentrations of zinc increased by 10 times, and copper by 9 times. Although the burned watershed monitored in this study was largely undeveloped, the concentrations of metals measured were in the range of concentrations typically measured from highway drainage, industrial areas and mining operations.[38]

Natural Canyon Drainage Systems

On the Palos Verdes Peninsula the improved MS4 is interconnected with natural canyon drainage courses that naturally detain and retain runoff, effectively serving as nature-based stormwater retention systems. Intense rain events can cause erosion in the natural canyons and increase transport of sediments and mobilize storm-borne sediment pollutants; for this reason, it is important to protect these canyons from hydromodification. Overall, these natural canyon drainage courses serve to attenuate pollutants and reduce stormwater pollutant loading to receiving waters. The reasonable assurance model has been calibrated against storm flow data from the CIMP monitoring to more accurately reflect the storm runoff reduction provided by these natural canyon systems.

Organochlorine Pesticides

Organochlorine pesticides (OC pesticides) are a large group of legacy pesticides, including chlordane, dieldrin, and DDT, that were previously used widely throughout the United States. Even though they have been banned from use for many years, they are slow to degrade and continue to persist in the

[36] SCCWRP 2012. ED Stein, JS Brown, TS Hogue, MP Burke, A Kinoshita. pp. 11-28 in: Stephen Weisberg and Karlene Miller (eds.), Southern California Coastal Water Research Project 2012 Annual Report. Southern California Coastal Water Research Project. Costa Mesa, CA.

[37] SCCWRP 2012.

[38] Burke et al. 2013.

environment. Because of their chemical and physical properties these pollutants tend to partition and bind preferentially to the surfaces of soil particles. When transported in stormwater-borne sediment to local receiving waters, OC pesticides have been shown to accumulate in the fatty tissue of fish and wildlife and bio-magnify in the food-web. Soils historically treated with DDT and chlordane continue to be a source of pollutants in the storm-borne sediment discharges from the MS4 on the Palos Verdes Peninsula as evidenced by the recent CIMP monitoring results discussed in the next section.

DDT

The history of DDT use was summarized in the staff report to the Machado Lake Toxics TMDL as follows:

> *"DDT first became widely used as a pesticide in 1939; the use was focused on controlling insects that transmit diseases such as malaria and typhus during World War II. DDT for agricultural and commercial uses became widespread in the United States after 1945. 1959 was the peak of DDT use in the United States when approximately 80 million pounds were applied. In California, DDT was used for the control of both agricultural and urban pests like mosquitoes and cockroaches. In 1963, the California Department of Food and Agriculture declared DDT a restricted material. The last year that substantial amounts of DDT were applied in California was 1970 when 1.2 million pounds of DDT were applied primarily to agricultural areas."*[39]

Considering the ubiquitous use of DDT from 1939 through 1970 and understanding the history of land use and development on the Palos Verdes Peninsula, it is reasonable to expect that DDT was used in residential applications and that DDT and its breakdown products, DDE and DDD may remain in soils within the Palos Verdes Peninsula.

CHLORDANE

The history of chlordane use was summarized in the staff report to the Machado Lake Toxics TMDL as follows:

> *"Chlordane was first registered and approved for both agricultural and non-agricultural uses in the United States in 1948. Non-agricultural uses of chlordane included treating pests in residential lawns and gardens as well as structural pests such as termites. Chlordane was used on a variety of agricultural crops including corn, citrus, deciduous fruits and nuts, and vegetables. In 1978, the U.S. EPA cancelled the use of chlordane on all food crops and for applications to lawns and gardens, although it was still registered for use in termite control. In 1988, the U.S. EPA cancelled all uses for chlordane."*[40]

Due to the widespread use of chlordane on residential lawns and gardens, it is reasonable to expect that chlordane may remain in soils within the watershed.

DIELDRIN

The history of dieldrin use was summarized in the staff report to the Machado Lake Toxics TMDL as follows:

[39] Machado Lake Pesticides and PCBs TMDL. Staff Report - September 2, 2010, page 13.
[40] Machado Lake Pesticides and PCBs TMDL. Staff Report - September 2, 2010, page 15

> *Dieldrin was widely used from 1950 – 1970 as a structural pesticide for the control of termites and as an agricultural pesticide for cotton, corn, and citrus crops. The agricultural use of dieldrin was banned by the US Department of Agriculture in 1970 and in 1987 all uses of dieldrin were cancelled.*[41]

Historical agricultural land uses on the Palos Verdes Peninsula are not known to include cotton, corn or citrus crops. Since the use of dieldrin in residential areas was mainly as a structural termiticide and was not widely applied in lawns and gardens, it is less likely that dieldrin will be present in soils. If present, dieldrin would exhibit similar fate and transport properties as chlordane and DDT, i.e., it would partition on storm-borne sediment. As discussed in the next section, to-date dieldrin has not been detected in storm borne sediment of the CIMP outfall monitoring.

POLYCHLORINATED BIPHENYLS (PCBS)

Polychlorinated biphenyls (PCBs) are mixtures of synthetic organic chemicals that were commonly used for various applications from approximately 1929 until 1979 when the U.S. banned PCB manufacturing, processing, distribution, and use. PCBs may be present in products that were made before 1977 but are still in use today, such as transformers, fluorescent lighting fixtures, household caulking, paints and waxes[42].

U.S. EPA identifies the following list of products and materials that if produced and installed prior to the 1979 ban may still contain PCBs:[43]

- Transformers and capacitors
- Electrical equipment including voltage regulators, switches, re-closers, bushings, and electromagnets
- Oil used in motors and hydraulic systems
- Old electrical devices or appliances containing PCB capacitors
- Fluorescent light ballasts
- Cable insulation
- Thermal insulation material including fiberglass, felt, foam and cork
- Adhesives and tapes
- Oil-based paint
- Caulking
- Plastics
- Carbonless copy paper
- Floor finish

Considering the predominantly residential nature of development on the Palos Verdes Peninsula and the limited industrial sources, either current or in the past, presence of PCBs in exposure to stormwater is most likely limited to external building materials such as caulk or paint or in utility transformers or residuals in soils associated with spills from ruptured utility transformers.

POLYCYCLIC AROMATIC HYDROCARBONS (PAHS)

[41] Machado Lake Pesticides and PCBs TMDL. Staff Report - September 2, 2010, page 15

[42] USEPA: Santa Monica Bay DDT and PCBs TMDL

[43] https://www.epa.gov/pcbs/learn-about-polychlorinated-biphenyls-pcbs#commercial

Polycyclic aromatic hydrocarbons (PAHs) are a group of organic contaminants that are associated with the release of petroleum products (petrogenic sources) or form from the incomplete combustion of hydrocarbons (pyrogenic sources). PAHs are an environmental concern because they are toxic to aquatic life and because several of the individual PAH compounds are suspected human carcinogens. Research has shown that the dominant source of origin is pyrogenic (combustion of organic matter) in the Los Angeles Region, and PAHs are often deposited through atmospheric deposition and delivered to waterbodies in stormwater runoff[44]. Other non-point sources may include leaking motor oil, tire wear and vehicular exhaust.

METALS

General wear and tear of automotive parts can be a source of metals. For example, brake wear and tire wear can release copper, lead, and zinc into the environment and contribute concentrations of metals to roads and in turn stormwater runoff. Motor oil and automotive coolant spills are another potential source of metals. One study found that cars are the leading source of metal loads in stormwater, producing over 50 percent of copper, cadmium, and zinc loads[45].

Table 2-17: Automotive Sources of Metals in Stormwater[46]

Source	Cadmium	Chromium	Copper	Iron	Nickel	Lead	Zinc
Gasoline	●		●			●	●
Exhaust					●	●	
Motor oil and grease				●	●	●	●
Antifreeze	●	●	●	●		●	●
Undercoating						●	●
Brake Linings			●	●	●	●	●
Tires	●		●			●	●
Asphalt	●		●		●		●
Concrete			●		●		●
Diesel Oil	●	●				●	●
Engine wear				●	●	●	●

Fertilizers, herbicides, and pesticides used for lawn and landscape maintenance can contain metals such as cadmium, copper, mercury, zinc, lead, iron, and manganese[47]. Algaecides, wood preservatives, galvanized metals, and paints when used in exposure to stormwater can also be a source of these metals.

ARSENIC

[44] Sabin, L.D., K.A. Maruya, W. Lao, D. Diehl, D. Tsukada, K.D. Stolzenbach, and K.C. Schiff 2009. Exchange of Polycyclic Aromatic Hydrocarbons among the Atmosphere, Water, and Sediment in Coastal Embayments of Southern California, U.S.A. Environmental Toxicology and Chemistry, Vol. 29, No. 2, pp. 265-274.
[45] Schueler, T., and H.K. Holland. 2000. The Practice of Watershed Protection. Center for Watershed Protection, Ellicott City.
[46] Nixon, H., and J.D. Saphores. 2007. Impacts of motor vehicle operation on water quality: Clean-up costs and policies. Transportation Research Part D. *Transport and Environment.*
[47] County of Los Angeles. 2010. *Multi-pollutant TMDL Implementation Plan for the Unincorporated County Area of Los Angeles River Watershed*. County of Los Angeles, Los Angeles, CA

Arsenic is a natural component of the Earth's crust and low levels of the element are found in all environmental media. Anthropogenic sources of arsenic include nonferrous metal mining and smelting, pesticide application, coal and oil combustion, wood combustion, and waste incineration. Most anthropogenic arsenic is emitted to the atmosphere through high temperature processes (e.g., coal and oil combustion, smelting operations, and waste incineration) and occurs as fine particles which are transported by wind and air currents until they are returned to earth by wet or dry deposition.[48]

Arsenic found in soil, either naturally occurring or from anthropogenic releases, forms insoluble complexes with iron, aluminum, and magnesium oxides found in soil surfaces, and is relatively immobile. However, under reducing conditions, arsenic can be released from the solid phase, resulting in soluble mobile forms of arsenic, which may potentially leach into groundwater or result in runoff of arsenic into surface waters. Arsenic is largely immobile in agricultural soils; therefore, it tends to concentrate and remain in upper soil layers indefinitely. Terrestrial plants may accumulate arsenic by root uptake from the soil or by absorption of airborne arsenic deposited on the leaves.[49] Arsenic can also leach from wood treated with chromated copper arsenate (CCA). Ammoniacal copper zinc arsenate (ACZA) is another arsenic-containing waterborne preservative, though not as widely used as CCA.

Based on current and historical land use, potential sources of arsenic within the Palos Verdes Peninsula watersheds may include air deposition and residuals in soils from pesticide application, with very minor contributions from leaching of wood used in landscaping or exterior building materials exposed to stormwater that have been treated with arsenate-type wood preservatives. Arsenic present in stormwater discharges would be expected to be associated primarily with storm-borne sediments.

COPPER

Research beginning in the 1990s to address copper impairment of lower South San Francisco Bay has provided a wealth of information on sources of copper releases to stormwater from urban and suburban areas. A study prepared by TDC Environmental in 2004 of copper sources in urban and stormwater runoff to San Francisco Bay identified vehicle brake pads, followed by atmospheric deposition, architectural copper, industrial use, potable water discharged to storm drains, soil erosion and copper algaecides, in order of significance.[50] Other studies from other parts of the U.S. and internationally have also contributed to the body of evidence for the importance of these sources in stormwater runoff from developed areas. The relative importance of copper sources depends on land use within a watershed as well as proximity to nearby air pollution sources.

Sources of copper in deposits from air pollution can be a result of combustion of vehicle or stationary source fuels, including wood burning. TDC Environmental estimated comparable emission rates of copper from industrial air emissions and emissions from fires (both residential wood burning and forest fires). Air pollution may convey copper from local sources or air emission sources outside the immediate area that are then deposited in a watershed, either via dry air deposition or wet air deposition during rainfall. In 2006 a study of atmospheric dry deposition of metals was conducted at six urban sites and one nonurban site within the coastal region of the Los Angeles air basin. Mean flux of copper at the urban sites ranged from 11 to 34 micrograms per square meter per day whereas the flux of copper at the non-urban Malibu

[48] https://www.atsdr.cdc.gov/toxprofiles/tp2-c6.pdf
[49] https://www.atsdr.cdc.gov/toxprofiles/tp2-c6.pdf
[50] TDC Environmental, 2004. Copper Sources in Urban Runoff and Shoreline Activities – Information Update. Prepared for the Clean Estuary Partnership. November 2004.

Creek Watershed site was 3.7 micrograms per square meter per day—the Malibu Creek watershed is generally upwind of the Los Angeles metropolitan area which further removes it from urban influence. [51]

Architectural copper if left uncoated will develop a patina of copper oxides which are water soluble. The amount of copper washed off architectural features is proportional to the surface area, so copper roofs provide the greatest surface area, with gutters and flashing providing a lesser surface area.[52]

Trace levels of copper may occur naturally in soils or be present because of application of copper-containing pesticides. The TDC Environmental study estimated an average value of 38.57 mg Cu/kg soil based on data from the State Water Resources Control Board's construction stormwater database for the San Francisco Bay area. Copper-containing pesticides are widely used to control fungi, mildew, algae and roots. Common applications include control of roots in sewers, controlling algae in swimming pools and ponds, and preventing rot and mildew on wood, roofing and other outdoor surfaces. Copper is also used in lawn and garden fungicides.[53]

Copper in the potable water supply may arise from the raw water supply, from algaecides used to control algae in reservoirs, or by dissolution from copper pipes.[54] Potable water may flow into the storm drain system due to runoff from outdoor irrigation, hydrant flushing, and other sources of outdoor water use such as car washing or patio cleaning.

Antifouling hull paints or coatings are applied to marine vessels to prevent the attachment and growth of "fouling organisms" such as barnacles, oysters, mussels, shipworms, or algae that attach to boat hulls. Copper has been a standard biocide in anti-fouling hull paints for many decades, and copper- based antifouling hull paints are currently the most commonly used antifouling coating. Copper in hull paint can slowly leach into the water column and be released from the hull as particles that fall to the bed sediments, causing impairment[55]. There are no marinas or boat maintenance facilities within the Peninsula WMG watersheds, however it is noteworthy that Cabrillo Marina in Los Angeles Harbor exhibits ongoing elevated dissolved copper concentrations as discussed in Section **2.2.3**.

Based on the preceding discussion of major sources of copper and understanding of current and past land uses on the Palos Verdes Peninsula, potential sources of copper in stormwater discharges from the watershed may include releases from vehicle brake pads, use of algaecides in pools or fountains, pesticide application in landscapes, and air deposition.

LEAD SOURCES

Potential sources of lead to the watershed may include historical and current air deposition of lead from leaded gasoline used historically in automobiles and currently in general aviation fuel, lead wheel weights on vehicles, and lead in paint on buildings constructed prior to 1977. Beginning in November 1973 U.S. EPA began requiring the phase out of lead in all grades of gasoline—at the time the average lead content in gasoline was 2-3 grams per gallon amounting to 200,000 tons of lead emissions per year in the U.S. By 1995 leaded fuel accounted for only 0.6 percent of total gasoline sales and less than 2,000 tons of lead

[51] Sabin, L.D., J.H. Lim, K.D. Stolzenbach and K.C. Schiff, 2006. Atmospheric Dry Deposition of Trace Metals in the Coastal Region of Los Angeles, California, U.S.A. Environ Toxicol Chem. 2006 Sep;25(9)2334-41.
[52] TDC Environmental 2004.
[53] TDC Environmental 2004.
[54] TDC Environmental 2004.
[55] Metz, V. and Gregg, J. Boat Hull Coating Selection and Hull Cleaning for Water Pollution Prevention: Water Quality Factsheet for Marina Operators and Boaters. Water Quality Program, California Coastal Commission. (2017).

emissions per year. Effective January 1, 1996, the Clean Air Act banned the sale of leaded fuel in on-road vehicles.[56] The nearby Torrance Airport located just north of the Palos Verdes Peninsula is a general aviation airfield and a potential source of air deposition of lead within the Palos Verdes Peninsula watershed due to the use of leaded avgas fuel in piston engine aircraft.

A 2009 study by Sabin found that the mean flux of lead due to air deposition at urban sites in the Los Angeles basin ranged from 8.3 to 29 micrograms per square meter per day, whereas the flux at the non-urban site in Malibu Creek Watershed was 1.4 micrograms per square meter per day. A significant drop in concentration of lead was observed in the study by Sabin when compared with the study done 15 years earlier in 1987—this was attributed to the elimination of lead from gasoline in the late 1980s.[57] Aviation gasoline for piston airplanes, known as avgas, still includes lead additives and is widely used for general aviation aircraft thus continuing to be a source of lead in air deposition. Jet aircraft and turbine-powered propeller aircraft do not use avgas. Efforts to develop an operationally safe and suitable replacement for the leaded additive in avgas have been underway for over a decade. [58]

According to the California Department of Toxic Substances Control (DTSC), prior to 2010 approximately 1.6 million pounds of lead wheel weights fell from vehicles each year onto roadways. Roadway traffic pulverizes lead wheel weights into dust which then contaminates the air and washes into storm drains. As of January 1, 2010, California law prohibits the manufacture, sale or installation of wheel weights containing more than 0.1% lead.[59]

In 1977 the U.S. Consumer Product Safety Commission effectively banned lead in paint in residential properties and buildings by limiting the allowable concentration to 0.06 percent.[60] Deteriorating or improperly abated lead paint in older buildings can endanger human health, especially that of children, and may cause release of lead to the environment, including stormwater.

MERCURY

According to USEPA, on a global level, gold mining is the largest source of anthropogenic mercury emissions, followed by stationary combustion of coal, non-ferrous metals production and cement production.[61] No gold mining or non-ferrous metals industrial sources are known to have existed on the Palos Verdes Peninsula with the exception of a former cement mixing facility located on the site of the former Chandler sand and gravel quarry. Thus, the predominant sources of mercury that might be encountered on the Palos Verdes Peninsula are mercury deposited as a result of air deposition or improper disposal of mercury-containing consumer products. USEPA maintains a website with information on products that contain mercury.[62]

ZINC

A study was commissioned by the California Stormwater Quality Association (CASQA) to identify major and minor sources of zinc as a water pollutant and to assist MS4 Permittees in focusing source control measures in a cost-effective manner. The two major sources of zinc in urban runoff identified by the study

[56] https://archive.epa.gov/epa/aboutepa/epa-takes-final-step-phaseout-leaded-gasoline.html
[57] Sabin et al. 2006.
[58] Federal Aviation Administration 2013. Fact Sheet – Leaded Aviation Fuel and the Environment. June 19, 2013.
[59] http://www.dtsc.ca.gov/PollutionPrevention/ToxicsInProducts/leadwheelweights.cfm
[60] https://www.cpsc.gov/Recalls/1977/cpsc-announces-final-ban-on-lead-containing-paint
[61] https://www.epa.gov/international-cooperation/mercury-emissions-global-context#types
[62] https://www.epa.gov/mercury/resources-mercury-science-and-research

were outdoor surfaces treated with zinc (especially galvanized steel surfaces) and tire wear debris. Other local sources depending on land use may include zinc-containing paint, recycled tire shred and crumb products, industrial air emissions, zinc-rich soils, and mining. Minor sources of zinc in urban runoff include vehicle brake pads, wheel weights, vehicle exhaust, zinc-preserved wood, and certain types of roofing and siding materials. [63]

Galvanized steel has long been used as a cost-effective material for outdoor applications such as: roofing, gutters, flashing, drainage pipe, and chain-link fencing. Zinc sheet has drawn recent interest in the design community for its appearance and longevity as a building roofing material and use as siding for commercial and institutional buildings. A body of literature since the late 1980s has documented relatively high concentrations of zinc in runoff from outdoor zinc surfaces, and consistent with this occurrence, zinc concentrations are typically highest in urban runoff from industrial land uses. The amount of zinc washed off outdoor surfaces is directly proportional to the exposed surface area. Other factors include the quality of zinc material and the presence of temporary or permanent coatings over the zinc surface. Galvanized wire fencing has surprisingly large surface area, for example a 6-foot-high industrial gauge (6-gauge) chain link fence has a surface area of 2.2 square meters per meter of length.[64] The presence of coatings over the zinc surface reduces or substantially eliminates exposure to weather depending on the permanence of the coating—temporary passivation coatings reduce zinc losses for several years but eventually wash away, whereas painted zinc surfaces nearly eliminate zinc in runoff. Location is also important because when large zinc surfaces like galvanized chain-link fencing are sited over permeable surfaces in the landscaped buffers between properties, infiltration of runoff into a soil drip zone substantially reduces zinc levels in runoff.[65]

Nearly all rubber products, including tires, contain zinc oxide which is used to accelerate the vulcanization process. “According to the International Zinc Association, zinc oxide improves tire wear abrasion performance, protects against ultraviolet radiation, reduces thermal effects caused by internal friction, helps bond rubber to metal (such as the steel cord of tires), reduces rubber shrinkage during curing, and helps keep product molds clean.”[66] In the U.S., the main outdoor use for rubber is in vehicle tires.

Tires also comprise the majority of California’s rubber waste and through strong efforts by CalRecycle, about half of waste tire material is reused within the state. Reuse applications for waste tires that have the potential to disperse zinc into the environment include combustion as tire-derived fuel, tire retreads, and tire shred and crumb products such as those used in artificial turf infill and rubberized asphalt.[67] There are no facilities permitted to use tire-derived fuel for combustion within the Los Angeles area.[68]

Tire wear from on-road vehicles is expected to be the predominant source of zinc within the watershed. To the extent that rubberized asphalt paving is used for road resurfacing within the watershed, there may be contributions of zinc from this use as well. There is limited information currently available on the significance of rubberized asphalt as a source of zinc in stormwater runoff.

[63] TDC Environmental, 2015. Zinc Sources in California Urban Runoff prepared for California Stormwater Quality Association. April 2015.
[64] Golding 2006. *A Survey of Zinc Concentrations in Industrial Stormwater Runoff*. Washington State Department of Ecology, Environmental Assessment Program. Publication No. 06-03-009.
[65] Blok 2005. Blok, J. (2005). "Environmental Exposure of Road Borders to Zinc." The Science of the Total Environment 348(1-3): 173-190.
[66] TDC Environmental, 2015.
[67] TDC Environmental, 2015.
[68] California Air Resources Board, 2015. 2015 Report on Air Emissions from Facilities Burning Waste Tires in California. June 2015.

Air deposition of zinc can also be important. The 2006 study by Sabin found that the mean flux of zinc due to air deposition at urban sites in the Los Angeles basin ranged from 69 to 228 micrograms per square meter per day whereas zinc flux at the non-urban Malibu Creek Watershed site was 15 micrograms per square meter per day.[69]

Typical California soils have a mean zinc concentration of 149 mg/kg, with few soil types exceeding 200 mg/kg. However, a few soil formations (e.g., the Bedford Canyon formation and fresh carbon-rich portions of the Monterey formation) have much higher zinc levels in excess of 300 mg/kg. High-zinc soils may increase zinc levels in urban runoff and creeks where these soils are exposed.[70] Since the marine sediment target for zinc in the Harbor Toxics TMDL is set at 150 mg/kg in sediment, discharge of suspended sediment associated with soils exhibiting zinc concentrations only slightly above the mean soil concentration in California could cause exceedance of the target even without loading from additional sources.

BACTERIA

Sources of indicator bacteria potentially present in the Peninsula WMG's watersheds based on land uses include both anthropogenic and non-anthropogenic sources such as:

- Animal wastes – horses, dogs, cats, etc.
- Gardening activities - application of animal manure that has not been fully composted to gardens and landscapes are a source of bacteria
- Organic food waste from commercial activities when dumpsters are left uncovered in exposure to stormwater, or subject to scattering by vectors such as seagulls, pigeons, rats, and racoons
- Illegal dumping from recreational vehicle/vessel holding tanks among others, can be a source of elevated levels of total coliform bacteria
- Sanitary sewer overflows, leaks and/or illicit connections of sanitary lines to the storm drain system
- Illegal connections and discharges are also possible sources of bacteria in stormwater discharge
- Open defecation associated with recreational activities or people without housing
- Non-anthropogenic sources of indicator bacteria include – soils, decaying vegetation, wildlife such as birds, opossums, raccoons, etc.

Sanitary sewer systems and septic systems are potential sources of contaminants. Cracks in aging sewer laterals and mainlines, root intrusion and fats/oils/grease clogs can contribute to sanitary sewer leaks and overflows. When sanitary sewers overflow or leak, they can release raw sewage into the environment. Raw sewage contains high concentrations of indicator bacteria and nutrients and may also contain other pollutants such as suspended solids, pathogenic organisms, toxic pollutants, oil and grease.

NUTRIENTS

[69] Sabin et al. 2006.
[70] TDC Environmental, 2015.

Possible sources of nutrients include runoff from residential and commercial areas associated with landscaping activities and use of fertilizer for lawns and gardens, including organic fertilizer such as compost or manure. Maintenance activities such as washing cars, parking lots and driveways can contribute nutrients to the watershed since some detergents contain phosphorus. Other sources of nutrients include food wastes and domestic animal wastes in exposure to stormwater, or occasional sewer overflows. Key sources of nutrients identified in the Palos Verdes Peninsula Nutrient Implementation Plan[71] were fertilizer applied to turf and landscapes, horse manure, and dry air deposition of nitrogen:

- Manure - Within the portion of the Palos Verdes Peninsula that drains to Machado Lake equestrian activities and horse keeping are common. Horse manure can be a source of nutrients in runoff. The average 1,000-pound animal produces over 102 pounds of total nitrogen and 18.8 pounds of total phosphorous per year[72]. Information from the Model Equestrian Center Project provides support for the understanding that equestrian centers are a source of nutrients in stormwater runoff.
- Numerous reports document the linkages between excess nutrients in local water bodies and the augmentation of naturally occurring soil nutrients with nitrogen and phosphorus applied in commercial fertilizers, whether organic or synthetic. The desire for green turf and the use of tropical or exotic plants may lead to the overuse or the misapplication of nitrogen and phosphorus fertilizers. Because single-family residences are the predominant land use within the Palos Verdes Peninsula, the application of fertilizer to residential landscapes and to a lesser extent commercial landscapes, ball fields and parks are potential sources of nutrients. The excess nutrients accumulated in the soils can be transported to waterways through excessive irrigation or stormwater runoff.
- Air deposition of nitrogen due to air pollution, particularly onto impervious surfaces where it can be readily washed into storm drains is a known source of nitrogen, the predominate species being NHO_3 (nitric acid), NO_2 (nitrogen dioxide) and NH_3 (ammonia)[73].

TRASH

Statewide and local studies have documented the presence of trash in state waters and the accumulation of land-based trash in the ocean. Trash discarded on land may be transported through storm drains to waterways, shorelines, and the ocean. Street and storm drain trash studies conducted in regions across California have provided insight into the composition and quantity of trash that flows from urban streets into the storm drain system and out to adjacent waters.[74] The major source of trash results from litter that is intentionally or accidentally released/deposited onto roadways or other land uses in the watershed by human activity or animal vectors. Transport mechanisms which cause the litter to reach the storm drain system include wind action, dispersion by vectors and movement with surface runoff during storm events. The Statewide Trash Amendments identify certain priority land uses that have been shown in multiple studies to have high trash generation rates, specifically these include high-density residential land uses

[71] Palos Verdes Peninsula Subwatershed Coordinated Implementation Plan in Compliance with the Machado Lake Eutrophic, Algae, Ammonia and Odors (Nutrient) TMDL, March 11, 2011.
[72] Wheeler and Zajaczkowski. *Horse Stable Manure Management, Publication G-97*. Penn State College of Agricultural Sciences Cooperative Extension, Agricultural and Biological Engineering
[73] Palos Verdes Peninsula Subwatershed Coordinated Implementation Plan. 2011.
[74] SWRCB Resolution 2015-0019. Amendment to the Water quality Control Plan for Ocean Waters of California to Control Trash and Part 1 Trash Provisions of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays and Estuaries of California.

with at least ten developed dwelling units per acre, industrial land uses, commercial land uses, mixed urban land uses, and public transportation stations.[75]

2.3.2. CHARACTERIZATION OF STORMWATER AND NON-STORMWATER DISCHARGE QUALITY

The Peninsula WMG began conducting outfall monitoring consistent with the CIMP beginning in 2016. The outfall monitoring program includes:

> Outfall Monitoring: Stormwater outfall water quality and flow monitoring is conducted at six (6) locations during three (3) wet weather events per year. Two (2) of these outfall monitoring locations (SD-1 and SD-2) are used to evaluate stormwater discharges from the Palos Verdes Peninsula to the Santa Monica Bay. Four (4) outfall monitoring locations (Rolling Hills Estates (RHE) City Hall, Lariat, Solano, and Valmonte) are used to evaluate stormwater discharges from the Palos Verdes Peninsula to the Dominguez Channel Watershed, including the Wilmington Drain, Machado Lake and the Greater Los Angeles Harbor surface waterbodies. The CIMP outfall data also includes continuous flow monitoring and monthly grab samples for Total Nitrogen and Total Phosphorus in two (2) of the afore mentioned outfall locations with baseline flows to quantify discharges of nutrients from the Palos Verdes Peninsula to Machado Lake and assess attainment of the Machado Lake Nutrient TMDL targets.
>
> Non-stormwater Outfall Monitoring: Periodic storm drain screening and monitoring is also conducted to assess whether there are significant dry weather discharges from the storm drains on the Palos Verdes Peninsula that need to be added to the monitoring program.

Since the initial development of the EWMP, four complete years of outfall monitoring data have been collected and validated and are available for use in this characterization and, importantly, for calibration of the model supporting the reasonable assurance analysis.

Trends in this data are summarized in the following subsection for purposes of updating the source assessment for the following Peninsula WMG Category 1 and 2 priority pollutants: organochlorine pesticides (chlordane, DDT and its breakdown products DDE and DDD, dieldrin), PCBs, polycyclic aromatic hydrocarbons (PAHs), metals (arsenic, copper, lead, mercury, zinc), nutrients (nitrogen, phosphorus), fecal indicator bacteria, and trash.

The following summarizes findings and trends in this stormwater discharge quality from the four completed monitoring years between July 2016 and June 2020.

ORGANOCHLORINE PESTICIDES AND POLYCHLORINATED BIPHENYLS (PCBS)

Stormwater outfall monitoring for bioaccumulative organochlorine pesticides and PCBs is conducted by filtering the sediment fraction from stormwater samples at each of the outfall monitoring sites (two outfalls tributary to Santa Monica Bay and four outfalls tributary to Machado Lake). Sediment samples filtered from each storm event are archived and composited by site for the entire storm year (at least

[75] SWRCB Final Staff Report for Amendment to the Water Quality Control Plan for Ocean Waters of California to Control Trash and Part 1 Trash Provisions for Inland Surface Waters, Enclosed Bays, and Estuaries of California.

three sample events) to accumulate sufficient sample to analyze all the required organochlorine pesticides as well as PCBs.

For the Santa Monica Bay DDT and PCBs TMDL, waste load allocations (WLAs) set by the USEPA to attain fish tissue concentration limits for human consumption are based on the calculated three-year average mass of DDT and PCBs discharged from the Santa Monica Bay watershed area of the Peninsula assigned as a percentage of the total mass based WLA for the entire Santa Monica Bay Watershed. In order to estimate stormwater loading of DDT and PCBs to the Santa Monica Bay during TMDL development, a study by Curren et al. (2011) was used along with data collected by the City of Los Angeles between 2007 and 2010. Estimated stormwater loads from Santa Monica Bay watersheds were found to be lower than TMDL calculated allowable waste loads necessary to achieve sediment targets; therefore, the WLAs in the TMDL for DDT and PCBs are based on existing MS4 loading estimates, and MS4 dischargers are essentially in an anti-degradation condition[76]. **Table 2-17** demonstrates that the rolling three-year average Santa Monica Bay outfall monitoring results meet the assigned WLAs for both DDT and PCBs, consequently RAA modeling is not necessary for this water body pollutant combination.

Table 2-18: Santa Monica Bay DDT & PCBs 3-Year Rolling Average Outfall Data

3-Year Period	Monitoring Station	DDT (g/year)	PCBs (g/year)
Santa Monica Bay TMDL Annual Mass-Based WLA*		**0.97**	**5.05**
3-Year Averages			
2016-17 thru 2018-19	**Peninsula-SD1**	0.0582	0.0677
	Peninsula-SD2	0.0795	0.0634
2017-18 thru 2019-20	**Peninsula-SD1**	0.0570	0.0014
	Peninsula-SD2	0.8836	0.2267

*The WLAs indicated in the TMDL are assigned to the entire Santa Monica Bay Watershed. The WLAs shown here are calculated as a percentage of the TMDL WLAs based on the Peninsula EWMP area.
Note: Flow data for stormwater outfall event 1/19/17 is not available for SD-2 due to personnel error in deploying equipment during the monitoring event and is therefore not included in this calculation

The Machado Lake Pesticides and PCBs WLAs are set differently than for the Santa Monica Bay in that for Machado Lake the WLAs are expressed as three-year average concentrations in the sediment fraction of the discharge, rather than as total pollutant mass discharged. The organochlorine pesticide 4,4'-dichlorodiphenyltrichloroethane (DDT) and its breakdown products 4,4'-dichlorodiphenyldichloroethylene (DDE) and 4,4'dichlorodiphenyldichloroethane (DDD) are assigned WLAs individually and grouped as Total DDT in the Machado Lake Toxics TMDL. Outfall monitoring data from the Palos Verdes Peninsula generally supports the underlying assumption in the Machado Lake Toxics TMDL that a three-year averaging period would provide a means to meet concentration-based sediment targets for Dieldrin and PCBs since Dieldrin has not been observed to occur in sediment samples

[76] USEPA: Santa Monica Bay DDT and PCBs TMDL

above detection limits, and PCBs have only exceeded the 3-year average concentration in sediment at one site for one 3-year period. By contrast, as shown in **Table 2-18**, the data for the DDT breakdown product DDE and for Chlordane show that sediment discharges from all four monitored outfalls tributary to Machado Lake exceed the rolling three-year WLA consistently for those constituents and yet for DDT itself, the WLAs are met. This is evidence that DDT is degrading in the environment. This data also demonstrates that residuals present in sediments on the Palos Verdes Peninsula from legacy use of DDT and Chlordane are ubiquitous. The results vary widely from storm year to storm year, and it is unclear whether the variability is related to timing of sample collection during the storm hydrograph, the intensity of particular storm events, or a combination of these and other variables. Despite the variability in the data, DDE and Total Chlordane concentrations in sediment discharges are consistently above the WLAs across all four sites. This data has been combined with data collected for total suspended solids (TSS) in these samples and incorporated into the reasonable assurance modeling for Machado Lake.

Table 2-19: Machado Lake Pesticides & PCBs 3-Year Rolling Average Concentrations in Storm-Borne Sediment

Constituent	Final Machado Lake Pesticides and PCBs TMDL WLA (µg/kg) *	3-Year Period	Average Rolling 3-year Monitoring Results by Outfall Location (µg/kg)				
			RHE City Hall	RHE City Hall Duplicate	Valmonte	Solano	Lariat
Sum DDD	**4.88**	2016-17 thru 2018-19	**21.77**	**8.5**	1.99	3.26	1.73
		2017-18 thru 2019-20	**22.2**	**8.87**	2.73	**279.8**	3.37
Sum DDE	**3.16**	2016-17 thru 2018-19	**14.9**	**13.93**	**6.6**	**27.43**	**30.33**
		2017-18 thru 2019-20	**17.23**	**16.93**	**10.00**	**100.4**	**36.3**
Sum DDT	**4.16**	2016-17 thru 2018-19	0.98	1	0.58	1.33	0.2
		2017-18 thru 2019-20	1.42	1.74	1.02	2.03	1.33
Total Chlordane	**3.24**	2016-17 thru 2018-19	**15.47**	**8.27**	**28.96**	**48.07**	**9.7**
		2017-18 thru 2019-20	**16.81**	**9.47**	**30.46**	**110.41**	**14.93**
Total PCB Congeners	**59.8**	2016-17 thru 2018-19	7	12.53	0.97	**81.68**	1.29
		2017-18 thru 2019-20	1.37	7.2	0.83	1.35	1.13

*Applied as a 3-year average

METALS

Total and dissolved metals have been monitored in stormwater discharges from the RHE City Hall outfall site, which is representative of discharges to the Los Angeles Harbor since all of the typical land uses found on the Palos Verdes Peninsula are included in the catchment tributary to the RHE City Hall MS4 Outfall site. This data has been utilized in the reasonable assurance modeling for the Los Angeles Harbor to assess

the necessary load reductions for copper and zinc to meet the waste load allocations for the Los Angeles Harbor water segments to which the Peninsula WMG is tributary.

Arsenic and mercury have been added to the outfall monitoring sites for the Santa Monica Bay in response to recent 303(d) listings, however sufficient data are not yet available to support the reasonable assurance modeling.

POLYCYCLIC AROMATIC HYDROCARBONS (PAHS)

Total PAHs in discharges from the RHE City Hall outfall site representative of discharges to the Los Angeles Harbor have been analyzed as the sum of acenaphthylene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, fluorene, indeno(1,2,3-c,d)pyrene, phenanthrene, and pyrene. Results for Total PAHs measured in stormwater samples from this site have been used in the RAA modeling to assess load reductions needed to meet the waste load allocations for the Los Angeles Harbor.

NUTRIENTS – DRY WEATHER

Monthly dry weather monitoring for Total Nitrogen and Total Phosphorus has been conducted in storm drain outfalls tributary to Machado Lake with presence of significant year-round baseline flows associated with rising groundwater. In **Figure 2-7** Total Nitrogen concentrations in these monthly year-round baseline dry weather flows are compared with the water quality objective for Machado Lake of 1.0 mg/L over the course of four complete reporting years. These results show periods when the Total Nitrogen results remain near or below the water quality objective interspersed by periods when the Total Nitrogen results are consistently above the water quality objective.

In **Figure 2-8** Total Phosphorus concentrations in these monthly year-round baseline dry weather flows are compared with the water quality objective for Machado Lake of 0.1 mg/L over the course of four complete reporting years. These results show periods when the Total Phosphorus results at the RHE City Hall site remain near or below the water quality objective interspersed with short-term excursions above the water quality objective. By contrast, at the Valmonte monitoring site the Total Phosphorus results are consistently above the water quality objective.

Total Nitrogen and Total Phosphorus monitoring also have been conducted at four storm drain outfalls tributary to Machado Lake during wet weather along with wet weather flow monitoring. This stormwater monitoring data along with the monthly dry weather data has been incorporated into the reasonable assurance modeling to assess necessary load reductions needed to meet the overall nutrient WLAs for Machado Lake.

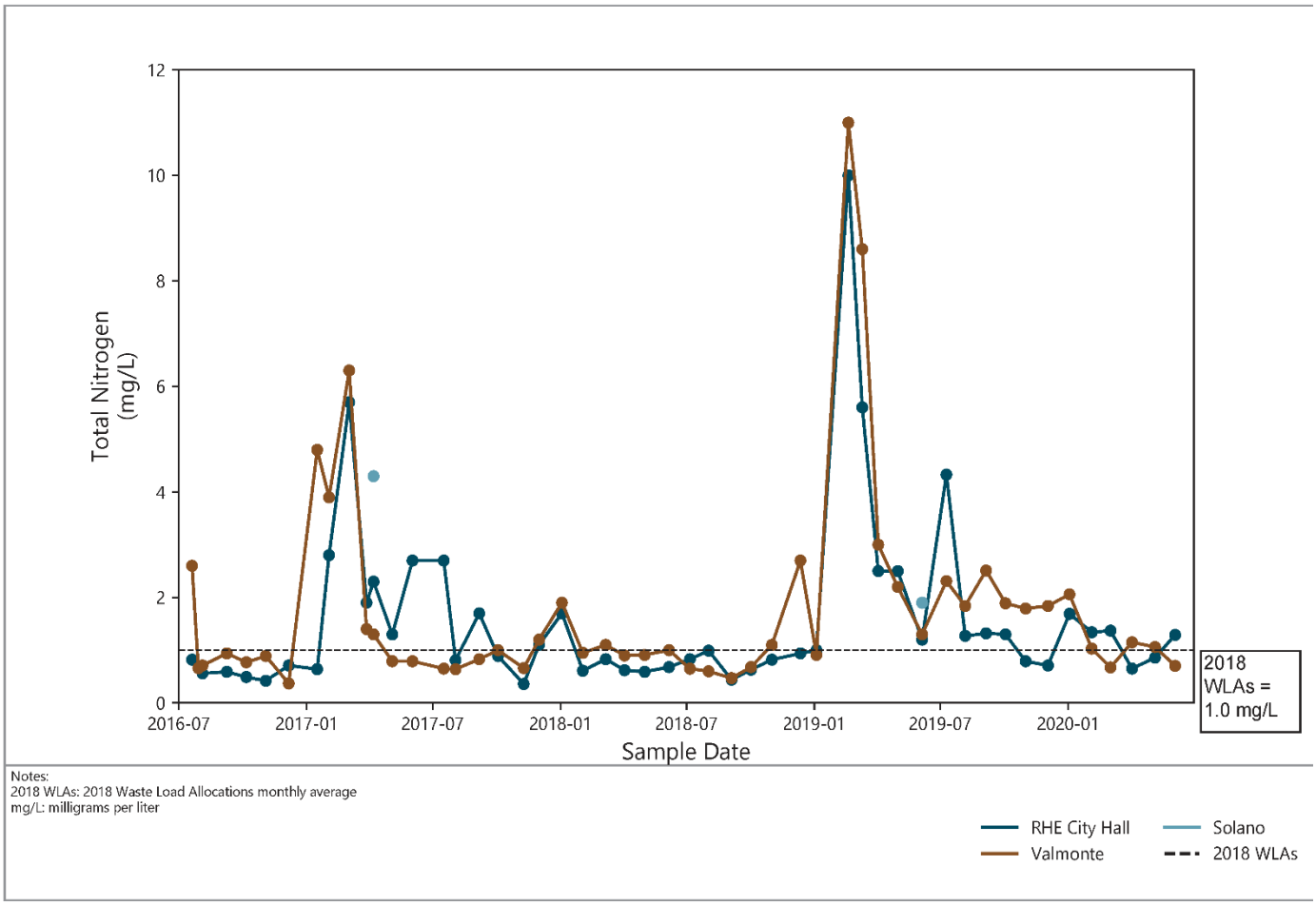


Figure 2-8: Total Nitrogen Concentrations in Peninsula Machado Lake Outfall flows from 2016-2020

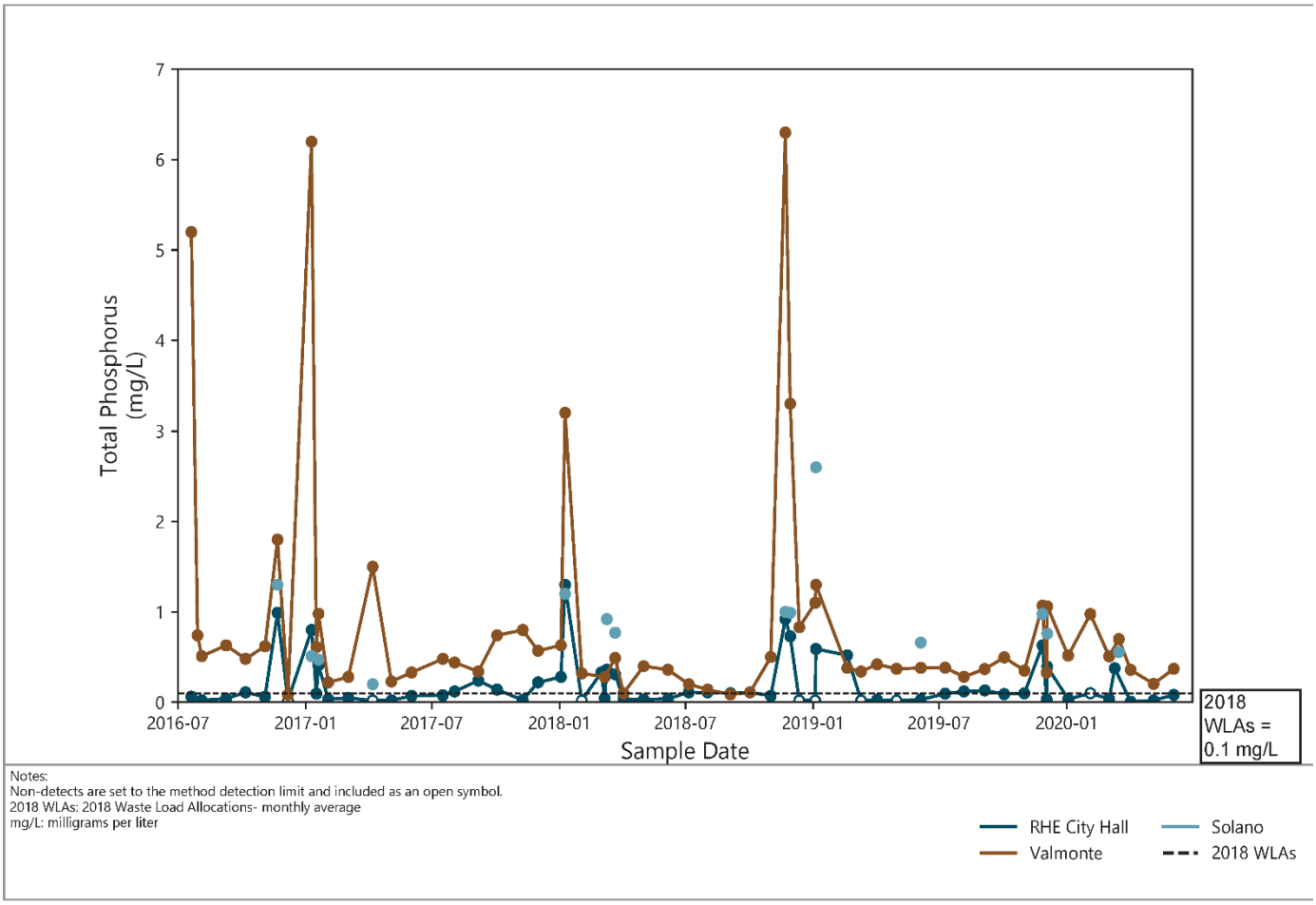


Figure 2-9: Total Phosphorus Outfall Concentrations in Peninsula Machado Lake Outfall flows 2016-2020

TRASH

Trash is not a pollutant amenable to reasonable assurance modeling. The Peninsula WMG agencies are individually responsible for meeting WLAs for trash TMDLs and/or complying with the Statewide Trash Provisions as appropriate, and for monitoring and reporting consistent with their approved plans.

FECAL INDICATOR BACTERIA

As shown in **Figure 2-9, Figure 2-10,** and **Figure 2-11** fecal indicator bacteria densities of Total Coliforms, Fecal Coliforms and Enterococci in stormwater discharged from the Peninsula MS4 outfalls to Santa Monica Bay (SD-1 and SD-2) do exceed the single-sample water quality based effluent limitations (WQBELs) during wet weather and these results are typical of MS4 discharges. There does not appear to be an increasing or decreasing trend in these wet weather indicator bacteria densities over the four years of CIMP monitoring nor has there been degradation of recreational water quality of the Santa Monica Bay shoreline or nearshore waters off the Palos Verdes Peninsula, as discussed in Section **2.2.1**. Given that the

Palos Verdes Peninsula beaches for which monitoring data exists have been removed from the 303(d) list for indicator bacteria impairments and the fact that there is no apparent degradation of recreational water quality, reasonable assurance modeling is not necessary for indicator bacteria in the Santa Monica Bay.

E. Coli indicator bacteria densities in stormwater discharged from the RHE City Hall MS4 outfall to Wilmington Drain consistently exceed the STV of 320 cfu /100 mL for fresh waters designated for limited water contact recreation. These indicator bacteria densities have remained relatively consistent during the four years of CIMP monitoring. This stormwater outfall monitoring data has been incorporated into the reasonable assurance modeling to assess necessary load reductions to address the 303(d) listing for Wilmington Drain.

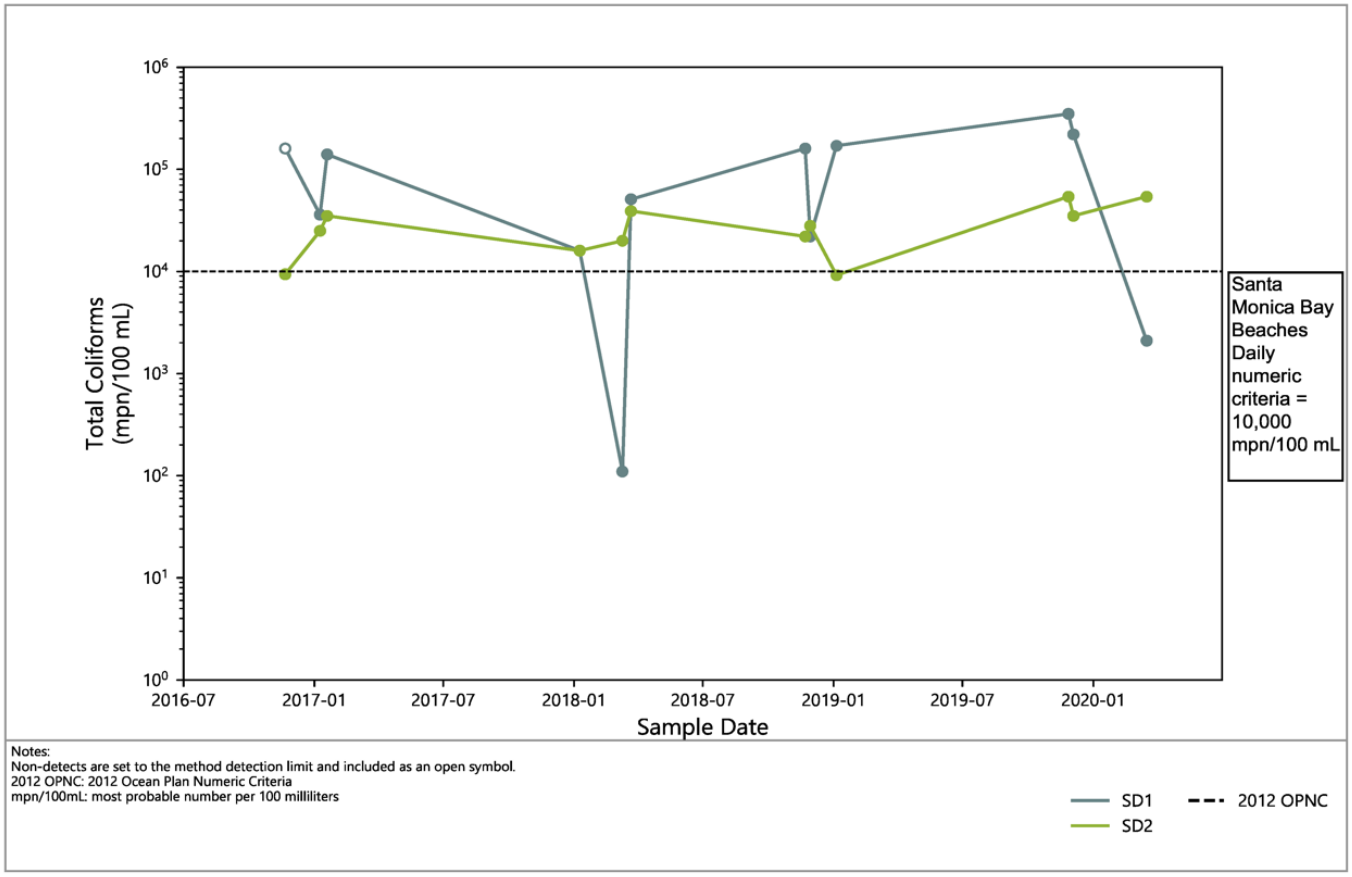


Figure 2-10: Total Coliform Concentrations in Peninsula Stormwater Discharges from SD1 and SD2 (2016-2020)

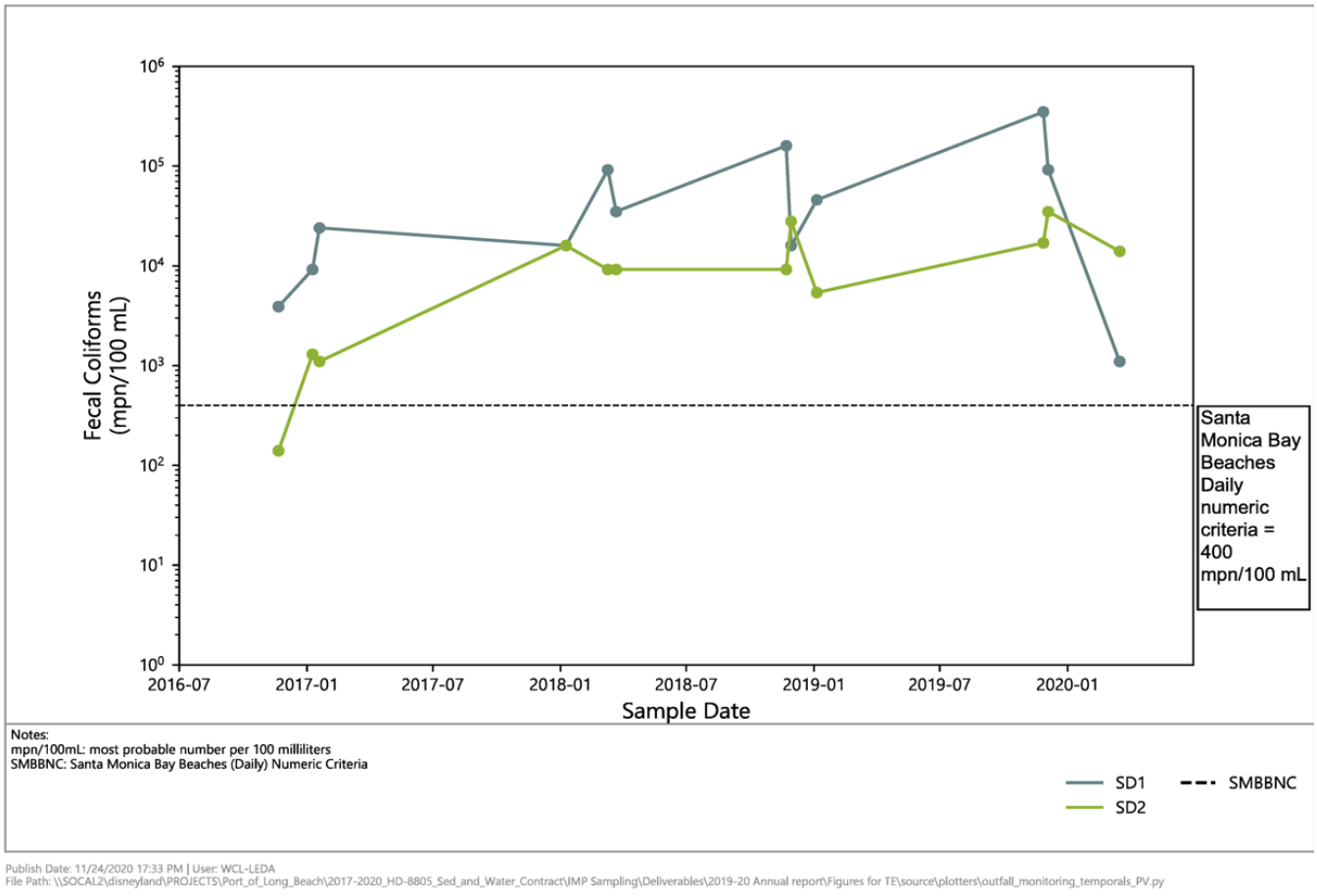


Figure 2-11: Fecal Coliform Concentrations in Peninsula Stormwater Discharges from SD1 and SD2 (2016-2020)

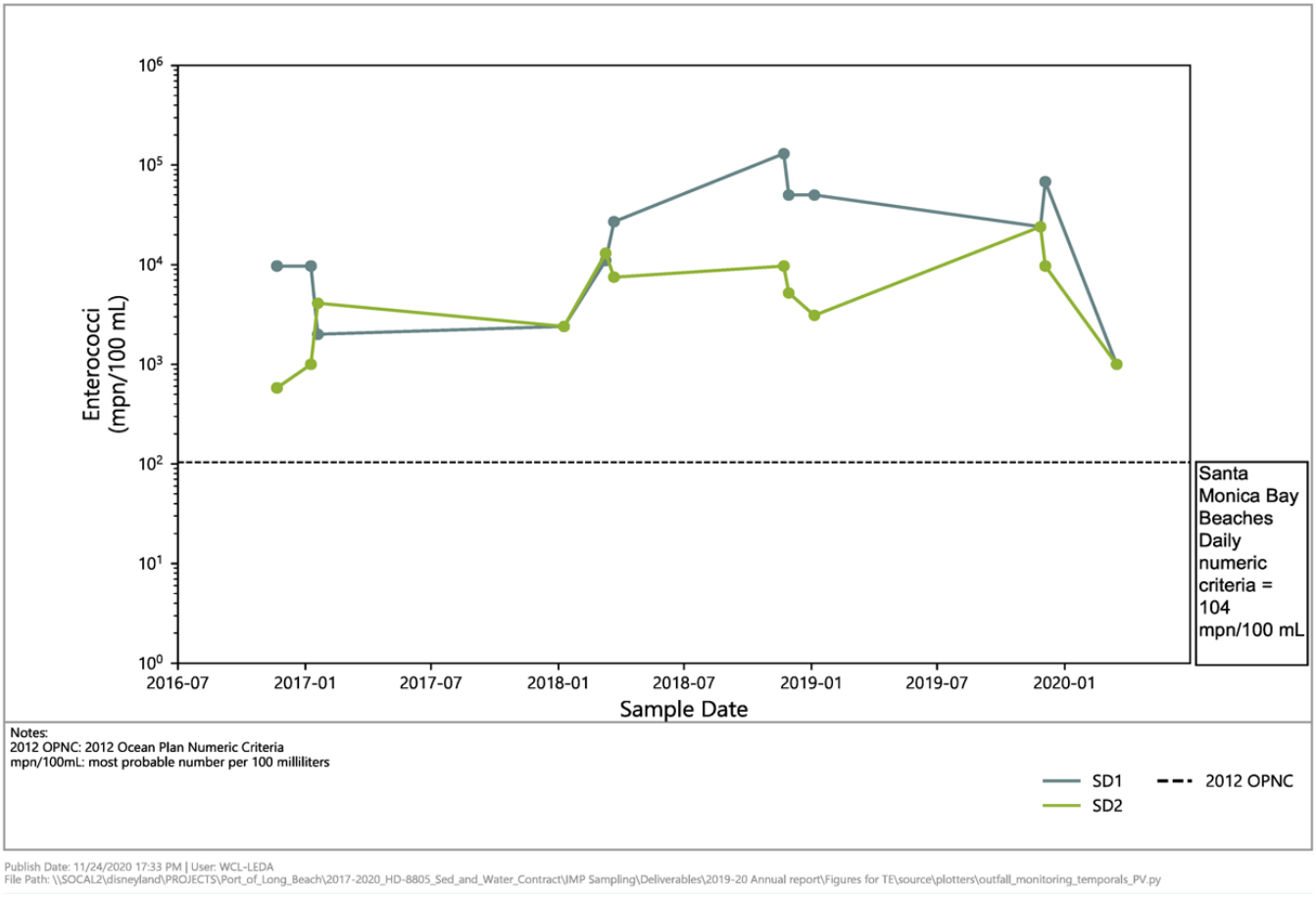


Figure 2-12: Enterococci Concentrations in Peninsula Stormwater Discharges from SD1 and SD2 (2016-2020)

3. SELECTION OF WATERSHED CONTROL MEASURES

This chapter identifies Watershed Control Measures (WCMs) to be implemented through the Participating Agencies' jurisdictional stormwater management programs, and collectively on a watershed scale. The WCMs are structural and/or nonstructural controls designed with the following objectives:

- Prevent or eliminate non-stormwater discharges to the MS4 that are a source of pollutants from the MS4 to receiving waters.
- Implement pollutant controls necessary to achieve all applicable interim and final water quality-based effluent limitations and/or receiving water limitations pursuant to corresponding compliance schedules.
- Ensure that discharges from the MS4 do not cause or contribute to exceedances of receiving water limitations.
- Retain the runoff volume of the 85th%, 24-hour storm event, where feasible.

The goal is to create an efficient program that focuses individual and collective agency resources on water quality priorities (WQPs). The WCMs are categorized as:

- Minimum Control Measures (MCMs),
- Non-stormwater Discharge (NSWD) Measures, and
- Targeted Control Measures (TCMs), which are designed to achieve applicable water quality-based effluent limitations and receiving water limitations.

Each WCM category may be further categorized through type: structural or nonstructural, and structural WCM may be categorized by status as well: existing, planned, proposed, or potential. Combined with Chapter 4 (RAA) and Chapter 5 (Compliance Schedules), the EWMP addresses the nature, scope, and timing of implementation for each WCM and provides interim milestones for the WCMs to achieve TMDL compliance. Also discussed are the responsibilities of each Permittee.

Since the Machado Lake TMDLs and the Los Angeles Harbor Toxics TMDL WLAs were calculated based on the average annual water year, the revised RAA used the average water year (Water Year 2010) as the critical condition to establish wet weather nutrient and organic pollutant target load reductions (TLRs) in the Peninsula Machado Lake watershed management area (WMA)[77], including the Wilmington Drain WMA[1] tributary to Machado Lake, and the Los Angeles Harbor WMA. Consistent with all existing Los Angeles region freshwater bacteria TMDLs, the RAA used the 90th percentile water year (Water Year 2011) as the critical condition to establish wet weather bacteria TLRs in the Wilmington Drain WMA to address the 303(d) listing. Based on these critical conditions, the RAA estimated the following 24-hour stormwater runoff management volumes needed to meet all the non-zero TLRs: 1.3 acre-ft for the Machado Lake WMA, 0.5 for the Wilmington Drain – Solano WMA, 7.4 acre-ft for the Wilmington Drain WMA, 5.4 acre-ft for Los Angeles Harbor – Inner Harbor WMA, and 1.5 acre-ft for the Los Angeles Harbor – Cabrillo Marina WMA. These 24-hour management volumes are intended to be addressed through LID implementation, existing/planned BMPs, and proposed green streets and regional BMPs as described in this chapter.

Please note that this estimate does not reflect an estimate of recharged groundwater but is simply an estimate of the reduced amount of stormwater runoff leaving the Peninsula EWMP Area as a result of BMP implementation as discussed herein.

[77] Both Machado Lake and Wilmington Drain WMAs are subwatersheds to the HUC-12 Dominguez Channel Watershed.

3.1. MINIMUM CONTROL MEASURES

The Minimum Control Measures (MCMs) are baseline WCMs required for all Permittees. The MCMs are defined in the MS4 Permit (excluding modifications set forth in an approved EWMP) and are implemented individually by each Permittee. The objectives of the MCMs are to 1) result in a significant reduction in pollutants discharged into receiving waters and 2) satisfy the requirements of 40 CFR §122.26(d)(2)(iv). The MCMs are separate from Targeted Control Measures, which are included in the EWMP to specifically address WQPs.

The MS4 Permit allows the modification of certain MCMs programs, so long as the modified actions are set forth in the approved EWMP and are consistent with 40 CFR §122.26(d)(2)(iv). The modifications are based on an assessment to identify opportunities for focusing resources on WQPs. The term "modifications" refers only to instances where language from the MS4 Permit MCM provisions is removed and/or replaced. The Permittees in the Peninsula EWMP have implemented the MCMs (Development Construction Program, Industrial/Commercial Facilities Program, Illicit Connection and Illicit Discharges Elimination Program, Planning and Land Development Program, Public Agency Activities Program, Public Information and Participation Program, and Progressive Enforcement and Interagency Coordination Program) as applicable and will continue to do so as required. Any control measures that are enhancements of the existing programs (i.e. do not conflict with the MS4 Permit MCM provisions) are included in the separate category of Targeted WCMs.

A summary of the assessment of each MCM program as well as a determination as to whether each Participating Agency will implement the MCM provisions either 1) as stated in the corresponding section of the MS4 Permit or 2) with modifications to focus resources on WQPs can be found in Section 3.1.2. The implementation of the MCMs are annually reported in the NPDES Individual Annual Reports.

3.1.1. L.A. COUNTY FLOOD CONTROL DISTRICT MINIMUM CONTROL MEASURES

The LACFCD will implement the MCMs as defined in the MS4 Permit. See Appendix 1 for additional information.

3.1.2. ASSESSMENT AND MODIFICATION OF MINIMUM CONTROL MEASURES (PARTICIPATING AGENCIES, EXCLUDING LACFCD)

The following section is an assessment of the MS4 Permit MCMs, intended to identify opportunities for modifying MCMs to focus resources on WQPs. This section applies to all participating agencies where applicable, excluding the LACFCD.

3.1.2.1 DEVELOPMENT CONSTRUCTION PROGRAM

The purpose of the MS4 Permit Development Construction Program is to track, inspect and enforce implementation of BMPs on construction sites and to ensure that construction projects of one acre or more have coverage under the Construction General Permit. The Permittees are not modifying this Program and will implement it as defined in the MS4 Permit.

3.1.2.2 INDUSTRIAL/COMMERCIAL FACILITIES PROGRAM

The purpose of the MS4 Permit Industrial/Commercial Facility Program is to track, inspect, and enforce implementation of BMPs at industrial and commercial facilities and to ensure coverage under the Industrial General Permit where appropriate. There are currently no sites subject to the Industrial General Permit within the jurisdictional authority of the Peninsula WMG nor any commercial sites within the City of Rolling Hills. The Permittees are not modifying this Program and will implement it as defined in the MS4 Permit.

3.1.2.3 Illicit Connection and Illicit Discharges Elimination Program

The purpose of the MS4 Permit Illicit Connection and Illicit Discharge (IC/ID) Elimination Program is to detect, investigate and eliminate IC/IDs to the MS4. The Permittees are not modifying this Program and will implement it as defined in the MS4 Permit.

3.1.2.4 Planning and Land Development Program

Following MS4 Permit provisions, Permittees cannot modify the Planning and Land Development Program to be less strict than requirements in the MS4 Permit. The Permittees will implement the Program as defined in the MS4 Permit.

3.1.2.5 Public Agency Activities Program

The Public Agency Activities Program consists of several sub-programs. Many of the MS4 Permit provisions within the sub-programs consist of baseline operation and maintenance (O&M) control measures that do not appear to offer clear benefits from modification. The sub-programs that do suggest a prioritized approach – such as street sweeping and catch basin cleaning frequencies – already provide this opportunity (frequencies are based on an agency's assessment of trash and debris generation). As such the Cities are not modifying this Program and will implement it as defined in the MS4 Permit.

3.1.2.6 Public Information and Participation Program

The MS4 Permit allows an agency to implement the requirements of the Public Information and Participation Program (PIPP) 1) by participating in a County-wide effort, 2) by participating in a Watershed Group effort, 3) individually within its jurisdiction or 4) through a combination of these approaches. The Agencies will implement the PIPP following a combination of approaches.

In terms of Program modifications, the MS4 Permit provisions provide flexibility to focus efforts on WQPs through the development of the Program. As such, the Cities will implement it as defined in the MS4 Permit. Modifications to elements of the PIPP MCM Program were made to address the Peninsula WMG watershed priorities through activity-specific outreach programs targeted at the following residential activities:

a) DIY auto activities

b) DIY home improvement activities

c) DIY landscaping and gardening activities

d) Pet owner activities

e) Rainwater Harvesting and Downspout Disconnection

Each Permittee will implement the Residential Outreach Program through a combination of individual, watershed, and Countywide program efforts to implement Residential Outreach Program elements.

The Peninsula WMG implement a customized PIPP strategy, developed collaboratively with the Beach Cities WMG, to better address watershed priorities, including; hosting Sustainable Gardening and Landscaping and Integrated Pest Management (IPM) webpages with the South Bay Environmental Services Center (SBESC) providing information regarding alternative pest controls and best management practices for fertilizer use, developing a BMP tip card targeting mobile businesses that generate waste water to mitigate non-stormwater discharges, developing a Small Site Construction brochure focused on illicit discharge mitigation measures, developing a comprehensive Homeowner's Guide to Rainwater Harvesting to encourage the interception and collection of stormwater on residential properties, maintaining pet waste collection and clean-up stations in municipal parks, developing horse keeping and manure outreach material, facilitating the management of landscape for brush and fire control by providing unlimited green waste collection to residents which minimizes potential leaching of phosphorus from accumulated vegetation and helps to prevent brush fires which mitigates the release of toxic pollutants, and promoting water conservation and stormwater pollution and prevention messages via email blasts and the SBESC website.

Outreach metrics may include impressions, educational materials distributed, website views/interactions, or individuals signed up to receive information. Agencies will annually report outreach metrics in the Individual Annual Report.

3.1.2.7 Progressive Enforcement and Interagency Coordination

Following MS4 Permit provisions, Permittees cannot modify the Progressive Enforcement and Interagency Coordination Program. The Permittees will implement the Program as defined in the MS4 Permit.

3.1.4 Fifth Term MS4 Permit Minimum Control Measures

Previous iterations of the WMP included a review of the substantive enhancements and additions to the MCMs. The purpose of the review was to highlight new provisions that would address WQPs. The MCM Provisions of the Fifth Term MS4 Permit do not include significant changes. As such, a review of expected Fifth Term MS4 Permit MCM provisions is not included in the WMP. The implementation of the Enhanced MCMs is annually reported in the NPDES Individual Annual Reports and Permittees will continue to report the implementation of Enhanced MCMs. .

3.2. NON-STORMWATER DISCHARGE MEASURES

The Participating Agencies will require dischargers that drain to their respective MS4s to implement the Non-stormwater Discharge (NSWD) Measures. If the Participating Agencies identify non-stormwater discharges from the MS4 as a source of pollutants that cause or contribute to exceedances of receiving water limitations, the WCMs will be modified and implemented – subject to the adaptive management process – to effectively eliminate the source of pollutants consistent with the MS4 Permit. In these instances, potential WCMs may include prohibiting the non-stormwater discharge to the MS4, requiring the responsible party to 1) incorporate additional BMPs to reduce pollutants in the non-stormwater discharge or conveyed by the non-stormwater discharge or 2) divert to a sanitary sewer for treatment, or strategies to require the non-stormwater discharge to be separately regulated under a general NPDES permit.

The Permittees in the Peninsula WMP have implemented the NSWD Measures as applicable and will continue to do so as required by the MS4 Permit. The implementation status of the NSWD Measures have not changed since the August 2019 Peninsula EWMP. See Appendix 3.1 for enhanced dry weather runoff reduction control measures.

The implementation of NSWD Measures have been annually reported in the NPDES Individual Annual Reports and the Watershed Progress Report. The results of the most recent joint NSW Screening and Monitoring were provided in the 2017-18 Peninsula Watershed Report Volume II IMCR in Section 6.3c and Table 6f which summarized the work completed to investigate the sources of any significant non-stormwater discharges at outfalls within the Peninsula WMG. The WMG regularly assesses dry weather water quality monitoring data and other information to confirm the results of the NSW Screening and Monitoring.

3.3 TARGETED CONTROL MEASURES

Targeted Control Measures (TCMs) are additional control measures beyond the baseline MCMs and NSWD measures of the MS4 Permit that are intended to target the Peninsula WMG's WQPs based on potential pollutant sources identified in the updated source assessment in Section 2.3. TCMs may be divided into two categories: nonstructural and structural. The selection of structural and nonstructural control measures to address WQPs within the Peninsula WMG is a vital component of the EWMP planning process.

The Participating Agencies continue to implement structural and nonstructural control measures in the watershed. There are many different types of structural and nonstructural control measures that provide varying benefits from their implementation. The following sections and corresponding appendices describe TCMs that may be implemented (where implementation is conditional upon factors such as site constraints, governing body approval, etc.), as well types of structural BMPs available to the Peninsula WMG.

3.3.1 CONTROL MEASURES IDENTIFIED IN TMDLS/IMPLEMENTATION PLANS

This section describes the nonstructural control measures that have been previously identified in TMDLs and corresponding implementation plans and the status of their implementation. For those TMDLs that do not sufficiently identify control measures, control measures are identified in the planned Targeted Control Measures as described in the following sections in this chapter. For more information on the TMDLs refer to Section 2: Water Quality Priorities.

3.3.1.1 SANTA MONICA BAY BEACHES BACTERIA TMDL

To meet the requirements of Santa Monica Bay Beaches Bacteria (SMBBB) TMDL, a Coordinated Shoreline Monitoring Plan (CSMP) was developed by a committee of responsible agencies, including representatives from the Peninsula WMG. The Peninsula WMG monitoring sites historically experience fewer exceedance days than the reference beach used in the TMDL and are therefore in an anti-degradation condition[78]. Furthermore, as discussed in Section 2.2.1, all of the Peninsula shorelines monitoring sites have been delisted from the 303(d) list in accordance with the State Water Resources Control Board's delisting criteria. As a result, control measures in the approved Implementation Plan include continued implementation of MCMs to protect or enhance existing water quality, and as-needed investigation if an excessive number of exceedances occurs at a monitoring site. As discussed in Section 2.2.1, monitoring results consistently demonstrate attainment of the dry and wet weather SMBBB TMDL receiving water limitations, therefore a RAA modeling effort is not required for this water body pollutant combination. Summer-dry and winter-dry weather data at the SMBBB TMDL compliance monitoring locations (CMLs) collected up to TMDL Year 2015 were evaluated in the initial RAA to conclude that the dry weather water quality was better than that of the referenced beach based on long-term average exceedance rates. For the revised RAA, the summer-dry and winter dry- weather monitoring data collected between Year 2015 and 2019 have been evaluated to verify that the dry weather exceedance rates have not degraded from historical levels and continue to meet their receiving water limitations.

3.3.1.2 SANTA MONICA BAY NEARSHORE AND OFFSHORE DEBRIS TMDL

[78] The antidegradation policy applies to waters that are determined to have high water quality and requires that existing high quality be maintained.

Compliance with the Santa Monica Bay Debris TMDL is based on installation of structural best management practices such as full capture or partial capture systems, institutional controls, or any best management practices, to attain a reduction in the amount of trash in the Santa Monica Bay. Through a joint project among the PVP Agencies 1,112 catch basins have been retrofit with certified full capture Connector Pipe Screens within the Santa Monica Bay watershed areas of the Peninsula WMG, funded in part through a $600,000 Prop 84 Santa Monica Bay Restoration Commission Grant. See Permittee's individual Annual Reports for status and information on compliance with the Santa Monica Bay Nearshore and Offshore Debris TMDL.

3.3.1.3 SANTA MONICA BAY DDT &PCBS TMDL

Data summarized in Section 2.3.1 demonstrates that the rolling three-year average Santa Monica Bay outfall monitoring results meet the assigned WLAs for both DDT and PCBs, consequently RAA modeling is not necessary for this water body pollutant combination.

3.3.1.4 MACHADO LAKE TRASH TMDL

Compliance with the Machado Lake TMDL is based on installation of structural best management practices such as full capture or partial capture systems, institutional controls, implementation of a Minimum Frequency of Assessment and Collection (MFAC) program, or any best management practices, to attain a reduction in the amount of trash in the Machado Lake Watershed. To date, over 2,000 full capture trash devices have been installed in Peninsula WMG catch basins tributary to Machado Lake, partially funded by Proposition 84 Stormwater Grant funding. These devices were installed in accordance with the compliance schedule outlined in the TMDL. See Permittee's individual Annual Report for status and information on compliance with the Machado Lake Trash TMDL.

3.3.1.5 MACHADO LAKE NUTRIENTS TMDL AND MACHADO LAKE PESTICIDES & PCBS TMDL

To meet the requirements of the Machado Lake Nutrients TMDL, the Peninsula WMG monitors the Machado Lake outfalls on a monthly basis. To meet the requirements of the Machado Lake Pesticides & PCBs TMDL, the Peninsula WMG collects sediment samples from the Machado Lake outfalls during every wet weather event and compiles the samples for analysis. See data summarized in Chapter 2. The Peninsula WMG developed a plan for achievement of compliance with the Machado Lake Nutrients TMDL in the Palos Verdes Peninsula Subwatershed Coordinated Implementation Plan (2011), which served as guidelines for an adaptive implementation of source control programs and development of structural best management practices.

Infiltration projects reducing nutrients, pesticides, and PCBs flow to Machado Lake, such as the Chandler Ranch Project, have been constructed and the Peninsula WMG continues to pursue structural projects to within the Peninsula Watershed and support project opportunities outside of the Peninsula Watershed such as the Torrance Airport Stormwater Project.

For nutrients, pesticides, and PCBs source control programs, the Peninsula WMG in a collaborative effort with the Beach Cities, developed Sustainable Gardening and Landscaping and Integrated Pest Management (IPM) webpages, provided information regarding alternative pest controls and best management practices for fertilizer use, a BMP tip card targeting mobile businesses that generate waste water to mitigate non-stormwater discharges, developed a Small Site Construction brochure focused on illicit discharge mitigation measures, developed a comprehensive Homeowner's Guide to Rainwater Harvesting to encourage the interception and collection of stormwater on residential properties, maintain

pet waste collection and clean-up stations in municipal parks, and developed horse keeping and manure outreach material.

3.4 NONSTRUCTURAL TARGETED CONTROL MEASURES

Following MS4 Permit provisions, the Peninsula WMG has developed customized strategies, control measures and O&M control measures to implement the EWMP. Addressing WQPs will be based on a multi-faceted strategy initially focused on source control. If pollutants are not generated or released, they will not be available for transport to the receiving waters. In addition, if soils can be stabilized, sediment controlled, and dry-weather runoff and initial flushes of stormwater runoff eliminated or greatly reduced, the major transportation mechanisms will be eliminated or greatly reduced, and fewer pollutants will reach the receiving waters. Since there is a substantial body of research demonstrating that wildfires can be a significant source of toxic pollutants in stormwater, prevention of wildfires is also an important source control measure for preventing pollutant mobilization and transport of the Peninsula WMG, which is identified as a very high fire hazard severity zone. See detailed discussion in Section 2.3.1.

Many of the highest WQPs, such as copper, lead, and zinc, are released into the atmosphere, resulting in widespread aerial deposition onto impervious surfaces in the Watershed. In addition, these pollutants are discharged directly onto streets, highways, parking lots, and driveways from motor vehicle components such as brakes, wheel weights, and tires. The Participating Agencies have concluded that the most cost-effective and long-lasting way to address WQPs is to develop and support state-wide or regional measures that will encourage or require, if necessary, product or material substitution at the manufacturing stage. This can be a complex and time-consuming process, but the payoff in water quality improvement can be tremendous.

The nonstructural TCMs supplement the MCM efforts with targeted source control measures such as incentives for irrigation control and upgraded street sweeping equipment, designed with the objective of achieving interim and final water quality-based effluent limitations and/or receiving water limitations.

Planned and potential nonstructural TCMs for each participating agency can be found in the Appendix 3.1.

3.5 STRUCTURAL TARGETED CONTROL MEASURES

Structural TCMs are Structural BMPs that, in combination with MCMs, are designed with the objective to achieve interim and final water quality-based effluent limitations and/or receiving water limitations and where feasible to achieve retention of runoff from the 85th percentile, 24-hour storm event. Structural TCMs are an important component of the Peninsula WMG's load reduction strategy. These BMPs are constructed to capture runoff and filter, infiltrate, or treat stormwater. If properly maintained, these BMPs can have high pollutant removal efficiencies); however, they tend to be more expensive than nonstructural BMPs. The two prevailing approaches for implementing Structural BMPs are regional and distributed approaches. Both serve important purposes and should be considered in combination to determine the best possible implementation strategy to meet the Peninsula WMG's water quality goals. Appendix 3.2 provides a description of each of the major structural BMP subcategories.

DISTRIBUTED BMPS

Distributed Structural BMPs are generally built at the site-scale. They are intended to treat stormwater runoff at the source and usually capture runoff from a single parcel or a small area consisting of multiple parcels and public rights of way. They may also include nature-based solutions such as natural habitat restoration, and in particular on the Palos Verdes Peninsula natural canyon habitat and riparian canyon restoration.

REGIONAL BMPS

Regional BMPs refer to large structural BMPs that receive flows from neighborhoods or large areas and may provide multiple benefits such as: improved water quality, increased water supply, improved flood management, enhanced park space, restored habitat, improved public access to waterways, creation of new recreational opportunities, enhanced green spaces at school, reduced heat local island effect, increased number of trees or other vegetation, or implementation of nature-based solutions[79].

3.5.1 PERFORMANCE EVALUATION OF STRUCTURAL CONTROL MEASURES

Except for areas where runoff from the 85th percentile, 24-hour is retained, the performance of existing and planned BMPs in the Peninsula EWMP area is evaluated through the RAA following provisions of the MS4 Permit, both in terms of volume capture (based on BMP design criteria) and predicted effluent quality. An analysis of BMP Performance data has been summarized in Appendix 4.1 and a summary of modeled BMPs is included in **Figure 3-1** and **Table 3-1** below. Refer to Section 4 (Reasonable Assurance Analysis) for more detail on the RAA.

3.5.1.1 REGIONAL BMPS

This chapter contains a summary of existing, planned, proposed, and potential Regional BMPs within the Peninsula EWMP area

. These project categories are defined as follows:

- Existing – constructed and on-line Regional BMPs.

[79] Los Angeles County, California – Code of Ordinances. Flood Control District Code. Chapter 16 - The Los Angeles Region Safe, Clean Water Program. Accessed May 2021.

- Planned – some planning for the Regional BMP has been conducted (i.e. preliminary design report, feasibility study).
- Proposed – initial planning for the Regional BMP has begun, but feasibility studies and preliminary design reports have not yet been completed.
- Potential – alternative locations where conditions may be suitable for a Regional BMP

It is important to note that the EWMP is subject to adaptive management during the implementation phase (see Section 9 of this EWMP). The Participating Agencies may notify the Regional Board that alternative, equivalent actions are proposed in place of the actions described herein. It is important for the Participating Agencies to have flexibility during the implementation phase if proposed Regional BMPs are found to be infeasible or less desirable than alternatives. Regional BMPs will be subject to feasibility studies and/or alternatives analyses. In some cases, the actions proposed herein may be determined to be less preferred compared to other alternatives. If a preferred alternative action is identified and selected, the responsible agency will notify the Regional Board of the newly selected alternative(s) and demonstrate its equivalency.

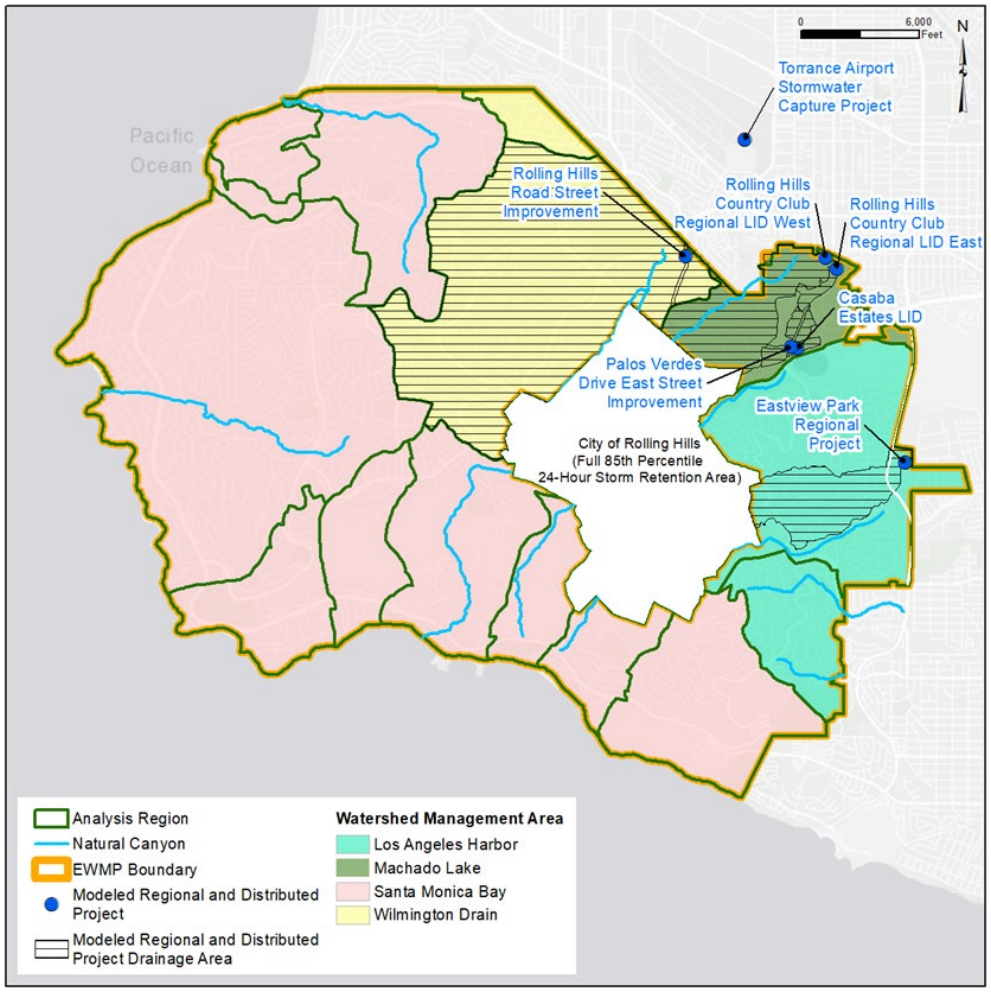


Figure 3-1: Modeled Regional Projects

Table 3-20: Summary of Modeled Regional BMPs

Watershed Management Area	Project Name	Lead WMG Member	Completed, Planned, or Proposed	BMP Type	Drainage Area (ac)	Impervious Drainage Area (ac)	BMP Volume (ac-ft)	Infiltration /Treatment Capacity
Wilmington Drain (WD-1)	Torrance Airport Stormwater Basin Project Phase II	Rolling Hills Estate Torrance[a]	Planned	Subsurface Detention & Diversion to Sewer	74 (PVE)	15 (PVE)	21[b]	2.2 cfs
					678 (RPV)	263 (RPV)		
					1,113 (RHE)	539 (RHE)		
					441 (LAC)	112 (LAC)		
	Rolling Hills Road Green Street Improvement	Rolling Hills Estate	Proposed	Pervious Pavement	0.4 (RHE)	0.4 (RHE)	0.04	1 in/hr
Machado Lake (ML-1)	Casaba Estates LID	Rolling Hills Estate	Completed	Surface Retention Basin	28 (RHE)	7 (RHE)	0.4	0.9 in/hr
	Rolling Hills Country Club Regional LID Project – West	Rolling Hills Estate	Completed	Surface Retention & Infiltration Basin	358 (RHE) [c]	60 (RHE)	3.8	482 in/hr
	Rolling Hills Country Club Regional LID Project – East	Rolling Hills Estate	Completed	Surface Retention & Infiltration Basin	51 (RHE)	2.0 (RHE)	0.7	1.3 in/hr
	Palos Verdes Drive East Green Street Improvement	Rolling Hills Estate	Potential	Green Infrastructure - TBD	2.6 (RHE)	0.5 (RHE)	0.3	1 in/hr
Los Angeles Harbor – Inner Harbor (LAH-IH)	Eastview Park Regional Project	Rancho Palos Verdes	Proposed	Subsurface Retention, Treatment and Diversion	345 (RPV)	123 (RPV)	1.2	0.6 cfs

Notes:
RPV-Rancho Palos Verdes; PVE-Palos Verdes Estates; RHE-Rolling Hills Estates; RH-Rolling Hills; LAC – Los Angeles County Unincorporated; TOR-Torrance

(a) The Peninsula WMG has agreed to collaborate with City of Torrance to utilize this project to receive and manage stormwater runoff from the Peninsula EWMP area.

(b) The Torrance Airport Stormwater Basin Project total estimated BMP volume is 21 ac-ft. The Peninsula WMG RAA June 2021 model that did not include Rolling Hills demonstrates that for the Wilmington Drain (WD-1) Watershed Management Area (WMA), 8 ac-ft of 24-hour management volume is needed to meet the final target load reductions. See Section 4 and Section 5 of the EWMP and Appendix 4.1 RAA Report.

(c) Does not include Rolling Hills 85%, 24-hr stormwater runoff retention area.

3.5.1.1.1 COMPLETED REGIONAL BMPS

CASABA ESTATES (FORMERLY BUTCHER RANCH)[80]

The Casabas Estates regional BMP project was completed in 2013. The project is approximately 8.55 acres located in Rolling Hills Estates. It is bounded on the south by Palos Verdes Drive North, easterly by Monticello Drive, and westerly by Palos Verdes Drive East. The project consists of residential lots, one new Commercial Recreational lot, parking lots, private roads, and allows for keeping of horses on the residential lots.

The project involved re-grading a portion of the pre-existing ravine to remove standing water conditions. This ravine area was rehabilitated into a vegetated bioretention system to retain and infiltrate runoff from the site. The project receives runoff from offsite (through an existing 24" diameter culvert under Palos Verdes Drive East) from onsite and offsite areas (a total of 28.62 acres). The new bioretention system was designed to retain and infiltrate onsite and offsite runoff in a volume greater than the 85th percentile, 24-hr storm event; therefore, the project was modeled in the RAA as a Regional EWMP Project. See **Figure 3-2** for post-development design conditions.

The Casaba Estates project includes multiple benefits in addition to the stormwater quality benefits that will be observed. These additional benefits may include, but are not limited to, the following:

- **Beneficial Use Protection**. This project will result in higher water quality which will help to protect recreational beneficial uses and support public health (and wellness) in Machado Lake and the Greater LA Harbor.
- **Neighborhood Greening and Public Recreation**. This project includes green space within this development which can positively impact the aesthetics, as well as property values, of urbanized areas. Property value tends to increase when an urban neighborhood has green space or trees in sight (CNT, 2010). Green infrastructure and green space can also alleviate urban heat-island effects by reducing temperatures by about 5^{o}F through shade and evaporation (CNT, 2010).
- **Water Conservation/Supply**. The stormwater retained onsite recharges groundwater which is being used for potable or non-potable purposes by the adjacent golf course, thus offsetting reliance on imported water supply.

[80] Bolton Engineering Corp. *Hydrology and Hydraulic Calculations*. September 13, 2010.

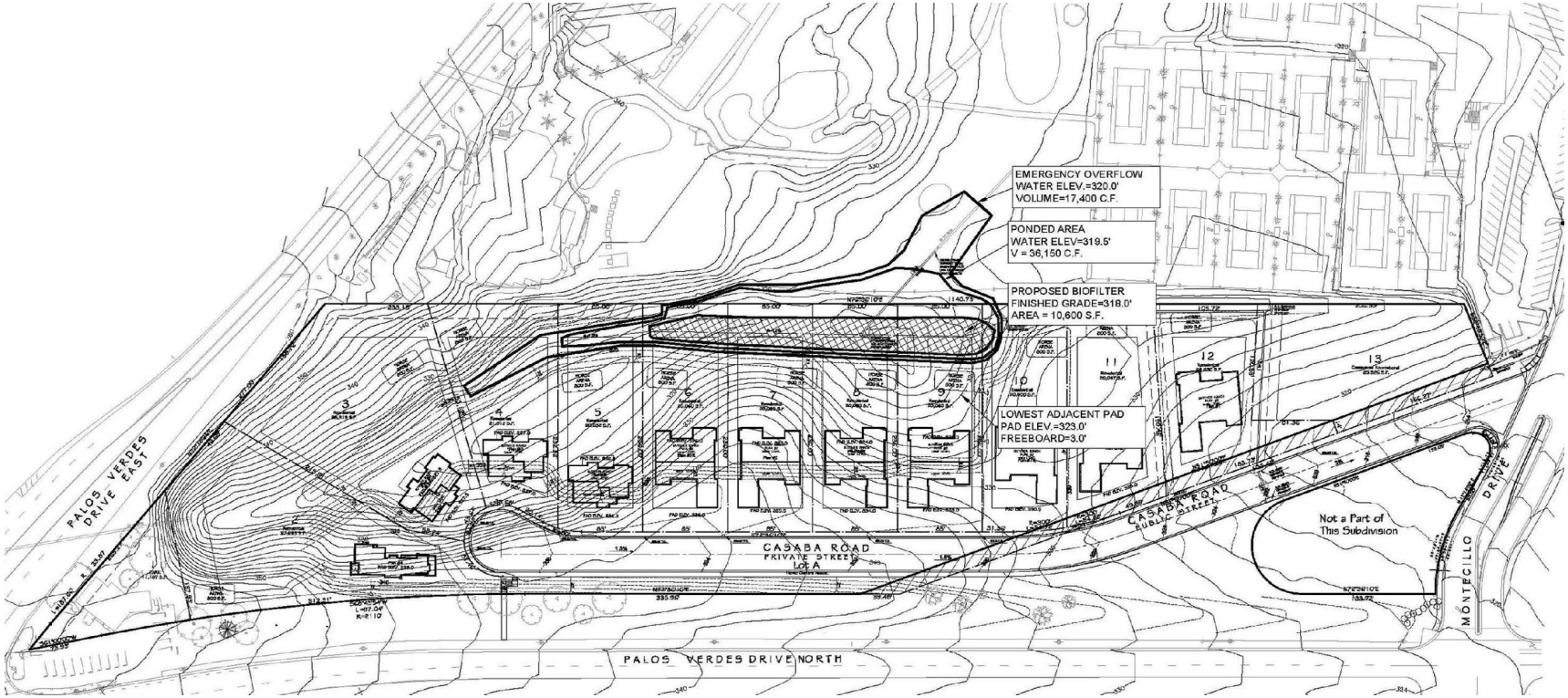


Figure 3-2: Casaba Estates (formerly Butcher Ranch) Post-Development Design Conditions (Bolton Engineering Corp. Hydrology and Hydraulic Calculations. September 13, 2010).

SAN RAMON CANYON

The San Ramon Canyon project is located in the City of Rancho Palos Verdes. The project was completed in October 2014. The project consists of a mid-canyon inlet structure connected to a 3,900-foot long and a 54-inch pipe that outlets below the oceanfront bluff, bypassing a highly erodible section of the canyon (see **Figure 3-3**). The project inlet is located slightly upstream of the upper switchback along Palos Verdes Drive East and substantially reduces the amount of flow being delivered to an existing, and overwhelmed, storm drain at Palos Verdes Drive South/25th Street. This project improves water quality by substantially reducing erosion and minimizing debris and sediment transport to this drain by diverting all stormwater runoff from a greater than ¼ inch rain event to the underground pipe, diverting it from the erosive canyon. Two tunnels (over 2,300 feet in total) were dug, about 4,000 linear feet of 54-inch steel pipe was laid, an aesthetically-pleasing sculpted concrete outlet structure was built at the beach, a well-anchored concrete inlet structure was installed in the canyon bottom (acts as a detention basin), the canyon streambed was restored to historic elevations, new native habitat landscaping was installed, affected portions of the Palos Verdes Drive East roadway and storm drain system were repaired and improved, and hiking trail access points were created. Due to the nature of this project its benefits could not be quantified in the RAA model. However, as mentioned above, this project significantly improves the quality of the downstream receiving water and addresses PCBs, DDT, and Sediment Toxicity.

The San Ramon Canyon project includes multiple benefits in addition to the stormwater quality benefits that have been accrued. These additional benefits include, but are not limited to, the following:

- **Beneficial Use Protection**. This project protects recreational beneficial uses and supports public health (and wellness) in Santa Monica Bay
- **Habitat**. This project restores and protects the existing streambed and the surrounding ecosystem to encourage infiltration and biologic uptake.
- **Flood Management**. This project decreases flood risk by reducing runoff rate and volume.
- **Water Conservation/Supply**. The stormwater retained onsite recharges the groundwater which is being used for potable or non-potable purposes by the golf course, thus offsetting reliance on imported water supply.



Figure 3-3: San Ramon Canyon Project

CHANDLER RANCH/ROLLING HILLS COUNTRY CLUB PROJECT[81]

Redevelopment of the former Chandler Quarry in the City of Rolling Hills Estates was completed in 2018 through private funding to construct a 114-home subdivision (Chandler Ranch) and reconfigure the Rolling Hills Country Club golf course and clubhouse. The golf course portion of the project was constructed on the site of the former quarry, with the golf course and subsurface infiltration gallery designed to provide the same hydraulic retention and infiltration capacity as the former quarry, an exception to the Peninsula's typical geological constraints. The new homes that are part of this redevelopment are still under construction, however the stormwater infiltration systems have been fully operational since January 2018 and the golf course is also completed. The project site lies within the Machado Lake sub-watershed of the Dominguez Watershed Management Area (DWMA). The 226-acre project site is now comprised of the Chandler Ranch homes under development the Rolling Hills Country Club, and golf course.

The regional project consists of three (3) infiltration galleries along with a pretreatment system for each gallery that consists of a suite of catch basin inserts, drainage swales, barrancas and, for the largest gallery, a biofiltration basin. The largest subsurface infiltration gallery has been designed as a regional BMP system to capture the 50-year storm runoff event from its 705.2-acre tributary area. This regional project well exceeds the standard for retention of the 85th percentile, 24-hour storm.

See **Figure 3-4, Figure 3-5,** and **Figure 3-6**.

The Chandler Ranch/Rolling Hills Country Club project has multiple benefits in addition to the stormwater quality benefits. These additional benefits include, but are not limited to, the following:

- **Beneficial Use Protection**. This project protects the multiple beneficial uses of Machado Lake and supports public health (and wellness) through protection of this public recreational asset.
- **Neighborhood Greening and Public Recreation**. This project increases green space within this neighborhood which positively impacts the aesthetics, as well as property values, of adjacent areas. Property value tends to increase when an urban neighborhood has green space or trees in sight (CNT, 2010). Green infrastructure and green space can also alleviate urban heat-island effects by reducing temperatures by about 5°F through shade and evaporation (CNT, 2010). Replacement of the landfilling and concrete plant uses of the former quarry site with green space has decreased the associated air pollutants including dust from the concrete and inert landfill activity, as well as diesel truck trips along local roadways.
- **Water Conservation/Supply**. The stormwater retained onsite recharges groundwater and is used by the golf course for non-potable purposes, thus offsetting reliance on imported water supply.
- **Public Education/Awareness**. This project incorporates stormwater infrastructure within a recreational facility, creating an awareness of stormwater quality and its importance.

[81] Hunsaker and Associates. *Water Quality Mitigation Plan*. June 16, 2010.

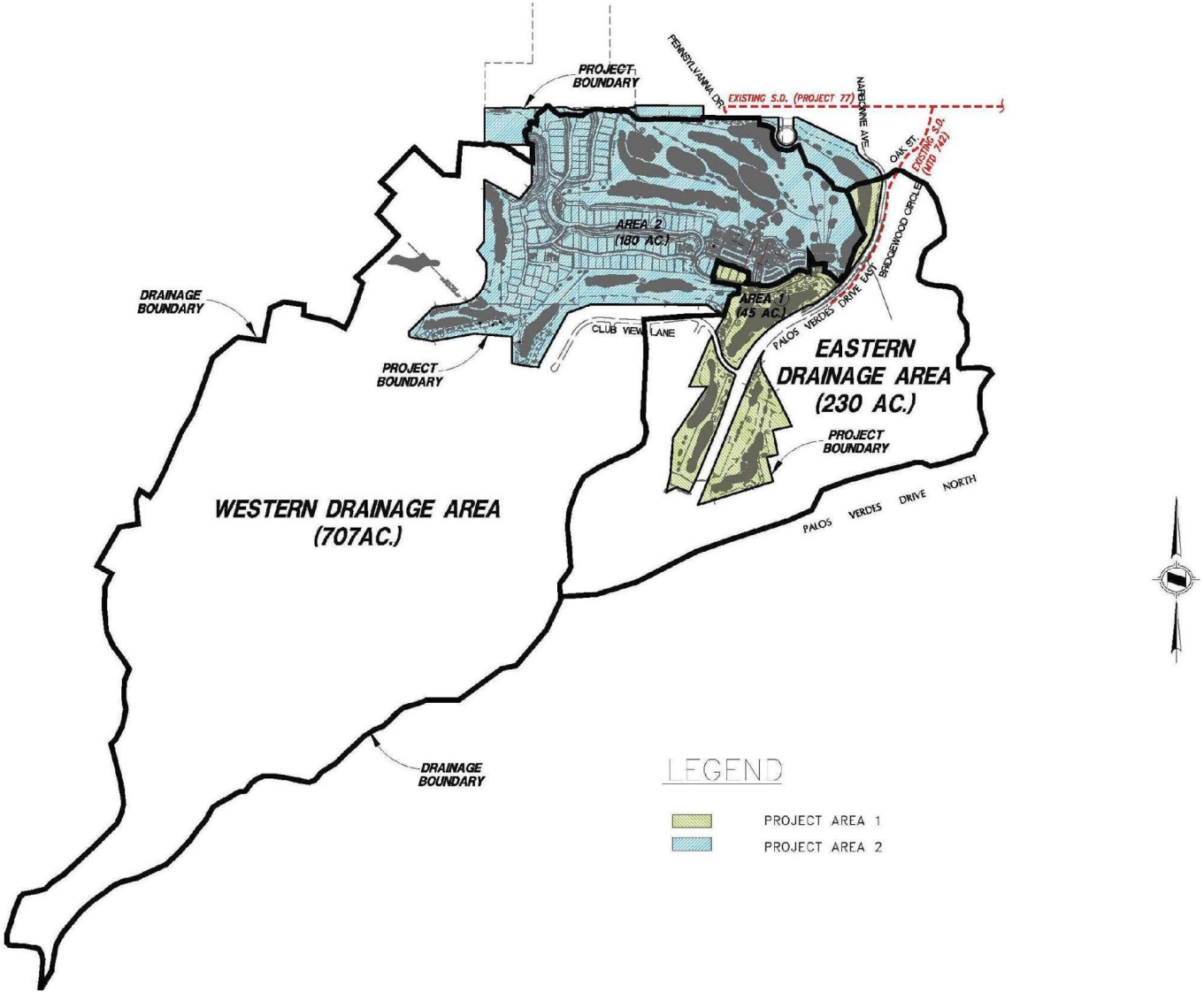


Figure 3-4: Chandler Quarry Project Drainage Area Map
Source: Hunsaker and Associates. Water Quality Mitigation Plan. June 16, 2010.

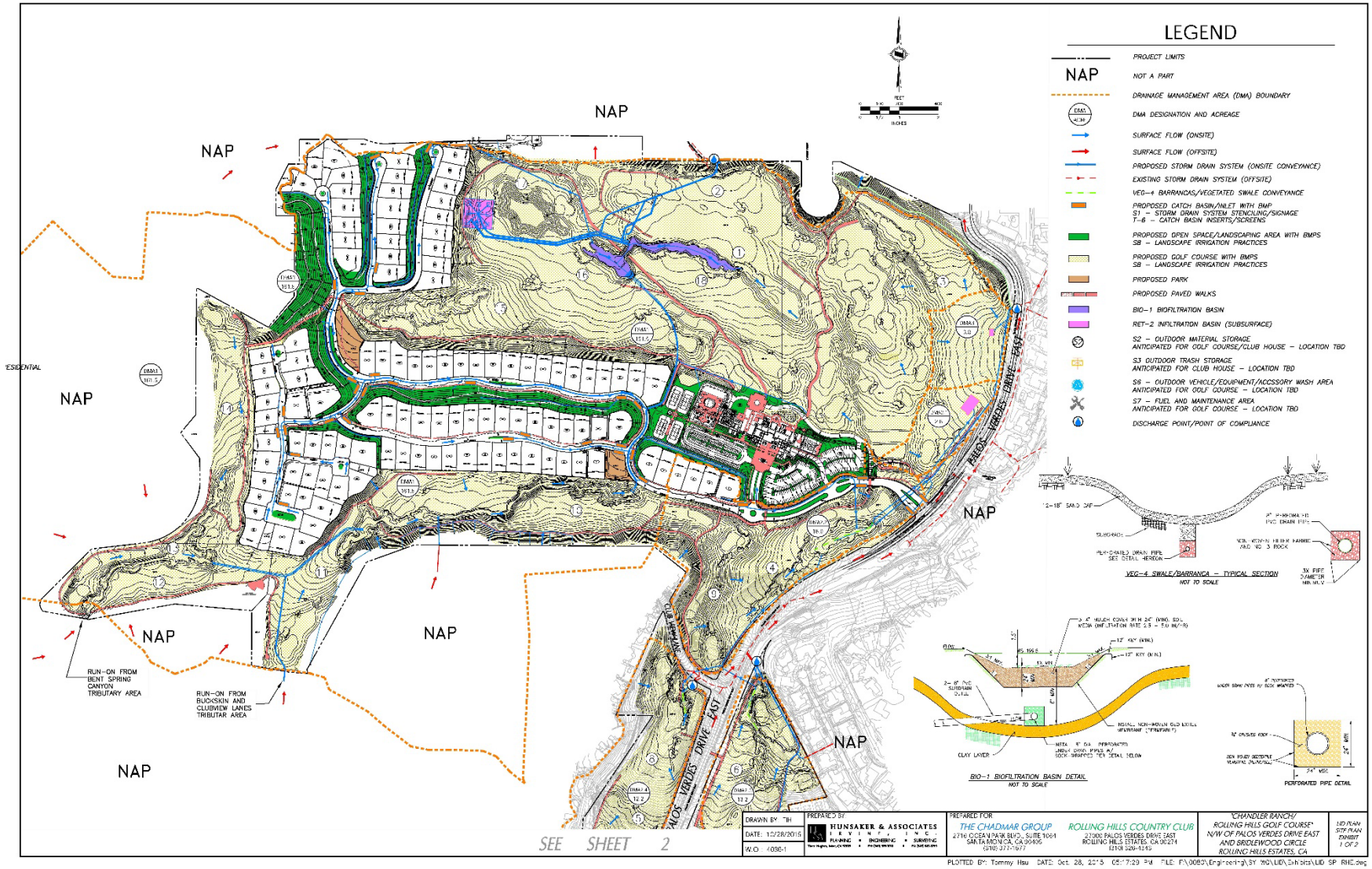


Figure 3-5: Chandler Quarry Project Drainage and Water Quality Concept Plan
Source: Hunsaker and Associates. Water Quality Mitigation Plan. January 29, 2016

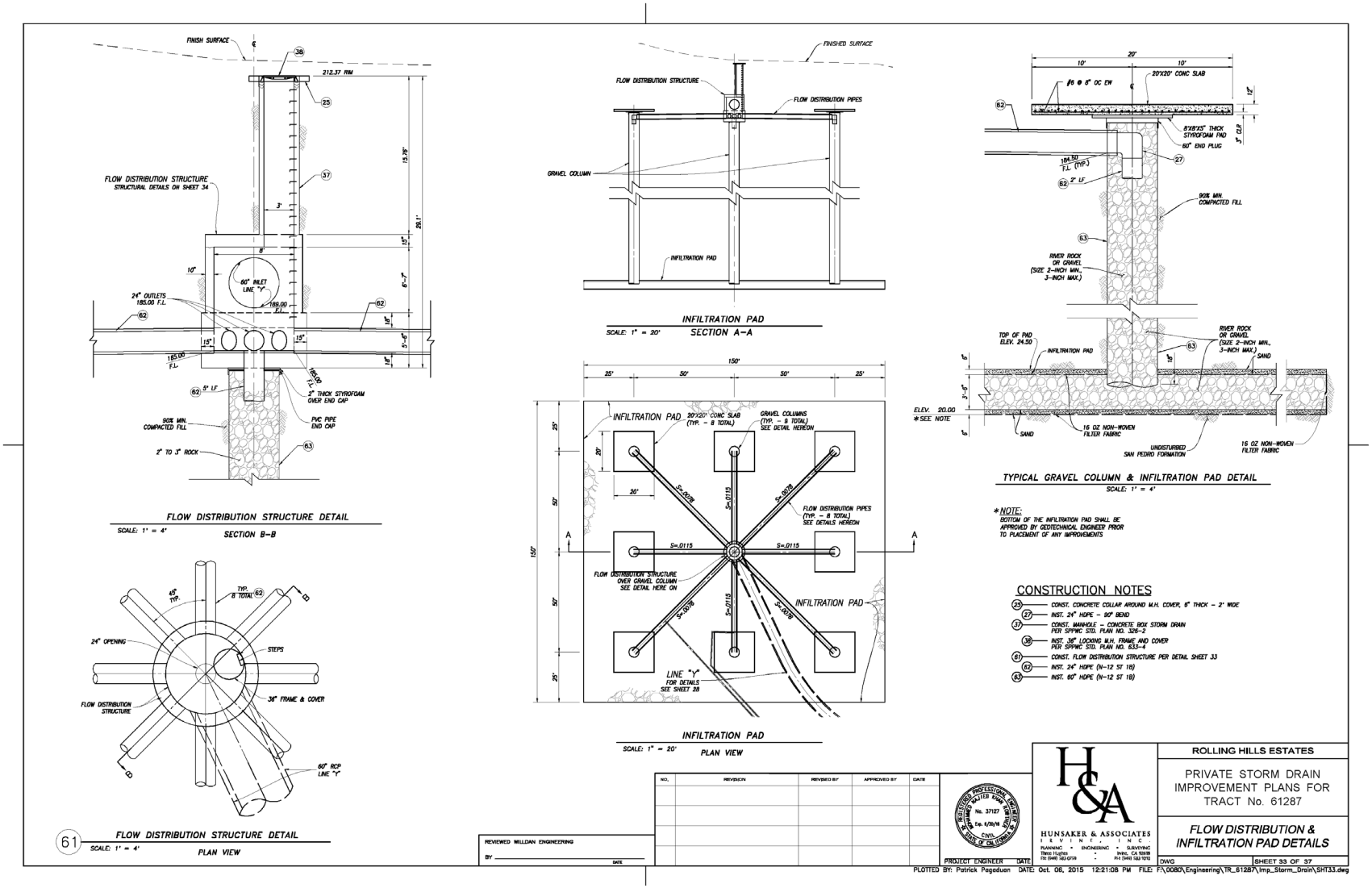


Figure 3-6: Chandler Quarry Project Infiltration System Concept Design

Source: Hunsaker and Associates. Water Quality Mitigation Plan. January 29, 2016

3.5.1.1.2 PLANNED REGIONAL BMPS

The Peninsula WMG has planned regional BMPs which are at levels varying from a concept plan to a final design. The anticipated pollutant removals associated with these BMPs were modeled in the RAA prior to determining additional BMPs necessary for each drainage area. A summary of Planned Regional BMPs within the Peninsula EWMP area is included below.

TORRANCE AIRPORT BASIN

A planned regional BMP located within the City of Torrance adjacent to the Torrance Airport will capture and divert urban stormwater flows into the sanitary sewer. This project is located within the Machado Lake Watershed, outside the Peninsula WMG watershed (see **Figure 3-7**). The agencies with tributary area to this planned regional BMP include the cities of Torrance, Rolling Hills, Rolling Hills Estates, Rancho Palos Verdes, Palos Verdes Estates, and unincorporated Los Angeles County.

The purpose of the project is to divert stormwater flows from the storm drain to be pre-treated and then stored in subsurface reservoirs for controlled release to the sanitary sewer system and ultimately to the Joint Water Pollution Control Plant (JWPCP) in the City of Carson where the Metropolitan Water District (MWD) has constructed the Regional Recycled Water Advanced Purification Center demonstration plant to treat storm water for regional groundwater infiltration. See **Figure 3-8**. The project was modeled in the RAA and is predicted to achieve the TLRs for the entire Wilmington Drain WMA, while also capturing stormwater from the 24-hour, 85th percentile event .

The Torrance Airport project will have multiple benefits in addition to the stormwater quality benefits which may include, but are not limited to, the following:

- **Beneficial Use Protection**. This project will prevent stormwater runoff from reaching the Machado Lake, and instead divert these flows to the sanitary sewer and ultimately to the JWPCP, thus resulting in improved water quality, protection of beneficial uses, and support of public health and wellness in Machado Lake.
- **Flood Management**. This project will decrease flood risk by reducing runoff rate and volume.
- **Water Conservation/Supply**. The stormwater diverted to sanitary sewer system and ultimately to the JWPCP will provide a source of urban stormwater flow for recycled water and potential regional groundwater infiltration.

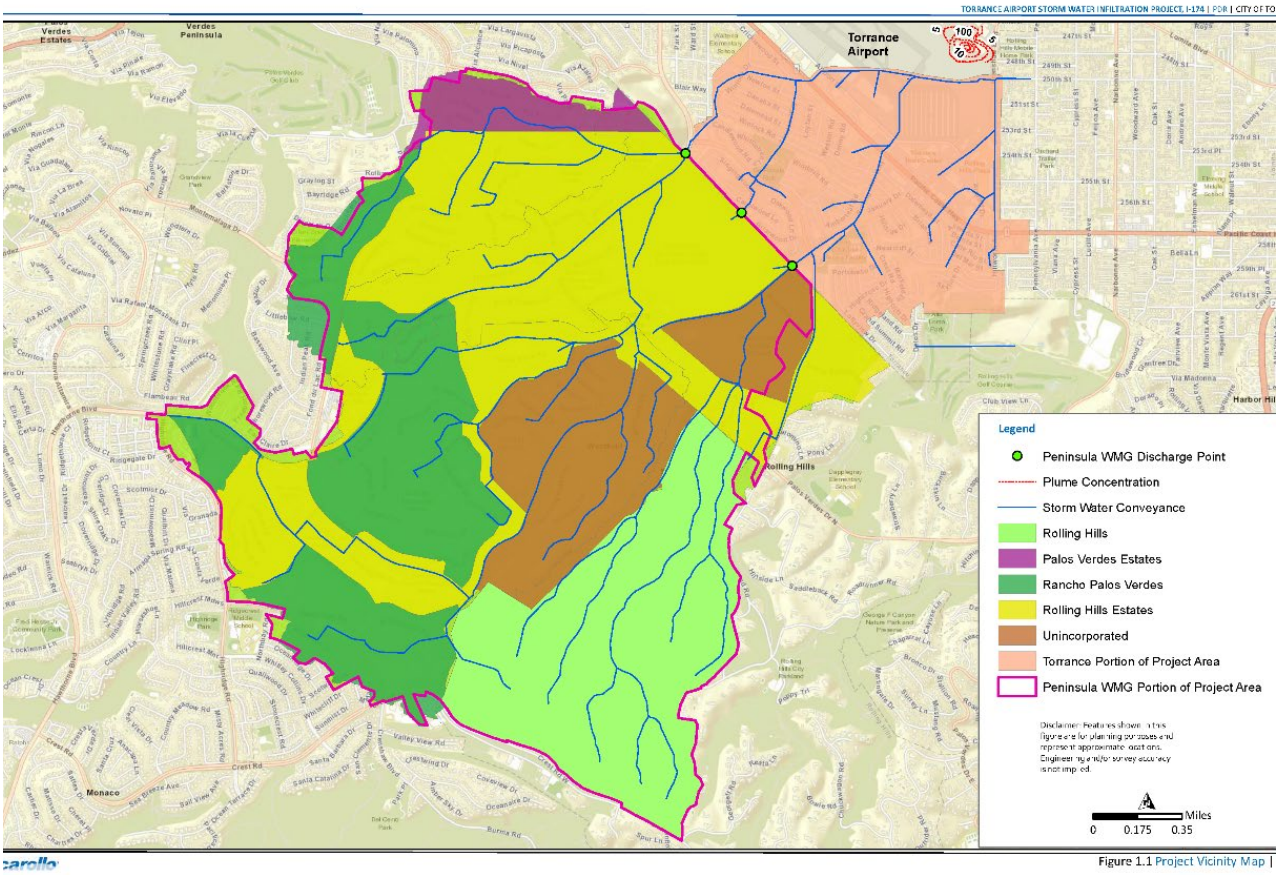


Figure 3-7: Torrance Airport Drainage Area

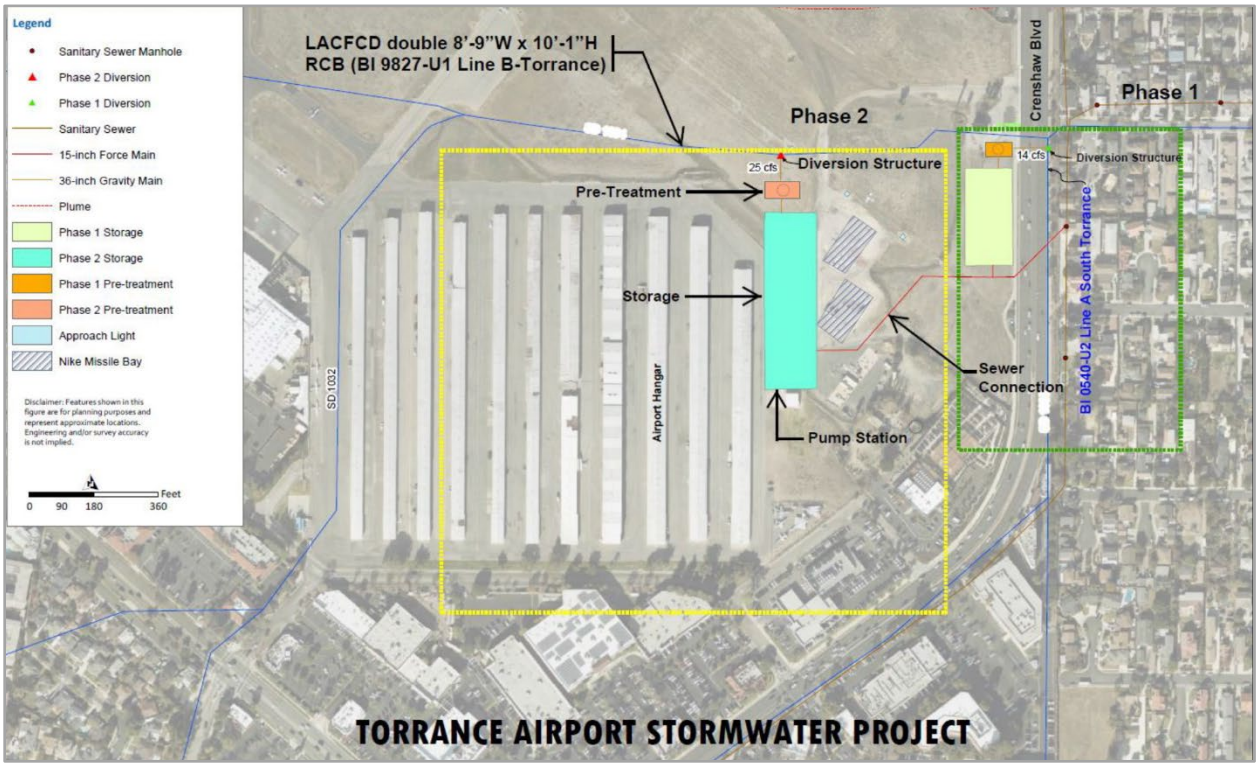


Figure 3-8: Conceptual Layout of Torrance Airport Basin

3.5.1.1.3 PROPOSED REGIONAL BMPS

The Peninsula WMG has proposed regional BMPs, in addition to those already existing and planned, in order to achieve the TLRs. Appendix 4.1 provides greater detail on the current land use designation, location, and potential design capture volume of each site. The proposed BMP sites were scored and ultimately ranked by the sum score from these characteristics:

- Drainage area
- Site area
- Completion status
- Land use
- Estimated infiltration rate
- Estimated depth to groundwater
- Geotechnical hazards
- Sensitive environmental area
- Liquefaction potential.

The sites with the largest drainage area were scored the highest. The land use with the highest accessibility is listed first. Within each land use designation, the sites have been scored from largest to smallest. Ultimately, these locations can serve as a starting point for the continued implementation of the EWMP. Note that with Regional BMPs there are opportunities for multiple agencies to benefit from the same site. The land uses are ranked as follows:

OPEN SPACE AND RECREATION: Sites designated for open space, parks, and recreational activities were ranked with the highest potential for future regional BMPs. This ranking is based on the fact that these types of areas have a high likelihood of being publicly owned eliminating or reducing any high land acquisition costs, they generally have a high percentage of landscaped area available, and they have a greater opportunity for multiple benefits.

MUNICIPAL INSTITUTION: Sites owned by a municipality and designated for government use were ranked with the second highest potential for future Regional BMPs. This ranking is based on the institution being municipally-owned and presenting a higher likelihood of collaboration than a privately-owned facility. Although this may be the case, many Municipal Institutions may not be willing to take on maintenance responsibilities which could result in the necessity of land acquisition or maintenance agreements.

GOLF COURSES/COUNTRY CLUBS: Sites designated as golf courses or country clubs were ranked with the third highest potential for future Regional BMPs. This ranking is based on the fact that these types of areas generally have a high percentage of landscaped area available and have a greater opportunity for multiple benefits. Although this may be the case, land acquisition for these sites is expected to be a difficult and costly process.

EDUCATIONAL USE: Sites designated for educational use were ranked with the fourth highest potential for future Regional BMPs. These sites generally have a high percentage of landscaped area available and have a greater opportunity for multiple benefits; however, gaining cooperation is expected to be difficult.

COMMERCIAL USE: Sites designated as commercial areas were ranked with the fifth highest potential for future regional BMPs. This ranking is based on the fact that these types of areas generally have a high percentage of parking available which could potentially be retrofitted for infiltration opportunities. Although this may be the case, land acquisition for these sites is expected to be a difficult and costly process.

The available sites were then further assessed by the Peninsula WMG to determine locations for Regional BMPs. Note that the sites presented do not represent the only sites available for the Peninsula WMG. The site selection process took into account the following characteristics:

LOCATION IN RELATION TO RAA RESULTS: The RAA provides an estimation of runoff reduction to be provided in each area in order to meet the water quality objectives. The sites should be selected to take this into consideration.

GIS DATA: GIS data was further analyzed to screen projects based on criteria such as land use, topography, hydrologic features, streets and roads, existing storm drain infrastructure, and storm drain invert depth.

PROJECT BENEFITS: Projects with potential multiple benefits were prioritized due to the increase in the overall benefit and support for these projects. Benefits to take into consideration included, but were not limited to, the following:

- Water quality benefits
- Water supply benefits
- Recreational use
- Multi-agency benefits
- Publicly owned
- Storage availability
- Funding available
- Project readiness
- Flood control benefits
- Proximity to pollutant sources or impaired waters
- Adjacent to existing storm drain

PROJECT CONSTRAINTS: Potential project constraints were a key component in site selection and elimination. It is important to take into consideration any constraints that may result in project infeasibility prior to the design phase. Constraints that were taken into consideration include:

- High groundwater
- Potential for deleterious geotechnical impacts (land movement)
- Low infiltration rates
- Existing soil contamination/proximity to existing soil contamination
- Brownfields[82]
- Existing groundwater contamination/proximity to existing groundwater contamination
- Potential for soil instability (liquefaction zones, hillside areas)

[82] With certain legal exclusions and additions, the term "brownfield site" means real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant (*Environmental Protection Agency*).

- Existing private ownership (requires land acquisition)
- Cost Effectiveness (determined through RAA)
- Historical landmarks

The participating agencies of the Peninsula Watershed Management Group has encountered geotechnical and geological constraints in the process of developing projects. Due to the unique geological nature of the Palos Verdes Peninsula, infiltration is often infeasible. Frequent geologic movement is prevalent throughout the Palos Verdes Peninsula and extensive research has documented areas where geotechnical hazards exist and are a concern. See **Figure 3-9**. These geologic conditions coupled with additional areas where rising groundwater is a known concern have limited the feasibility of infiltration projects in many areas within the Palos Verdes Peninsula.

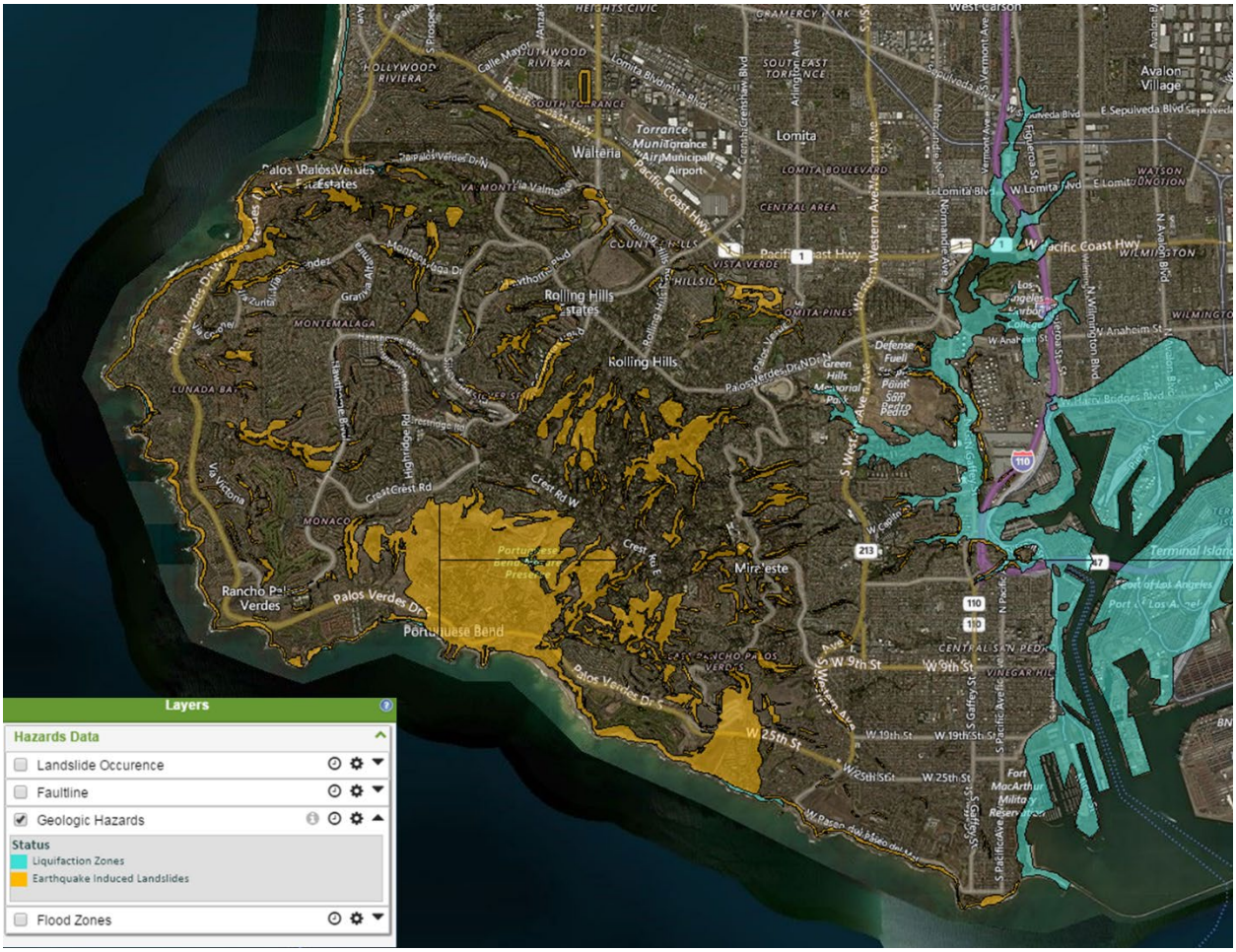


Figure 3-9: Geologic Hazards in the Palos Verdes Peninsula Watershed

These locations served as a starting point for the RAA, which was the final step to determine where BMPs were needed and the pollutant removal that could be observed through implementation of a BMP.

BMPs were identified in a prioritized manner. Prioritization was based on cost (low cost BMPs were prioritized); BMP effectiveness for the pollutants of concern (BMPs that had greater treatment efficiency for the pollutant of concern in a particular analysis region were prioritized over other BMPs); and implementation feasibility as determined by desktop screening. In general, structural BMPs were identified that would result in the greatest load reduction per dollar. This was accomplished by targeting land uses with the greatest drainage area with imperviousness, and BMPs with the greatest performance,

particularly for the controlling pollutant. The Proposed BMPs resulting from the selection process are described below.

MACHADO LAKE WATERSHED BMPS

The Machado Lake Watershed has limited areas capable of implementing infiltration projects due to limited areas with storm drains, available right-of-way, geotechnical hazards, specifically land subsidence, and lack of available space. Despite these limitations, construction of a large infiltration system was completed at the former Chandler Quarry (Chandler Ranch/Rolling Hills Country Club Project) in 2018. Alternatives to regional infiltration-type projects have also been proposed: the Palos Verdes Peninsula Multi-Benefit Flow Diversion Project and the Rolling Hills Road Green Street Improvement. The Peninsula WMG will continue efforts to identify projects within and outside of the geotechnically challenged Machado Lake Watershed. In previous iterations of the Peninsula EWMP (2016, 2019), projects in the Machado Lake Watershed were considered "proposed regional BMPs." After further investigation and communication with potential project collaborators or land owners, the projects as they were initially conceived were found to be infeasible (South Coast Botanic Garden Regional BMP, Palos Verdes Landfill Regional BMP, and the Valmonte Regional BMP). The South Coast Botanic Garden Regional BMP was removed because at this time, a regional-scale project is not feasible. The County is prioritizing planning of alternate regional projects (Palos Verdes Peninsula Multi-Benefit Flow Diversion Project and Torrance Airport Project) with the Peninsula agencies. Feasibility investigations have shown that site conditions are not conducive for stormwater capture.

PALOS VERDES PENINSULA MULTI-BENEFIT FLOW DIVERSION PROJECT

The EWMP initially conceived the closed Palos Verdes Landfill (PVLF) as a potential location for diversion of a major storm drain into a flow-through regional stormwater treatment facility. Due to impaired groundwater and subsurface contamination at this inactive landfill, which is under the oversight of DTSC, the scale of the original proposed project, which was sized to manage large storm flows, was subsequently determined to be infeasible due to constraints associated with the proposed project site on the PVLF Main Site. A smaller scale project is currently proposed to divert baseline flows for beneficial use for irrigation. The proposed project would address significant year-round baseline flow from rising groundwater in a major storm drain system tributary to Machado Lake within the WD-1 Analysis Region, i.e., the Machado Lake Wilmington Drain subwatershed. See **Figure 3-10**.

The Palos Verdes Peninsula Multi-Benefit Flow Diversion project would have multiple benefits in addition to the stormwater quality benefits that will be accrued. These additional benefits may include, but are not limited to, the following:

- **Beneficial Use Protection**. This project will result in higher water quality which will help to protect recreational beneficial uses and support public health (and wellness) in Machado Lake. Furthermore, beneficially using the baseline flows emerging from the Palos Verdes Hills within the Palos Verdes Peninsula for enhancing parks and open space is a sustainable use for capture flows that reduces the demand of imported water.
- **Neighborhood Greening and Public Recreation**. The primary uses proposed for the captured flows will be to replace potable water used for irrigation of nearby parks and public landscaping. The use of native and climate-appropriate plants in landscaping would maximizes the use of nature-based

solutions by limiting use of turf grass only for playing fields. Green infrastructure and green space can also alleviate urban heat-island effects by reducing temperatures by about 5°F through shade and evaporation (CNT, 2010).

- **Water Conservation/Supply**. The primary water supply benefits to accrue from the captured flows are to offset current potable water use for irrigation, thus offsetting reliance on imported water supply.
- **Public Education/Awareness**. This project will beneficially use captured runoff to enhance recreational benefits, creating an awareness of stormwater and its value as a resource. This project will provide public education opportunities in the form of on-site educational materials, such as placards and interpretive signage.

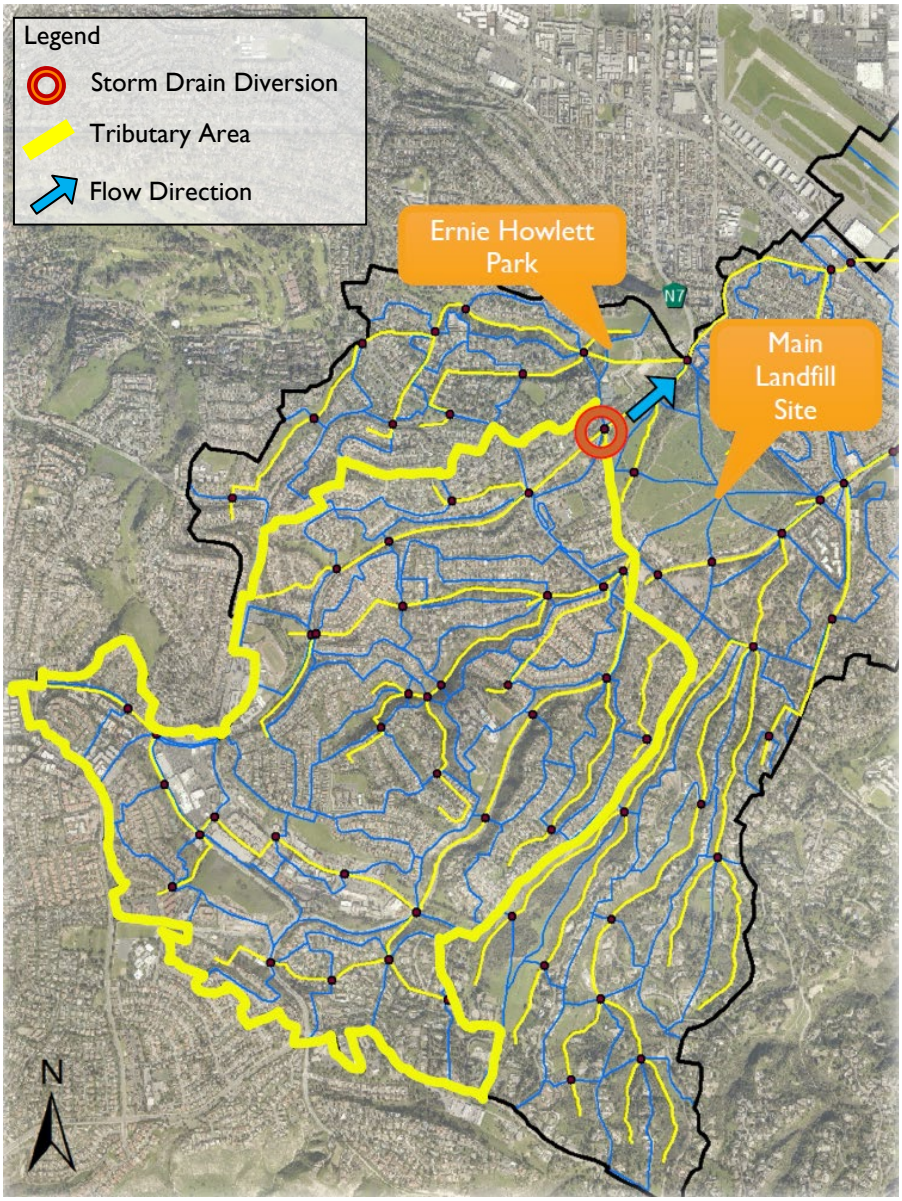


Figure 3-10: Proposed PVP Multi-Benefit Flow Diversion Drainage Area

ROLLING HILLS ROAD GREEN STREET IMPROVEMENT

Redevelopment of Rolling Hills Road from Palos Verdes Drive North to the northern boundary of Rolling Hills Estates with Torrance has been proposed to the conceptual design level. The project concept has received significant community engagement through the City of Rolling Hills Estates' Traffic and Safety Committee. The preferred project conceptual design received City Council approval on December 8, 2020. This section of roadway will be significantly improved to include bike lanes and pedestrian/equestrian multi-use pathways on both sides of Rolling Hills Road and will incorporate green infrastructure features consistent with the City of Rolling Hills Estates' Green Street Policy. Due to grade/elevation change along the length of the roadway and current unimproved soft shoulders, during storm conditions the current drainage conditions along the roadway result in erosion and transport of sediment into downstream MS4s. Roadway realignment is likely to be associated with this project and will include the installation of rolled curbs and gutters and related drainage improvements. Project construction will be scheduled after the neighboring City of Rolling Hills completes installation of a new sanitary sewer line along this same stretch of roadway. Benefits of the project include but are not limited to improved pedestrian, equestrian and bicycle safety; connectivity to local bicycle routes in the adjacent City of Torrance; stormwater quality improvements through reduced sediment and associated pollutant transport; and enhanced multi-modal transportation and recreational opportunities. Potential green street elements could include porous paving, biofiltration, bioswales or dry wells.

LOS ANGELES HARBOR WATERSHED BMPS

EASTVIEW PARK INFILTRATION PROJECT

Eastview Park is a large park space near the southeast corner of the intersection of Western Avenue and Westmont Drive in Rancho Palos Verdes (see **Figure 3-11**). A large storm drain main runs adjacent to the park, draining approximately 350 acres. There are two sanitary sewer outfall tunnels running through Eastview Park at depths ranging from 145-208 ft. If feasible, treatment at this location could consist of a subsurface infiltration BMP capable of capturing the 1-inch design storm[83] is proposed. Assuming a depth of 6 feet, the project footprint would be approximately 3.5 acres. Multiple benefits include pollutant load reduction and groundwater recharge. Significantly more work is needed to investigate the feasibility, cost-effectiveness, and design details of such a BMP. In the case that infiltration is not a feasible option or unforeseen constraints affect the project, alternative BMPs could be proposed in the Los Angeles Harbor Watershed.

The Eastview Park Infiltration project would have multiple benefits in addition to the stormwater quality benefits that will be observed. These additional benefits may include, but are not limited to, the following:

- **Beneficial Use Protection**. This project will result in higher water quality which will help to protect recreational beneficial uses and support public health (and wellness) at the Greater LA Harbor.
- **Neighborhood Greening and Public Recreation**. This project will increase the green space within this development which can positively impact the aesthetics, as well as property values, of urbanized areas. Property value tends to increase when an urban neighborhood has green space or trees in sight (CNT, 2010). Green infrastructure and green space can also alleviate urban heat-island effects by

[83] The 1.00 -inch storm was selected for load reduction purposes and is larger than the 85th percentile storm (approximately 0.85-inch).

reducing temperatures by about 5°F through shade and evaporation (CNT, 2010). Recreation opportunities also can be increased by increased green space which may decrease the amount of cars on the road, subsequently decreasing the associated pollutants.

- **Water Conservation/Supply**. The stormwater retained onsite will recharge the groundwater which could potentially be used for potable or non-potable purposes in the future, thus offsetting reliance on imported water supply.
- **Public Education/Awareness**. This project will incorporate stormwater infrastructure within an area which is highly used by the public creating an awareness of stormwater quality and its importance. The onsite BMP may serve as public education opportunities in the form of on-site educational materials, such as placards and interpretive signage.

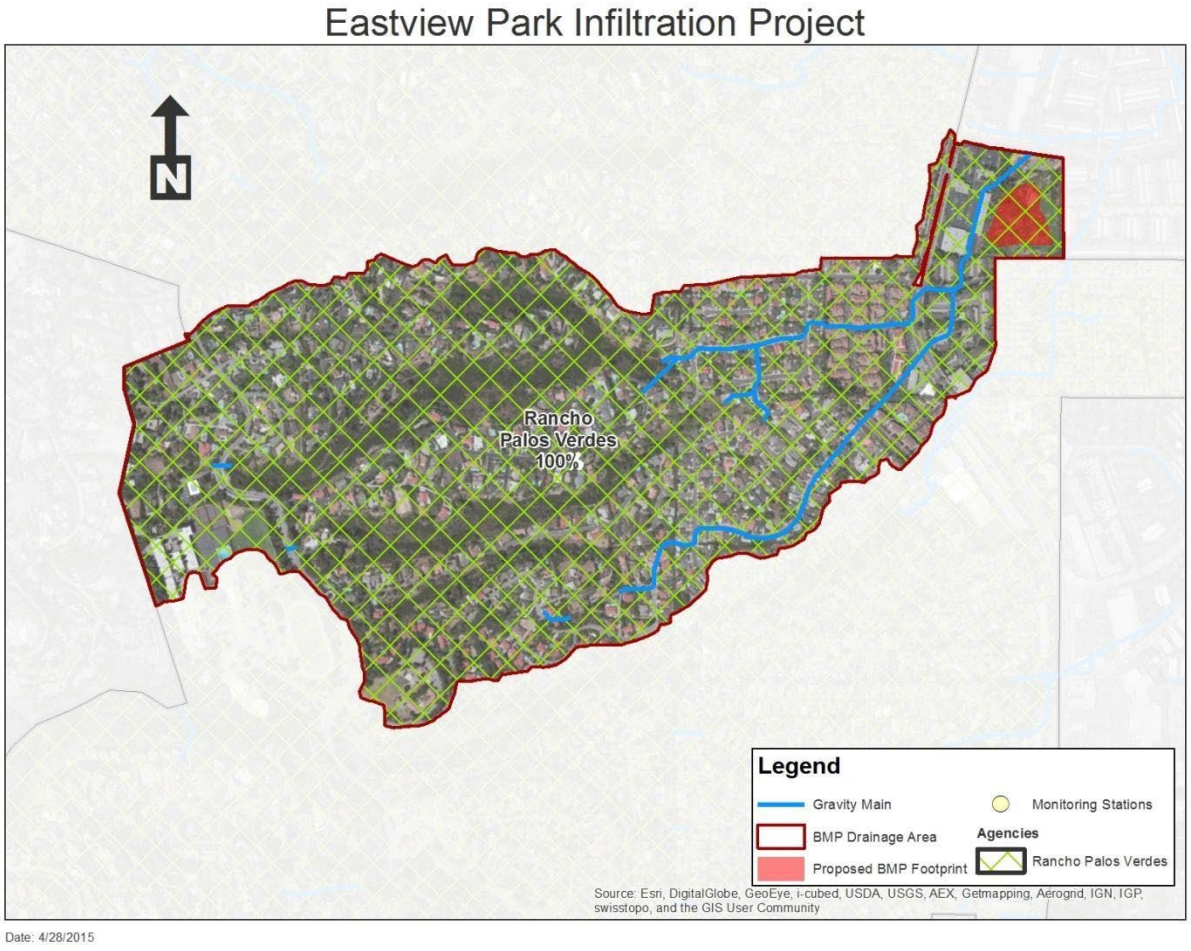


Figure 3-11: Proposed Eastview Park Infiltration Project Drainage Area

3.5.1.1.4 POTENTIAL REGIONAL BMPS

In addition to the existing, planned, and proposed BMPs, several opportunities will be considered for implementation. In many cases, significantly more work is needed to investigate the feasibility, cost-effectiveness, and design details of these BMPs; however, they will be considered during the implementation phase of the EWMP. As further information is gathered, the Participating Agencies may be inclined to select the below opportunities as alternative or supplemental to the proposed BMPs listed above. The revised RAA model projected that to meet the TLRs, the Peninsula Watershed Management Group needs to develop additional projects to manage stormwater besides projects that are existing, planned, or proposed. This includes projects that would manage additional stormwater for Rancho Palos Verdes and Rolling Hills Estates in the ML-1 WMA, for Rancho Palos Verdes and Rolling Hills Estates in the LAH-IH WMA, and for Rancho Palos Verdes in the LAH-CM WMA. See Section 4 and Section 5.

The EWMP is subject to adaptive management during the implementation phase (see Section 9 of this EWMP) and it is important for the Participating Agencies to have flexibility during the implementation phase if proposed Regional BMPs are found to be infeasible or less desirable than alternatives.

POTENTIAL MACHADO LAKE WATERSHED BMPS

HARBOR CITY PARK

A stormwater capture project at Harbor City Park would provide water quality improvements to Machado Lake. An earlier project concept, included in the EWMP developed by the Dominguez Channel Watershed Management Group, assumed an infiltration project with 2,230 acres diverted to the project from Cities of Los Angeles, Lomita, and unincorporated Los Angeles County. On behalf of the Peninsula WMG, the County of Los Angeles initiated discussion with City of Los Angeles and Los Angeles County Sanitation Districts to evaluate feasibility of expanding the project to include tributary area from the Palos Verdes Peninsula, diverting stormwater and dry weather runoff from a total capture area of 4,783 acres to be infiltrated or diverted to the Joint Water Pollution Control Plant in Carson for treatment.

WALTERIA DETENTION BASIN

The Walteria Detention Basin was constructed for flood protection in 1962 by the LACFCD. The basin has a perimeter of approximately one mile and extends to an approximate depth of 100 feet and has a total capacity of approximately 1,005 acre-feet. The primary function of the Walteria Detention Basin is to provide flood protection and as such it is operated to detain flows that enter the basin during storm events. During storm conditions the basin receives runoff from a tributary area of approximately 2,287 acres with 7.6% of that area (174 acres) contributed by the Peninsula WMG, with the balance of the area contributed by the City of Torrance. The facility is operated as a detention basin and when a major storm is forecast or following a significant storm event, the level in the basin is pumped down to maintain sufficient flood protection capacity for adjacent communities and to sustain capacity of downstream flood conveyance infrastructure. When such discharge is necessary, the discharge is pumped into a 54-inch diameter storm drain, i.e., through the Project No. 584 storm drain, and comingles with flows from other MS4 agencies before eventually discharging to Wilmington Drain and on to Machado Lake. The Peninsula WMG also understands that it is also necessary to periodically pump the level in the basin down for maintenance purposes.

The Walteria Detention Basin was identified as a potential location for a regional BMP in the Peninsula EWMP, pending the results of a Special Study Monitoring Program. The City of Torrance and the LACFCD collaborated and completed the two-year Special Study Monitoring program to characterize water quality of the stormwater flowing into and out of the basin. Results of the monitoring effort can be found in the 2017-18 Watershed Annual Report.

Although it is not feasible to use Walteria Basin as an in-situ water quality treatment system (such as through application of aluminum sulfate or other flocculants) since such approaches could diminish the flood protection capacity of the basin, the Peninsula WMG is interested in further analysis to assess how the basin could be utilized as part of a regional system of stormwater capture projects in conjunction with the Torrance Airport Regional Project, the Harbor City Park Regional Project, and the Palos Verdes Multi-Benefit Flow Diversion Project to meet Machado Lake TMDL WLAs on a mass basis for the tributary area to the basin.

Fern Creek & Valmonte Canyon Crossing Restoration Project (Fern Creek Multi-Benefit Wetland Restoration Project)

Fern Creek Canyon and Valmonte Canyons are natural drainage courses that converge at the western corner of Ernie Howlett Park in Rolling Hills Estates where stormwater flows from the two canyons are directed into an improved culvert and cross under Ernie Howlett Park via a subsurface storm drain that connects into the MS4 leading to Wilmington Drain and Machado Lake. As observed through years of dry weather monitoring, Valmonte Canyon does not exhibit flow during dry weather, however Fern Creek Canyon receives groundwater discharges and exhibits low or intermittent flows throughout the year along its lower reach. The mouth of Fern Creek Canyon as it enters the culvert has been adversely impacted by periodic storm debris flows from upper reaches of the canyon which accumulate at the mouth below the culvert entrance. Restoring the creek bed at the mouth of the canyon and management of debris flows could reduce nutrient loading to Machado Lake associated with these year-round low flows. The land at this location is currently privately held and is used for horse keeping, but is not suitable for residential development, thereby making land acquisition for public open space and recreation potentially feasible in the future by the City of Rolling Hills Estates. This project would have multiple benefits in addition to year-round water quality benefits for Machado Lake including, but not limited to, improvement of riparian habitat, permanent trail access and connectivity of the multi-use trail system at the crossing of Fern Creek and Valmonte Canyon Trails (currently trail access is conditional by permission of the property owner), restoration and protection of stream habitat, and enhanced passive and active recreational opportunities.

Academy Canyon and Trail Restoration Project

This project would restore and preserve a one-mile section of natural canyon drainage course and hiking trail that has been adversely impacted by hydromodification. Erosion of the canyon invert has eroded portions of the trail and exposed sections of a 2,000 linear foot section of subterranean sewer line. Restoration work would involve canyon, trail and sewer line stabilization, trail enhancement, stormwater management to protect from future hydromodification and improvement of stormwater quality through erosion remediation and control, enhancement of wildlife habitat, and enhancement of recreational and educational opportunities. The trail crest is located adjacent to an independent K-12 day school—the school has listed the canyon as a certified wildlife habitat with the National Wildlife Federation and includes the canyon in its environmental education programs. At its terminus near Palos Verdes Drive North, Academy Canyon drainage is directed into a box culvert and flows via the subsurface MS4 to Wilmington Drain and Machado Lake. Reversing the impacts of hydromodification will enhance the nature-based retentive function of this natural canyon thereby reducing storm flow and associated pollutant loading to Machado Lake.

Palos Verdes Drive East Green Street

The City of Rolling Hills Estates is considering redevelopment of Palos Verdes Drive East roadway from Palos Verdes Drive North to the northern boundary of Rolling Hills Estates with the City of Lomita. Due to grade/elevation change along the length of the roadway, roadway curvature and unimproved soft

shoulders, during storm conditions the current drainage conditions along the roadway result in erosion and transport of sediment into downstream MS4s and cause stormwater to flow across the roadway at several locations. Conceptual planning for the project has not yet begun but would incorporate the City's Green Street Policy and include/consider the following improvements and benefits: pedestrian, equestrian and vehicular safety; drainage improvements; stormwater quality improvements through reduced sediment and associated pollutant transport; and enhanced multi-modal transportation and recreational opportunities.

Reopener for the Machado Lake Nutrient and Pesticides and PCBs TMDL

A reconsideration of the Machado Lake Nutrient TMDL was scheduled for September 11. 2016, and the Peninsula WMG submitted a request for reconsideration on September 7, 2016. At the time Regional Board TMDL staff indicated that a sufficient body of in-lake monitoring data collected by the City of Los Angeles following completion of the lake rehabilitation project would be needed prior to a reconsideration. The Peninsula WMG subsequently requested the Machado Lake Nutrient and Pesticides & PCBs TMDL implementation schedules be extended as part of the Regional Board's Consideration of Extension of Final TMDL Implementation deadlines for Certain TMDLs in the Los Angeles Region in November 2020; however, the Machado Lake TMDLs were ultimately not considered for extension in that action. A TMDL reopener to allow reevaluation of the TMDL schedules for final compliance is an avenue which the Peninsula WMG continues to support.

Potential Santa Monica Bay Watershed BMPs

Malaga Cove Water Reuse[84]

The City of Palos Verdes Estates has implemented dewatering measures to prevent nuisance rising groundwater from damaging homes and businesses in Malaga Cove. The nuisance groundwater removed from these dewatering sites is currently discharged into the local storm drain system and/or to the nearby Pacific Ocean. This potential project could divert this water to a nearby school site or a nearby parkway in Palos Verdes Estates for irrigation use. This project would serve as a dry weather/low flow diversion rather than as stormwater capture or treatment project.

In 2019, the City of Palos Verdes Estates completed a source tracking study of dry weather storm drain flows in this area for presence of HF183 human markers and found no persistent human sources in the City's MS4 system upstream of Malaga Cove Beach. Although this potential project has not been included in the load reductions modeled in the RAA, if needed in the future, it has the potential to contribute to additional pollutant removal by reducing or eliminating non-stormwater discharges and low flow wet weather flows from the drainage area.

More work would be required to investigate the feasibility, cost-effectiveness, and design details of such a BMP. The Malaga Cove Water Reuse project could have additional benefits besides water quality benefits including offsetting current use of potable water in landscaping of nearby areas.

Portuguese Bend Landslide Complex Mitigation Project[85] (Abalone Cove Water Reuse)

The City of Ranchos Palos Verdes has implemented dewatering measures to prevent nuisance groundwater and runoff from damaging homes and businesses. In the City of Rancho Palos Verdes, continuous-withdrawal dewatering wells have been installed to slow the progression of the Abalone Cove Landslide and the Portuguese Bend Landslide. The nuisance groundwater removed from these dewatering

[84] RMC. "Abalone Cove Project and Malaga Cove Plaza Project Conceptual Evaluation." August 06, 2009.

[85] Information gathered from a feasibility study which is currently being conducted for this project.

sites is currently discharged into the local storm drain system and/or to the nearby Pacific Ocean. The City of Rancho Palos Verdes conducted and completed a feasibility study of the Portuguese Bend Landslide Complex (PBLC) to investigate additional mitigation measures to reduce landslide movement and protect Santa Monica Bay coastal water quality. Although this potential project has not been included in the load reductions modeled in the RAA, it has the potential to contribute to additional pollutant removal by reducing or eliminating non-stormwater discharges and low flow wet weather flows from the drainage area. Additionally, the PBLC Mitigation project will serve to protect the restored rocky reef from excessive sediment deposition from stormwater discharges through drainage improvements, flow detention basins, bioswales, and coastal sage scrub habitat restoration.

More work is needed to investigate the cost-effectiveness and design details of such a BMP.

3.5.1.1.5 STAKEHOLDER INCORPORATION

STAKEHOLDER MEETINGS

The Peninsula WMG initially solicited stakeholder input on the Peninsula EWMP development. These stakeholders included: City Staff, City Council Members and Water Quality and Flood Protection Oversight Committee, Governmental Organizations Staff, Non-Governmental Environmental Organizations Staff, Non-Governmental Organizations Staff, and residents. Several public workshops were held and ultimately stakeholder feedback was incorporated. The Participating Agencies have and will continue to conduct project-specific stakeholder and community engagement through public workshops, meetings, and project presentations at the Safe, Clean Water Program South Santa Monica Bay Watershed Area Steering Committee meetings.

3.5.2 85TH PERCENTILE, 24-HOUR RUNOFF RETENTION AREAS

As provided in Order R4-2021-0105 Part IX.A.4.k., Watershed Management Programs may demonstrate that strategies, control measures, and BMPs cumulatively retain the runoff volume from the 85th percentile, 24-hour storm event for the drainage area tributary to the applicable receiving water and for such areas an RAA is not required. Furthermore, as provided in Order R4-2021-0105 Part X.B.2.b.iii., a Permittee is deemed in compliance with final WQBELs and receiving water limitations if it has retained all conditionally exempt, non-essential non-stormwater and all stormwater runoff up to and including the volume equivalent to the 85th percentile, 24-hour event for the drainage area tributary to the applicable receiving water provided the Permittee is implementing all actions and schedules in an approved Watershed Management Program. Watershed areas that fully retain the 85th percentile, 24-hour runoff volume and were excluded from the RAA analysis are shown in **Figure 3-12** and described in the subsequent narrative.

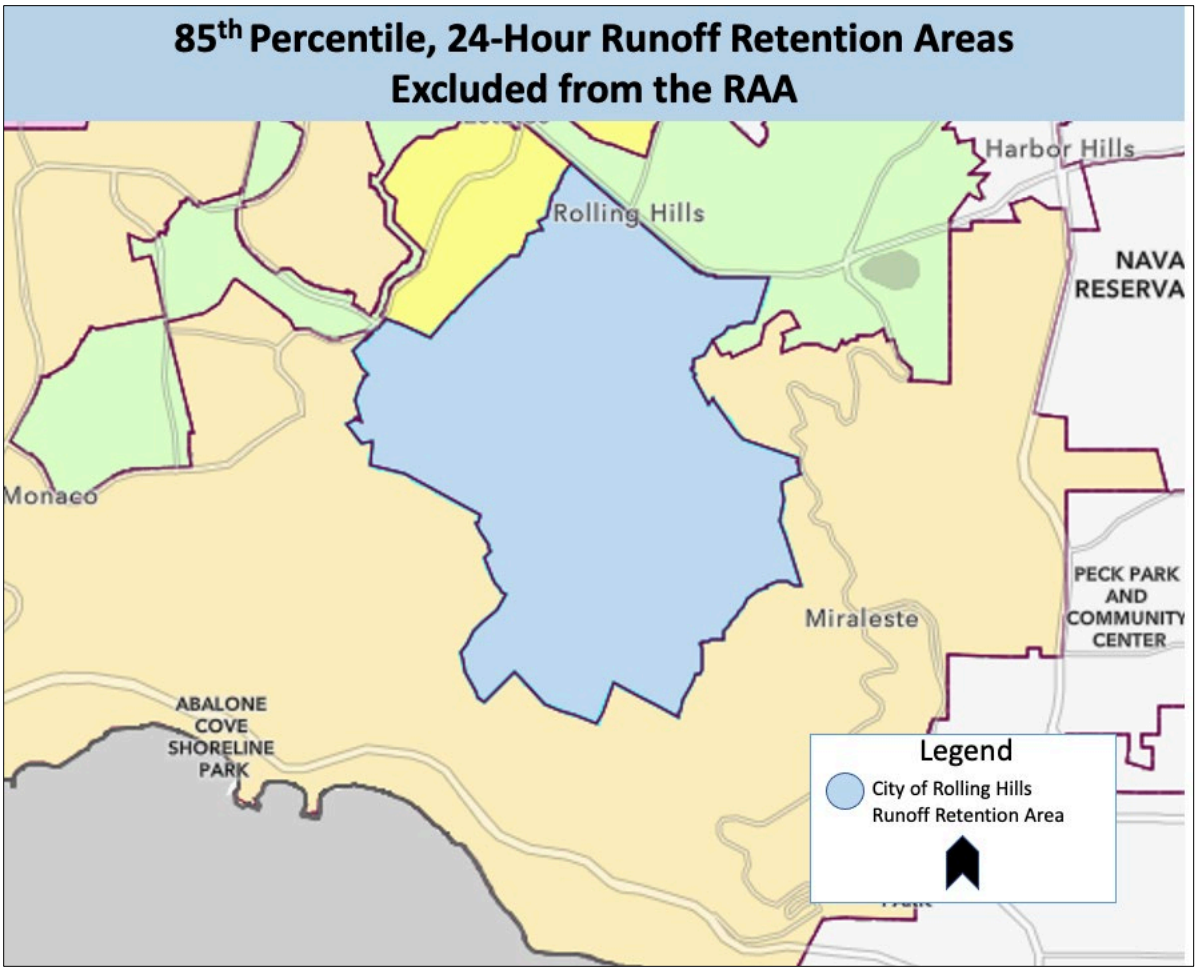


Figure 3-12 85th Percentile, 24-Hour Runoff Retention Areas Excluded from RAA

ROLLING HILLS NATURE-BASED RUNOFF RETENTION AREA

The City of Rolling Hills (Rolling Hills) is a small, entirely residential semi-rural community of single-family homes with fewer than 2,000 residents in three square miles. By design, it is a model of low-impact development utilizing nature-based solutions for management of stormwater. Its zoning code includes strict standards for development ratios on each property and limits disturbed area during development. A substantial area of land in Rolling Hills is constrained from development due to steep hillsides and canyons; the use of these areas as wildlife habitat and for native vegetation is emphasized. Rolling Hills' zoning code further promotes the preservation and appreciation of open space by requiring easements for equestrian/hiking trails on all lots. There are approximately 30 miles of unpaved equestrian/hiking trails throughout the city.[86]

Under Rolling Hills municipal code[87], only 40% of the net area of a residential lot may be disturbed during construction and the remaining area of the lot must remain in its natural, pre-development state. Only 35% of the net lot area may be developed with impervious surfaces, including structures, patios, and other paved areas. Given that the minimum lot size in Rolling Hills is 1 acre, with many substantially larger lots, the limitation on lot coverage preserves significant permeable area throughout the city. Additionally, driveways may not cover more than 20% of the area of the yard in which they are located, and uncovered motor courts/parking pads may not cover more than 10% of the yard in which they are located.

Roads within the City have many green street features. They are designed as narrow, two-lane undivided winding roads 20 to 25 feet wide with rolling to steep grades lined with significant naturalized landscaping. There are no sidewalks or curb-and-gutter systems, and roads are not designed to be stormwater conveyance systems.[88]

Stormwater run-off that is not contained on properties is conveyed through Rolling Hills via natural, soft bottom, vegetated drainage courses/canyons (see **Figure 3-13**), providing disconnection of impervious developed areas and ample opportunity for natural bioretention and infiltration as described in Section 2.3.1: Pollutant Fate and Transport Mechanisms within the Watershed. There is limited public infrastructure and no city-owned or maintained storm drains, roads, sidewalks, or curb-and-gutter, though there are some limited, discontinuous drainage improvements owned/operated by the Los Angeles County Flood Control District (LACFCD).

[86] City of Rolling Hills 1990. General Plan – Land Use Element. June 25, 1990.
[87] Rolling Hills Municipal Code, Title 17
https://library.municode.com/ca/rolling_hills/codes/code_of_ordinances?nodeId=TIT17ZO
[88] City of Rolling Hills 1990. General Plan – Circulation Element. June 25, 1990.

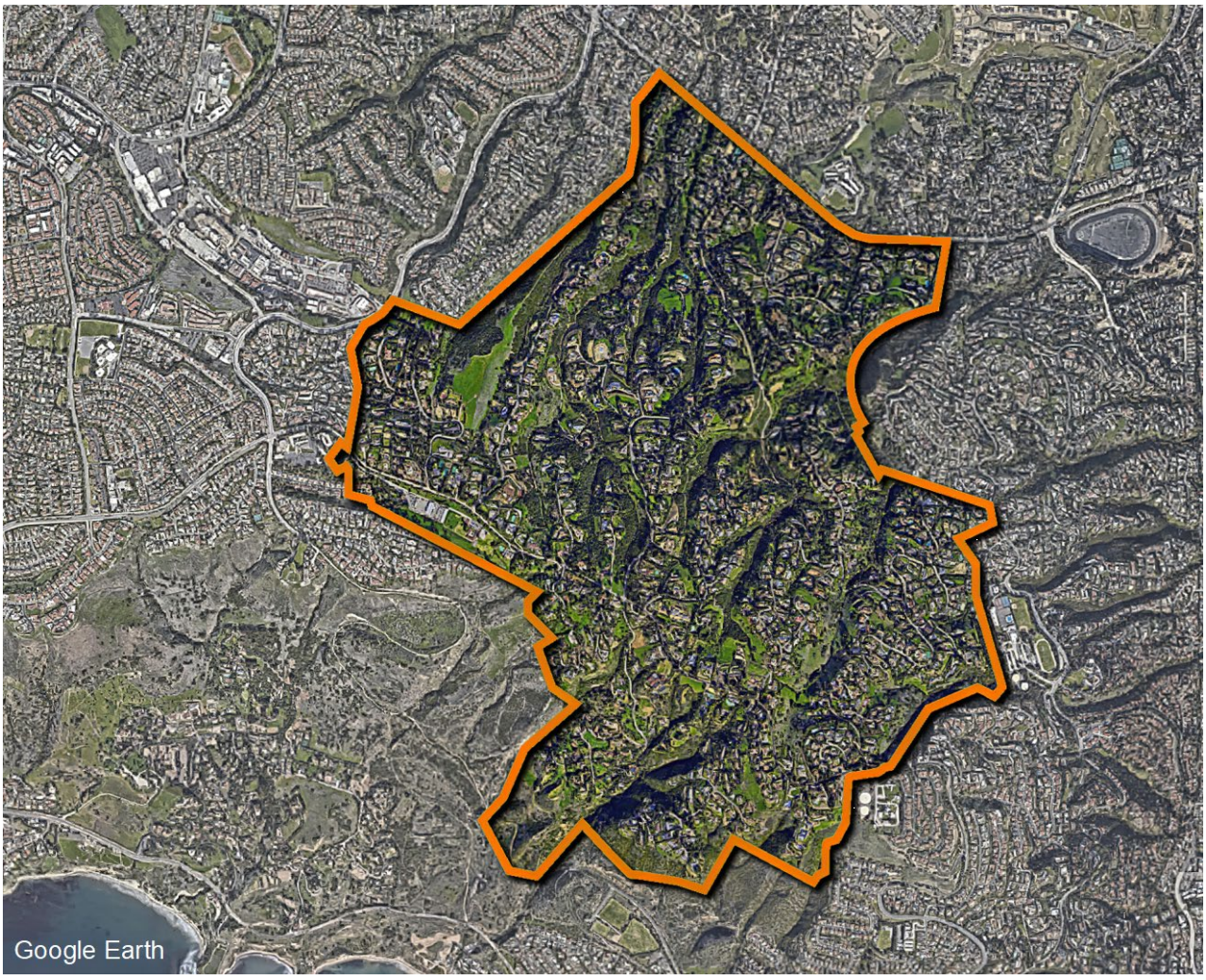


Figure 3-13 Rolling Hills Nature-Based Stormwater Runoff Retention Area

The net effect of Rolling Hills' planning and land development standards along with its extensive network of natural canyon drainage systems is to promote retention and infiltration, creating a system of nature-based solutions for stormwater management. Along with the Minimum Control Measures, Non-Stormwater Discharge Measures, and Targeted Non-Structural Control Measures described in Sections 3.1, 3.2 and 3.3, this system of nature-based runoff retention measures effectively retains runoff from the 85%, 24-hr rain event within Rolling Hills as demonstrated through monitoring.

Continuous flow monitoring was conducted in Sepulveda Canyon in Rolling Hills for two complete wet-weather seasons, from October 26, 2020 through April 2022. Sepulveda Canyon is the largest canyon system within the Machado Lake tributary area of City, and the second largest in the City as a whole. It extends from the top of the Palos Verdes Peninsula at the drainage divide between the Machado Lake and Santa Monica Bay watersheds, running northward to the City's northern boundary. Sepulveda Canyon consists of approximately 280 acres lying entirely within Rolling Hills with tributary land use representative of the City as a whole.

The continuous flow monitoring was conducted using an ultra-sonic sensor and data logger within a culvert at the Middleridge Road crossing (33.773522, -118.348538), which is an accessible location near the bottom of the canyon suitable for flow monitoring. No flow was recorded by the Sepulveda Canyon monitoring equipment during two complete wet seasons except for during one intense rain event that occurred from December 29 - 30, 2021. Monthly visual field inspections conducted between November 2020 and June 2021 confirmed the absence of flows and documented the site conditions during storm events. In Rolling Hills the 85th %, 24-hr rain event ranges from 1.0 - 1.1 inches, depending on location. From October 26, 2020, through April 30, 2022, there were four (4) rainfall events greater than or equal to (≧) the 85th%, 24-hr event with numerous lesser rainfall events occurring. No flow was measured at the Sepulveda Canyon monitoring station during three of the ≧85th%, 24-hr rain events which ranged from 1.13 to 1.38 inches of rainfall, nor was any flow measured during the smaller rain events. The fourth large rain event, which occurred from December 29-30, 2021, was more intense and more than twice the 85th% 24-hour storm depth; the LA County rain gauge at the Rolling Hills Fire Station recorded 2.36 inches in the 24-hour period from 10am on December 29th through 10am on December 30th, 2021, which was in excess of the 95%, 24-hour storm depth. In total, the Rolling Hills Fire Station rain gauge recorded more than 3 inches for that entire rain event which spanned 31 hours and produced flow at the Sepulveda Canyon monitoring station beginning approximately 14 hours after the rain event began. That rainfall event provides an estimate of the upper bound on the retentive capacity of runoff retention in Rolling Hills. The no-flow results observed during the three other ≧85th%, 24-hr rainfall events as well as the numerous smaller rainfall events that occurred throughout the monitoring period provide evidence that the strategies, control measures and BMPs implemented by Rolling Hills cumulatively retain stormwater runoff up to and including runoff from the 85th percentile, 24-hour storm event, as well as any conditionally exempt non-stormwater discharges.

4. REASONABLE ASSURANCE ANALYSIS

4.1. RAA SUMMARY

The MS4 Permit requires that a Reasonable Assurance Analysis (RAA) be conducted for the waterbody-pollutant combinations addressed by this EWMP for areas not addressed through retention of the 85%, 24-hr storm event. The RAA involves the identification and evaluation of potential BMP implementation scenarios with respect to the MS4 Permit-specified effluent and receiving water limits (RWLs) for the priority pollutants of concern for the Peninsula WMG. The RAA demonstrates achievement of these effluent and receiving water limits for each waterbody-pollutant combination addressed in this EWMP. As part of the Adaptive Management process as prescribed by the MS4 Permit, the RAA must be updated by June 30, 2021, and submitted for review and approval by the Regional Water Board Executive Officer.

Further refining the original RAA (2015), the revised RAA continues to conform to Permit requirements and the (2014) guidelines developed by the Regional Board. Per MS4 Permit provisions, the revised RAA incorporates recent monitoring data, project planning and implementation, and modeling advances. Additionally, the revised RAA addresses issues and comments raised by the State Water Resources Control Board (SWRCB, 2020), such as inclusion of relevant data for model calibration, non-structural Best Management Practices (BMP) credit, and application of the limiting pollutant approach.

The updated wet weather RAA was conducted using the Watershed Management Modeling System 2.0 (WMMS 2.0), the latest modeling tool developed by Los Angeles County Flood Control (LACFCD), to determine a cost-effective implementation strategy to meet applicable water quality standards (i.e. TMDL waste load allocations [WLA] and Basin Plan Objectives) and targets. For dry weather, a revised semi-quantitative approach was implemented to update the dry weather portion of the revised RAA.

The RAA process:

1. Applied an acceptable model tailored to the Peninsula WMG based on available outfall and receiving water data collected through June 2020.
2. Calculated target load reductions (TLRs) necessary to achieve applicable water quality targets.
3. Demonstrated that the existing and proposed suite of projects will attain the TLRs. Where this was not demonstrated, volumetric management needs have been documented to show what needs to be achieved in order to demonstrate compliance.

The final MS4 WLAs for total nitrogen and total phosphorus are expressed in the following two ways in the Machado Lake Nutrients TMDL:

- Monthly average WQBEL concentration.
- Annual average pollutant load calculated as the WQBEL concentration multiplied by the annual average inflow to the Machado Lake (8.45 HM3/year) apportioned to each WMA tributary to Machado Lake (directly or via Wilmington Drain). This method was initially established in the Los Angeles County Machado Lake Nutrient TMDL Special Study (LACDPW, 2011) following conditional approval of the work plan by LARWQCB (LARWQCB, 2010).

Of the two acceptable pathways to meet targets, the annual average pollutant load method was selected to determine the allowable load in subsequent TLR calculations.

The revised and updated Peninsula RAA therefore meets the objectives and requirements of the MS4 Permit and RAA Guidance Document, demonstrating that a reasonable assurance of compliance will be achieved in each analysis region if the TLRs are fully and appropriately managed.

Refer to the Reasonable Assurance Analyses provided in Appendix 4.1 for the rationale of the *Model Selection and Overview* and the *RAA Approach*. Refer to Appendix 4.2 for requirements for achieving RWLs for each pollutant category.

4.2. REASONABLE ASSURANCE ANALYSIS

The Reasonable Assurance Analysis for the Peninsula WMG is included in Appendix 4.1.

Table 4-1 summarizes the interim target load reductions (TLRs) established by the RAA, which yielded interim TLRs of zero for all analysis regions in the Machado Lake and Wilmington Drain WMAs. For the Santa Monica Bay and Los Angeles Harbor WMAs, no RAA is required to demonstrate compliance with the interim MS4 WLAs because receiving water monitoring demonstrates the pollutants are below the interim RWLs.

See **Table 4-2** for the final TLR summary. For the Santa Monica Bay WMA, no RAA is required to demonstrate compliance with the final MS4 WLA because receiving water monitoring shows the pollutants are meeting the RWLs.

For the non-zero TLRs in the Machado Lake WMA, all the TLR-equivalent 24-hour management volumes are less than the 85th percentile, 24-hour design storm runoff volume. As a result, the recommended approach is to meet the final TLRs rather than trying to meet the full 85th percentile, 24-hour design storm runoff capture alternative. For the Machado Lake analysis region, the largest 24-hour management volume was selected as the target compliance metric, since management of the largest volume will result in management of all others. For the Wilmington Drain WMA, since bacteria was not modeled and 85th percentile 24-hour design storm capture projects are planned for both tributary analysis regions, the full 85th percentile, 24-hour runoff volume is shown as the compliance volume.

For analysis regions in the Los Angeles Harbor WMA, the 85th percentile 24-hour design storm runoff volume of each analysis region is less than the maximum TLR-equivalent 24-hour runoff management volumes in that analysis region. Therefore, the recommended approach is to meet the full 85th percentile 24-hour runoff capture alternative.

Table 4-3 summarizes the results of the Peninsula EWMP RAA for all analysis regions and shows that the TLRs will be met through a combination of LID, Regional and Distributed BMPs. More details on the completed, planned, proposed and potential BMPs to be implemented to meet these TLRs is provided in Section 3.

Table 4-21: Interim Wet Weather Target Load Reduction Summary

WMA	Analysis Region	Pollutant	Critical Condition	Baseline Load		Allowable Interim Load		Interim Target Load Reduction			TLR Equivalent 24-Hour Management Volume (ac-ft)
								Absolute		% of Baseline Load	
Machado Lake	ML-1	Total Nitrogen	Average Runoff Year	Final TLR = 0%, hence RAA achieved							
		Total Phosphorus	Average Runoff Year	38.4	lb/yr	475	lb/yr	0	lb/yr	0%	0.0
Machado Lake - Wilmington Drain	WD-1	Total Nitrogen	Average Runoff Year	Final TLR = 0%, hence RAA achieved							
		Total Phosphorus	Average Runoff Year	346	lb/yr	3,731	lb/yr	0	lb/yr	0%	0.0
	WD - Solano	Total Nitrogen	Average Runoff Year	Final TLR = 0%, hence RAA achieved							
		Total Phosphorus	Average Runoff Year	Final TLR = 0%, hence RAA achieved							
Los Angeles Harbor	LAH - IH	Total Copper Total Lead Total Zinc DDx (Total) Total PCBs Total PAHs	Receiving water monitoring shows all interim RWLs have been met. Hence no RAA needed.								
	LAH-CM	Total Copper Total Lead Total Zinc DDx (Total) Total PCBs Total PAHs	Receiving water monitoring shows all interim RWLs have been met. Hence no RAA needed.								
Santa Monica Bay	SMB	DDx (Total) Total PCBs	Receiving water monitoring shows all RWLs have been met. Hence no RAA needed.								
	SMBBB	Total Coliform Fecal Coliform Enterococci	Receiving water monitoring shows all RWLs have been met. Hence no RAA needed.								

Table 4-22: Final Wet Weather Target Load Reduction Summary

Subwatershed	Analysis Region	Pollutant	Critical Condition	Baseline Load		Final Target Load Reduction			
						Absolute		% of Baseline Load	TLR Equivalent 24-Hour Management Volume (ac-ft)
Machado Lake	ML-1	Total PCBs	Average Water Year	7.5E-04	lb/yr	0	lb/yr	0%	0.0
		DDx (Total)	Average Water Year	1.0E-03	lb/yr	9.0E-04	lb/yr	88%	1.3
		DDT (All congeners)	Average Water Year	1.2E-05	lb/yr	0	lb/yr	0%	0.0
		DDE (All congeners)	Average Water Year	6.4E-04	lb/yr	5.7E-04	lb/yr	89%	**1.3**[1]
		DDD (All congeners)	Average Water Year	6.3E-04	lb/yr	5.2E-04	lb/yr	82%	1.1
		Total Chlordane	Average Water Year	2.1E-04	lb/yr	1.3E-04	lb/yr	64%	0.7
		Dieldrin	Average Water Year	1.2E-05	lb/yr	0	lb/yr	0%	0.0
		Total Nitrogen	Average Water Year	119	lb/yr	0	lb/yr	0%	0.0
		Total Phosphorus	Average Water Year	38.4	lb/yr	0.4	lb/yr	1%	0.1
		n/a	85th Percentile 24-Hour Storm	1.6	ac-ft	1.6	ac-ft	100%	1.6
Machado Lake - Wilmington Drain	WD-1	Total PCBs	Average Water Year	3.6E-03	lb/yr	0	lb/yr	0%	0.0
		DDx (Total)	Average Water Year	4.9E-03	lb/yr	4.3E-03	lb/yr	88%	7.4
		DDT (All congeners)	Average Water Year	6.0E-05	lb/yr	0.0E+00	lb/yr	0%	0.0
		DDE (All congeners)	Average Water Year	3.1E-03	lb/yr	2.7E-03	lb/yr	89%	7.4
		DDD (All congeners)	Average Water Year	3.1E-03	lb/yr	2.5E-03	lb/yr	82%	6.2
		Total Chlordane	Average Water Year	9.9E-04	lb/yr	6.3E-04	lb/yr	64%	4.2
		Dieldrin	Average Water Year	5.6E-05	lb/yr	0	lb/yr	0%	0.0
		Total Nitrogen	Average Water Year	1510	lb/yr	0	lb/yr	0%	0.0
		Total Phosphorus	Average Water Year	346	lb/yr	47.2	lb/yr	14%	0.6
		Bacteria (*E. coli*)	90th Percentile Wet Year	8.3	10^{12} MPN/yr	4.2	10^{12} MPN/yr	51%	6.0
		n/a	85th Percentile 24-Hour Storm	8.01	ac-ft	8.01	ac-ft	100%	**8.0**[1]
	WD-Solano	Total PCBs	Average Water Year	2.07E-04	lb/yr	0	lb/yr	0%	0.0
		DDx (Total)	Average Water Year	2.84E-04	lb/yr	2.5E-04	lb/yr	88%	0.5
		DDT (All congeners)	Average Water Year	3.47E-06	lb/yr	0	lb/yr	0%	0.0
		DDE (all congeners)	Average Water Year	1.77E-04	lb/yr	1.6E-04	lb/yr	89%	0.5
		DDD (All congeners)	Average Water Year	1.76E-04	lb/yr	1.4E-04	lb/yr	82%	0.4

Subwatershed	Analysis Region	Pollutant	Critical Condition	Baseline Load		Final Target Load Reduction			
						Absolute		% of Baseline Load	TLR Equivalent 24-Hour Management Volume (ac-ft)
		Total Chlordane	Average Water Year	5.72E-05	lb/yr	3.6E-05	lb/yr	64%	0.3
		Dieldrin	Average Water Year	3.21E-06	lb/yr	0	lb/yr	0%	0.0
		Total Nitrogen	Average Water Year	42	lb/yr	0	lb/yr	0%	0.0
		Total Phosphorus	Average Water Year	9	lb/yr	0	lb/yr	0%	0.0
		Bacteria (*E. coli*)	90th Percentile Water Year	0.46	10^{12} MPN/yr	0.23	10^{12} MPN/yr	50%	0.5
		n/a	85th Percentile 24-Hour Storm	0.57	ac-ft	0.57	ac-ft	100%	**0.6**[1]
Los Angeles Harbor	LAH - IH	Total Copper	Average Water Year	8.1	lb/yr	4.5	lb/yr	55%	2.2[2]
		Total Lead	Average Water Year	1.7	lb/yr	0	lb/yr	0%	0.0
		Total Zinc	Average Water Year	33.5	lb/yr	17.4	lb/yr	52%	2.0
		4,4'-DDT	Average Water Year	1.3E-05	lb/yr	0	lb/yr	0%	0.0
		DDx (Total)	Average Water Year	4.7E-03	lb/yr	4.6E-03	lb/yr	96%	10.4
		Total PCBs	Average Water Year	3.5E-03	lb/yr	1.0E-03	lb/yr	30%	0.9
		Total PAHs	Average Water Year	4.4E-01	lb/yr	9.8E-03	lb/yr	2%	0.1
		n/a	85th Percentile 24-Hour Storm	5.4	ac-ft	5.4	ac-ft	100%	**5.4**[1]
	LAH-CM	Total Copper	Average Water Year	1.8	lb/yr	0.87	lb/yr	49%	0.5[2]
		Total Lead	Average Water Year	0.4	lb/yr	0	lb/yr	0%	0.0
		Total Zinc	Average Water Year	8.2	lb/yr	4.1	lb/yr	50%	0.5
		4,4'-DDT	Average Water Year	3.3E-06	lb/yr	0	lb/yr	0%	0.0
		DDx (Total)	Average Water Year	1.2E-03	lb/yr	1.2E-03	lb/yr	96%	2.8
		Total PCBs	Average Water Year	8.8E-04	lb/yr	2.6E-04	lb/yr	30%	0.3
		Total PAHs	Average Water Year	1.1E-01	lb/yr	2.5E-03	lb/yr	2%	0.1
		n/a	85th Percentile 24-Hour Storm	1.5	ac-ft	1.5	ac-ft	100%	**1.5**[1]

[1] Bold value is the representative 24-hour management runoff volume for each analysis region. For WD-1 and WD-Solano, the 85th percentile, 24-hour storm volume is selected since bacteria was not modeled.

[2] TLR for Total Copper does not account for expected reductions over time due to copper brake pad phase-outs in California. See Appendix 4.1 RAA Section 8.2.1.

Table 4-23: Peninsula EWMP RAA Summary

Analysis Region	Management Volume	Final Target Load Reduction			BMP Load Reduction Summary												
					LID Redevelopment			Regional Projects[2]			Distributed Projects			Total Load Reduction			Assurance Achieved?
		Absolute		%	Absolute		%	Absolute		%	Absolute		%	Absolute		%	
ML-1	24-Hour[1]	1.3[3]	ac-ft	100	0.003	ac-ft	0.2	1.25	ac-ft	96	0.04	ac-ft	0.4	1.3	ac-ft	100	Yes
WD-1	85%, 24-Hour	8.0[3]	ac-ft	100	0.02	ac-ft	0.6	8.0	ac-ft	100	0	ac-ft	0	8.0	ac-ft	100	Yes
WD-Solano	85%, 24-Hour	0.6[3]	ac-ft	100	<0.01	ac-ft	0.5	0.6[4]	ac-ft	100	0	ac-ft	0	0.6	ac-ft	100	Yes
LAH-IH	85%, 24-Hour	5.4[3]	ac-ft	100	0.03	ac-ft	0.6	5.4	ac-ft	100	0	ac-ft	0	5.4	ac-ft	100	Yes
LAH-CM	85%, 24-Hour	1.5[3]	ac-ft	100	<0.01	ac-ft	0.5	1.5	ac-ft	100	0	ac-ft	0	1.5	ac-ft	100	Yes

[1] The 24-hour management volume is the equivalent runoff management volume that will achieve all TLRs. It does not necessarily equate to BMP capacity. A project located at analysis region outlet may have more 24-hour management capacity than a project with same BMP capacity but is located further upstream in the analysis region. The 24-hour management volume of a project needs to be computed via a continuous modeling simulation using the calibrated Peninsula EWMP WMMS 2 model.

[2] Regional projects include existing and proposed projects discussed in Section 3 of the EWMP and modeled in the RAA.

[3] Please see the Appendix 4.1 RAA Section 7.6 and Table 11 on how the representative 24-hour management volume was selected for each analysis region.

[4] Includes the Walteria Basin Special Study for analysis region WD-Solano. It is assumed that the Peninsula WMG will continue working with LACFCD and City of Torrance to assess how the Walteria Basin can be utilized as part of a regional stormwater capture project in conjunction with other regional projects in the Wilmington subwatershed to meet TLRs in the WD-Solano analysis region.

5. IMPLEMENTATION SCHEDULE

This Chapter provides the implementation schedule for the Peninsula EWMP. The implementation schedule will be used to measure progress toward addressing the highest water quality priorities (WQPs) and achieving final water quality-based effluent limitations (WQBELs) and receiving water limitations (RWLs). As noted in Chapter 4 and Appendix 4.1 Reasonable Assurance Analysis (RAA), interim WQBELs have been met for all water body pollutant combinations (WBPCs).

5.1. INTRODUCTION

Provisions of the MS4 Permit describe how receiving water limits (RWLs) goals are to be attained for various WBPCs identified through adaptive management of the EWMP. Specifically, the following categories of WBPCs are to be addressed by the EWMP:

- WBPCs addressed through a TMDL (Category 1 pollutants)
- 303(d)-listed WBPCs (Category 2 Pollutants)
  - Pollutants in the same class as those identified in a TMDL and for which the waterbody is 303(d)-listed
  - Pollutants not in the same class as those identified in a TMDL, but for which the waterbody is 303(d)-listed
- Non 303(d)-listed WBPCs (Category 3 pollutants)
  - Pollutants for which there are exceedances of RWLs, but for which the waterbody is not 303(d)-listed

Refer to Section 2 for the priority pollutant categorization for the Peninsula EWMP.

5.2. SCHEDULES

Per Permit provisions, TMDL schedules must be incorporated into the EWMP to demonstrate that watershed control measures (WCMs) selected during EWMP development will adequately address these WBPCs in a timely manner so that MS4 discharges of the pollutants will not cause or contribute to exceedances of RWLs.

This updated EWMP incorporates TMDL schedules outlined in the Permit and, where necessary, interim milestones and dates for their achievement during the next five-year Permit term. These schedules will be used to measure progress towards addressing the highest water quality priorities and achieving applicable WQBELS and/or RWLs.

These schedules will meet the following criteria:

- Schedules must be adequate for measuring progress on a watershed or subwatershed scale.
- Schedules must be developed for all WCMs that will be implemented individually and on a watershed scale.

Schedules must also incorporate the following:

- Applicable interim and/or final TMDL deadlines occurring within the Permit term identified in Permit.
- Interim milestones and dates for their achievement within the Permit term must be developed for any applicable TMDL(s) where deadlines within the next 5-year Permit term are not otherwise specified.
- Interim milestones and dates for their achievement within the Permit term must be developed for Water Quality Priorities not addressed through a TMDL (Category 2 and 3 WBPCs) based on the following criteria:
    - Milestones must be based on measurable criteria or indicators, to be achieved in the receiving waters and/or MS4 discharges,
    - A schedule with dates for achieving the milestones must be developed, and
    - A final date for achieving the receiving water limitations as soon as possible must be determined.

The Peninsula WMG has identified Category 1 and 2 WBPCs as summarized in Table 2-1.

Table 5-1 below outlines the dates and corresponding water quality objectives to be achieved by the Peninsula EWMP.

5.2.1. NONSTRUCTURAL BEST MANAGEMENT PRACTICES SCHEDULE

The RAA does not assume or separately quantify a load reduction for the implementation of nonstructural BMPs. Rather, because recent monitoring data was used during calibration, it was assumed that the calibrated baseline model effectively accounted for the load reduction accomplished by existing non-structural BMPs already being implemented in the Peninsula EWMP area. These nonstructural BMPs consist of Minimum Control Measures (MCMs), Nonstormwater Discharge (NSWD) Measures and Nonstructural Targeted Control Measures (TCMs) as described in Chapter 3 and Appendix 3.1.

In accordance with the State Board Order (SWRCB, 2020), all non-structural BMP credits are required to be adequately justified. As such, the RAA has calculated load reductions associated with quantifiable non-structural BMPs (for copper reductions resulting from phase out of copper in brake pads).

In 2010, California Senate Bill 346 (SB 346) was enacted to eliminate nearly all use of copper in brake pad manufacturing. In 2013, TDC Environmental prepared a draft detailed study for the California Stormwater Quality Association (CASQA) describing the expected percent reduction for copper as a result of the passage of SB 346 (TDC Environmental, 2013). The TDC study identified three possible implementation scenarios, the least aggressive of which estimated that a 52% load reduction in copper will be achieved by 2032 due to the brake pad phase-out.

Although there is an expectation that copper loads in urban runoff will decrease over time as a result of SB 346, the updated RAA did not attempt to take credit for this load reduction at this time. Following the collection of additional watershed-specific water quality data in the future, adaptive management may be utilized by the Peninsula WMG to update the TLR for copper and/or the load reductions expected to be achieved by this source control program.

5.2.2. STRUCTURAL BEST MANAGEMENT PRACTICE SCHEDULE

STRUCTURAL MINIMUM CONTROL MEASURE SCHEDULE

Pollutant load reductions are anticipated through each Participating Agency's effective implementation of the structural LID BMP requirements of the Planning and Land Development Program.

STRUCTURAL TARGETED CONTROL MEASURE SCHEDULE

The RAA (Chapter 4) and Appendix 4 RAA Report demonstrates the cumulative effectiveness of BMPs to be implemented, supports BMP selection, and provides target load reduction (TLR) goals optimized across the entire watershed.

The plan depicted in the RAA is considered a potential scenario. Through the adaptive management process, the Participating Agencies may select different types and/or locations of BMPs as described in Chapter 3. The proposed implementation schedule for the projects needed to meet the 24-hour management volumes identified in the RAA can be found in **Table 5-1.** In addition to the projects listed in **Table 5-1** and shown in **Figure 5-1, Figure 5-2,** and **Figure 5-3**, the Peninsula WMG is also collaboratively identifying and seeking funding for other regional projects. The Peninsula WMG agencies draining to modeled projects are listed in **Figure 5-1**, **Figure 5-2**, and **Figure 5-3**. These agencies would be responsible for the development of the modeled projects.

In the WD-1 analysis region, the Torrance Airport Project as proposed will meet the 85%, 24-hour management volume required to meet final target load reductions. The Rolling Hills Road

Street Improvement/Green Street project is a proposed project that will only be relied upon if the Torrance Airport Stormwater Basin Project does not proceed as planned.

In the Machado Lake ML-1 analysis region, the City of Rolling Hills Estates intends to meet its 24-hour management volume via the ML-1 RHE Project, and the Palos Verdes Drive East Street Improvement/Green Street will only be relied upon if it is integrated into the ML-1 RHE Project.

These projects listed below were not modeled in the RAA due to uncertainty of their feasibility, future design, and performance:

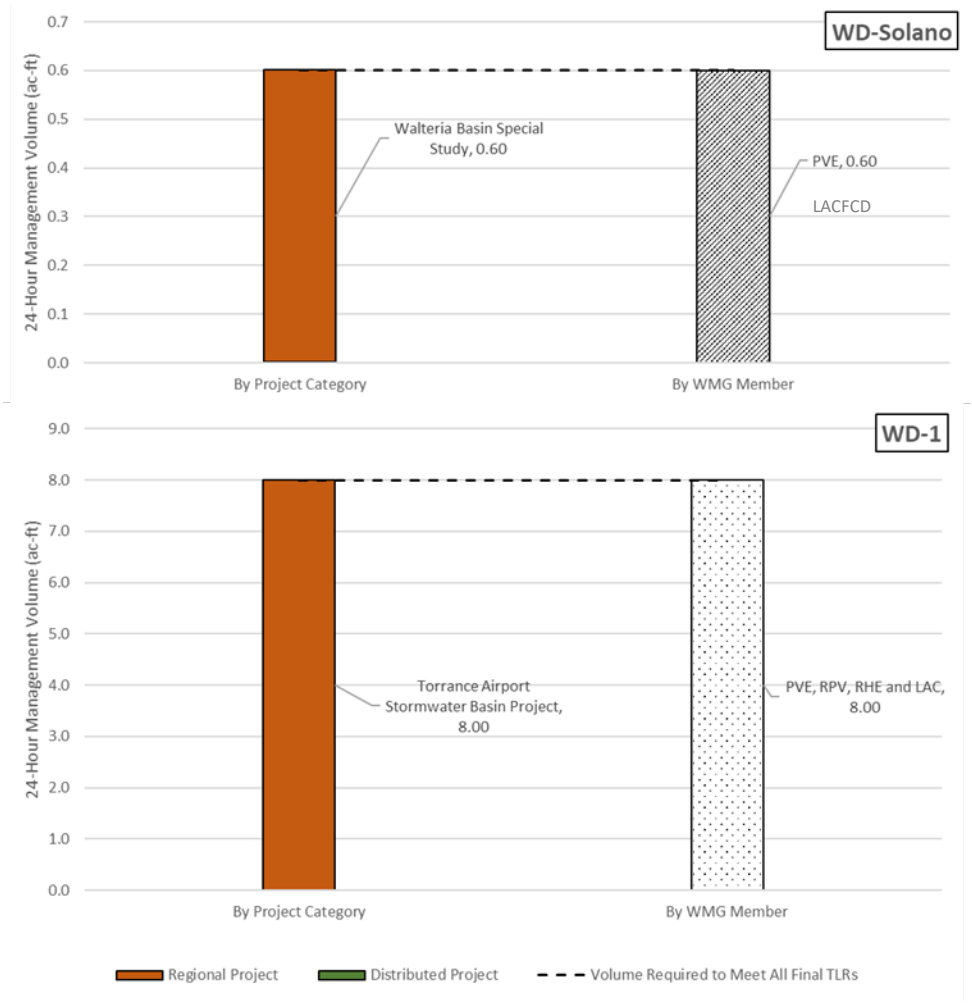
- **Walteria Basin Special Study**: Walteria Basin is a flood control basin that receives runoff from 174 acres of drainage area (which includes 55 acres of impervious area) from Palos Verdes Estates in analysis region WD-Solano. The Peninsula WMG will continue working with LACFCD and the City of Torrance to assess how the Walteria Basin can be utilized as part of a regional system of stormwater capture project in the Machado Lake watershed to meet TLRs in the WD-Solano analysis region.
- **Palos Verdes Multi-Benefit Flow Diversion Project**. This project is currently proposed as a dry weather flow management project within analysis region WD-1. The Peninsula WMG submitted this project for FY 21-22 SCW Technical Resources Program funding and it has been approved by the South Santa Monica Bay Watershed Area for inclusion in its FY 21-22 Stormwater Investment Plan being forwarded to the Regional Oversight Committee and Los Angeles County Board of Supervisors for final technical resources funding approval. A wet weather flow management component will be further evaluated if additional wet weather projects are required to meet the final TLR through the Peninsula EWMP adaptive management process.
- **Harbor City Park Stormwater Capture Project**. This project is a signature regional project proposed by the Dominguez Channel WMG. It is hydrologically connected to the Torrance Airport Stormwater Capture Project and can potentially capture and treat excess stormwater runoff from analysis region WD-1. The project was approved for SCW Technical Resources Program FY 20-21 funding. The Peninsula WMG is interested in collaborating with the Dominguez Channel WMG to share in the benefits of reduced load if additional wet weather projects are required to meet the final TLR through the Peninsula EWMP adaptive management process.

Enhanced Watershed Management Program

Table 5-24: Structural TCM Implementation Schedule

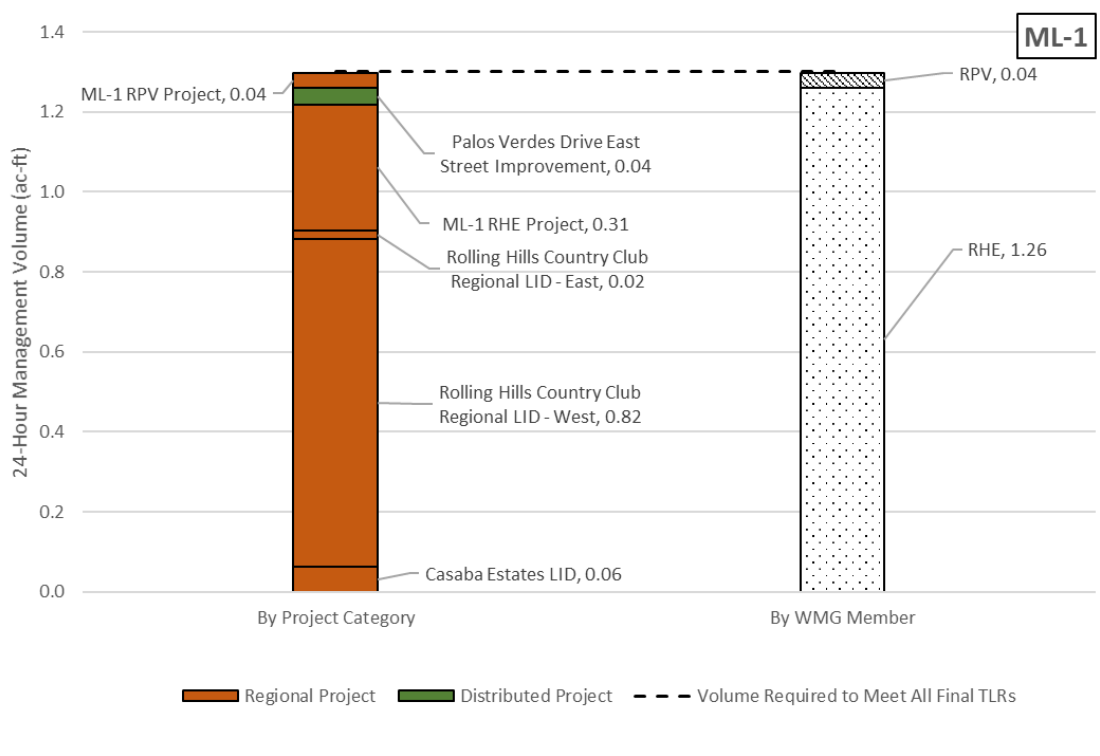
Subwatershed	Analysis Region	Project Name	Responsible WMG Member	Estimated Schedule			Modeled 24-Hour Management Volume (ac-ft)	Final TLR Equivalent 24-Hour Management Volume (ac-ft)	Targeted Milestone
				Site Investigation and Feasibility Study	Design and Permitting	Construction/ Implementation			
Machado Lake - Wilmington	WD-1	Torrance Airport Stormwater Basin Project Phase II	RPV, RHE, PVE, LA County, and TOR[a]	Completed in 2019	Completed in 2019	Completion Date: 2027	7.4	8.0	• Machado Lake Nutrient TMDL Final Deadline Date: (September 11, 2018) • Machado Lake Pesticides and PCBs TMDL Final Deadline Date: (September 30, 2019)
	WD-Solano	WD-Solano PVE Project/Study	PVE, LACFCD	Completion Date: 2024	TBD	Completion Date: 2027	0.57	0.6	
Machado Lake	ML-1	Casaba Estates LID	RHE	Project completed in 2013			0.06	1.3	
		Rolling Hills Country Club Regional LID Project – West	RHE	Project completed in 2018			0.82		
		Rolling Hills Country Club Regional LID Project – East	RHE	Project completed in 2018			0.02		
		ML-1 RHE Project (may replace PVDE Green Street Improvement)	RHE	Completion Date: 2024	Completion Date: 2025	Completion Date: 2027	0.35		
		ML-1 RPV Project	RPV	Completion Date: 2024	Completion Date: 2025	Completion Date: 2027	0.04		
LA Harbor	LAH - IH	Eastview Park Regional Project	RPV	Completion Date: 2022	Completion Date: 2025	Completion Date: 2030	1.16	5.38	Long Beach and Greater LA Harbor Toxics TMDL Final Deadline Date: (March 23, 2032)
	LAH-IH (cont.)	LAH-IH RPV Project	RPV	Completion Date: 2024	Completion Date: 2027	Completion Date: 2032	3.42		
		LAH-IH RHE Project	RHE	Completion Date: 2025	Completion Date: 2028	Completion Date: 2030	0.80		
	LAH-CM	LAH-CM RPV Project	RPV	Completion Date: 2024	Completion Date: 2026	Completion Date: 2032	1.51	1.51	

[a] The Torrance Airport Stormwater Basin Project is a collaborative effort with the City of Torrance.



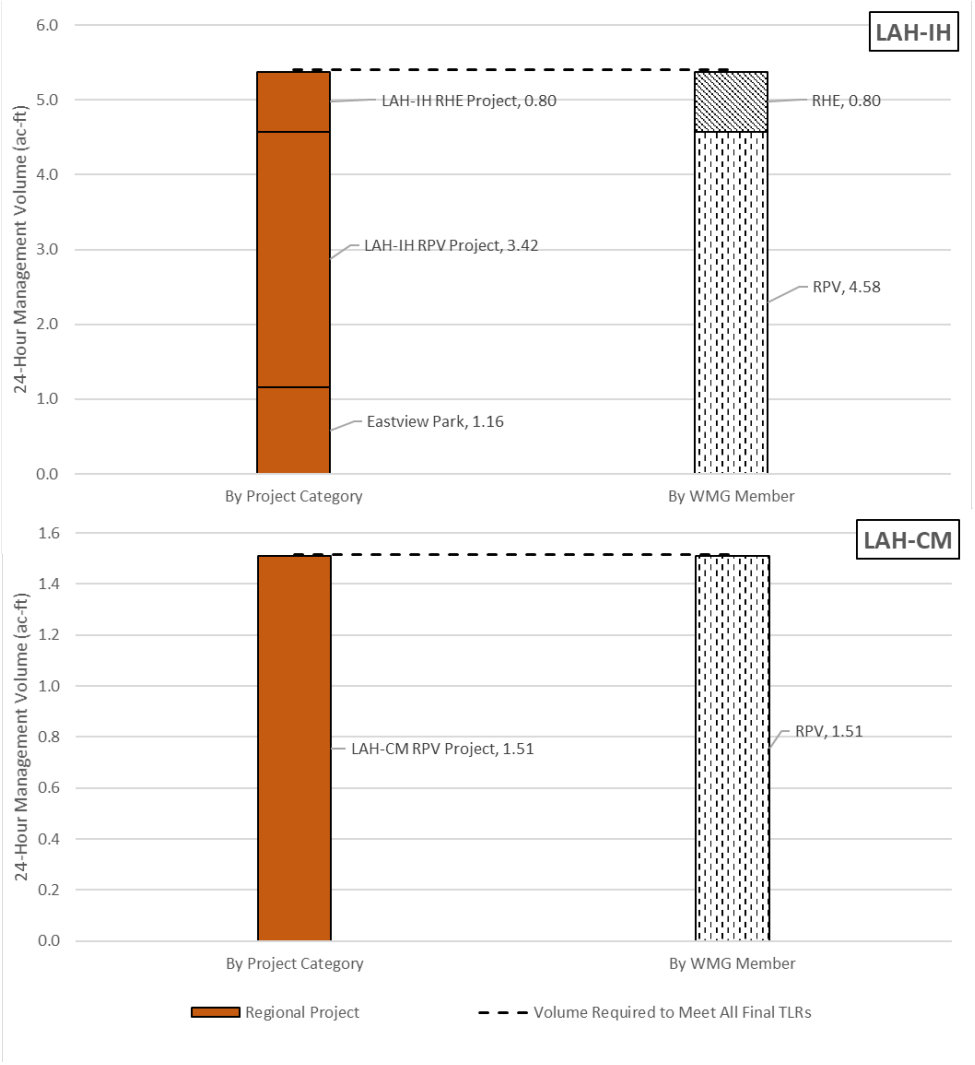
Note:
PVE = Palos Verdes Estates; RPV =Rancho Palos Verdes; RHE = Rolling Hills Estates. LAC = Unincorporated Los Angeles County
Due to comparatively low volumes, LID redevelopment distributed projects are not shown in the figure

Figure 5-14: 24-Hour Management Volume Breakdown in Wilmington Drain WMA (WD-1 and WD-Solano)



Note:
RPV = Rancho Palos Verdes; RHE = Rolling Hill Estates
Due to comparatively low volumes, LID redevelopment is not shown in the figure

Figure 5-15: 24-Hour Management Volume Breakdown in Machado Lake WMA (ML-1)



Note: RPV = Rancho Palos Verdes; RHE = Rolling Hill Estates

Due to comparatively low volumes, LID redevelopment is not shown in the figure

Figure 5-16: 24-Hour Management Volume Breakdown in Los Angeles Harbor WMA

6. EWMP IMPLEMENTATION COSTS AND FINANCIAL STRATEGY

The purpose of this section is to present the financial strategy and to represent the strategic options available to the permittees for financing the program costs associated with this updated EWMP. This section provides an order-of-magnitude estimate of the financial resources and an outline for the financial strategy associated with those costs that may be required to attain the goals of the EWMP. The financial strategy is defined as the options available to the Peninsula WMG to finance the EWMP implementation, including a prioritization of these options.

6.1. EWMP IMPLEMENTATION COSTS

Planning-level estimates of costs associated with implementation of the proposed structural BMPs within the Peninsula WMG area are provided herein based on results from the RAA (Section 4). This section includes an evaluation of the overall economic impacts the proposed projects and programs may have on the community. The cost estimates are preliminary and are based on the best available information to date. The estimated costs will be refined as EWMP implementation progresses with the use of actual BMP implementation costs. Costs associated with implementation of non-structural programs are not provided herein.

Cost opinions are presented as an aid for decision makers, and contain considerable uncertainties. Given the iterative and adaptive nature of the EWMP and the many variables associated with the projects, the budget forecasts are order-of magnitude estimates, and are subject to change based on BMP effectiveness assessments, results of outfall and receiving water monitoring, and additional studies such as site specific objectives which could modify water quality objectives for a specific water body-pollutant combination.

6.1.1. METHODOLOGY

Costs estimated for structural BMPs include capital as well as “soft” costs, which include considerations such as contingency and permitting.

The capital, operation and maintenance (O&M) and 20-year life-cycle costs of the proposed projects were estimated using the following information and cost functions:

- For the Torrance Airport Stormwater Capture Project, the presented costs were extracted from the Safe Clean Water Program Feasibility Study submitted in October 2020 (City of Torrance, 2020).
- The cost of the remaining projects was estimated based on key modeling parameters using the cost functions presented in the WMMS 2.0 Phase II Report (LACFCD, 2020c). The cost functions are summarized in **Table 6-1**.

Table 6-25: WMMS 2.0 Cost Function

BMP Type	BMP Component	Capital Cost[1]	Annual O&M Cost[1]	Life Cycle Cost[1]
Pervious Pavement		$253(A)	$5.1 (A)	$253(A) + $5.1(A) (Yr)
Subsurface Retention + Infiltration	Diversion	$7,000(In)	$320(In)	[$7000 + $12,000](A) + $12.6(Vf) + $6,000(Yr) + $320 (In)(Yr)
	Pretreatment	$12,000(In)		
	Storage	$12.6(V)	$6,000	
Subsurface Retention + Filtration	Diversion	$7,000(In)	$320(In)	[$7000 + $12,000](A) + $12.6(Vf) + $6,000(Yr) + $320 (In)(Yr) + [$177,000 +$70,000](Eff) + [$1,000 + $3,000](Eff)*(Yr)
	Pretreatment	$12,000(In)		
	Storage	$12.6(V)	$6,000	
	Pump	$177,000(Eff)	$3,000(Eff)	
	Filtration	$70,000(Eff)	$1.000(Eff)	
Subsurface Retention + Diversion to Sewer	Diversion	$7,000(In)	$320(In)	[$7000 + $12,000](In) + $12.6(Vf) + $6,000(Yr) + $320 (In)(Yr) + $177,000(Ps) + $3,000(Ps)(Yr)
	Pretreatment	$12,000(In)		
	Storage	$12.6(V)	$6,000	
	Pump	$177,000(Ps)	$3,000(Ps)	
	Sewer Diversion		$67,000	

[1] A – BMP footprint in ft^2; Eff – Treatment rate in cfs ; In – Inflow rate in cfs; Ps – Sewer diversion rate in cfs; Vf – BMP storage capacity in ft^3;

Soft costs are project costs that cannot be calculated on a unit cost basis. For conceptual cost estimating, these costs are generally calculated as a percentage of total capital costs.

The soft costs considered for each BMP were:

- ***Contingency*** – Costs intended to compensate for any estimating inaccuracy based on assumptions or measured values, unanticipated market conditions, scheduling delays and acceleration issues, lack of bidding competition, and subcontractor defaults.
- ***Construction Management*** – The costs associated with management and oversight of the construction of the BMP, from project initiation until completion of the contract.
- ***Mobilization and Demobilization*** – The costs associated with activation/deactivation of equipment and manpower resources for transfer to/from a construction site until completion of the contract.
- ***Permitting*** – Cost, including permit fees and personnel hours, of obtaining required permits for BMP installation. Examples of permits needed may include erosion and sediment control, stormwater, construction, and public space permits.
- ***Engineering and Planning*** – Costs associated with BMP and site design, as well as access for maintenance, environmental mitigation, buried objects, safety/security, traffic control, limited space, and site restoration.

The expected costs for each of these soft costs as percent of total project capital costs are presented in **Table 6-2**. These percentages were based on literature, best professional judgment, and data from past projects.

Table 6-26: Range of Soft Costs for Regional Projects

Cost Item	Low Cost Assumption (% of Capital Cost)	High Cost Assumption (% of Capital Cost)
Contingency	10%	20%
Construction Management	8%	15%
Mobilization and Demobilization	3%	5%
Permitting	3%	5%
Engineering and Planning	10%	20%
Total	38%	50%

6.2. SUMMARY OF COSTS

The Reasonable Assurance Analysis (RAA) for the Peninsula EWMP indicates that the 24-hour management volume of runoff and stormwater required to be captured within the Watershed to comply with RWLs and WQBELs is: 1.3 acre-ft for the Machado Lake WMA, 0.5 for the Wilmington Drain – Solano WMA, 7.4 acre-ft for the Wilmington Drain WMA, 5.4 acre-ft for Los Angeles Harbor – Inner Harbor WMA, and 1.5 acre-ft for the Los Angeles Harbor – Cabrillo Marina WMA.

Table 6-3 presents the estimated capital cost to construct or implement each modeled structural BMP and the associated annual O&M costs. The cost summary does not include already-completed regional projects (Casaba Estates LID and Rolling Hills Country Club LID) or projects that are not included in the RAA (Harbor City Park Stormwater Capture Project). The cost of the Palos Verdes Peninsula Multi-benefit Flow Diversion Project will be determined as part of the Project's Safe, Clean Water Program Feasibility Study.

Table 6-27: Estimated Capital and O&M Costs for Regional BMPs

Analysis Region	Lead Agency	Project	Capital	Annual O&M Cost	20-Year Life Cycle Cost
ML-1	Rolling Hills Estates	Palos Verdes Drive East Street Improvement	$2,859,000	$58,000	$4,012,000
ML-1	Rolling Hills Estates	ML-1 RHE Regional Project	$254,000	$40,000	$1,060,000
ML-1	Rancho Palos Verdes	ML-1 RPV Regional Project	$30,000	$40,000	$821,000
WD-1	Rancho Palos Verdes and Torrance	Torrance Airport Stormwater Basin Project Phase 2	$12,000,000	$118,000	$13,700,000
WD-1	Rolling Hills Estates	Rolling Hills Road Street Improvement	$481,000	$10,000	$675,000
LAH-IH	Rancho Palos Verdes	Eastview Park	$781,000	$42,000	$1,619,000
LAH-IH	Rolling Hills Estates	LAH-IH RHE Regional Project	$2,308,000	$47,000	$3,241,000
LAH-IH	Rancho Palos Verdes	LAH-IH RPV Regional Project	$540,000	$41,000	$1,363,000
LAH-CM	Rancho Palos Verdes	LAH-CM RPV Regional Project	$913,000	$9,000	$968,000

6.3. FINANCIAL STRATEGY

6.3.1. SUMMARY

Financing the implementation of the Peninsula EWMP has historically been the greatest challenge confronting the Peninsula WMG. In the absence of stormwater utility fees (aside from those specified for maintenance), the Peninsula WMG had no dedicated revenue stream to pay for implementation of the EWMP. The absence of a stable stormwater funding mechanism not tied to municipal General Funds became ever more critical with the approval of the fourth term MS4 Permit, which greatly magnified the cost challenges associated with managing stormwater. This prompted the City Manager Committees of the California Contract Cities Association and the League of California Cities, Los Angeles Division, to form a City Managers' Working Group (Working Group) to review stormwater funding options after the Clean Water, Clean Beaches funding initiative that was proposed by LA County failed to move forward. The result was a Stormwater Funding Report that noted, "the Los Angeles region faces critical, very costly, and seriously underfunded stormwater and urban runoff water quality challenges." The Report found that funding stormwater programs is so complex and dynamic, and that the water quality improvement measures are so costly, that Permittees could not depend on a single funding option at the time. The Report also included a variety of recommendations, including organizational recommendations; education and outreach program recommendations; recommendations for legislation; Clean Water, Clean Beaches recommendations; local funding options; and recommendations for the Regional Water Board[89]. The Watershed Group carefully considered the recommendations of the Report during the development of the original financial strategy for the EWMP, and placed focus on the local funding options presented in the Report to secure the needed funding for initial implementation of the EWMP.

The challenges associated with financing the implementation of the EWMP have since been partially addressed and ameliorated with the passage of Measure W, which was approved by voters in Los Angeles County with 69.45% of the vote in the general election held on November 6, 2018. Measure W successfully proposed the implementation of a special parcel tax of 2.5 cents per square foot of impermeable area to be included on property tax bills in Los Angeles County beginning in October 2019. As presented on the ballot, funds generated through Measure W are to be utilized for "improving/protecting water quality; capturing rain/stormwater to increase safe drinking water supplies and prepare for future drought; protecting public health and marine life by reducing pollution, trash, toxins/plastics entering Los Angeles County waterways/bays/beaches." The special parcel tax is initially anticipated to amount to an annual, county-wide commitment of up to $285 million, though this could decrease slightly over time as exemptions and credits are processed.

The passage of Measure W also created the Safe Clean Water Program (SCWP), which is administered by the County of Los Angeles and is designed to provide local, dedicated funding for stormwater and urban runoff management programs and projects. Total revenue will be distributed per the following breakdown: 10% will be allocated to the District Program (for the Los Angeles County Flood Control District to distribute funds, provide staff support, and oversee capacity building programs), 40% to the Municipal Program, and 50% to the Regional Program.

The Municipal Program will provide cities with direct funding proportional to the revenues generated within their boundaries. The Peninsula WMG may utilize these funds to finance the implementation of the EWMP, including public LID projects and many of the other WCMs outlined in Section 3.

[89] League of California Cities. (2014). Providing Sustainable Water Quality Funding in Los Angeles County. Prepared By City Managers Working Group. Los Angeles County Division May 21, 2014.

The Regional Program will allocate funds through nine Watershed Area Steering Committees (WASCs) into the competitive Infrastructure, Technical Resources, and Scientific Studies Programs. Respectively, the Infrastructure Program will provide funding for multi-benefit regional projects including design, permits, CEQA compliance, grant-writing, right-of-way and land acquisition, construction, and long-term operations and maintenance of projects; the Technical Resources Program will provide funding for the development of project feasibility studies; and the Scientific Studies Program will provide funding for scientific studies, technical studies, monitoring, modeling, and other similar activities. The Peninsula WMG falls under the jurisdiction of the South Santa Monica Bay WASC.

With the implementation of the SCWP underway, the Peninsula WMG now have a reasonably dependable revenue stream to offset, albeit only partially, the high costs of the multi-faceted strategy for the selection and implementation of WCMs outlined in Section 3. The Peninsula WMG has coordinated the proposed implementation schedule (outlined in Section 5) with the financial strategy outlined in this chapter. However, uncertainties associated with future risks persist. For instance, there are multiple TMDLs in multiple watersheds that must be addressed despite limited resources.

The Peninsula Agencies will set priorities to construct these facilities strategically, and in accordance with the administrative and financial limitations and requirements of the SCWP framework, and seek alternative outside funding in order to close funding gaps.

To address the Water Quality Priorities (WQPs), the Peninsula WMG is going to pursue a multi-faceted financial strategy. In addition, the Peninsula WMG has coordinated the proposed implementation schedule (see Section 5) with the financial strategy. The participating agencies are committed to developing projects through the design phase so that they are shelf ready to take advantage of grants and federal infrastructure funding that may become available. In collaboration with City of Torrance, the Participating Agencies secured Prop 1 Stormwater Planning grant funding for the preliminary design and feasibility study for the Torrance Airport Project and supported the subsequent application for SCW Regional Program Infrastructure funding for design, which was approved and included in the South Santa Monica Bay (SSMB) Watershed Area Steering Committee (WASC) FY 20-21 Stormwater Investment Plan (SIP). The Torrance Airport Project has the potential to address the highest water quality priorities of the Machado Lake Nutrient and Pesticides and PCBs TMDLs within the WD-1 WMA. The Peninsula WMG is planning to submit the Torrance Airport Project to the SSMB WASC for construction funding by the FY2122 Call for Projects deadline. The participating agencies also received SCW Regional Program Technical Resources funding to complete feasibility studies during FY2122 for the Palos Verdes Peninsula Multi-Benefit Flow Diversion and during FY2021 for the Harbor City Park Regional projects for the WD-1 WMA. The participating agencies also succeeded in securing SCW Technical Resources Program funding for the Eastview Park Infiltration Project feasibility study as part of the SSMB WASC FY 20-21 SIP. The Eastview Park Project will address priority pollutants under the Long Beach and Greater LA Harbor Toxics TMDLs in the LAH-IH WMA.

The continued exploration and leveraging of additional sources of funding will be necessary to finance the implementation of the WCMs. Notably, these may include Municipal Safe Clean Water Program funds and other existing funding measures (such as Measures H, A, and M), various grant programs administered by local, state and federal agencies, local fees such as inspection fees, and Clean Water State Revolving Fund program financing agreements to the extent feasible.

Additionally, the Peninsula WMG will also support programs to increase water conservation, reduce dry weather discharges to the storm drain system, and reduce TSS during wet weather. Successfully accomplishing these efforts could reduce the money needed in the long term to capture and/or treat stormwater discharges to comply with TMDLs and address other WQPs.

In the long term, the challenge of financing the WCMs for the Peninsula WMG has partially been alleviated with the passage of Measure W and the ongoing implementation of the SCWP, which have established a reasonably dependable revenue stream for local water quality programs. Nonetheless, implementation of the WMP will require the cooperation of many entities, including business, environmental organizations, and the Regional Board.

6.3.2. OTHER POTENTIAL FUNDING OPTIONS

The financial strategy to fund the EWMP requires the utilization of multiple funding options. The Peninsula WMG will work together to maximize cost-effectiveness and each individual agency will be responsible for seeking funding for its share in EWMP implementation. The sections below outline multiple approaches to funding and allow each jurisdiction to consider and select the funding options that best fit the specific preferences of their agency. For each funding option, a brief description is included that includes benefits and challenges associated.

EDUCATION AND OUTREACH

The Peninsula WMG implements public outreach and engagement on a watershed-based level and at the individual participating agency level. Projects proposed for SCW funding are reviewed by various stakeholders: government, non-profit, and business and available for public review and comment at the Watershed Advisory Steering Committee (WASC) level.

LEGISLATION

Legislative action has changed the face of contemporary stormwater management. This includes passage of laws, adoption of regulations, and interpretation of laws and enforcement of regulations by the courts at local, state and federal levels. These legislative activities impact all aspects of stormwater management by local governments, as well as the private sector, such as developers who provide basic infrastructure as a part of their developments, industrial facilities that discharge stormwater from their properties, and those conducting ground disturbing construction activities. The Peninsula WMG will continue participation in stormwater legislation advocacy efforts led by the League of California Cities and California Contract Cities and California Stormwater Quality Association (CASQA). The challenges associated with legislation include time and resources. Incorporating new legislation requires a significant amount of time and political influence. Although these options have great potential, they will likely not be available in the short term.

FEDERAL AND STATE GRANTS

Federal and State Grant programs are made available for agencies to receive funding for projects which fall under the guidelines of the grant.

Factors considered in the financial strategy include the following:

- ***Matching Funds.*** Almost all grants include matching requirements, which can be up to 50% of the total project costs. Additionally, grant development and administration can take up significant resources, particularly from the small agencies associated with the Peninsula WMG.
- ***Shovel ready projects are typically preferred.*** Grant programs are generally structured to favor projects that are "shovel ready", while projects without substantially complete design plans are less likely to be selected.
- ***Grants are competitive.*** Each grant program has a set allocation of funds that are available within a defined region (i.e. statewide). As regulatory pressures are increased throughout California and the United States, the competition for securing this type of funding will significantly increase.
- ***Project eligibility.*** Project eligibility is dependent on the grant program which may not support the project type as needed.

- ***Long-term O&M funding.*** In general, grants are structured to help fund project construction costs. Separate funding streams for the operations and maintenance costs would be needed.

The Peninsula agencies are committed to pursuing and leveraging these opportunities with their SCW Regional and Municipal funding as well as other local funding sources as they become available.

LOCAL FUNDING OPTIONS

The agencies may consider local funding options to address stormwater funding. Local funding options would typically be pursued within individual agencies. Local funding options include:

- Safe Clean Water Municipal Program funds allocated as local return proportional to the revenues generated within the municipality for activities such as project development, design, construction, monitoring, and O&M;
- Revising street sweeping contracts to provide NPDES trash control programs;
- Adoption of water conservation fees to provide funding for reducing irrigated runoff to conserve water and reduce dry weather discharges;
- Local, statewide, or regional fees on car rentals to contribute to copper and zinc clean-up costs and incorporate stormwater quality features into street and highway projects funded by bonds and other street funds;
- Increase in commercial facility inspection fees.

Local funding options may be considered in the financial strategy for short-term funding.

CLEAN WATER STATE REVOLVING FUND

The Clean Water State Revolving Fund (CWSRF) program is a federal-state partnership that provides low-cost financing (at half of the most recent General Obligation Bond Rate at the time of funding approval – 1.6% in March 2015) with terms up to 30 years for a wide range of water quality infrastructure projects. This fund is likely to be the vehicle for delivery of federal infrastructure funding to local projects once it becomes available to states. The Peninsula WMG could use CWSRF for individual projects or groups of projects as there is no maximum funding limit. The CWSRF can be used for a variety of projects including stormwater measures to manage, reduce, treat, or recapture stormwater or subsurface drainage water; water conservation, efficiency, and reuse; and watershed pilot projects meeting criteria in CWA §122.

TRANSPORTATION BONDS

Another consideration is future transportation bonds. This can be pursued by encouraging the Metropolitan Transportation Authority (MTA) to include funding stormwater quality features, such as Green Streets, in future bonds and encourage Council of Governments to develop strategic transportation plans that include mitigations designed to address water quality issues from transportation projects.

RECOMMENDATIONS FOR THE REGIONAL WATER QUALITY CONTROL BOARD

The Regional Board should request funding for a staff position that would be responsible to identify and distribute information on the available federal, state, non-profit, corporate and other sources of funds; and establish an on-line resource center to assist the cities in complying with the stormwater permit requirements.

6.3.3. PRIORITIZATION

The Group continues to support programs to increase water conservation, reduce dry-weather discharges to the storm drain system, and reduce TSS during wet weather. Successfully accomplishing these efforts could reduce the funds needed in the long term to capture and/or treat stormwater discharges to comply with TMDLs and address other WQPs.

The Peninsula WMG and/or the Participating Agencies will also pursue state grants (i.e. IRWMP, Proposition 1, Proposition 84, etc.) and potential federal infrastructure funding to implement stormwater BMPs.

In the long term, financing the WCMs for the Peninsula Watershed will require establishing dependable revenue streams for local water quality programs with the cooperation of many entities, including business and environmental organizations. Participating Agencies will begin utilizing existing funds to implement the EWMP as well as pursue additional funding in accordance with Table 6-4 below.

Table 6-28: Funding Option Priorities

Agency	Funding Priorities	Integration with Existing Infrastructure Improvement Plans
County	1. Federal and State Grants 2. Local Funding Options & Stormwater Fees (Measure W Safe Clean Water Program) 3. Seek allocation in the General Fund; investigate bond and loan opportunities (i.e. CWSRF) 4. Continued participation in stormwater funding advocacy efforts led by the League of California Cities and California Contract Cities and CASQA	• Incorporation of stormwater improvements in capital improvement plan for public facilities • Design guidelines updated and included green street standard plans which include elements such as bio-retention planters, porous pavement, tree wells, etc.
LACFCD	1. Federal and State Grants 2. Local Funding Options & Stormwater Fees (Measure W Safe Clean Water Program) 3. Seek allocation in the Flood Fund	• Incorporation of stormwater improvements in capital improvement plan for public facilities •
RPV PVE RHE RH	1. Federal and State Grants 2. Local Funding Options & Stormwater Fees (Measure W Safe Clean Water Program) 3. Continued participation in stormwater funding advocacy efforts led by the League of California Cities and California Contract Cities and CASQA	• Incorporation of stormwater improvements in capital improvement plan for public facilities

7. LEGAL AUTHORITY

This section covers information such as documentation and references/links to water quality ordinances for each participating agency. These documents demonstrate adequate legal authority to implement and enforce Watershed Control Measures (WCMs) identified in this plan and as required in the MS4 Permit. The goal of these WCMs is to create an efficient program that focuses on the watershed priorities by meeting the following objectives:

- Prevent or mitigate non-storm water discharges to the MS4 that are a source of pollutants from the MS4 to receiving waters.
- Implement pollutant controls necessary to achieve all applicable interim and final water quality-based effluent limitations and/or receiving water limitations pursuant to corresponding compliance schedules.
- Ensure that discharges from the MS4 do not cause or contribute to exceedances of receiving water limitations.

The WCMs include the minimum control measures, non-stormwater discharge measures and targeted control measures (i.e. controls to address TMDL and 303(d) listings). As the requirement to incorporate these WCMs is an element of the MS4 Permit, the legal authority to implement them results from each agency's legal authority to implement the NPDES MS4 Permit.

Table 7-1 includes the water quality ordinance for each agency with a reference link. Additionally, the participating agencies have developed and adopted LID ordinances and Green Street Policies which provides legal authority to enforce the Planning and Land Development Program.

Table 7-1: Water Quality Ordinance Language

City	Water Quality Ordinance	Reference
Rancho Palos Verdes	Chapter 13.10 - STORM WATER AND URBAN RUNOFF POLLUTION CONTROL	https://www.municode.com/library/ca/rancho_palos_verdes/codes/code_of_ordinances?nodeId=TIT13PUSE_CH13.10STWAURRUPOCO
13.10.020 Purpose – *This chapter is also intended to provide the city with the legal authority necessary to control discharges to and from those portions of the municipal storm water system over which it has jurisdiction as required by the municipal NPDES permit.*		
Palos Verdes Estates	Chapter 13.08 – STORM DRAINS AND STORM WATER MANAGEMENT AND POLLUTION CONTROL	http://www.codepublishing.com/ca/palosverdesestates/
13.08.Purpose and Intent– *The purpose of this chapter is to protect and enhance the quality of surface waters and surface water bodies, including the Santa Monica Bay and Machado Lake, in a manner consistent with the Federal Clean Water Act (33 U.S.C. Sections 1251 et seq.), the California Porter-Cologne Water Quality Control Act (Cal. Water Code Sections 13000 et seq.), and the municipal National Pollutant Discharge Elimination System (NPDES) permit.*		
Rolling Hills	Chapter 8.32 - Storm Water Management and Pollution Control	https://library.municode.com/ca/rolling_hills/codes/code_of_ordinances?nodeId=TIT8HESA_CH8.32STWAMAPOCO
8.32.030 - Purpose and intent. *A. The purpose of this chapter is to comply with the Federal Clean Water Act, the California Porter-Cologne Water Quality Control Act, and the Municipal NPDES Permit by:* *1. Reducing pollutants in storm water discharge to the maximum extent practicable;* *2. Regulating illicit connections and illicit discharges and thereby reducing the level of contamination of storm water and dry weather runoff into receiving waters; and* 3. *Regulating non-storm water discharges to the storm sewer system.*		

Rolling Hills Estates	Chapter 8.38 - STORMWATER AND URBAN RUNOFF POLLUTION CONTROL	https://library.municode.com/ca/rolling_hills_estates/codes/code_of_ordinances?nodeId=TIT8HESA_CH8.38STURRUPOCO
8.38.030 Construction and Application – *This chapter will be construed to assure consistency with the requirements of the Clean Water Act and the Porter-Cologne Water Quality Control Act, and their implementing regulations, and the municipal NPDES permit.*		
LACFCD	Flood Control District Code, Chapter 21 - Stormwater and Runoff Pollution Control	https://library.municode.com/HTML/16274/level2/FLCODICO_CH21STRUPOCO.html#FLCODICO_CH21STRUPOCO_21.01PUIN
21.01 - Purpose and Intent - *The purpose and intent of this chapter is to regulate the stormwater and non-stormwater discharges to the facilities of the Los Angeles County Flood Control District for the protection of those facilities, the water quality of the waters in and downstream of those facilities, and the quality of the water that is being stored in water-bearing zones underground.*		

8. COORDINATED INTEGRATED MONITORING PROGRAM

The Participating Agencies implement a customized Coordinated Integrated Monitoring Program (CIMP) based on the provisions set forth in Attachment E of the MS4 Permit. The data collected by the CIMP are used to assess the effectiveness of the EWMP projects and programs in addressing water quality priorities, specifically in achieving water quality-based effluent limitations (WQBELs) and receiving water limitations (RWLs) per compliance schedules. The customized CIMP includes the following program elements:

- Receiving Water Monitoring
- Storm Water Outfall Monitoring
- Non-Storm Water Outfall Monitoring
- Regional Studies

9. ADAPTIVE MANAGEMENT PROCESS

Adaptive management is the process by which new information about the state of the watershed is incorporated into the EWMP.

Following the previous 2018 and 2020 Adaptive Management processes, the Peninsula WMG is required to submit an updated EWMP and Reasonable Assurance Analysis (RAA) by June 30, 2021 for review and approval by the Regional Board. The updated RAA detailed in Appendix 4.1, utilizes all relevant, available data, including updates to the water body pollutant combination prioritization, source assessment, TMDL milestone achievements, and control measure performance data. As further elaborated in the updated EWMP (Section 2, Section 3, RAA Report in Appendix 4.1, etc.), the EWMP is adaptively managed following the process described in the MS4 Permit.

The process is implemented by the participating agencies and submitted to the Regional Water Board for review and approval as required by the MS4 Permit and as deemed appropriate. The purpose of the adaptive management process is to improve the effectiveness of the EWMP based on – but not limited to – consideration of the following:

1. Progress toward achieving interim and/or final water quality-based effluent limitations and/or receiving water limitations in §VI.E and Attachments L through R of the MS4 Permit, according to established schedules;
2. Progress toward achieving improved water quality in MS4 discharges and achieving receiving water limitations through implementation of the watershed control measures based on an evaluation of outfall-based monitoring data and receiving water monitoring data;
3. Achievement of interim milestones;
4. Reopening of TMDLs;
5. Re-evaluation of the water quality priorities identified for the Watershed Management Area (WMA) based on more recent water quality data for discharges from the MS4 and the receiving water(s) and a reassessment of sources of pollutants in MS4 discharges;
6. Availability of new information and data from sources other than the MS4 Permittees' monitoring program(s) within the WMA that informs the effectiveness of the actions implemented by the Permittees;
7. Regional Water Board recommendations; and
8. Recommendations for modifications to the Enhanced Watershed Management Program solicited through a public participation process.

9.1. MODIFICATIONS

Based on the results of the adaptive management process, the participating agencies may find that modifications of the EWMP are necessary to improve effectiveness. Modifications may include new deadlines and interim milestones, with the exception of those deadlines established in a TMDL.

9.1.1. REPORTING

Modifications are reported in the Annual Report and as part of the Report of Waste Discharge (ROWD) required pursuant to the MS4 Permit. The background and rational for these modifications are included by addressing the following points:

- Identify the most effective control measures and describe why the measures were effective and how other control measures will be optimized based on past experiences.
- Identify the least effective control measures and describe why the measures were deemed ineffective and how the control measures will be modified or terminated.
- Identify significant changes to control measures during the prior year and the rationale for the changes.
- Describe all significant changes to control measures anticipated to be made in the next year and the rationale for the changes. Those changes requiring approval of the Regional Water Board or its Executive Officer shall be clearly identified at the beginning of the Annual Report.
- Include a detailed description of control measures to be applied to New Development or Re-development projects disturbing more than 50 acres.
- Provide the status of all multi-year efforts that were not completed in the current year and will continue into the subsequent year(s).
- Provide the status of multi-year/future regional BMPs, both planned and proposed.
- Provide the status of efforts to secure funding for structural TCMs both for capital investments and O&M.

9.1.2. IMPLEMENTATION

Modifications are implemented upon approval by the Regional Water Board Executive Officer or within 60 days of submittal if the Regional Water Board Executive Officer expresses no objections.

9.2. RECEIVING WATER LIMITATIONS

The adaptive management process fulfills the requirements in MS4 Permit to address continuing exceedances of receiving water limitations.

10. REPORTING PROGRAM & ASSESSMENT

The reporting information provided below is based on the requirements of the MS4 Permit. These implementation reports and monitoring reports allow the Regional Board to assess implementation progress and program effectiveness.

10.1. ANNUAL REPORT

Each year as directed by the MS4 Permit, all Permittees are required to submit an Individual Annual Report. Each year the participating agencies in the Peninsula EWMP will also submit a joint Watershed Annual Report to the Regional Water Board Executive Officer. The Watershed Annual Report will present a summary of information that will allow the Regional Board to assess implementation progress and effectiveness of the watershed management program[90].

The reporting process is intended to meet the following objectives to assess:

- Each agency's participation in the Enhanced Watershed Management Program and Coordinated Integrated Monitoring Program.
- The impact of each agency's storm water and non-storm water discharges on the receiving water.
- Monitoring results in comparison to receiving water limitations, numeric water quality-based effluent limitations, and non-storm water action levels.
- The effectiveness of control measures in reducing discharges of pollutants from the MS4 to receiving waters.
- Whether the quality of MS4 discharges and the health of receiving waters is improving, staying the same, or declining as a result watershed management program efforts, and/or TMDL implementation measures, or other Minimum Control Measures.
- Whether changes in water quality can be attributed to pollutant controls imposed on new development, re-development, or retrofit projects.

The Annual Report will identify data collected and strategies, control measures and assessments implemented for each watershed within the participating agency's jurisdiction. The participating agencies will submit annual reports as required by the MS4 Permit.

[90] Annual reports will cover summary from previous fiscal year beginning July 1st through June 30th of the following year.

10.2. MONITORING REPORT

10.2.1. DATA REPORTING

Analytical data reports will be submitted on a semi-annual basis, or as directed by the MS4 Permit. CEDEN-formatted data will be sent electronically to the Regional Water Board's Storm Water site at MS4stormwaterRB4@waterboards.ca.gov. These data reports will summarize:

- Exceedances of applicable WQBELs, receiving water limitations, or any available interim action levels or other aquatic toxicity thresholds.
- Basic information regarding sampling dates, locations, or other pertinent documentation.
- The annual watershed monitoring report will summarize efforts to address water quality exceedances.

10.2.2. CHRONIC TOXICITY REPORTING

Aquatic toxicity monitoring results will be submitted to the Regional Board on an annual basis as part of the watershed and monitoring report as well as in the semi-annual basis data report submittal.

10.2.3. TMDL REPORTING

The participating agencies will also report on progress of TMDL implementation on an annual basis as part of the watershed and monitoring report and submit to the Regional Water Board Executive Officer.

Appendix 1.0

LA County Flood Control District Summary

In 1915, the Los Angeles County Flood Control Act established the LACFCD and empowered it to manage flood risk and conserve stormwater for groundwater recharge. In coordination with the United States Army Corps of Engineers the LACFCD developed and constructed a comprehensive system that provides for the regulation and control of flood waters through the use of reservoirs and flood channels. The system also controls debris, collects surface storm water from streets, and replenishes groundwater with storm water and imported and recycled waters. The LACFCD covers the 2,753 square-mile portion of Los Angeles County south of the east-west projection of Avenue S, excluding Catalina Island. It is a special district governed by the County of Los Angeles Board of Supervisors, and its functions are carried out by the Los Angeles County Department of Public Works. The LACFCD service area is shown in **Figure 1.A -1.**

Unlike cities and counties, the LACFCD does not own or operate any municipal sanitary sewer systems, public streets, roads, or highways. The LACFCD operates and maintains storm drains and other appurtenant drainage infrastructure within its service area. The LACFCD has no planning, zoning, development permitting, or other land use authority within its service area. The permittees that have such land use authority are responsible under the Permit for inspecting and controlling pollutants from industrial and commercial facilities, development projects, and development construction sites. (Permit, Part II.E, p. 17.)

The MS4 Permit language clarifies the unique role of the LACFCD in storm water management programs: "[g]iven the LACFCD's limited land use authority, it is appropriate for the LACFCD to have a separate and uniquely-tailored storm water management program. Accordingly, the storm water management program minimum control measures imposed on the LACFCD in Part VI.D of this Order differ in some ways from the minimum control measures imposed on other Permittees. Namely, aside from its own properties and facilities, the LACFCD is not subject to the Industrial/Commercial Facilities Program, the Planning and Land Development Program, and the Development Construction Program. However, as a discharger of storm and non-storm water, the LACFCD remains subject to the Public Information and Participation Program and the Illicit Connections and Illicit Discharges Elimination Program. Further, as the owner and operator of certain properties, facilities and infrastructure, the LACFCD remains subject to requirements of a Public Agency Activities Program."
(Permit, Part II.F**,** p. 18.)

Consistent with the role and responsibilities of the LACFCD under the Permit, the EWMPs and CIMPs reflect the opportunities that are available for the LACFCD to collaborate with permittees having land use authority over the subject watershed area. In some instances, the opportunities are minimal, however the LACFCD remains responsible for compliance with certain aspects of the MS4 permit as discussed above.

In some instances, in recognition of the increased efficiency of implementing certain programs regionally, the LACFCD has committed to responsibilities above and beyond its obligations under the 2012 Permit. For example, although under the 2012 Permit the Public Information and

Participation Program is a responsibility of each Permittee, the LACFCD is committed to implementing certain regional elements of the PIPP on behalf of all Permittees at no cost to the Permittees. These regional elements include:

- Maintaining a countywide hotline (888-CLEAN-LA) and website (www.888cleanla.com) for public reporting and general stormwater management information at an estimated annual cost of $250,000. Each Permittee can utilize this hotline and website for public reporting within its jurisdiction.
- Broadcasting public service announcements and conducting regional advertising campaigns at an estimated annual cost of $750000.
- Facilitating the dissemination of public education and activity specific stormwater pollution prevention materials at an estimated annual cost of $100,000.
- Maintaining a stormwater website at an estimated annual cost of $10,000.

The LACFCD will implement these elements on behalf of all Permittees starting July 2015 and through the Permit term. With the LACFCD handling these elements regionally, Permittees can better focus on implementing local or watershed-specific programs, including student education and community events, to fully satisfy the PIPP requirements of the 2012 Permit.

Similarly, although water quality monitoring is a responsibility of each Permittee under the 2012 Permit, the LACFCD is committed to implement certain regional elements of the monitoring program. Specifically, the LACFCD will continue to conduct monitoring at the seven existing mass emissions stations required under the previous Permit. The LACFCD will also participate in the Southern California Stormwater Monitoring Coalition's Regional Bioassessment Program on behalf of all Permittees. By taking on these additional responsibilities, the LACFCD wishes to increase the efficiency and effectiveness of these programs.

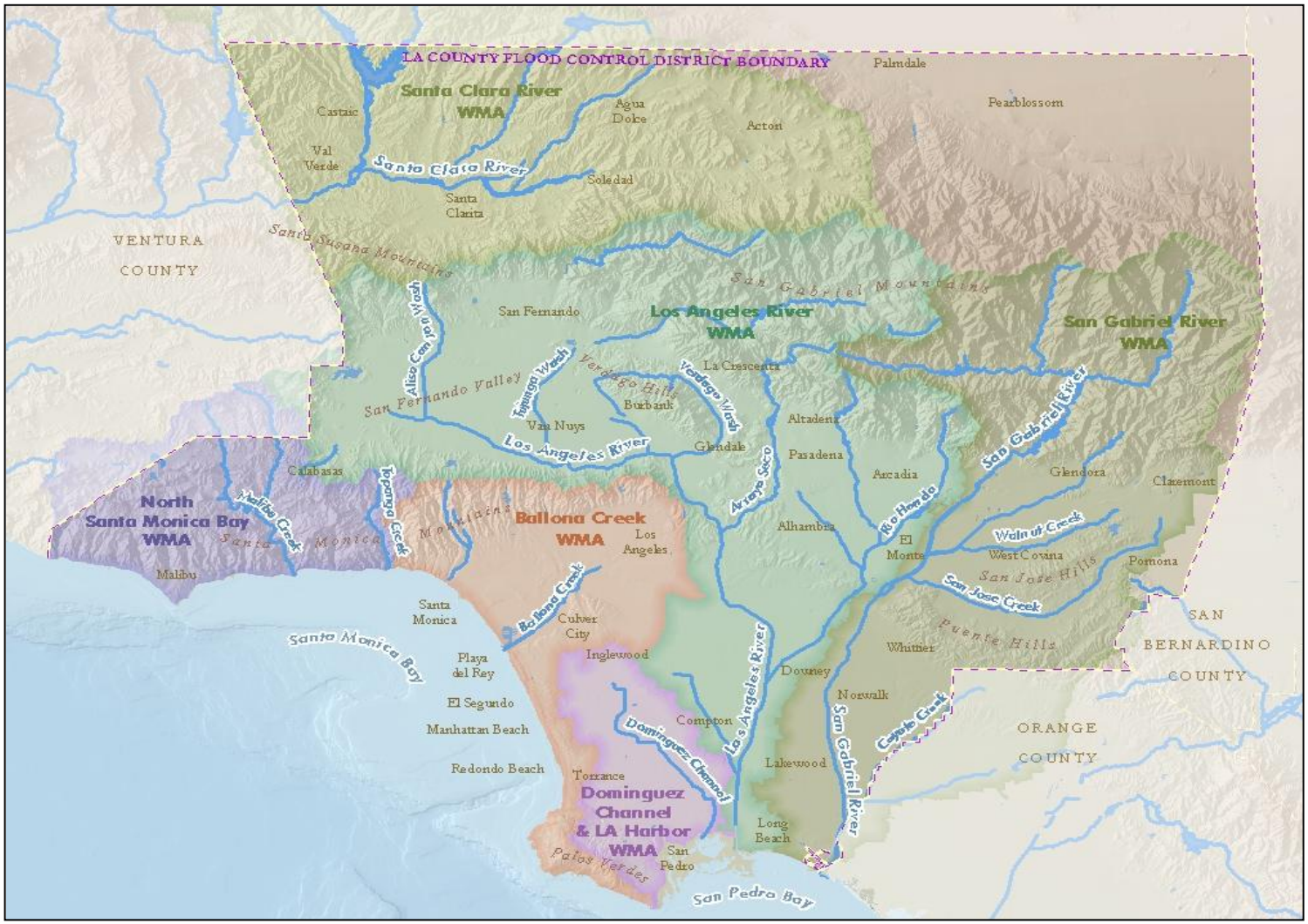


Figure 1.A-1 Los Angeles County Flood Control District Service Area

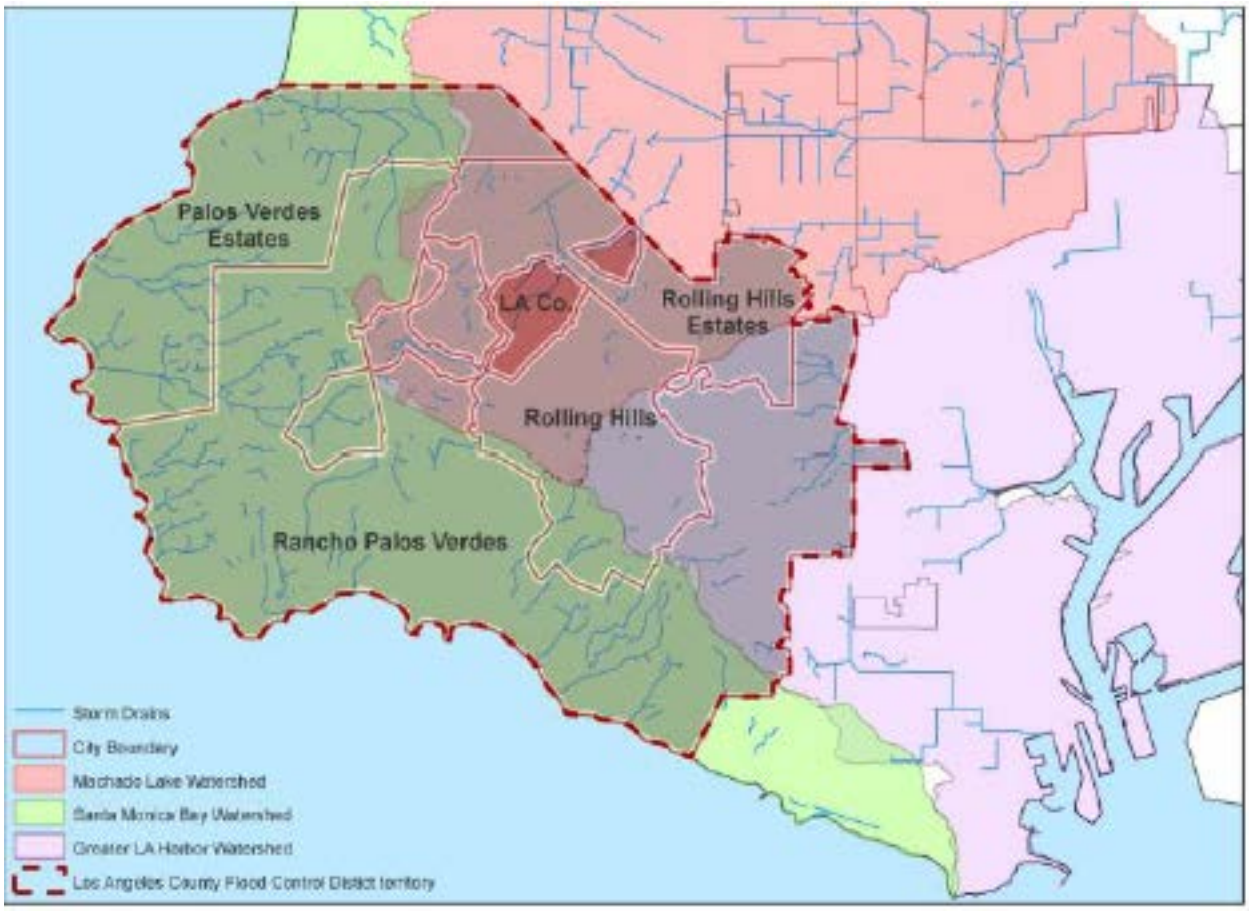


Figure 1.A-2 Los Angeles County Flood Control District Areas in Peninsula WMG

Appendix 3.1

Nonstructural Targeted Control Measures

3.1 NONSTRUCTURAL TARGETED CONTROL MEASURES

Table 3.1-1 lists implemented enhanced nonstructural TCMs for each participating agency. The BMP effectiveness from 4 is based on similar BMPs listed in Tetra Tech's CLRP for Chollas Creek Watershed in San Diego County, 2012.

The responses for each agency under Table 3-3 are defined as follows:

- **R** *Regulatory TCM.* The TCM is to be implemented through legislative measures that have the support of the Peninsula WMG.
- **C** *Completed TCM*. The TCM is preexisting (has been in effect for several years or more).

Table 3.1-2 lists the anticipated pollutants to be addressed through each Nonstructural TCM. The pages following **Table 3-4** describe each of the listed controls. It is important to note that the LACFCD are operating regional stormwater programs and consequently incorporating localized institutional TCMs may not be feasible. As such their exclusion from such TCMs is justified.

Table 3.1-1: Enhanced Nonstructural Targeted Control Measures (TCMs)

Targeted Control Measure	BMP effectiveness with respect to WQPs[1]			Agency				
	Priority Pollutant Reduction	Sediment reduction	Volume or flow reduction	LACFCD	County Unincorporated	Palos Verdes Estates	Rancho Palos Verdes	Rolling Hills	Rolling Hills Estates
Planning and Land Development									
LID and Green Streets Staff Training	❑	❑	❑	N/A	C	C	C	C	C
Industrial/Commercial Facilities									
Restaurant Certification Program	◆	◇	❑	N/A		C	C	NA	C
Dry weather runoff reduction									
Irrigation Reduction Incentives Program	◆	◆	◆	N/A	C	C	C	C	C
Public Information and Participation									
Downspout Disconnect Program	❑	❑	◆	N/A	C	C	C	C	C
Targeted Outreach	◆	◆	◆	C	C	C	C	C	C
Horse Manure Management	◆	◇	◇	N/A	C	N/A	C	C	C
Public Agency Activities									
Enhanced Street Sweeping	◆	◆	◇	N/A	C	C	C	NA	C
Adopt Sewer System Management Plan (SSMP)	◆	◇	◇	N/A	C	C	C	NA	C
Increased Street Sweeping Frequency or Routes	◆	◆	◇	N/A		C		NA	C
Jurisdictional SW Management									
Prepare guidance documents to aid in implementation of MS4 Permit MCMs	❑	❑	❑	C	C	C	C		C
Regulatory Initiatives									
Brake Pad Replacement Program	◆	◆	◇	R	R	R	R	R	R
Lead Reduction Program	◆	◆	◇	R	R	R	R	R	R
Zinc Reduction Program	◆	◆	◇	**Watershed Group**					
Apply for grant funding for stormwater projects (Measure W Safe Clean Water Program)	◆	◆	◆	C	C	C	C	NA	C
Ordinances									
Water Efficient Landscaping	◆	◇	◆	N/A	C	C	C	C	C
Green Building Ordinance	◆	❑	❑	N/A			C		
Enhanced Irrigation Runoff Reduction Program	◆	❑	◆	N/A	C	C	C	C	C
Adoption of LA County Fire Code	◆	◆	◆	C	C	C	C	C	C

✗ – Planned TCM **P** – Potential TCM **C** – Completed/Implemented TCM R - Regulatory TCM

◆ Primary pollutant reduction ❑ Secondary pollutant reduction ◇ Pollutant not addressed

[1] BMP effectiveness ratings based on similar BMPs listed in Tetra Tech's CLRP for Chollas Creek Watershed in San Diego County, 2012.

Table 3.1-2: Anticipated Pollutants to be addressed through Enhanced Nonstructural TCMs

Targeted Control Measure	Category 1							Category 2		
	SMB Trash	SMB DDT & PCBs	ML Trash	ML Pesticides & PCBs (Chlordane, DDT, Dieldrin, and PCBs)	ML Nutrients (Total Nitrogen and Total Phosphorus)	Harbor Toxics (Copper, DDT, Lead, PAHs, PCBs, and Zinc)	SMB Beaches Indicator Bacteria	SMB Arsenic	SMB Mercury	Wilmington Drain E. coli
Restaurant Certification Program	✓		✓		✓		✓	✓	✓	✓
Rainwater Harvesting Program	✓		✓		✓	✓	✓	✓	✓	
Irrigation Reduction Incentives Program	✓		✓		✓	✓	✓	✓	✓	✓
Targeted Outreach	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Horse Manure Management					✓		✓			✓
Enhanced Street Sweeping	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Adopt Sewer System Management Plan					✓		✓	✓	✓	✓
Increased Street Sweeping Frequency or Routes	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Wildfire Prevention Program		✓		✓	✓	✓		✓	✓	
Prepare Guidance Documents	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Brake Pad Replacement Program						✓				
Lead Reduction Program						✓				
Zinc Reduction Program						✓				
Apply for Grant Funding (SCW Regional and Municipal Program)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Water Efficient Landscaping	✓		✓		✓	✓	✓	✓	✓	✓
Green Building Ordinance	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Enhanced Irrigation Runoff Reduction Program	✓		✓		✓	✓	✓	✓	✓	✓

INDUSTRIAL/COMMERCIAL FACILITIES

RESTAURANT CERTIFICATION PROGRAM

The Restaurant Certification Program educates restaurants on restaurant best management practices, including proper disposal of wastes and spill prevention. This program enhances the Commercial MCMs by implementing an annual program of restaurant inspections. Additionally, through promotion of green business or ocean-friendly certification programs, agencies encourage restaurants to go above and beyond local stormwater regulations to help prevent pollution.

The program is currently being implemented by the City of Rancho Palos Verdes, Palos Verdes Estates, and Rolling Hills Estates.

DRY WEATHER RUNOFF REDUCTION

IRRIGATION REDUCTION INCENTIVES PROGRAM

This measure will provide incentives such as rebates for irrigation reduction (i.e. runoff reduction) practices such as xeriscaping and turf conversion. All agencies are currently involved in this effort through the West Basin Municipal Water District rebate incentives program and promotion by the South Bay Cities Council of Governments Environmental Services Center.

ENHANCED IRRIGATION RUNOFF REDUCTION PROGRAM

Reductions to irrigation runoff help to achieve runoff volume reduction and associated pollutant load reductions. This BMP, which doubles as a water conservation initiative, incorporates good landscaping practices to limit irrigation runoff. Measures to reduce irrigation runoff can be implemented wherever landscapes are irrigated. Residential, commercial, recreational, and industrial land uses can be targeted by incentive policies and programs. The Peninsula WMG agencies already implement Water Efficient Landscaping ordinances. Additional implementation methods being implemented include:

- Municipal Landscape Retrofits converting municipal landscaping to drought tolerant, low irrigation landscaping
- Landscape Irrigation Efficiency Program for large landscape residential water users
- Weather-based irrigation controller exchange events through West Basin Municipal Water District
- Turf Conversion Programs implemented through West Basin Municipal Water District to encourage the conversion of lawns and gardens to drought tolerant, low irrigation landscaping
- California Friendly Landscape Workshops through West Basin Municipal Water district and South Bay Environmental Services Center
- Rain barrel distribution through South Bay Environmental Services Center

The County of LA and the cities of Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills, and Rolling Hills Estates are currently implementing this program.

PUBLIC INFORMATION AND PARTICIPATION

DOWNSPOUT DISCONNECT PROGRAM

This Program encourages homeowners to redirect their downspouts to a rain garden or rain barrel program. This program is currently being implemented for the Peninsula WMG through the West Basin Municipal Water District and through the South Bay Cities Council of Governments website and direct outreach by individual agencies.

TARGETED OUTREACH

Within the Public Information and Education Program, targeted activity-specific residential outreach is conducted to address watershed priorities. This targeted outreach effort is focused on residential do-it-yourself (DIY) auto, home improvement, and gardening activities and pet owner activities and is implemented through the promotion of successful existing workshops and programs and the development and dissemination of dual print/electronic outreach pieces targeted at residential activities for which City staff have identified a clear need. The Permittees will adapt the PIPP over time to address new information, water quality priorities and stormwater management program priorities – activities listed below provide examples of how the PIPP is currently being enhanced. The targeted residential outreach includes:

- Promotion of the CalRecycle Used Oil Collection and Filter Recycling Program
- Promotion of sustainable landscaping, gardening and water efficiency programs offered through West Basin Municipal Water District
- Waste management and recycling outreach
- Promotion/hosting of household hazardous waste collection events
- Development and distribution of outreach pieces including a dual print/digital mobile business tip card, small site construction brochure, and a print brochure showcasing Native and Drought Tolerant Plant Gardens and Landscapes on the Palos Verdes Peninsula
- Maintenance and promotion of Environmentally Friendly Landscaping, Gardening and Integrated Pest Management outreach webpages
- Maintenance of California-friendly demonstration gardens throughout the Peninsula
- Maintenance of pet waste stations in municipal parks
- Development and distribution of South Bay Homeowners Guide to Rainwater Harvesting
- Dissemination of Wildfire Prevention materials from CalFire

HORSE MANURE MANAGEMENT

Where residential horse keeping is allowed, the Peninsula WMG agencies implement and enforce Horse Manure Management ordinances requiring the proper handling and disposal of horse manure to prevent its accumulation, runoff, or leaching. Peninsula WMG agencies that allow residential horse keeping also provide manure collection services through the solid waste contract. Additionally, public outreach materials describing stormwater BMPs for horse keeping are targeted to horse owners and equestrian businesses throughout the Peninsula. These efforts work to address pollutants generated from existing equestrian facilities which are a recognized source of nutrients. In Rolling Hills Estates, the completed Model Equestrian Center Project at the Peter Weber Equestrian Center (PWEC) serves an educational function in addition to the water quality improvements realized through retrofits to the facility. Interpretive signage throughout the PWEC identifies horse keeping BMPs for owners of horses boarded

at the facility, horse trainers, and children who attend pony camps at the facility (as well as their parents). Pony camp materials used at the facility include worksheets on environmentally friendly horse keeping practices.

PUBLIC AGENCY ACTIVITIES

ENHANCED STREET SWEEPING

Improved street and median sweeping technology enhances the potential for wet weather pollutant load reductions for bacteria, metals, non-metal toxics, and nutrients. Increasing the sweeping frequency, increasing the area of impervious cover swept, or upgrading the sweeping equipment can result in an increase in pollutant load removal[2]. Most of the Peninsula Agencies contract street sweeping to private companies. These companies have already phased in regenerative sweepers.

Regenerative air sweepers have the ability to clean a larger path than vacuum sweepers, can remove smaller debris more efficiently and release less exhaust and particulates back into the environment. Generally speaking, regenerative air systems are more environmentally friendly than are vacuum sweepers. Regenerative air sweepers are similar to vacuum sweepers in that there is a suction tube located on one side of the sweeping head. However, the key difference between regenerative and vacuum sweepers is that, unlike vacuum sweepers which exhaust the particulate-laden used air back into the atmosphere, regenerative air sweepers work on a closed loop system. In most applications, they also are a better choice than are vacuum sweepers. As the regenerative air sweepers circulate the air on a continuous basis. [3]

The cities of Palos Verdes Estates and Rancho Palos Verdes implement this Program. Additionally, the County of Los Angeles has incorporated regenerative sweepers in its street cleaning program.

ADOPT SEWER SYSTEM MANAGEMENT PLAN (SSMP)

All agencies are enrolled in the statewide Waste Discharge Requirements for Sanitary Sewer Systems, which required the development and implementation of a SSMP in mid-2009. The goal of the SSMP is to reduce and prevent sanitary sewer overflows (SSOs), as well as mitigate any SSOs that do occur. This goal also addresses WQPs. Elements of the SSMP include:

- Sanitary sewer system operation and maintenance program
- Design and performance provisions
- Overflow emergency response plan
- FOG Control Program
- System Evaluation and Capacity Assurance Plan

INCREASED STREET SWEEPING FREQUENCY OR ROUTES

This measure works to increase the street sweeping frequency, jurisdiction-wide or in high trash-generating areas and/or include additional routes (e.g. center medians and intersections).

[2] City of San Diego: San Diego River Watershed Comprehensive Load Reduction Plan – Appendix A: BMP Representation Summary (2012)

[3] An Overview of Power Sweeping Equipment Technology (www.worldsweeper.com)

REGULATORY INITIATIVES

BRAKE PAD REPLACEMENT PROGRAM

Efforts of the California Stormwater Quality Association (CASQA) and Sustainable Conservation led to the passage of the SB 346 legislation in 2010 and signed by the Governor on September 25, 2010. This legislation is a milestone that will significantly reduce the level of copper in metropolitan area waters throughout the state. SB 346 requires incremental reduction in the amount of copper in vehicle brake pads, which constitute the single largest source of copper in metropolitan environments[4]. Already in effect, new codes required on brake pads sold in California will provide information on copper content and a notice that on and after January 1, 2014 any motor vehicle brake friction materials sold in California must contain no more than 0.1 percent by weight of the following materials: cadmium and its compounds, chromium (VI) salts, lead and its compounds, mercury and its compounds, and asbestiform fibers.

According to industry data on brake pad copper content, "SB 346 should reduce annual statewide copper emissions by more than 1.2 million pounds per year and should reduce brake pad copper levels by about 95%"[5]. Additionally, based on available information, which was largely developed through a lengthy collaboration among brake pad manufacturers, government agencies, and environmental groups in the Brake Pad Partnership, a preliminary estimate of copper runoff reduction due to this piece of legislation was developed.

In 2013, TDC Environmental prepared a draft detailed study for the California Stormwater Quality Association (CASQA) describing the expected percent reduction for copper as a result of the passage of SB 346 (TDC Environmental, 2013). The TDC study identified three possible implementation scenarios, the least aggressive of which estimated that a 52% load reduction in copper will be achieved by 2032 due to the brake pad phase-out.

Although there is an expectation that copper loads in urban runoff will decrease over time as a result of SB 346, the updated RAA did not attempt to take credit for this load reduction at this time. Following the collection of additional watershed-specific water quality data in the future, adaptive management may be utilized by the Peninsula WMG to update the TLR for copper and/or the load reductions expected to be achieved by this source control program.

LEAD REDUCTION PROGRAM

The SB 346 legislation was passed by the Senate, approved by the Governor, and filed with the Secretary of State on October 11, 2010. This bill prohibits the manufacture, sale, or installation in California of a wheel weight that contains more than 0.1% lead. Additionally, this bill requires that if the department identifies an alternative to lead contained in wheel weights as a chemical of concern, then the lead alternative would remain subject to the evaluation process, as prescribed, to determine how best to limit exposure or to reduce the level of hazard posed by the lead alternative.

Through the implementation of SB 757, a reduction in lead will be observed for the Peninsula WMG.

ZINC REDUCTION PROGRAM

The Department of Toxic Substances Control (DTSC) adopted new Safer Consumer Product Regulations that became effective October 1, 2013. These regulations contain a process for identifying and prioritizing Chemicals of Concern in Priority Products containing these constituents, as well as a process for eliminating or reducing the adverse impacts of Chemicals of Concern in Priority Products. It will apply to

[4] Moran, Kelly. 2011. Brake Pad Copper Reduction – MRP Section C.13.c. Report 2011
[5] Ibid.

most consumer products placed into the stream of commerce in California. It specifically applies to adverse environmental impacts, including adverse water quality impacts, and it contains a petition process for identification and prioritization of chemicals and projects. CASQA, supported by Peninsula WMG, has started the process of conducting research and building a file of critical information to support the designation of zinc in tires as a future priority product/constituent combination.

Measures:

- As a watershed group, plan to work with others to use the Department of Toxic Substances Control's Safer Consumer Product Regulations to reduce the zinc in tires, which is one of the greatest sources of zinc in urban areas.

ORDINANCES

WATER EFFICIENT LANDSCAPING ORDINANCE

The Peninsula WMG agencies implement and enforce water efficient landscaping ordinances to promote the design, installation, and maintenance of landscaping in a manner that conserves water resource and minimizes irrigation water runoff.

Additionally, the Peninsula Agencies jointly developed and have been distributing a tri-fold color brochure promoting Native & Drought Tolerant Plant Gardens and Landscapes on the Palos Verdes Peninsula. This brochure was developed with input from the Palos Verdes Peninsula Land Conservancy, Los Angeles County Fire Department and South Coast Botanic Garden staff.

GREEN BUILDING ORDINANCE

The City of Rancho Palos Verdes, the largest of the Peninsula WMG agencies, implements a Green Building Construction ordinance, effective January 1, 2014, that establishes incentives such as expedited plan review and fee reductions, and outlines procedures for participation in the agency's voluntary green building program. This program encourages the design and development of single-family, multifamily residential, commercial, institutional and mixed-use projects that are sited, designed, constructed and operated to enhance the well-being of occupants, and to minimize negative impacts on the community and natural environment. In addition, all of the Peninsula WMG agencies have adopted or customized the 2010 California Green Building Standards Code.

The Green Building Ordnance is based on a point system in which a developer earns points for incorporating certain aspects of the program into their design. Some of the specific stormwater quality aspects of this program are identified below in **Table 3.1-3**

Table 3.1-3: Green Building Ordinance Program Stormwater Quality Aspects

Category	***Stormwater Benefit***
Stormwater Control: • Permeable Paving Material • Filtration and/or Bio-Retention Features • Non-Leaching Roofing Materials • Smart Stormwater Street Design • Rainwater Harvesting System • Vegetated Roof	Encourages incorporation of stormwater BMPs which directly benefits stormwater quality
Irrigation Control: • Plants Grouped by Water Needs • Resource Efficient Landscapes • High-Efficiency Irrigation System	Reduces irrigation demand which subsequently reduces dry weather flows
Impervious Area Reduction: • Construction Footprint • Minimal Turf in Landscape • Trees	Reduces impervious areas which subsequently reduces stormwater runoff
Non-toxic Materials	Reduces exposed toxic materials during and after construction
Vandalism Deterrence Practices and Vandalism Management Plan	Reduces the potential for vandalism which subsequently reduces the potential for exposed contaminants associated with vandalism (i.e. spray paint, trash, etc.)
Pedestrian, bicycle, and public transit access	Reduces vehicle use which subsequently reduces pollutants associated with vehicles (i.e. organics, oil, grease, metals, etc.)
Structural Pest Controls	Reduces likeliness of needing pest-control which subsequently reduces potential for related contaminants to be exposed to stormwater
Green Building Education	Increases environmental awareness including stormwater quality

WILDFIRE PREVENTION PROGRAM

There is a substantial body of research demonstrating that wildfires can be a significant source of pollutants in stormwater while also increasing stormwater runoff from burned areas. Consequently, the prevention of wildfires is an important control measure for preventing mobilization and increased discharge of pollutants in stormwater. The agencies have adopted the most recent fire standards in Title 32 of the Los Angeles County Code (Fire Code). These include more restrictive building standards relating to fire and public safety than those adopted by the State Fire Marshal in the California Building Code. Because the Palos Verdes Peninsula is a very high fire hazard severity zone, CalFire encourages risk reduction through reduction of fire fuel, especially on properties adjacent to natural open space. The agencies offer green waste collection to residents through their solid waste franchise contracts to encourage the prompt removal of accumulated leaves and landscape debris to prevent brush fires which also minimizes the potential for leaching of nutrients from accumulated dead vegetation. The agencies disseminate information to residents on the management of landscapes for brush and fire control.

Appendix 3.2

Structural Best Management Practices (BMPs)

3.2 STRUCTURAL BMP SUBCATEGORIES

Structural BMPs fall under a variety of subcategories that correspond to their function and water quality benefit. Some of the most common of these subcategories are described below. These subcategories will be used throughout the EWMP to describe existing, planned, and potential regional and distributed BMPs.

INFILTRATION BMPS

Infiltration BMPs allow for stormwater to percolate through the native soils and recharge the underlying groundwater table, subsequently decreasing the volume of water discharged to the downstream waterbodies. These BMPs must be constructed in areas where the native soils have percolation rates and groundwater levels appropriate for infiltration.

INFILTRATION BASIN

An infiltration basin consists of an earthen basin with a flat bottom. An infiltration basin retains stormwater runoff in the basin and allows the retained runoff to percolate into the underlying soils. The bottom of an infiltration basin is typically vegetated with dryland grasses or irrigated turf grass.

INFILTRATION TRENCH

An infiltration trench is a long, narrow, rock-filled trench with no outlet other than for overflow. Runoff is stored in the void space between stones and infiltrates through the bottom and sides of the trench. Infiltration trenches provide the majority of their pollutant removal benefits through volume reduction. Pretreatment is important for limiting amounts of coarse sediment entering the trench which can clog and render the trench ineffective.

INFILTRATION GALLERY

An infiltration gallery may consist of a modular, multi-chamber pre-cast concrete arch system usually installed below grade. An infiltration gallery retains stormwater runoff in the basin and allows the retained runoff to percolate into the underlying soils.

BIORETENTION WITH NO UNDERDRAIN

Bioretention facilities with no underdrain are landscaped shallow depressions that capture and infiltrate stormwater runoff. These facilities function as a soil and plant-based filtration device that removes pollutants through a variety of physical, biological, and chemical treatment processes. The facilities normally consist of a ponding area, mulch layer, engineered media, and vegetation. As stormwater passes down through the media, pollutants are filtered, adsorbed, and biodegraded by the soil and vegetation.

DRYWELL

Drywells are similar to infiltration trenches in their design and function; however, drywells generally have a greater depth to footprint area ratio and can be installed at relatively deep depths. A drywell is a subsurface storage facility designed to temporarily store and infiltrate runoff. A drywell may be either a small excavated pit filled with aggregate or a prefabricated storage chamber or pipe segment.

Porous pavement

Porous pavements (concrete, asphalt, and pavers) contain small voids that allow water to pass through to a gravel base. They come in a variety of forms; they may be a modular paving system (concrete pavers, grass-pave, or gravel-pave) or poured in place pavement (porous concrete, permeable asphalt). Porous pavements treat stormwater and remove sediments and metals within the pavement pore space and gravel base. While conventional pavement results in increased rates and volumes of surface runoff, properly constructed and maintained porous pavements allow stormwater to percolate through the pavement and enter the soil below. This facilitates groundwater recharge while providing the structural and functional features needed for the roadway, parking lot, or sidewalk. The paving surface, subgrade, and installation requirements of porous pavements are more complex than those for conventional asphalt or concrete surfaces.

Biotreatment BMPs

Biotreatment BMPs treat stormwater through a variety of physical, chemical, and biological processes prior to being discharged to the MS4 system. These BMPs should be considered where Infiltration BMPs are infeasible.

Bioretention with Underdrains

Bioretention stormwater treatment facilities are landscaped shallow depressions that capture and filter stormwater runoff. These facilities function as a soil and plant-based filtration device that removes pollutants through a variety of physical, biological, and chemical treatment processes. The facilities normally consist of a ponding area, mulch layer, engineered media, and vegetation. As stormwater passes down through the media, pollutants are filtered, adsorbed, biodegraded, and sequestered by the soil and vegetation. Bioretention with underdrain systems are utilized for areas containing native soils with low permeability or steep slopes, where the underdrain system routes the treated runoff to the storm drain system.

Vegetated Swales

Vegetated swales are open, shallow channels with low-lying vegetation covering the side slopes and bottom that collect and slowly convey runoff flow to downstream discharge points. Vegetated swales provide pollutant removal through settling and filtration in the vegetation (usually grasses) lining the channels. In addition, although it is not their primary purpose, vegetated swales also provide the opportunity for volume reduction through subsequent infiltration and evapotranspiration and reduce the flow velocity. Where soil conditions allow, volume reduction in vegetated swales can be enhanced by adding a gravel drainage layer underneath the swale allowing additional flows to be retained and infiltrated. Where slopes are shallow and soil conditions limit or prohibit infiltration, an underdrain system or low flow channel for dry weather flows may be required to minimize ponding and convey treated and/or dry weather flows to an acceptable discharge point. An effective vegetated swale achieves uniform sheet flow through a densely vegetated area for a period of several minutes (depending on design standard used).

Wet Detention Basin

Wet detention basins are constructed, naturalistic ponds with a permanent or seasonal pool of water (also called a “wet pool” or “dead storage”). Aquascape facilities, such as artificial lakes, are a special form of wet pool facility that can incorporate innovative design elements to allow them to function as a stormwater treatment facility in addition to an aesthetic water feature. Wet ponds require base

flows to exceed or match losses through evaporation and/or infiltration, and they must be designed with the outlet positioned and/or operated in such a way as to maintain a permanent pool. Wet ponds can be designed to provide extended detention of incoming flows using the volume above the permanent pool surface.

Dry Extended Detention Basin

Dry extended detention basins are basins whose outlets have been designed to detain the stormwater runoff to allow particulates and associated pollutants to settle out. Dry extended detention basins do not have a permanent pool; they are designed to drain completely between storm events. They can also be used to provide hydromodification and/or flood control by modifying the outlet control structure and providing additional detention storage. The slopes, bottom, and forebay of Dry extended detention basins are typically vegetated.

Pre Treatment BMPs

Pre-treatment BMPs are typically not used as primary treatment; however, they are highly recommended for preliminary treatment in order to prolong the life and prevent clogging of the downstream system in a treatment train.

Media Filters

Media filters are usually designed as multi-chambered stormwater practices; the first is a settling chamber, and the second is a filter bed filled with sand or another filtering media. As stormwater flows into the first chamber, large particles settle out, and then finer particles and other pollutants are removed as stormwater flows through the filtering medium. They can also be used as pre-treatment, with their location prior to any infiltration or biotreatment BMP.

Catch Basin Inserts

Catch basins inserts typically include a grate or curb inlet and a sump to capture sediment, debris, and pollutants. Filter fabric can also be included to provide additional filtering of particles. The effectiveness of catch basin inserts, their ability to remove sediments and other pollutants, depends on its design and maintenance. Some inserts are designed to drop directly into existing catch basins, while others may require retrofit construction. Similar to media filters, catch basin filters can also be used as a pre-treatment BMP for infiltration and biotreatment BMPs.

Hydrodynamic Separators

Hydrodynamic separators are typically vertically oriented cylinders or rectangular vaults with baffles, weirs, and screens to direct flow to settle, separate and remove oil, sediment and floatables through the force of gravity. The effectiveness of hydrodynamic separators depends on its design and maintenance. Hydrodynamic separators are typically used in combination with other pre-treatment BMPs.

Sediment Chambers

Sediment chambers are typically wet detention basins allowing preliminary settling areas for large debris and sediment. As water reaches a predetermined level, it flows over a weir into bed of filter medium, usually composed of sand, soil, gravel, or a combination. The medium filters out small sediment and other pollutants.

RAINFALL HARVEST

Rainfall Harvest BMPs capture rainwater to be reused in lieu of discharging directly to the MS4.

ABOVE GROUND CISTERNS

Cisterns are large above ground tanks that store stormwater collected from impervious surfaces for non-potable domestic consumption. Above ground cisterns are used to capture runoff. Mesh screens are typically used to filter large debris before the stormwater enters the cistern. The collected stormwater could potentially be used for landscape irrigation and some interior uses, such as toilets and washing machines. The collection and consumption of the stormwater results in pollution control, volume reduction, and peak flow reduction from the site.

UNDERGROUND RETENTION

Underground retention systems function similarly to above ground cisterns in that they collect and use stormwater from impervious surfaces. These systems are concealed underground and can allow for larger stormwater storage and capture additional impervious surfaces not easily captured in an above ground system (e.g. parking lots and sidewalks). Water is then infiltrated into the ground via medium, usually composed of sand, soil, gravel, or a combination.

DIVERSION SYSTEMS

Flow diversion systems collect and divert runoff, flow diversion structures can primarily be sued in two ways.

LOW FLOW DIVERSION

Low flow diversion structures may be used to direct dry weather or small wet weather flows to a treatment facility via the sanitary sewer system or to a infiltration system, preventing the low flows from reaching a receiving water body. This is typically done with low flow runoff, which occurs during periods of dry weather or for small rain events at the beginning and end of the wet season.

STORMWATER DIVERSION

Stormwater diversion structures can also be used to direct storm flows from the MS4 into other structural BMPs. For example, diverted flow can be fed into a regional BMP, which may include underground detention.

Appendix 4.1

Reasonable Assurance Analysis Report

Prepared for

Palos Verdes Peninsula Watershed Management Group

Reasonable Assurance Analysis

Revised Palos Verdes Peninsula EWMP 2021

Prepared by

Geosyntec consultants

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1. INTRODUCTION

As specified in the 2012 Los Angeles Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Permit[1] (Permit), the Cities of Palos Verdes Estates, Rancho Palos Verdes, and Rolling Hills Estates, together with the County of Los Angeles and the Los Angeles County Flood Control District (LACFCD), collectively referred to as the Palos Verdes Peninsula (Peninsula) Watershed Management Group (WMG), developed an Enhanced Watershed Management Program (EWMP) for their drainage areas within the Santa Monica Bay, Machado Lake (including Wilmington Drain) and Los Angeles Harbor watersheds. As a part of demonstrating progress and adaptive management, the Peninsula WMG is required to submit a revised EWMP to the Los Angeles Regional Water Quality Control Board (LARWQCB), including an updated Reasonable Assurance Analysis (RAA), by June 30, 2021.

This report has been prepared to summarize the approach and results of the revised RAA. Building upon the original and revised updated plans in 2015 and 2018, the revised RAA has been conducted to conform to the original RAA guidelines developed by the LARWQCB (LARWQCB, 2014a). The revised RAA also provides updates to include recent monitoring data, project planning and implementation, and modeling advances over the past five years. Where appropriate, it also addresses issues and comments raised by the State Water Resources Control Board (SWRCB, 2020), such as inclusion of relevant data for model calibration, non-structural Best Management Practices (BMP) credit, and application of the limiting pollutant approach.

The updated wet weather RAA was conducted using the Watershed Management Modeling System 2.0 (WMMS 2.0), the latest modeling tool developed by LACFCD, to determine a cost-effective implementation strategy to meet applicable water quality standards (i.e., TMDL waste load allocations [WLA] and Basin Plan Objectives) and targets. This modeling platform was approved and endorsed by the LARWQCB as an acceptable regulatory approach for developing the RAA. WMMS 2.0 has the capability of representing wet and dry weather flow discharges, although based on a variety of factors, dry weather flows were not modeled using WMMS 2.0 as part of this effort. For dry weather, a revised semi-quantitative approach was implemented to update the dry weather portion of the revised RAA.

[1] Order No. R4-2012-0175 NPDES Permit No. CAS004001 Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, except those Discharges Originating from the City of Long Beach MS4.

The RAA was completed for the full geographic domain of the Peninsula EWMP area. Unless otherwise noted, all Water Body Pollutant Combinations (WBPCs) identified in the Peninsula EWMP have been addressed as part of this revised RAA.

2. WATER BODY POLLUTANT COMBINATIONS

The WBPCs defined in the original Peninsula EWMP were revised based on the most recent updates to applicable TMDLs and 303(d) listings, as well as the available Coordinated Integrated Monitoring Program (CIMP) monitoring data. The updated WBPC list is summarized in Table 1.

As with the original Peninsula EWMP, this RAA was done to address all Category 1 WBPCs by meeting the interim and final MS4 waste load allocations (WLAs), and all Category 2 and 3 WBPCs where the Peninsula WMG may have caused or contributed to historical exceedances.

Table 1. Updated Waterbody Pollutant Combinations

Category	Pollutant	Waterbody					
		SMB[a]	SMB Beaches	ML[b]	WD[c]	IH[d]	CM[e]
1	Chlordane (water, sediment, fish tissue) [1]			Wet Dry			
	Copper (water and sediment) [2]					Wet Dry	Wet Dry
	DDT (water, sediment, fish tissue) [2]	Wet Dry	Wet Dry	Wet Dry		Wet Dry	Wet Dry
	Dieldrin (water, sediment, fish tissue) [1]			Wet Dry			
	Indicator Bacteria		Wet Dry				
	Lead (water and sediment) [2]					Wet Dry	Wet Dry
	Total Nitrogen[3]			Wet Dry			
	Total PAHs[2]					Wet Dry	Wet Dry
	PCBs (water, sediment, fish tissue) [2]	Wet Dry	Wet Dry	Wet Dry		Wet Dry	Wet Dry
	Total Phosphorus[3]			Wet Dry			
	Trash	Wet		Wet			
	Zinc (water and sediment) [2]					Wet Dry	Wet Dry
2	Arsenic	Wet Dry					
	Indicator Bacteria				Wet		
	Mercury	Wet Dry					
3	Analysis of monitoring data from outfalls and receiving waters do not currently result in the identification of any Category 3 WBPCs						

Abbreviations:
a = Santa Monica Bay, b = Machado Lake, c = Wilmington Drain, d = Inner Harbor, e = Cabrillo Marina
Notes:
1. Machado Lake Pesticides and PCBs TMDL Water Quality Based Effluent Limits (WQBELs) for Chlordane and Dieldrin address the associated 303(d) listing for ChemA, therefore this listing is not shown in the table. Please refer to revised Peninsula EWMP Chapter 2 for additional descriptions.
2. The Dominguez Channel and Greater Los Angeles and Long Beach Harbor Toxics TMDL WQBELs for Total PAHs, Copper, DDT, Lead, PCBs and Zinc address associated 303(d) listings in harbor waterbodies for Toxicity, Benthic Community Effects, Benzo(a)pyrene, Chrysene, Dibenz[a,h]anthracene, Phenanthrene, and Pyrene, therefore these listings are not shown in the table. Please refer to revised Peninsula EWMP Chapter 2 for additional description.
3. Machado Lake Nutrient TMDL WQBELs for TN and TP address associated 303(d) listings for Algae, Ammonia, Eutrophic Conditions, and Odor, therefore these listings are not shown in the table. Please refer to revised Peninsula EWMP Chapter 2 for additional description.

3. MODEL SELECTION AND OVERVIEW

While the original RAA leveraged the strengths of the Structural BMP Prioritization and Analysis Tool (SBPAT) to perform the wet weather modeling analysis, the revised RAA used the newly released WMMS 2.0 modeling platform to maintain consistency with the majority of RAAs across Los Angeles County. Developed by LACFCD and publicly released in May 2020, WMMS 2.0 utilizes remote sensing, water quality, and hydrology data collected through 2018 to simulate contaminant loading, runoff volume, and flow rate. WMMS 2.0 contains two major components: the Loading Simulation Program in C++ (LSPC) to determine hydrology and pollutant loading; and the System for Urban Stormwater Treatment and Analysis Integration (SUSTAIN) to assist in BMP selection and performance. Detailed descriptions of each model component are provided below). An advantage of using the WMMS 2.0 model is the extensive regional calibration effort that has gone into the recent update of the model.

3.1. WMMS 2.0 LSPC

WMMS 2.0 LSPC (version 6.0) is capable of simulating watershed hydrology, sediment erosion and transport, and water quality processes from both upland contributing areas and receiving streams. Long-term, hourly rainfall data and average monthly evapotranspiration values are used along with land use-linked catchment imperviousness, soil properties, and land use-specific pollutant buildup/wash off rates to estimate wet weather runoff volumes and pollutant loading. WMMS 2.0 LSPC utilizes the following spatial and temporal data to conduct the simulation:

- Hydrologic response unit (HRU), which is a combination of:
    - Soils
    - Land cover
    - Groundwater recharge potential
    - Topography
    - Land use
- Hydraulic network (dams, debris basins, spreading grounds, water reclamation plants, storm drains, open channels)
- Subwatershed/subbasin
- Hourly and spatially interpolated precipitation and evapotranspiration data.

Figure 1 illustrates the HRUs and the hydraulic network, and the subwatershed boundary of the Peninsula EWMP area. Figure 2 illustrates the weather station coverage for the Peninsula LSPC model.

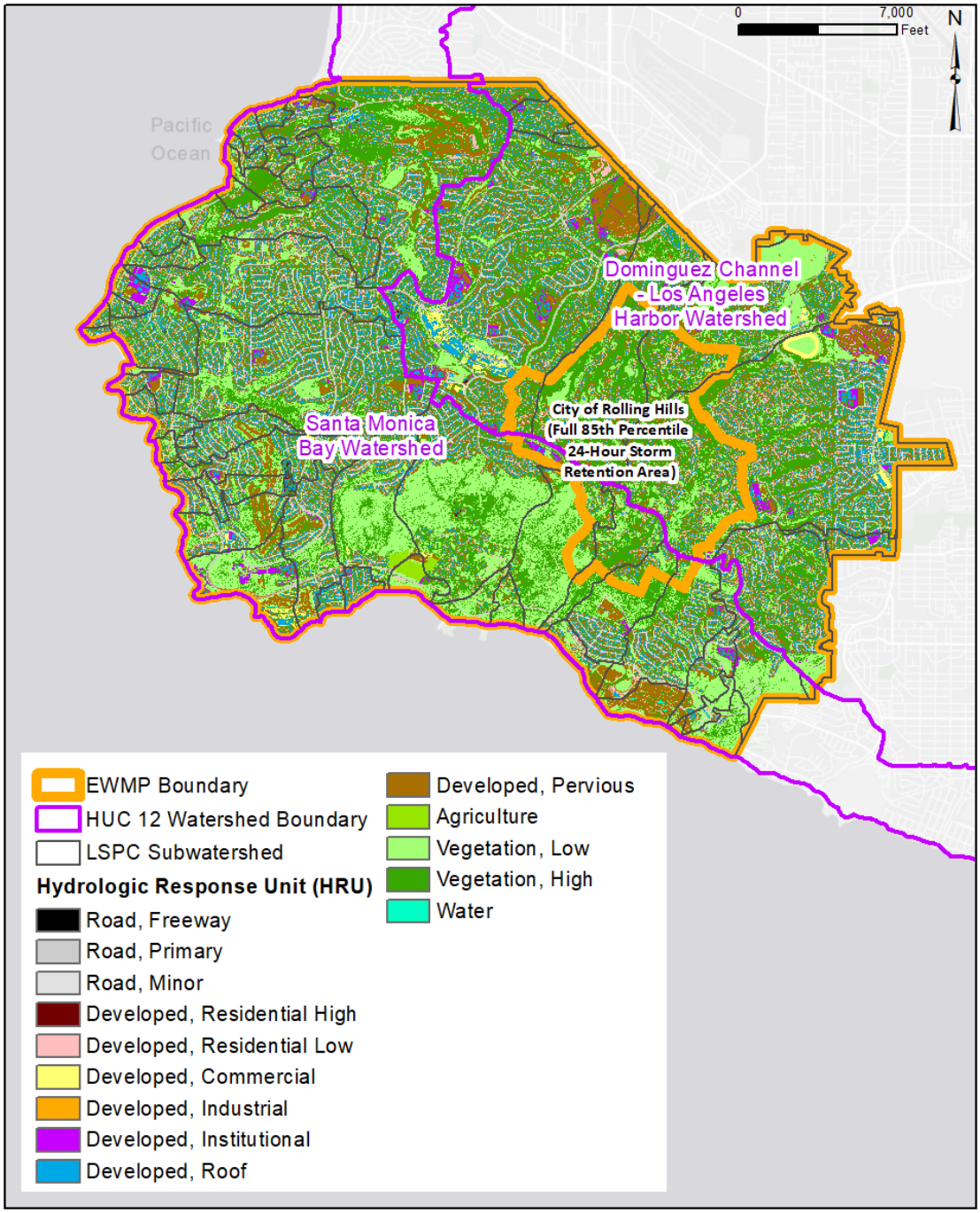


Figure 1. HRU Overview for Peninsula EWMP Area

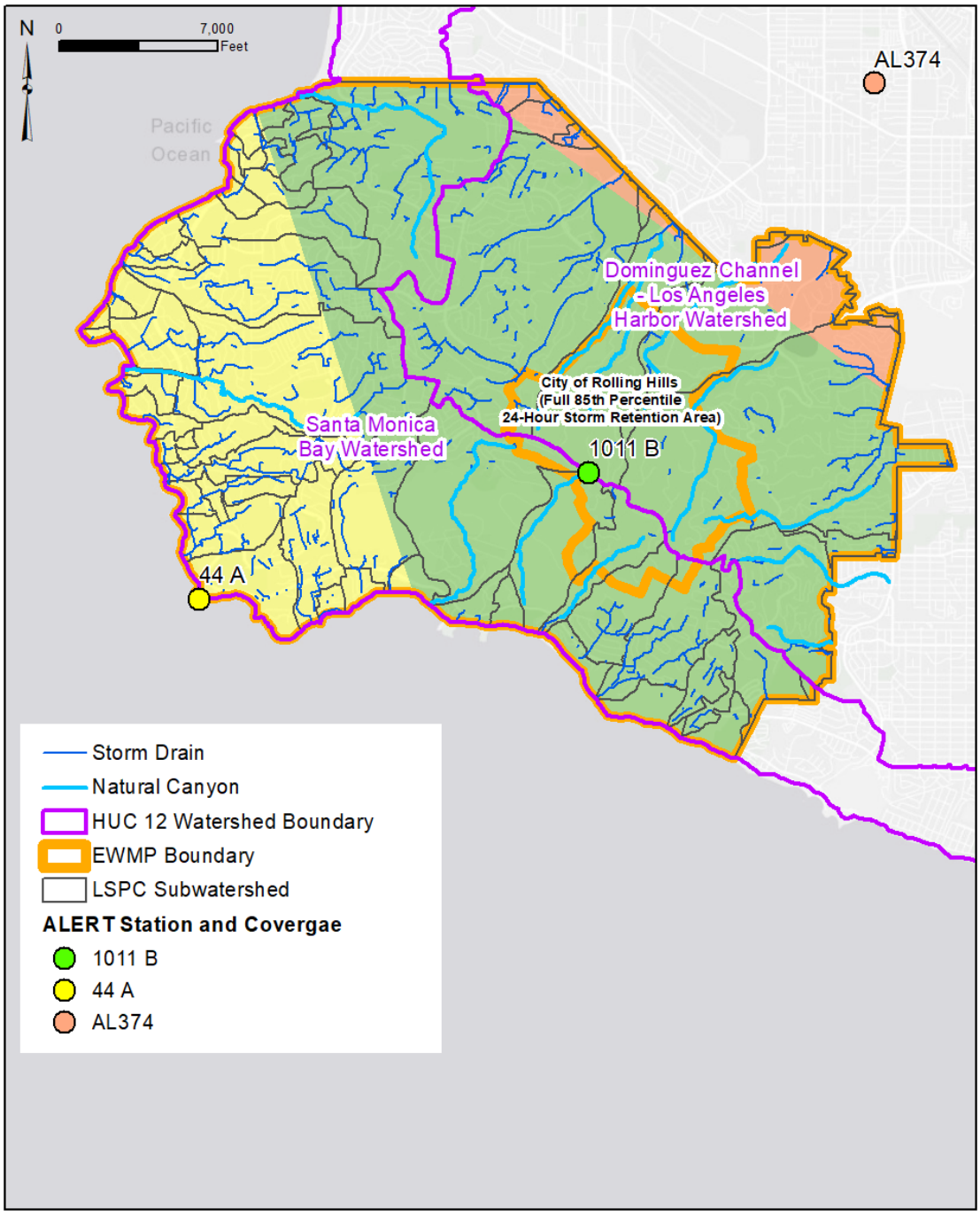


Figure 2. Hydraulic Network, Subwatershed, and Weather Station Overview

The default[2] WMMS 2.0 LSPC model has been configured, calibrated, and validated through a regional approach against flow and water quality monitoring data collected at all Mass Emission Stations (MES) in Los Angeles County. The following pollutants are included in the downloaded version of the WMMS 2.0 platform:

- Total Nitrogen
- Total Phosphorus
- Total Zinc
- Total Lead
- Total Copper
- Total Cadmium, and
- Total Suspended Solids (TSS)

The application of this model provides an estimate of the target load reduction (TLR), a numerical expression of the Permit compliance metrics (e.g., allowed mass per day for metals for wet weather and allowable exceedance days per year for bacteria), that serves as a basis for confirming, with reasonable assurance, that implementation of the proposed stormwater runoff or dry weather best management practices (BMPs) will result in attainment of the applicable TMDL WLA based WQBELs in the Permit for Category 1 pollutants, or the Water Quality Objectives for Category 2 pollutants.

The subsections below summarize the modifications to the default WMMS 2.0 LSPC model that were used to conduct the revised RAA.

3.1.1. Updating Weather Data

The default WMMS 2.0 LSPC model database includes precipitation data up to September 2018. Additional hourly rainfall data collected up to June 2020 from Los Angeles County Automatic Local Evaluation in Real Time (ALERT) rain gauges were requested and amended to the model database in accordance with the default WMMS 2.0 rain gauge coverage assignment.

3.1.2. Indicator Bacteria as a Modeled Constituent

Because none of the default constituents in WMMS 2.0 LSPC model can be used as a surrogate pollutant for fecal indicator bacteria (FIB), a representative FIB had to be added to the model. HRU-specific event mean concentration (EMCs) for FIB were established using monitoring data collected via the Peninsula CIMP through June 2020.

[2] The term "default" refers to the "as-downloaded" model released by LACFCD in May 2020.

However, no bacteria modeling was necessary for the updated Peninsula RAA for the following reasons:

- While indicator bacteria is a Category 1 WBPC for the Santa Monica Bay and Santa Monica Bay Beaches, no modeling was required to demonstrate reasonable assurance of compliance in the Santa Monica Bay watershed since water quality data demonstrates compliance is already being achieved. See Section 7.1 for further details on the Santa Monica Bay watershed.
- While indicator bacteria is a Category 2 WBPC for Wilmington Drain, the Peninsula subwatersheds tributary to Wilmington Drain will be managed with 85th percentile regional projects. Therefore, bacteria modeling was not required for these subwatersheds. See Section 7.3 for further details on the Wilmington Drain watershed.

3.1.3. Use of Surrogate Pollutants

Pollutant load rate and concentration for WBPCs involving the seven default WMMS 2.0 LSPC model pollutants and the added indicator bacteria were obtained from the WMMS 2.0 LSPC output files directly. A subset of the directly modeled pollutants was used as surrogate pollutants to establish pollutant loading and concentration of pollutants not directly modeled in the WMMS 2.0 LSPC model. Details on surrogate pollutant selection and assignment are presented in Section 7.

3.1.4. Model Calibration and Validation

The default WMMS 2.0 LSPC model has been calibrated by LACFCD on a regional basis using data through September 2018. Geosyntec further calibrated and validated the WMMS 2.0 LSPC model using Peninsula CIMP monitoring data collected up to June 2020 to best reflect the baseline hydrology and water quality conditions within the Peninsula EWMP area. This date was selected as it marks the most recently complete CIMP annual reporting year, and therefore is inclusive of the latest available data that has been properly QC'd by the Peninsula WMG. Detailed information on the model calibration can be found in Section 5.

3.1.5. Revising LSPC Sub-Basin Boundaries

Since the default LSPC subwatershed boundaries were developed at a regional scale and cover the entire Los Angeles Basin, they were found to contain some minor inaccuracies at the finer spatial resolution used for the revised RAA. As part of the revised RAA process, the subwatershed boundaries were refined to more accurately reflect the drainage boundaries within the Peninsula EWMP area.

3.2. WMMS 2.0 SUSTAIN

Utilizing hourly hydrograph and pollutograph outputs from LSPC, WMMS 2.0 SUSTAIN (version 2.1) provided estimates of water balance such as volumes evapotranspired, diverted, captured, treated, and/or released by various BMPs, as well as a conceptually optimal spatial distribution of BMPs based on cost-effectiveness to achieve TLR goals. WMMS 2.0 SUSTAIN also has a batch-processing framework to inform selection, configuration, and placement of BMPs throughout a watershed-based on defined evaluation criteria, such as cost and TLR. The default WMMS 2.0 SUSTAIN model was used to determine the estimated performance of BMPs summarized in Table 2.

Table 2. Default BMPs Modeled in SUSTAIN

BMP Type	Performance Type
Distributed BMP	
Bioretention/biofiltration (with optional underdrain)	Volume reduction and flow-through treatment
Pervious pavement	Volume reduction and flow-through treatment
Cistern/Rain barrel	Volume reduction
Drywell	Volume reduction
Proprietary treatment unit	Flow-through treatment
Regional BMP	
Infiltration gallery	Volume reduction
Retention/detention basin	Volume reduction and flow-through treatment
Constructed wetland	Volume reduction and flow-through treatment
Sewer diversion	Volume reduction
Regional treatment facility	Flow-through treatment

For the revised RAA, WMMS 2.0 SUSTAIN was used to estimate the performance of existing and proposed distributed and regional BMPs, thereby assuring that an effective and suitable suite of stormwater management BMPs is implemented to meet applicable interim and final TLR goals. This approach is therefore used to demonstrate a reasonable assurance of compliance for all modeled WBPCs. Details on modeled BMPs can be found in Section 8.

4. RAA APPROACH

Consistent with the original Peninsula EWMP RAA, the revised RAA was completed for the Peninsula EWMP analysis regions. An analysis region is defined by one of the following conditions:

1. A subwatershed that drains to a compliance monitoring location (CML) (e.g. WD-1)
2. Area tributary to the open beach between two CMLs (SMB-7-03_7-04)
3. Area tributary to an existing waterbody (e.g. LAH-IH)

As shown in Figure 3, there are 16 analysis regions in the Peninsula EWMP area. Among the analysis regions in the Dominguez Channel – Los Angeles Harbor HUC-12 watershed, analysis regions WD-Solano and WD-1 are tributary to Machado Lake via Wilmington Drain. Analysis region ML-1 is tributary to Machado Lake directly. Analysis regions LAH-IH and LAH-CM are tributary to Los Angeles Inner Harbor and Cabrillo Marina respectively.

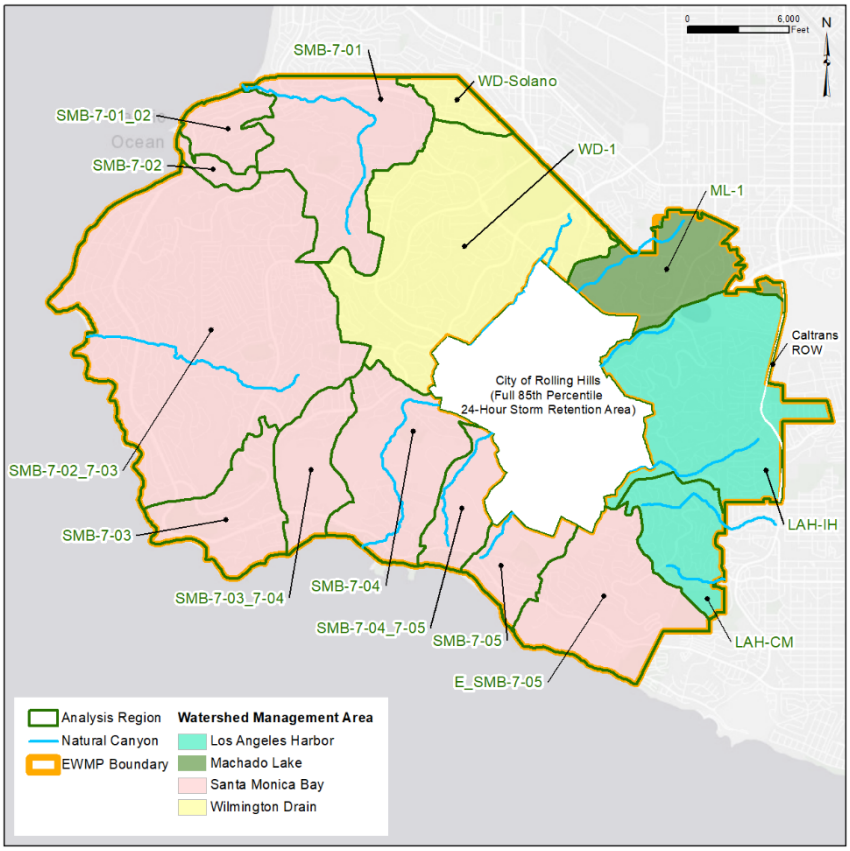


Figure 3. Analysis Region Overview

4.1. Wet Weather RAA Approach

The approach for representing wet weather flows and pollutant management for the RAA, including model determination and calibration, data inputs, critical condition selection calibration performance criteria, and output types, were selected for consistency with the RAA Guidance Document (LARWQCB, 2014b), as well as the functionality of WMMS 2.0. The process for determining the wet weather RAA included the following sequential steps for the Peninsula EWMP area:

1. Identify current WBPC list, including all quantifiable parameters requiring model simulation.
2. Revise, as needed, the contributing MS4 service areas to represent the Peninsula EWMP (e.g. remove lands or areas not required to be analyzed and adjust boundaries to match at a more detailed scale). This includes land owned and operated by Caltrans and the 85th-percentile 24-hour storm runoff retention area in City of Rolling Hills.
3. For analysis regions draining to a CML, review the Peninsula CIMP and SMBBB TMDL monitoring data and assess if the analysis region is already in compliance. Remove analysis regions that area in compliance based on monitoring data.
4. Perform hydrologic and water quality calibration on the WMMS 2.0 LSPC model using Peninsula CIMP outfall monitoring data.
5. Identify WBPC-specific critical conditions.
6. Develop TLRs for identified WBPCs during the respective critical condition.
7. Identify the following with respect to structural and non-structural BMPs:
    a. Significant variations to BMPs accounted for in the original Peninsula EWMP (e.g., differences in LID implementation levels);
    b. Exclude original Peninsula EWMP projects that were found to be technically infeasible at the scale originally proposed, such as the Valmonte Regional BMP and Palos Verdes Landfill Regional BMP;
    c. Identify new BMPs that have been implemented since 2014 and were not accounted for in the original EWMP; and
    d. Identify new BMPs that are planned for implementation and were not accounted for in the original EWMP.
8. Evaluate the pollutant load reductions of existing and proposed BMPs.
9. Compare these estimates with the final TLRs.
10. Revise the BMP implementation scenarios until all final TLRs are met, thereby reasonably assuring compliance with wet weather permit goals.

4.2. Dry Weather RAA Approach

Consistent with the original EWMP RAA, a semi-quantitative approach was implemented as summarized in Figure 4 to perform dry weather RAA and to demonstrate reasonable assurance of meeting applicable permit goals.

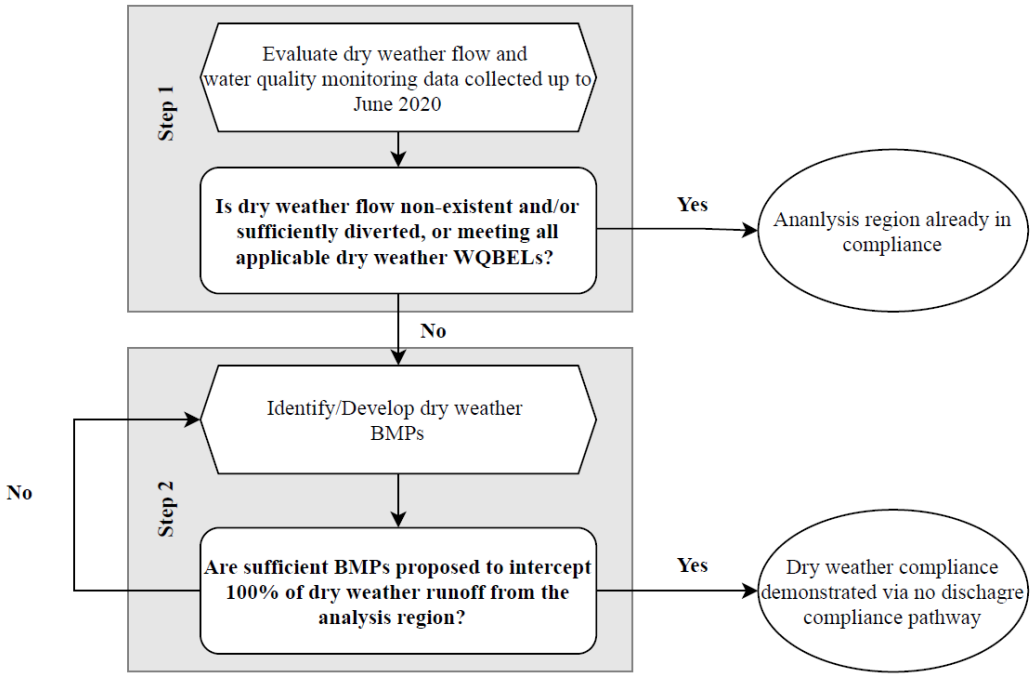


Figure 4. Dry Weather RAA Process

5. MODEL CALIBRATION AND VALIDATION

The default WMMS 2.0 LSPC watershed model was configured, calibrated, and validated by LACFCD through a regional approach against flow and water quality monitoring data collected at all Los Angeles County Mass Emission Stations (MES) between water years 2008 and 2018 (LACFCD, 2020a). Geosyntec further calibrated the model using Peninsula CIMP wet weather outfall flow and water quality data collected through June 2020. The calibrated Peninsula LSPC model was used as the foundation for performing the wet weather RAA. Figure 5 shows the CIMP monitoring locations used in model calibration and validation.

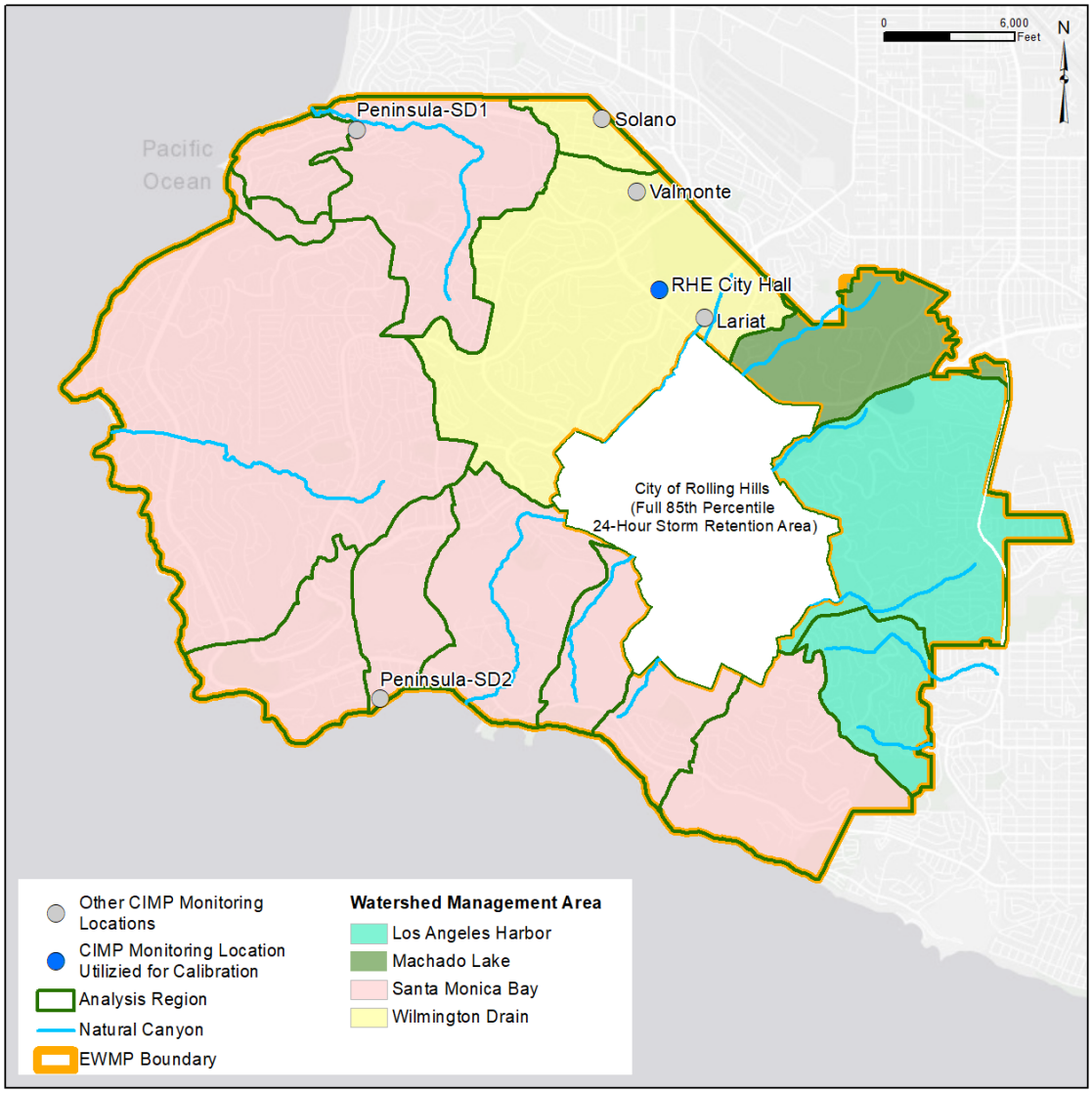


Figure 5. Locations of CIMP Monitoring Stations Utilized for Calibration

Calibrations were performed to meet the specifications of the RAA Guidelines Document (LARWQCB, 2014b), which are summarized in Table 3. Consistent with the regional WMMS 2.0 calibration process, percent bias (PBIAS) is the primary statistic used to evaluate the agreement between modeled-predicted and observed data. PBIAS quantifies systematic over- or under-prediction. Low values of PBIAS indicate a better fit. The lower bound of the "Fair" threshold is the minimum acceptable criteria for the model calibration. If a "Fair" threshold is not met during the model validation process, additional model adjustments are made to attain the threshold at the validation site. If such effort is not successful, additional investigations such as site monitoring investigations or further data collection would be completed to examine potential issues in the modeled and monitored data.

Table 3. Calibration Metrics

Category	Percent Difference Between Model-Predicated and Observed Data (PBIAS)		
	Very Good	Good	Fair
Hydrology / Flow	±0 – 10%	>±10% - 15%	>±15% - 25%
Sediment	±0 – 20%	>±20% - 30%	>±30% - 40%
Water Quality	±0 – 15%	>±15% - 25%	>±25% - 35%
Pesticides / Toxics	±0 – 20%	>±20% - 30%	>±30% - 40%

Details of the calibration and validation approach and results are presented in the following subsections.

5.1. Hydrologic Calibration

The objective of hydrologic calibration is to compare observed and model-predicted wet weather flow rates at monitoring sites and achieve a "Fair" agreement or better for the computed PBIAS metric.

As part of the Peninsula CIMP, continuous year-round flow data is collected at the Rolling Hills Estates City Hall (RHECH) and Valmonte outfall monitoring sites. For the remaining outfall monitoring sites, flow monitoring data is collected only during wet weather events, which is also when water quality samples are collected. With the exception of RHECH, the available wet weather flow rates were either too sporadic or too low, with no more than 15% of recorded wet weather flow above 0.1 cubic feet per second (cfs). As a result, and to avoid overly reducing runoff generation parameters, the hydrologic calibration only utilized continuous wet weather flow data collected at the RHECH monitoring site.

The hydrologic calibration required the evaluation of subsurface storage, infiltration, and groundwater recession modeling parameters. The calibration was performed by iteratively applying multipliers to HRU-specific modeling parameters. It should be noted that the majority of the Peninsula EWMP area first drains to vegetated natural canyons, where a significant portion of the runoff is detained and infiltrated prior to reaching downstream monitoring locations. This finding is consistent with the observation of the low flow rates at monitoring locations during the majority of the wet weather events. To account for the natural canyons throughout the Peninsula EWMP area, it is assumed that a fraction of the surface runoff is infiltrated in the natural canyons. The numeric value of the fraction was iteratively determined along with other HRU-specific modeling parameters until satisfactory calibration criteria were met. The resulting hydrology parameter ranges are presented in Table 4.

Table 4. Summary Calibrated Hydrology Modeling Parameters

Parameter	Description	Unit	Peninsula Model Range of Values
INFILT	Index to Infiltration Capacity	in/hr	0.4-8
AGWRC	Base groundwater recession	none	0.99
INTFW	Interflow inflow parameter	-	0.05-0.1
IRC	Interflow inflow recession parameter	-	0.03
ROUTE_SURO	Fraction of surface runoff routed to the stream	-	0.15

Notes: For hydrologic parameters not listed in the table, the default WMMS 2.0 model values were used without modification.

Table 5 presents a summary of the statistical results of the hydrologic calibration. Calculations of R^2, NSE, and PBIAS were based on a comparison of modeled and observed daily flow. For the PBIAS metric, all modeled flows were within or better than the "Fair" percent difference range, achieving the minimum acceptable criteria for the Regional Board RAA Guidance. R^2 and NSE are supplementary hydrological calibration metrics and show an acceptable correlation between modeled and observed flow data.

Table 5. Model Performance Summary - Hydrology

Calibration Metrics	Comparison Locations
	RHECH
PBIAS	+19.2

To further evaluate the temporal trends of the hydrology calibration, comparisons between model and observed monthly flows were evaluated by examining the time series

plots and the average monthly flows between November 2016 and June 2020. See Figure 6.

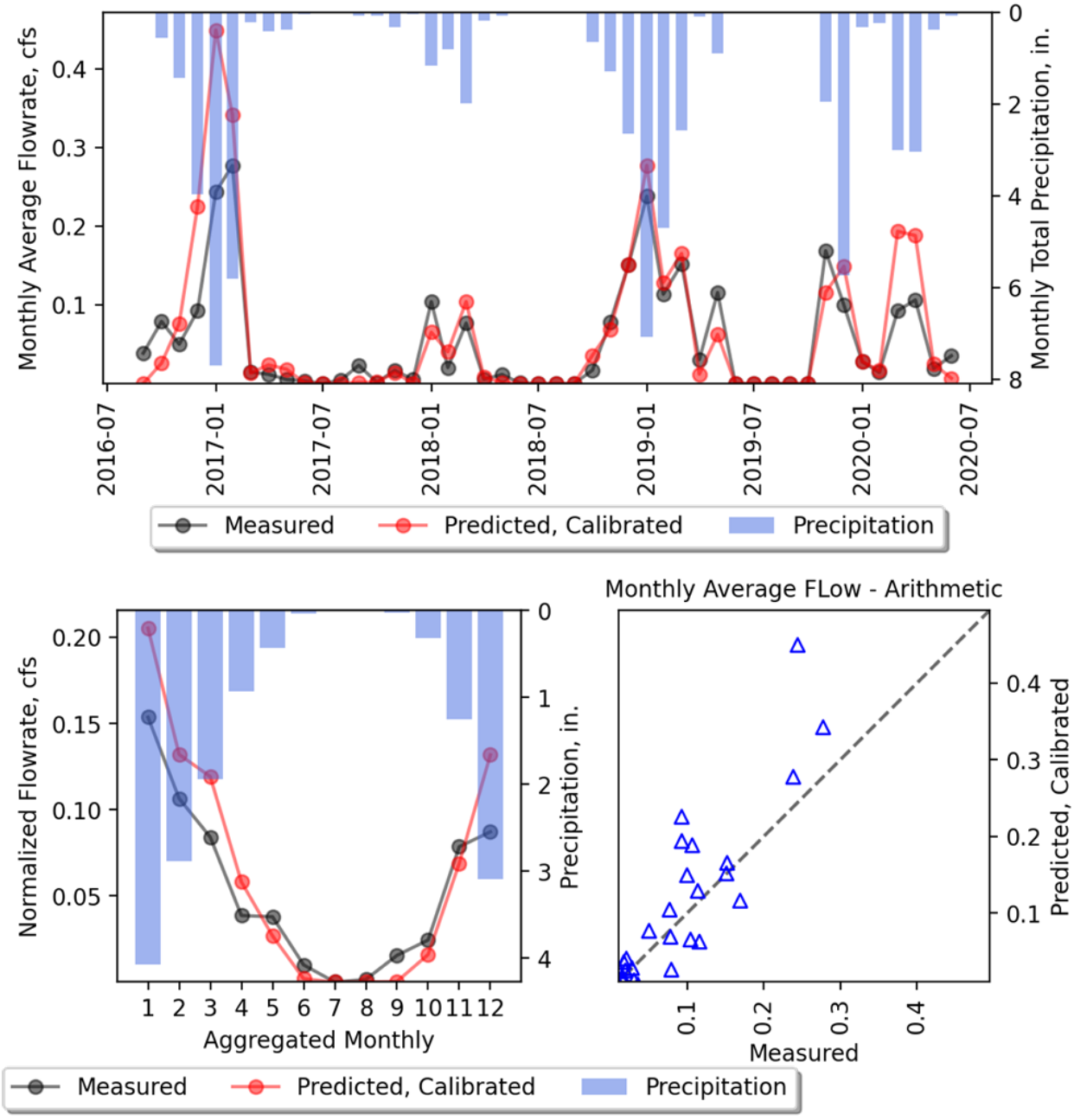


Figure 6. Comparison of Modeled and Monitored Flows at RHECH

5.2. Water Quality Calibration

The RAA Guideline requires water quality calibration based on available monitoring data from each analysis region over the most recent 10 years. The default WMMS 2.0 LSPC watershed model has been regionally calibrated and validated using data collected at Los Angeles County MES and CIMP receiving water monitoring stations throughout the Los Angeles County between water years 2008 and 2018. Building upon such effort, Geosyntec further calibrated the LSPC model using water quality data collected at Peninsula CIMP outfall monitoring locations shown in Figure 5. Modeling was completed for the following constituents:

- *E. coli*
- Total Suspended Solids (TSS)
- Nutrients – Total nitrogen and total phosphorus
- Metals – Total copper, total lead, and total zinc.

As discussed in Section 3.1.2, FIB representation was added to the WMMS 2.0 LSPC model to demonstrate compliance to water quality objectives that are expressed in exceedance days. HRU-specific land use bacteria EMCs from WMMS 1.0 were adopted as the starting point of the calibration. The next step in the calibration process was an iterative application of multipliers to EMCs across all HRUs. Specifically, the FIB modeling parameters were calibrated against *E. Coli* monitoring data collected at outfall site RHECH. The calibrated parameters are summarized in Table 6.

Table 6. Summary of Calibrated FIB Modeling Parameters

Parameter	Description	Units	Peninsula Model Range of Values
SOQC	Concentration of constituent in surface outflow	MPN/ 100mL	500 – 45,500
IOQC	Concentration of constituent in interflow outflow	MPN /100mL	500 – 45,500

Note: For parameters not listed in the table, the default WMMS 2.0 model values were used.

Total nitrogen was modeled as a non-sediment-associated pollutant in WMMS 2.0 LSPC. The total nitrogen build-up/wash-off parameter values are summarized in Table 7.

Table 7. Summary of Calibrated Total Nitrogen Loading Parameters

Parameter Name	Description	Units	Peninsula Model Values
ACQOP	Accumulation rate of total nitrogen on surface	lb/acre/day	0 - 3
SQOLIM	Maximum storage of total nitrogen on surface	lb/acre	0 - 12

Although TSS is not a pollutant of concern for the Peninsula EWMP area, it is a representative pollutant for sediment-associated pollutant simulation in LSPC. TSS load can be used as a surrogate for organic pollutants of concern that are not modeled directly in LSPC (i.e. PAHs, DDT, and PCBs). TSS calibration was performed by iteratively applying multipliers to HRU-specific parameter associated with sediment load buildup on the land surface. The range of values for TSS build-up/wash-off parameters are summarized in Table 8.

Table 8. Summary of Calibrated Sediment Loading Parameters

Parameter Name	Description	Units	Peninsula Model Range of Values
ACCSDP	Rate at which solids accumulate on the land surface	lb/acre/day	0 – 0.016
KSER	Coefficient in the detached sediment wash off equation	-	0 - 2

Note: TSS associated parameters that are not listed in the table, the default WMMS 2.0 model values were used without modification.

Metals and total phosphorous were modeled in WMMS 2.0 LSPC as sediment-associated pollutants. Calibration for metals was performed by iteratively applying HRU specific multipliers to LSPC model parameters associated with metal potency factors in order to maintain the same relative ratios among HRUs determined in the regionally calibrated WMMS 2.0 LSPC model. The model values associated with metal potency factors are summarized in Table 9.

Table 9. Summary of Calibrated Sediment-Associated Pollutant Parameters

Pollutant	Parameter Name	Description	Units	Peninsula Model Range of Values
Total Copper	POTFW	Pollutant wash-off potency factor per mass of sediment	lb/ton	0 – 0.4
	POTFS	Pollutant scour potency factor per mass of sediment	lb/ton	0 – 0.4
Total Lead	POTFW	Pollutant wash-off potency factor per mass of sediment	lb/ton	0 – 0.09
	POTFS	Pollutant scour potency factor per mass of sediment	lb/ton	0 – 0.09
Total Zinc	POTFW	Pollutant wash-off potency factor per mass of sediment	lb/ton	0 – 2.1
	POTFS	Pollutant scour potency factor per mass of sediment	lb/ton	0 – 2.1
Total Phosphorus	POTFW	Pollutant wash-off potency factor per mass of sediment	lb/ton	0 – 6.4
	POTFS	Pollutant scour potency factor per mass of sediment	lb/ton	0 – 6.4

Note: For parameters not listed in the table, the default WMMS 2.0 model values were used without modification.

Table 10 presents a summary of results for water quality calibration. Calculations of PBIAS are based on a comparison of modeled and observed daily average concentration at each outfall monitoring site. In reference to the RAA Guideline calibration metrics summarized in Table 3, all modeled pollutant concentrations were within the range for "Very Good" agreement with observed data.

Table 10. Water Quality Model Calibration Summary

Calibration Metric	Pollutants	RHECH
PBIAS	*E. coli*	-2.9
	TSS	14
	Total Copper	1.4
	Total Lead	7.1
	Total Zinc	4.9
	Total Nitrogen	-2.0
	Total Phosphorus	6.7

To further evaluate the temporal trends of the water quality calibration, comparisons between modeled and observed monthly flows were assessed using the time series plots of flows between November 2016 and June 2020. Please see Attachment A for the

resultant comparison plots. The time series plots for total zinc concentration is shown in Figure 7 as an example. The remaining time series plots are included in Attachment A.

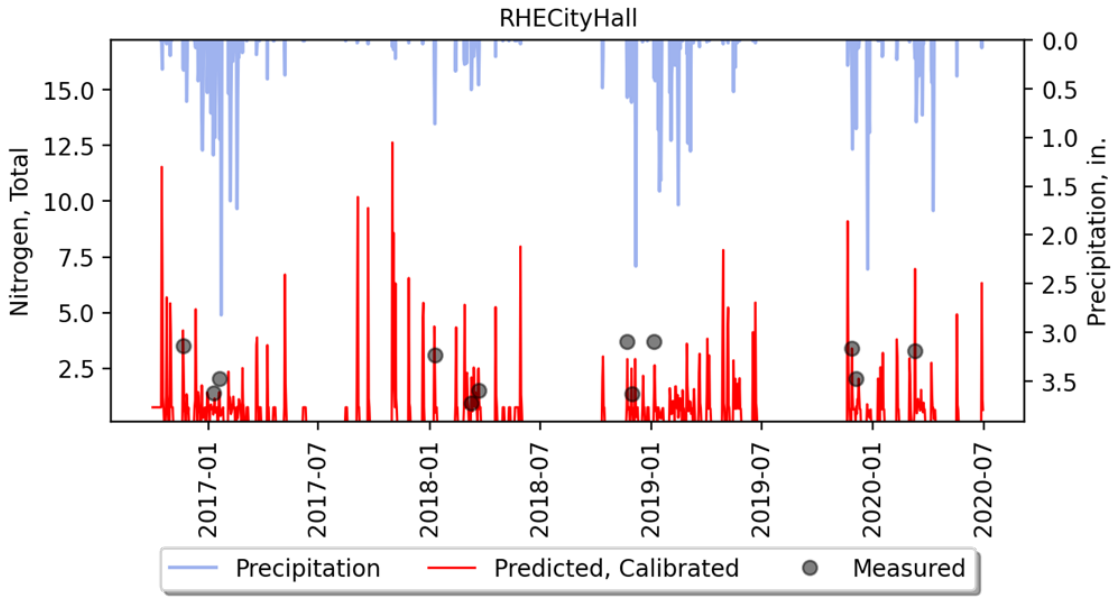


Figure 7. Total Nitrogen Concentration Comparison.

6. CRITICAL CONDITION DEFINITION

Consistent with RAA Guideline Document (LARWQCB, 2014b), the RAA was performed on the critical conditions defined in the applicable TMDLs. Determination of the critical conditions is summarized in the subsections below.

6.1. Machado Lake

The final MS4 WLAs in Machado Lake Nutrient TMDL and Machado Lake Pesticides and PCBs TMDL were both calculated based on the average water year, which is used as the critical condition for the wet weather RAA. LACFCD performed a hydrologic analysis to define the "average" water year during the WMMS 2.0 model development. Water Year 2010 was identified as the representative average water year in the Dominguez Channel watershed[3] based on analysis of the most recent 10-years of rainfall data (LACFCD, 2020c). As such, Water Year 2010 was used as the critical condition to establish wet weather nutrient and organic pollutant TLRs in the Peninsula Machado Lake watershed management area (WMA)

6.2. Wilmington Drain

Wilmington Drain WMA is a subwatershed tributary to Machado Lake. As explained in Section 6.1, Water Year 2010 represents the average water year and was used as the critical condition to establish wet weather nutrient and organic pollutants in the Peninsula Wilmington Drain WMA.

6.3. Los Angeles Harbor

According to the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Toxics TMDL (herein referred as the "Los Angeles Harbor Toxics TMDL"), the MS4 WLAs to Los Angeles Harbor waterbodies were calculated based on average annual condition. As such, the average water year was used as the critical condition to establish wet weather TLRs for metals and toxics pollutants. Again, Water Year 2010 was used as the critical wet weather condition.

[3] Both Machado Lake and Wilmington Drain WMAs are subwatershed to the HUC-12 Dominguez Channel Watershed.

7. TARGET LOAD REDUCTIONS

The following subsection documents the development of wet weather and year-round[4] TLRs for each of the Peninsula EWMP WMAs for all modeled WBPCs. A justification for WBPCs that did not require modeling to demonstrate compliance to applicable water quality standard are also provided. The dry weather RAA process, as described in Section 4.2 using the decision tree, do not require development of dry-weather specific TLRs. Section 10 summarizes the dry weather RAA results.

7.1. Santa Monica Bay WMA

Wet weather WBPCs in the Santa Monica Bay WMA include bacteria, trash and marine debris, PCBs, DDT, mercury, and arsenic. No modeling was conducted within the Santa Monica Bay WMA for the updated RAA, as reasonable assurance of compliance is already demonstrated via monitoring data.

7.1.1. Indicator Bacteria

The five SMBBB shoreline CMLs established for the Peninsula EWMP area (SMB 7-1 through 7-5) historically demonstrated fewer exceedance days than the reference beach (Leo Carrillo) used in TMDL development and were therefore considered anti-degradation sites when the TMDL was developed. The five Peninsula shoreline monitoring sites were sampled for indicator bacteria along the Palos Verdes Peninsula shoreline on a weekly basis. Data collected up through June 2020 indicate that exceedance of wet weather single sample limits are infrequent. All five sites generally averaged less than one exceedance day above the annual wet weather allowable exceedance days over the past 10 years, except during the 2016-17 rainy season which was wetter than the critical year. Given these findings, zero TLR were determined for analysis regions tributary to SMB-7-1 through 7-5. This is consistent with the TMDL's approach that acknowledges that historic bacteria exceedance rates for each of these subwatersheds are, on average, lower than that of the reference beach.

7.1.2. PCBs and DDT

For PCBs and DDT, the WLAs for the entire Santa Monica Bay watershed were determined as equal to the existing estimates of annual loads for DDTs and PCBs. Therefore, consistent with the TMDL, it is assumed that there is a required load reduction of zero for PCBs and DDT, and no RAA is required. Additionally, four complete years of nearshore receiving water quality data have been collected under the Peninsula CIMP

[4] Year-round TLRs that account for both wet and dry weather TLRs were only developed for area with observed non-exempt dry weather flow.

in the Santa Monica Bay and analyzed for total DDT and PCBs. Of these dry and wet-weather samples collected, only one (1) out of forty (40) samples or 2.5% resulted in detection of 4,4'- DDT at a concentration between the method detection limit and the reporting limit. This sample was collected during a summer dry weather sampling event in the fourth year of CIMP monitoring. None of the forty (40) receiving water samples collected over the past four years have resulted in detections of Total PCBs above the Ocean Plan objective for total PCBs. This data further validates the conclusion that the Peninsula WMG is in compliance with the TMDL MS4 WLA for total DDTs and total PCBs, and no RAA is needed for these WBPCs.

7.1.3. Mercury and Arsenic

Mercury and arsenic were recently added to the 303(d) list for Santa Monica Bay based on sediment and fish tissue data collected under the Hyperion Treatment Plant NPDES Permit no. CA0109991 between January 2006 and June 2010. There's no existing data or evidence tying either of these pollutants to stormwater MS4 discharges. Arsenic and mercury have been added to the outfall monitoring sites for the Santa Monica Bay in response to recent 303(d) listings, however insufficient data are available to support the need for RAA.

7.1.4. Trash and Marine Debris

Compliance with the Santa Monica Bay Debris TMDL will be met through a phased retrofit of catch basins throughout the Peninsula Santa Monica Bay WMAs. Trash exclusion devices, along with trash source controls to meet each interim compliance deadline and the final compliance deadline are the management controls planned to achieve compliance. Hence, these constituents do not require a TLR to be calculated and were not modeled as part of the revised RAA.

7.2. Machado Lake WMA

Wet weather and year-round pollutants of concern in the Machado Lake watershed include trash, PCBs, DDT, total chlordane, dieldrin, total nitrogen, and total phosphorus. Compliance with the Machado Lake Trash TMDL has been met through retrofit and ongoing maintenance of catch basins throughout the Machado Lake WMAs with trash exclusion devices. Hence, trash does not require a TLR and was not modeled as part of the revised RAA. TLRs for the remaining WBPCs were established using the calibrated WMMS 2.0 LSPC model. While the model is only capable of representing a subset of the WBPCs directly, justifications were provided to establish TLRs for the other WBPCs to comply with the State Board's requirement to demonstrate attainment of water quality standards for all compliance targets (SWRCB, 2020).

7.2.1. Nutrients

The final MS4 WLAs for total nitrogen and total phosphorus are expressed in the following two ways in the Machado Lake Nutrients TMDL:

- Monthly average WQBEL concentration.
- Annual average pollutant load calculated as the WQBEL concentration multiplied by the annual average inflow to the Machado Lake (8.45 HM^3/year) apportioned to each WMA tributary to Machado Lake (directly or via Wilmington Drain). This method was initially established in the Los Angeles County Machado Lake Nutrient TMDL Special Study (LACDPW, 2011) following conditional approval of the work plan by LARWQCB (LARWQCB, 2010).

Of the two acceptable compliance pathways, the annual average pollutant load method was selected to determine the allowable load in subsequent TLR calculations.

The following approach was implemented to calculate a TLR for total nitrogen and total phosphorus in Peninsula Machado Lake WMA:

1. The analysis region was modeled in LSPC for water year 2010 in order to obtain the baseline wet weather pollutant load. The number of wet days during the modeled year were also defined based on the precipitation data.
2. For analysis regions with observed dry weather flow, the baseline dry weather pollutant load was estimated by multiplying the average measured daily dry weather flow from water year 2010 by the average dry weather pollutant concentrations.
3. For analysis regions without observed dry weather flow as determined through the non-stormwater outfall screening and source investigation report (Peninsula WMG, 2018), the dry weather pollutant load was assumed to be zero.
4. The total baseline load was computed by summing the dry weather and wet weather pollutant load computed in Step 1 and 2.
5. The allowable load was calculated as the WQBEL concentration multiplied by the annual average inflow to the Machado Lake (8.45 HM3/year) apportioned to the analysis region tributary to the Machado Lake.
6. The difference between the annual baseline load (step 4) and the annual allowable load (step 5) resulted in a TLR for the average water year, which was the load reduction required to meet the allowable TMDL concentration.
7. A TLR equivalent 24-hour runoff management volume was estimated as the following:
    a. First, estimate the annually managed runoff volume by dividing the TLR by the annual baseline runoff volume.

b. Next, add an in-stream diversion to a hypothetical retention BMP with a 24-hour drawdown time at the outlet of analysis region and iteratively size until the diverted (and hence managed) runoff volume is equal to or greater than the annually managed runoff volume. The retention volume of this hypothetical retention BMP was determined to be the 24-hour runoff management volume. Both load-based TLRs and the equivalent 24-hour runoff management volumes are considered acceptable Peninsula EWMP compliance metrics

7.2.2. Pesticides and PCBs

PCBs, DDT, total chlordane, and dieldrin are Category 1 WBPCs in the Machado Lake WMA due to inclusion in the Machado Lake Pesticides and PCBs TMDL. The final MS4 WLA in the TMDL is expressed as the annual loading of pollutants calculated as the sediment-based WQBEL multiplied by the annual TSS load.

These pollutants cannot be modeled directly in WMMS 2.0 LSPC. Instead, TSS was modeled and used as a surrogate to compute the TLR based on data demonstrating the amount of pollutant associated with TSS particulates.

The following approach was implemented to calculate a TLR for each organic pollutant in the Peninsula Machado Lake WMA.

1. The analysis region was modeled in LSPC to obtain TSS load during water year 2010.
2. Particulate strength (organic-to-TSS ratio) for PCBs, DDT, total chlordane, and dieldrin were calculated using paired wet weather monitoring data collected at outfall monitoring within the Machado Lake and Wilmington Drain WMAs.
3. The baseline pollutant load was computed by multiplying the baseline TSS load and the organic pollutant particulate strength.
4. An average baseline pollutant concentration was computed as the annual baseline
5. The allowable load was calculated as the sediment-based WQBEL multiplied by the annual TSS load.
6. The difference between the baseline load and the allowable load resulted in a TLR for water year 2010 was the load reduction required to meet the applicable water quality standard.
7. A TLR equivalent 24-hour (daily) runoff management volume was estimated as the following:
    a. First, estimate the annually managed TSS load by dividing the TLR by the particulate strength.

b. Next, an in-stream diversion to a large hypothetical retention BMP with a 24-hour drawdown time at the outlet of analysis region was iteratively sized until the diverted (and hence managed) TSS load equal to or greater than the annually managed TSS load. The retention volume of this hypothetical retention BMP was deemed as the 24-hour runoff management volume. Both load-based TLR and the equivalent 24-hour runoff management volume are considered eligible Peninsula EWMP compliance metrics.

7.3. Wilmington Drain WMA

Wilmington Drain is an impaired waterbody that drains to Machado Lake. Hence, WBPCs applicable to the Machado Lake WMA (trash, PCBs, DDT, total chlordane, dieldrin, total nitrogen, and total phosphorus) are also applicable to the Wilmington Drain WMA. In addition, Wilmington Drain is a 303(d) listed receiving water for bacteria (*E. coli*), making this a Category 2 WBPC for the Wilmington Drain WMA.

Compliance with the Machado Lake Trash TMDL has been met through a phased retrofit of catch basins throughout the Wilmington Drain WMA. Therefore, trash does not require a TLR and was not modeled as part of the revised RAA. TLRs for the remaining pollutants of concern were established using the calibrated WMMS 2.0 LSPC model. While the model is only capable of modeling a subset of WBPCs directly, a justification was provided to how the TLRs were developed for the other WBPCs in order to demonstrate the attainment of water quality standards for all compliance targets (SWRCB, 2020).

7.3.1. Nutrients

Due to inclusion in the Machado Lake Nutrients TMDL, total nitrogen and total phosphorous are Category 1 WBPCs in Wilmington Drain. The same approach described in Section 7.2.1 was used to establish TLRs and TLR-equivalent 24-hour runoff management volumes for total nitrogen and total phosphorus.

7.3.2. Pesticides and PCBs

Due to inclusion in the Machado Lake Toxic TMDL, PCBs, DDT, total chlordane, and dieldrin are Category 1 WBPCs in the Machado Lake WMA. The same calculation approach described in Section 7.2.2 was used to determine TLRs and TLR-equivalent 24-hour management volumes for PCBs, DDT, total chlordane, and dieldrin TLRs.

7.3.3. Bacteria (*E. coli*)

Although Wilmington Drain is a 303(d)-listed waterbody for bacteria, modeling was not conducted as part of the updated RAA due to the fact that the Wilmington Drain watershed area will be fully captured and managed via 85th percentile regional projects. If future bacteria modeling is conducted, it will account for the latest State Board guidance regarding the statistical threshold value (STV) as well as local applications of this standard.

7.4. Los Angeles Harbor WMA

Wet weather pollutants of concern in the Los Angeles Harbor watershed include PCBs, DDT, total copper, total lead, total zinc, and PAHs. TLRs were established using the calibrated Los Angeles Harbor LSPC model. While the model is only capable of representing a subset of WBPCs directly, justification was provided to establish TLRs for the other WBPCs in order to comply with the State Board's requirement to demonstrate the attainment of water quality standards for all compliance targets (SWRCB, 2020).

7.4.1. Metals

Due to inclusion in the Dominguez Channel and Greater Los Angeles Harbor Toxics and Metals TMDL, total copper, total lead, and total zinc are considered Category 1 WBPCs for the two Los Angeles Harbor waterbodies the Peninsula EWMP area drains to (Inner Harbor and Cabrillo Marina). The final MS4 WLA in the TMDL are expressed in the following three ways:

1. Annual loading of pollutants calculated as the California Toxics Rule (CTR) saltwater chronic criteria-based water-column WQBEL concentration multiplied by the average annual flow volume.
2. Annual loading of pollutants calculated as the sediment-based WQBELs multiplied by the annual average TSS loading. The WQBEL is based on the Los Angeles Region Water Quality Control Plan to address the TMDL. It is adopted from the sediment numeric targets developed in the Screening Quick Reference Tables (SQuiRTs) developed by National Oceanic and Atmospheric Administration (NOAA).
3. Annual mass-based MS4 WLA apportioned to Peninsula WMG's tributary areas to the Los Angeles Harbor.

According to the MS4 Permit Attachment N, all three approaches are acceptable to demonstrate TMDL compliance. Method 2 was used as the allowable load in subsequent TLR calculations. The same calculation approach described in Section 7.2.2 was used to

establish TLRs and TLR-equivalent 24-hour management volumes for total copper, total lead, and total zinc, with one modification to Step 3. This modification did not require development of particulate strengths as the metal loads can be directly represented in WMMS 2.0 LSPC model.

7.4.2. Pesticides and PCBs.

Because of the Dominguez Channel and Greater Los Angeles Harbor Toxics and Metals TMDL, PCBs, DDT, total chlordane, and dieldrin are defined as Category 1 WBPCs for the two Los Angeles Harbor waterbodies draining the Peninsula EWMP area (Inner Harbor and Cabrillo Marina). The same calculation approach described in Section 7.2.2 was used to establish TLRs and TLR-equivalent 24-hour management volumes for PCBs, DDT, total chlordane, and dieldrin.

7.5. 85th Percentile, 24-Hour Design Storm Simulation

As an alternative path of demonstrating compliance with the MS4 Permit, the Peninsula WMG evaluated the option of fully capturing the 85th percentile, 24-hour design storm runoff from each WMA. The hydrology simulation was performed using the calibrated Peninsula WMMS 2.0 LSPC model. LACFCD has included the 85th percentile design storm hyetograph as part of the WMMS 2.0 database. The design storm depth for the Peninsula WMG varies from 0.8 to 1.1 inches (LACDPW, 2006).

7.6. Interim and Final Wet Weather TLR Summary

Final TLRs were developed for each modeled pollutant using the established numeric targets. TLRs are listed by analysis region for each modeled WBPC in Table 11. WBPCs for both Machado Lake and Wilmington Drain are applicable to analysis regions in the Wilmington Drain WMA (WD-1 and WD-Solano). WBPCs for the Machado Lake are applicable to analysis regions in the Machado Lake WMA (ML-1). WBPCs for the Los Angeles Harbor are applicable to the analysis regions of the Los Angele Harbor WMAs and. Specifically, WBPCs are apportioned to the Inner Harbor (LAH-IH) and to Cabrillo Marina (LAH-CM).

For the Machado Lake and Wilmington Drain WMAs, the calculation yielded zero total PCBs TLRs in all analysis regions. This is consistent with the recent CIMP monitoring, which showed no exceedance of total PCBs in the past five years. The calculation also yielded zero total nitrogen TLRs for all analysis regions and yielded zero total phosphorus TLRs for WD-Solano. A 1% total phosphorous TLR was calculated for ML-1 and a 14% total phosphorus TLR was calculated for WD-1. The primary reason of the resultant zero or little total nitrogen and total phosphors TLRs is the that the calibrated model, which reflected Peninsula WMG's watershed management over the past decade, significantly

showed reduction in wet weather runoff and associated less total nitrogen and total phosphorus load in comparison to the baseline condition used in the development of total nitrogen and total phosphorus MS4 WLAs in the TMDL. For the non-zero TLRs in the Machado Lake WMA, all the TLR-equivalent 24-hour management volumes are less than the 85th percentile, 24-hour design storm runoff volume. As a result, the recommended approach is to meet the final TLRs rather than trying to meet the full 85th percentile, 24-hour design storm runoff capture alternative. For the Machado Lake analysis region, the largest 24-hour management volume was selected as the target compliance metric, since management of the largest volume will result in management of all others. For the Wilmington Drain WMA, since bacteria was not modeled, and 85th percentile 24-hour design storm capture projects are planned for both tributary analysis regions the full 85th percentile, 24-hour runoff volume is shown as the compliance volume.

For analysis regions in the Los Angeles Harbor WMA, the 85th percentile, 24-hour design storm runoff volume of each analysis region is less than the maximum TLR-equivalent 24-hour runoff management volumes in that analysis region. Therefore, the recommended approach is to meet the full 85th percentile, 24-hour runoff capture alternative.

Table 11. Final Wet Weather Target Load Reduction Summary

Subwatershed	Analysis Region	Pollutant	Critical Condition	Baseline Load		Final Target Load Reduction			
						Absolute		% of Baseline Load	TLR Equivalent 24-Hour Management Volume (ac-ft)
Machado Lake	ML-1	Total PCBs	Average Water Year	7.5E-04	lb/yr	0	lb/yr	0%	0.0
		DDx (Total)	Average Water Year	1.0E-03	lb/yr	9.0E-04	lb/yr	88%	1.3
		DDT (All congeners)	Average Water Year	1.2E-05	lb/yr	0	lb/yr	0%	0.0
		DDE (All congeners)	Average Water Year	6.4E-04	lb/yr	5.7E-04	lb/yr	89%	**1.3**[1]
		DDD (All congeners)	Average Water Year	6.3E-04	lb/yr	5.2E-04	lb/yr	82%	1.1
		Total Chlordane	Average Water Year	2.1E-04	lb/yr	1.3E-04	lb/yr	64%	0.7
		Dieldrin	Average Water Year	1.2E-05	lb/yr	0	lb/yr	0%	0.0
		Total Nitrogen	Average Water Year	119	lb/yr	0	lb/yr	0%	0.0
		Total Phosphorus	Average Water Year	38.4	lb/yr	0.4	lb/yr	1%	0.1
		n/a	85th Percentile 24-Hour Storm	1.6	ac-ft	1.6	ac-ft	100%	1.6
Machado Lake - Wilmington Drain	WD-1	Total PCBs	Average Water Year	3.6E-03	lb/yr	0	lb/yr	0%	0.0
		DDx (Total)	Average Water Year	4.9E-03	lb/yr	4.3E-03	lb/yr	88%	7.4
		DDT (All congeners)	Average Water Year	6.0E-05	lb/yr	0.0E+00	lb/yr	0%	0.0
		DDE (All congeners)	Average Water Year	3.1E-03	lb/yr	2.7E-03	lb/yr	89%	7.4
		DDD (All congeners)	Average Water Year	3.1E-03	lb/yr	2.5E-03	lb/yr	82%	6.2
		Total Chlordane	Average Water Year	9.9E-04	lb/yr	6.3E-04	lb/yr	64%	4.2
		Dieldrin	Average Water Year	5.6E-05	lb/yr	0	lb/yr	0%	0.0
		Total Nitrogen	Average Water Year	1510	lb/yr	0	lb/yr	0%	0.0
		Total Phosphorus	Average Water Year	346	lb/yr	47.2	lb/yr	14%	0.6
		n/a	85th Percentile 24-Hour Storm	8.01	ac-ft	8.01	ac-ft	100%	**8.0**[1]
	WD-Solano	Total PCBs	Average Water Year	2.07E-04	lb/yr	0	lb/yr	0%	0.0
		DDx (Total)	Average Water Year	2.84E-04	lb/yr	2.5E-04	lb/yr	88%	0.5
		DDT (All congeners)	Average Water Year	3.47E-06	lb/yr	0	lb/yr	0%	0.0
		DDE (all congeners)	Average Water Year	1.77E-04	lb/yr	1.6E-04	lb/yr	89%	0.5
		DDD (All congeners)	Average Water Year	1.76E-04	lb/yr	1.4E-04	lb/yr	82%	0.4

Subwatershed	Analysis Region	Pollutant	Critical Condition	Baseline Load		Final Target Load Reduction			
						Absolute		% of Baseline Load	TLR Equivalent 24-Hour Management Volume (ac-ft)
		Total Chlordane	Average Water Year	5.72E-05	lb/yr	3.6E-05	lb/yr	64%	0.3
		Dieldrin	Average Water Year	3.21E-06	lb/yr	0	lb/yr	0%	0.0
		Total Nitrogen	Average Water Year	42	lb/yr	0	lb/yr	0%	0.0
		Total Phosphorus	Average Water Year	9	lb/yr	0	lb/yr	0%	0.0
		n/a	85th Percentile 24-Hour Storm	0.57	ac-ft	0.57	ac-ft	100%	**0.6**[1]
Los Angeles Harbor	LAH - IH	Total Copper	Average Water Year	8.1	lb/yr	4.5	lb/yr	55%	2.2[2]
		Total Lead	Average Water Year	1.7	lb/yr	0	lb/yr	0%	0.0
		Total Zinc	Average Water Year	33.5	lb/yr	17.4	lb/yr	52%	2.0
		4,4'-DDT	Average Water Year	1.3E-05	lb/yr	0	lb/yr	0%	0.0
		DDx (Total)	Average Water Year	4.7E-03	lb/yr	4.6E-03	lb/yr	96%	10.4
		Total PCBs	Average Water Year	3.5E-03	lb/yr	1.0E-03	lb/yr	30%	0.9
		Total PAHs	Average Water Year	4.4E-01	lb/yr	9.8E-03	lb/yr	2%	0.1
		n/a	85th Percentile 24-Hour Storm	5.4	ac-ft	5.4	ac-ft	100%	**5.4**[1]
	LAH-CM	Total Copper	Average Water Year	1.8	lb/yr	0.87	lb/yr	49%	0.5[2]
		Total Lead	Average Water Year	0.4	lb/yr	0	lb/yr	0%	0.0
		Total Zinc	Average Water Year	8.2	lb/yr	4.1	lb/yr	50%	0.5
		4,4'-DDT	Average Water Year	3.3E-06	lb/yr	0	lb/yr	0%	0.0
		DDx (Total)	Average Water Year	1.2E-03	lb/yr	1.2E-03	lb/yr	96%	2.8
		Total PCBs	Average Water Year	8.8E-04	lb/yr	2.6E-04	lb/yr	30%	0.3
		Total PAHs	Average Water Year	1.1E-01	lb/yr	2.5E-03	lb/yr	2%	0.1
		n/a	85th Percentile 24-Hour Storm	1.5	ac-ft	1.5	ac-ft	100%	**1.5**[1]

[1] Bold value is the representative 24-hour management runoff volume for each analysis region. For WD-1 and WD-Solano, the 85th percentile, 24-hour storm volume is selected since bacteria was not modeled.

[2] TLR for Total Copper does not account for expected reductions over time due to copper brake pad phase-outs in California. See Section 8.2.1.

To demonstrate compliance with interim TMDL WLAs, interim TLRs were developed for Category 1 pollutants that have non-zero TLRs as shown in as summarized in Table 11. No interim TLRs were developed for pollutants without an interim TMDL numeric target. The resultant interim TLRs are summarized in Table 12.

As shown in the table, the calculation yielded zero interim TLRs for all analysis regions in the Machado Lake and Wilmington Drain WMA. For analysis regions in the Los Angele Harbor WMA, no RAA is required to demonstrate compliance with the interim MS4 WLA because receiving water monitoring shows the 3-year average pollutants are below the RWLs at Inner Harbor and Cabrillo Marina for all pollutants of concern (Anchor QEA, 2019).

Table 12. Interim Wet Weather Target Load Reduction Summary

WMA	Analysis Region	Pollutant	Critical Condition	Baseline Load		Allowable Interim Load		Interim Target Load Reduction			TLR Equivalent 24-Hour Management Volume (ac-ft)
								Absolute		% of Baseline Load	
Machado Lake	ML-1	Total Nitrogen	Average Runoff Year	Final TLR = 0%, hence RAA achieved							
		Total Phosphorus	Average Runoff Year	38.4	lb/yr	475	lb/yr	0	lb/yr	0%	0.0
Machado Lake - Wilmington Drain	WD-1	Total Nitrogen	Average Runoff Year	Final TLR = 0%, hence RAA achieved							
		Total Phosphorus	Average Runoff Year	346	lb/yr	3,731	lb/yr	0	lb/yr	0%	0.0
	WD - Solano	Total Nitrogen	Average Runoff Year	Final TLR = 0%, hence RAA achieved							
		Total Phosphorus	Average Runoff Year	Final TLR = 0%, hence RAA achieved							
Los Angeles Harbor	LAH - IH	Total Copper	Receiving water monitoring shows compliance with all interim RWLs. Hence no RAA needed.								
		Total Lead									
		Total Zinc									
		DDx (Total)									
		Total PCBs									
		Total PAHs									
	LAH-CM	Total Copper	Receiving water monitoring shows compliance with all interim RWLs. Hence no RAA needed								
		Total Lead									
		Total Zinc									
		DDx (Total)									
		Total PCBs									
		Total PAHs									

8. STORMWATER CONTROL OVERVIEW

8.1. Methods to Select and Prioritize BMPs

To demonstrate reasonable assurance, dry weather and stormwater runoff BMPs were identified in a prioritized manner to meet the TLRs. Prioritization was based on cost (low-cost BMPs were prioritized first); BMP effectiveness for the pollutants of concern (BMPs that had greater treatment efficiency for the pollutant of concern in a particular analysis region were prioritized over other BMPs); and implementation feasibility as determined by the Peninsula WMG.

Because recent monitoring data was used during calibration, it was assumed that the calibrated baseline model effectively accounted for existing BMPs that were already present in the Peninsula EWMP area (e.g., implementation of street sweeping, catch basin and storm drain cleaning, and low impact development projects completed prior to June 2020, etc.). Since drainage area to the monitoring location utilized for hydrology and water quality calibration does not contain any existing regional stormwater BMPs or green streets, the effects of regional or green street BMPs were not used for calibration. The performance of existing, location specific regional BMPs has been quantified in this revised RAA.

The RAA was performed according to the following steps:

1. Calculate load reductions associated with existing structural regional and distributed BMPs;
2. Calculate load reductions for proposed regional and distributed BMPs that were identified in existing plans; and
3. If necessary, identify additional BMP capacity needed to meet any remaining TLR for each analysis region.

8.2. Quantified Non-Structural BMPs

In accordance with the State Board Order (SWRCB, 2020), all non-structural BMP credits are required to be adequately justified. Since data is limited with respect to load reductions achieved by most non-structural BMPs, this revised RAA incorporated the assumption that non-structural BMPs implemented prior to June 2020 (including enhanced minimal control measures [MCMs]) have been accounted for as part of the data used in the calibrated baseline condition. As a result, no “blanket” non-structural BMP load reduction credit has been incorporated into the revised RAA.

Source controls implemented by the Peninsula WMG included a combination of BMPs such as new or enhanced pet waste controls (ordinance, signage, education/outreach, mutt mitts, etc.), enhanced street sweeping (e.g., 100% vacuum sweepers, increased frequency, posting of 'No Parking' signs for street sweeping, etc.), increased catch basin and storm drain cleaning, and other new or enhanced non-structural BMPs that target the pollutants addressed in the EWMP. Although no separate pollutant load reduction was calculated in the RAA for the implementation of these BMPs, the RAA assumes that the Peninsula WMG will continue to implement a variety of these targeted non-structural BMPs.

One specific non-structural regulatory BMP program was accounted for in this revised RAA for which a load reduction could be quantified and forecasted based on phased implementation – the elimination of copper in brake pads.

8.2.1. Copper Brake Pad Reduction

In 2010, California Senate Bill 346 (SB 346) was enacted to eliminate nearly all use of copper in brake pad manufacturing. In 2013, TDC Environmental prepared a draft detailed study for the California Stormwater Quality Association (CASQA) describing the expected percent reduction for copper as a result of the passage of SB 346 (TDC Environmental, 2013). The TDC study identified three possible implementation scenarios, the least aggressive of which estimated that a 52% load reduction in copper will be achieved by 2032 due to the brake pad phase-out.

Although there is an expectation that copper loads in urban runoff will decrease over time as a result of SB 346, the updated RAA did not attempt to take credit for this load reduction at this time. Following the collection of additional watershed-specific water quality data in the future, adaptive management may be utilized by the Peninsula WMG to update the TLR for copper and/or the load reductions expected to be achieved by this source control program.

8.3. Representing Structural BMPs

To represent structural BMPs, WMMS 2.0 SUSTAIN was used to account for BMP storage, infiltration, inflow, and outflow capacities using available BMP as-built drawings or conceptual drawings provided by the Peninsula WMG. For structural BMPs that provide flow-through treatment, the treatment efficacy was represented as either fixed effluent concentration or as a percentage of influent concentration reduction extracted from the following data sources:

- WMMS 2.0 Phase II Report: BMP Model and Optimization Framework (LACFCD, 2020b), which includes effluent concentrations of BMPs included in the default WMMS 2.0 SUSTAIN model.

- The International Stormwater Database (IBMPDB; www.bmpdatabase.org), which is a comprehensive source of BMP performance information, comprised of data from a peer-reviewed collection of studies that have monitored the effectiveness of a variety of BMPs in treating water quality pollutants for multiple land use types.

8.3.1. Regional and Distributed Structural Projects

Through the project screening and evaluation process, a total of four regional projects and four distributed projects were modeled in the RAA, Table 13 summarizes project types and key modeling parameters. Project locations and tributary areas to these projects are shown in Figure 8.

The following regional structural projects are planned to receive Peninsula WMG runoff but were not modeled due to uncertainty of their future design and performance:

- **Walteria Basin Special Study**: Walteria Basin is a flood control basin that receives runoff from 174 acres of drainage area (which includes 55 acres of impervious area) from Palos Verdes Estates in analysis region WD-Solano. The Peninsula WMG will continue working with LACFCD and the City of Torrance to assess how the Walteria Basin can be utilized as part of a regional stormwater capture project in conjunction with other regional projects in the Machado Lake watershed to meet TLRs in the WD-Solano analysis region.
- **Palos Verdes Multi-Benefit Flow Diversion Project**. This project is currently proposed as a dry weather flow management project within analysis region WD-1. A wet weather flow management component will be further evaluated if additional wet weather projects are required to meet the final TLR through the Peninsula EWMP adaptive management process.
- **Harbor City Park Stormwater Capture Project**. This project is a signature regional project proposed by the Dominguez Channel WMG. It is hydrologically connected to the Torrance Airport Stormwater Capture Project and can potentially capture and treat excess stormwater runoff from analysis region WD-1. The Peninsula WMG is interested in collaborating with the Dominguez Channel WMG to share in the benefits of reduced load if additional wet weather projects are required to meet the final TLR through the Peninsula EWMP adaptive management process.

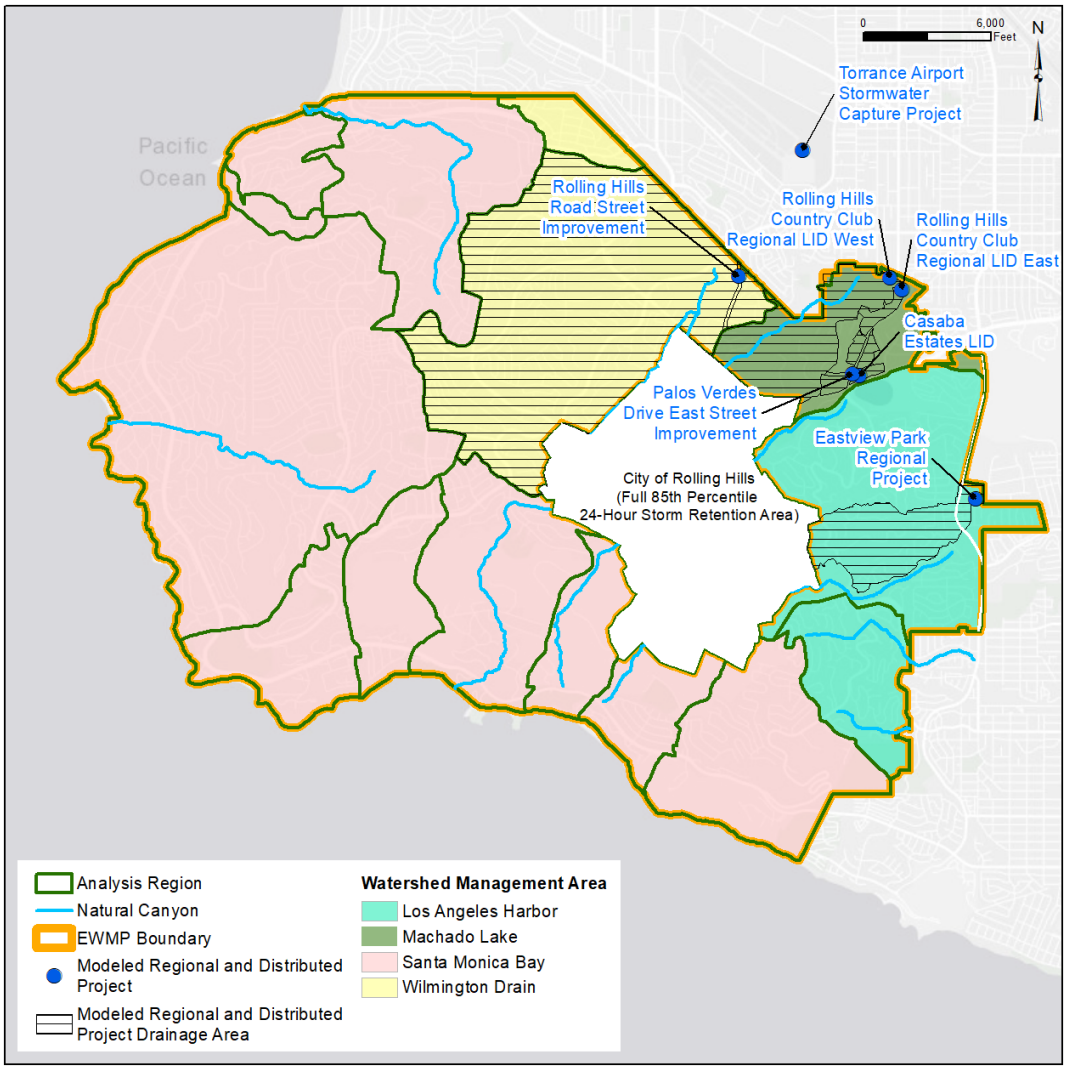


Figure 8. Modeled Regional and Distributed Projects

Table 13. Summary of Modeled Project

Analysis Region	Project	Lead WMG Member	BMP Type	Drainage Area (ac)	Impervious Drainage Area (ac)	BMP Volume (ac-ft)	Infiltration /Treatment Capacity
WD-1	Torrance Airport Stormwater Basin Project Phase II	Rancho Palos Verdes and Torrance[1]	Subsurface Detention & Diversion to Sewer	74 (PVE)	15 (PVE)	21	2.2 cfs
				678 (RPV)	263 (RPV)		
				1,113 (RHE)	539 (RHE)		
				441 (LAC)	112 (LAC)		
	Rolling Hills Road Street Improvement	Rolling Hills Estate	Pervious Pavement	0.4 (RHE)	0.4 (RHE)	0.04	1 in/hr
ML-1	Casaba Estates LID	Rolling Hills Estate	Surface Retention Basin	28 (RHE)	7 (RHE)	0.4	0.9 in/hr
	Rolling Hills Country Club Regional LID Project – West	Rolling Hills Estate	Surface Retention & Infiltration Basin	358 (RHE) [2]	60 (RHE)	3.8	482 in/hr
	Rolling Hills Country Club Regional LID Project – East	Rolling Hills Estate	Surface Retention & Infiltration Basin	51 (RHE)	2.0 (RHE)	0.7	1.3 in/hr
	Palos Verdes Drive East Street Improvement	Rolling Hills Estate	Pervious Pavement	2.6 (RHE)	0.5 (RHE)	0.3	1 in/hr
LAH-IH	Eastview Park Regional Project	Rancho Palos Verdes	Subsurface Retention, Treatment and Diversion	345 (RPV)	123 (RPV)	1.2	0.6 cfs

[1]The Peninsula WMG has agreed to collaborate with City of Torrance to utilize this project to receive and manage stormwater runoff form Peninsula EWMP area.
[2]Does not include non-Peninsula EWMP drainage area.
PVE = Palos Verdes Estates; RPV = Rancho Palos Verdes; RHE = Rolling Hills Estates: LAC = Unincorporated Los Angeles County

8.3.2. LID Redevelopment

The 2012 MS4 Permit established new criteria for redevelopment projects, requiring certain sized projects to capture, retain, or infiltrate the 85th percentile, 24-hr design storm or the 0.75-inch design storm, whichever is greater, or treat 150% of the peak stormwater runoff rate resulting from a 1-year, 1-hour design storm, via the implementation of low impact development (LID) BMPs. All LID BMPs constructed through June 2020 were assumed to be accounted for in the model via the monitoring and calibration process. Moving forward, LID was assumed to be implemented at the annual redevelopment rate of 0.038% per year. In accordance with this redevelopment rate, which was summarized in the 2019-20 Peninsula WMG Annual Watershed Report (Peninsula WMG, 2020), redevelopment that is subject to an LID ordinance was modeled assuming an annual redevelopment of 0.038% per year across all Peninsula WMG agency jurisdictions for residential, commercial, industrial, institutional, and transportation land uses. To estimate load reductions associated with these redevelopment BMPs, the land use percentages were multiplied by the respective land use areas in each analysis region. This resulted in a calculated area that would be treated by LID BMPs each year. This area was multiplied by the applicable number of years until the TMDL final deadlines, as LID BMPs will be implemented each year at the assumed rate. The total land use area assumed to be redeveloped for each analysis region was then modeled as being treated by assumed BMPs and the total load reduction was quantified.

To maintain consistency with the BMP types observed in redevelopment activities to-date in the Peninsula EWMP area, 52% of the redeveloped land is projected to implement bioretention or similarly functioning systems that fully capture the on-site 85th percentile, 24-hour storm runoff. The remaining 48% of the redeveloped area will implement biofiltration systems that treat 1.5 times on-site 85th percentile 24-hour storm runoff.

Modeling parameters of the bioretention and biofiltration units are summarized in Table 14.

Table 14. Redevelopment LID BMP Modeling Parameters

	Bioretention	Biofiltration
Max Years of Redevelopment Modeled	5 years[1] (Machado Lake and Wilmington Drain) 12 years[2] (Los Angeles Harbor)	
Pond Depth	12 inches	
Infiltration Rate	5 in/hr	n/a
Soil Depth (in)	24	
Effluent Concentration		
Total Copper	n/a	5.7 ug/L[3]
Total Lead	n/a	0.32 ug/L[3]
Total Zinc	n/a	12 ug/L[3]
TSS	n/a	10 mg/L[3]
E. coli	n/a	*See footnote 4*

[1] 5 years was assumed based on the expected coverage length of the MS4 Permit.
[2] Based on the effect year of the final Dominguez Channel and Los Angeles Harbor Toxic TMDL (2032).
[3] Default WMMS 2.0 SUSTAIN Parameter for Biofiltration BMP (LACFCD, 2020b)
[4] It is assumed that biofiltration BMP does not provide significant *E. coli* treatment.

9. WET WEATHER RAA RESULTS

9.1. Machado Lake WMA

Load reduction calculations for the Machado Lake WMA (analysis region ML-1) are summarized in Table 15. Through the RAA, the collective load reductions achieved by all existing and proposed BMPs were equal to or greater than all the TLRs within the analysis region. Hence, reasonable assurance was demonstrated.

As discussed in Section 7, a TLR-equivalent 24-hour stormwater management volume was computed for each non-zero TLR. Through the RAA, the 24-hour management volume achieved by a project was computed as the representative volume apportioned to the load reduction that was or would be achieved by the project. The resultant 24-hour management volume of a project may or may not be equal to its static detention capacity shown in Table 13. The approach of tying the 24-hour management volume metric to TLR result in prioritizing more efficient BMPs that provide more load reduction per BMP capacity. The 24-hour management volume of each project, and the cumulative 24-hour management volume achieved by all projects, are shown in Figure 9. As shown in the figure, for each analysis region, the cumulative 24-hour management volume achieved by all projects exceed the maximum 24-hour management need in each analysis region. Hence, reasonable assurance was also demonstrated throughout the Machado Lake WMA using the 24-hour runoff volume as the compliance metric.

To spatially represent the RAA output, the 24-hour management volume is illustrated in Figure 10. The 24-hour management volume of a regional project was reflected to its drainage area. In addition to the existing and proposed projects discussed in Section 8.3.1, two additional projects (ML-1 RHE Project and ML-1 RPV Project) were necessary to meet the 24-hour management volume requirement. Although these two projects were not explicitly modeled in the RAA, they are intended to manage drainage areas that do not drain to modeled projects (i.e. non-horizontally shaded area) in Figure 10 and provide the 24-hour management volume specified in Figure 9.

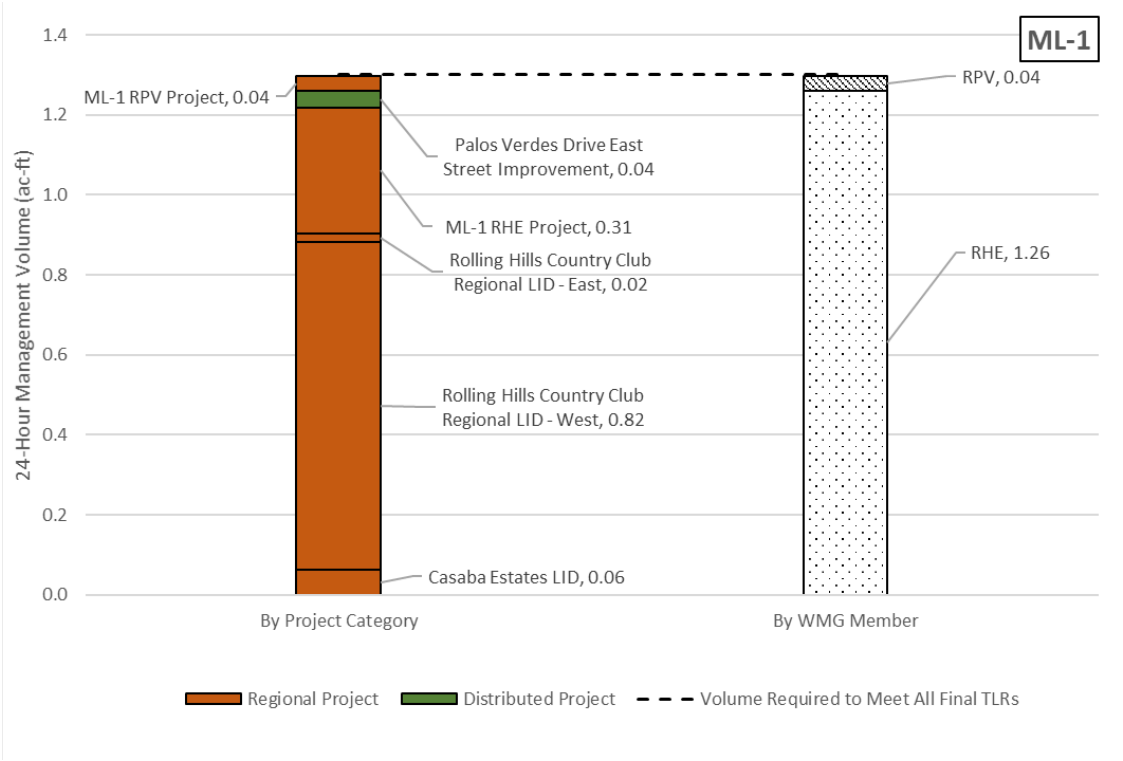
Table 15. Peninsula Machado Lake WMA (ML-1) RAA Summary

Analysis Region	Pollutant	Final Target Load Reduction			BMP Load Reduction Summary												
					LID Redevelopment			Regional Projects[2]			Distributed Projects			Total Load Reduction			Assurance Achieved?
		Absolute		%	Absolute		%	Absolute		%	Absolute		%	Absolute		%	
ML-1[a]	Total PCBs	0	lb/yr	0%	TLR = 0%, hence no RAA needed to demonstrate compliance												n/a
	DDx (Total)	9.0E-04	lb/yr	88%	2.3E-06	lb/yr	0.2%	8.8E-04	lb/yr	85%	3.1E-05	lb/yr	3.0%	9.0E-04	lb/yr	88%	Yes
	DDT (All congeners)	0	lb/yr	0%	TLR = 0%, hence no RAA needed to demonstrate compliance												n/a
	DDE (all congeners)	5.7E-04	lb/yr	89%	1.4E-06	lb/yr	0.2%	5.5E-04	lb/yr	85%	1.9E-05	lb/yr	3.0%	5.7E-04	lb/yr	89%	Yes
	DDD (All congeners)	5.2E-04	lb/yr	82%	1.4E-06	lb/yr	0.2%	5.1E-04	lb/yr	79%	1.9E-05	lb/yr	3.0%	5.2E-04	lb/yr	82%	Yes
	Total Chlordane	1.3E-04	lb/yr	64%	4.6E-07	lb/yr	0.2%	1.3E-04	lb/yr	63%	6.2E-06	lb/yr	3.0%	1.4E-04	lb/yr	66%	Yes
	Dieldrin	0	lb/yr	0%	TLR = 0%, hence no RAA needed to demonstrate compliance												n/a
	Total Nitrogen	0	lb/yr	0%	TLR = 0%, hence no RAA needed to demonstrate compliance												n/a
	Total Phosphorus	0.4	lb/yr	1%	0.1	lb/yr	0.2%	24.4	lb/yr	63%	1.1	lb/yr	2.9%	25.6	lb/yr	67%	Yes
	24-Hour Management Volume[1]	1.3[3]	ac-ft	100%	0.003	ac-ft	0.2%	1.25	ac-ft	96%	0.04	ac-ft	0.4%	1.3	ac-ft	100%	Yes

[1] The 24-hour management volume is the equivalent runoff management volume that will achieve all TLRs. It does not necessarily equate to BMP capacity. A project located at analysis region outlet may have more 24-hour management capacity than a project with same BMP capacity but is located further upstream in the analysis region. The 24-hour management volume of a project needs to be computed via a continuous modeling simulation using the calibrated Peninsula EWMP WMMS 2 model

[2] Regional projects include existing and proposed projects discussed in Section 8.3.1 and the estimated benefit of the additional project (ML-1 RHE Project and ML-1 RPV Project)

[3] Please see Section 7.6 and Table 11 on how the representative 24-hour management volume was selected for each analysis region.



Note:
RPV = Rancho Palos Verdes; RHE = Rolling Hill Estates
Due to comparatively low volumes, LID redevelopment is not shown in the figure

Figure 9. 24-Hour Management Volume Breakdown in Machado Lake WMA (ML-1)

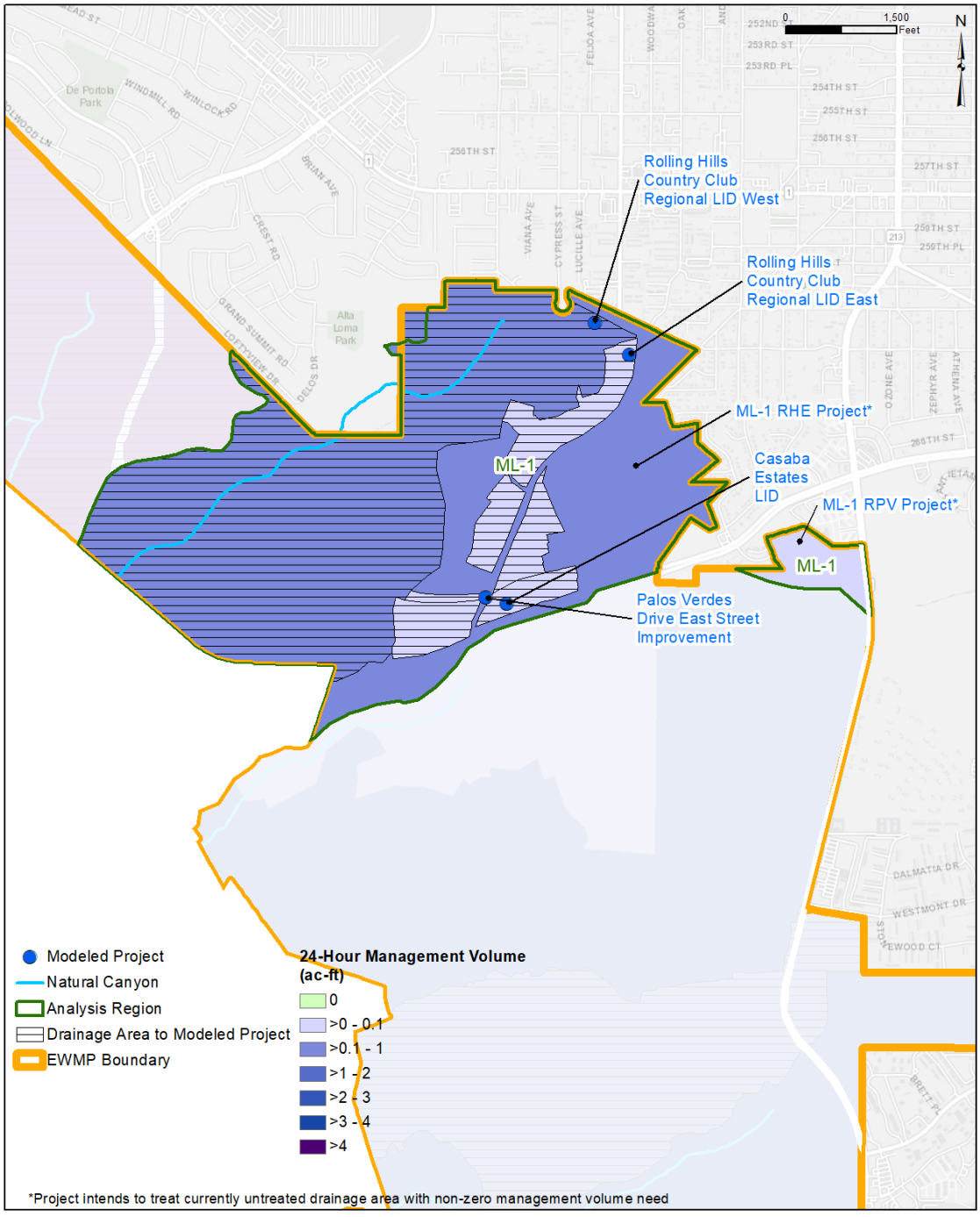


Figure 10. 24-Hour Management Volume Status in Machado Lake WMA (ML-1).

9.2. Wilmington Drain WMA

As discussed in Section 7.6, the 85th percentile, 24-hour storm runoff volume was determined as the compliance metric for the Peninsula Wilmington Drain subwatershed (analysis regions WD-1 and WD-Solano). To demonstrate reasonable assurance, the cumulative 24-hour management capacity of planned stormwater control measures shall be equal to or greater than the 85th percentile, 24-hour storm runoff volume for each analysis region.

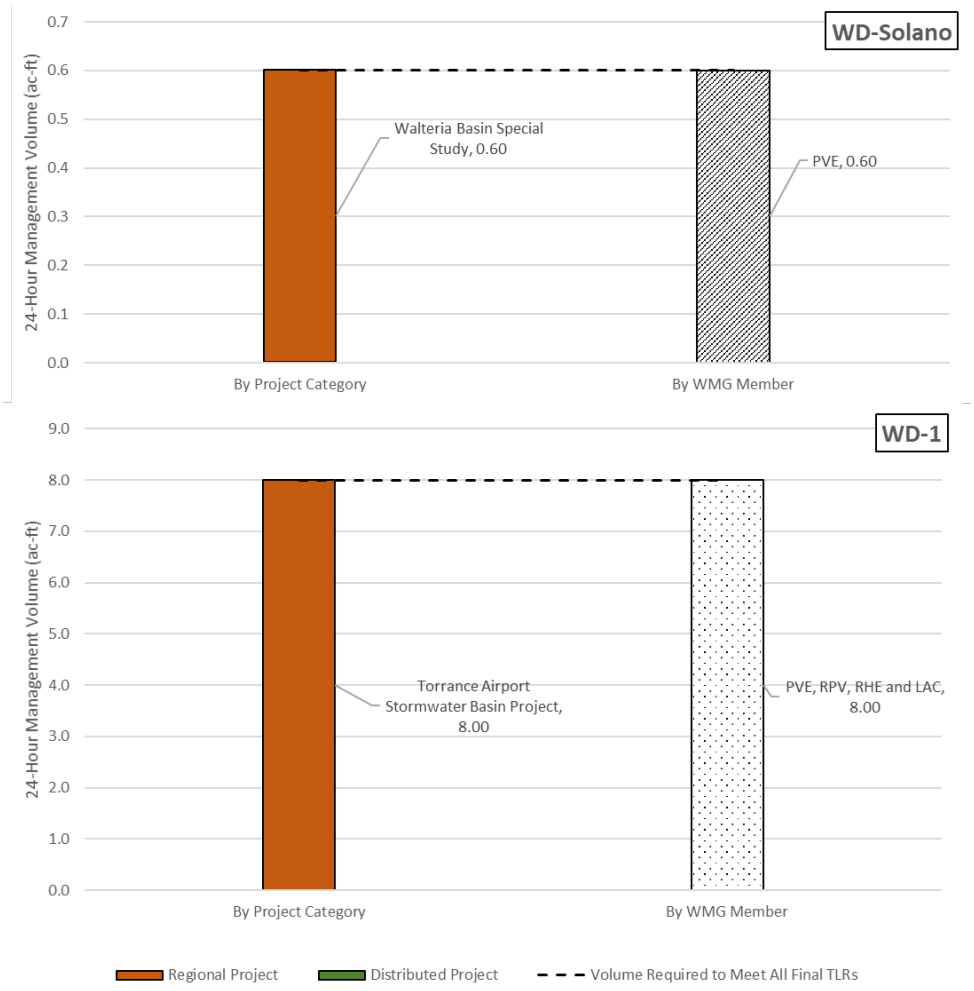
The 24-hour management capacity of the existing and planned stormwater control measures are summarized in Table 16. The 24-hour management volume breakdown by project category and Peninsula WMG agency is shown in Figure 11. To spatially represent the RAA output, the 24-hour management volume is also illustrated in Figure 12 where the 24-hour management volume of a regional project was reflected to its drainage area. For analysis region WD-Solano, the Peninsula WMG will continue to work with LACFCD and the City of Torrance to assess how the Walteria Basin can be utilized as a part of a regional stormwater capture project. The combination of these controls will be designed to achieve the TLRs in the WD-Solano analysis region in the areas without existing projects as shown in Figure 12.

Table 16. Peninsula Wilmington Drain WMA RAA Summary

Analysis Region	85th Percentile 24-Hour Runoff Volume			BMP Load Reduction Summary												
				LID Redevelopment			Regional Project			Distributed Project			Total Load Reduction			RAA Achieved?
				Absolute		%	Absolute		%	Absolute		%	Absolute		%	
WD-1	8.0 [1]	ac-ft	100%	0.02	ac-ft	0.6%	8.0	ac-ft	100%	<0.01	ac-ft	0%	8.0	ac-ft	100%	Yes
WD-Solano	0.6[1]	ac-ft	100%	<0.01	ac-ft	0.5%	0.6[2]	ac-ft	100%	0	ac-ft	0%	0.6	ac-ft	100%	Yes

[1]Please see Section 7.6 and Table 11 on how the representative 24-hour management volume was selected for each analysis region.

[2] Includes the Walteria Basin Special Study for analysis region WD-Solano. It is assumed that the Peninsula WMG will continue working with LACFCD and City of Torrance to assess how the Walteria Basin can be utilized as part of a regional stormwater capture project in conjunction with other regional projects in the Wilmington subwatershed to meet TLRs in the WD-Solano analysis region.



Note:
PVE = Palos Verdes Estates; RPV =Rancho Palos Verdes; RHE = Rolling Hills Estates. LAC = Unincorporated Los Angeles County
Due to comparatively low volumes, LID redevelopment distributed projects are not shown in the figure

Figure 11. 24-Hour Management Volume Breakdown in Wilmington Drain WMA (WD-1 and WD-Solano)

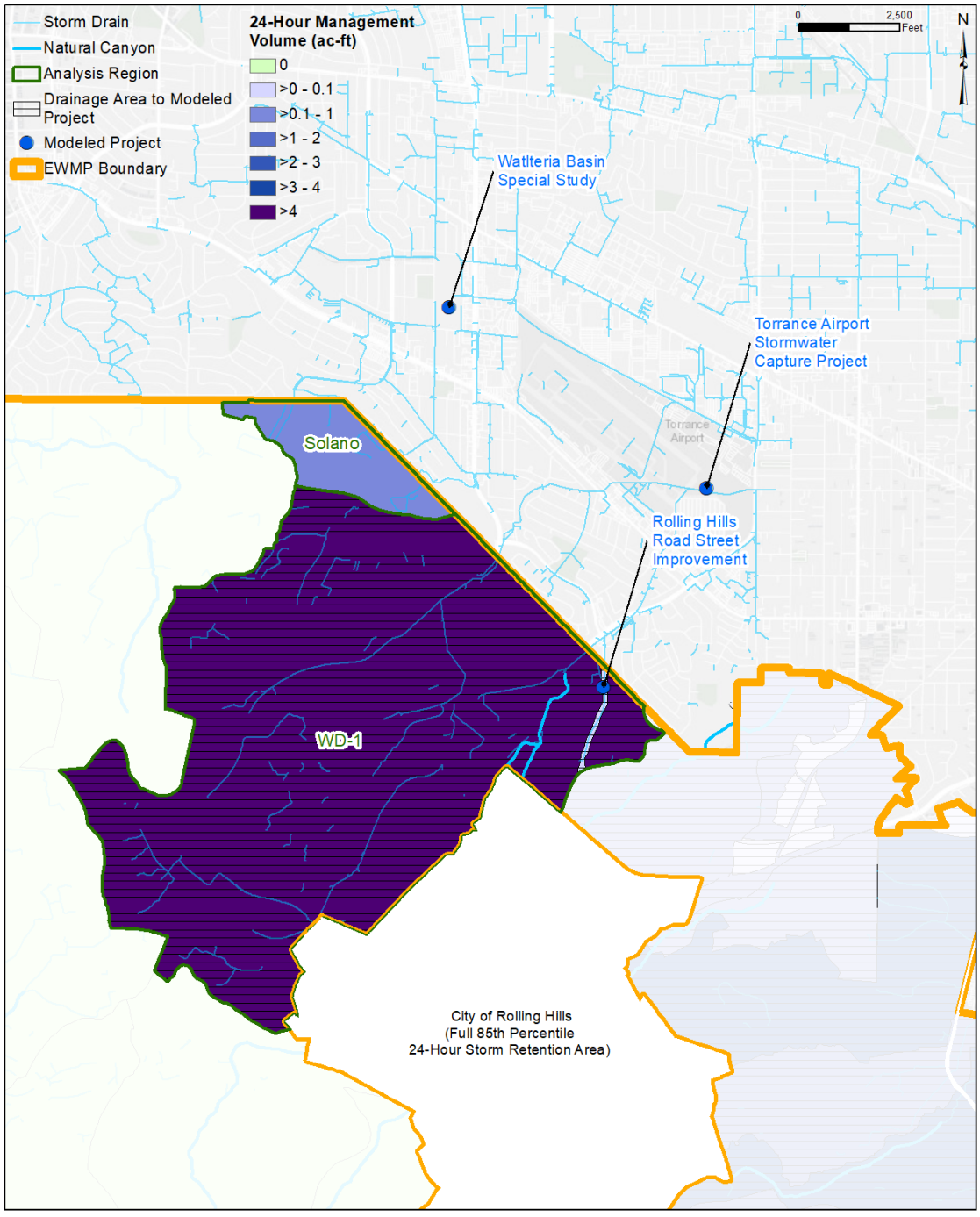


Figure 12. 24-Hour Management Volume Mapping in Wilmington Drain WMA (WD-1 and WD-Solano)

9.3. Los Angeles Harbor WMA

As discussed in Section 7.6, the 85th percentile, 24-hour storm runoff volume was determined as the compliance metric for the Peninsula Los Angeles Harbor WMA (analysis regions LAH-IH and LAH-CM). To demonstrate reasonable assurance, the cumulative 24-hour management capacity of planned stormwater control measures shall be equal to or greater than the 85th percentile, 24-hour storm runoff volume for each analysis region.

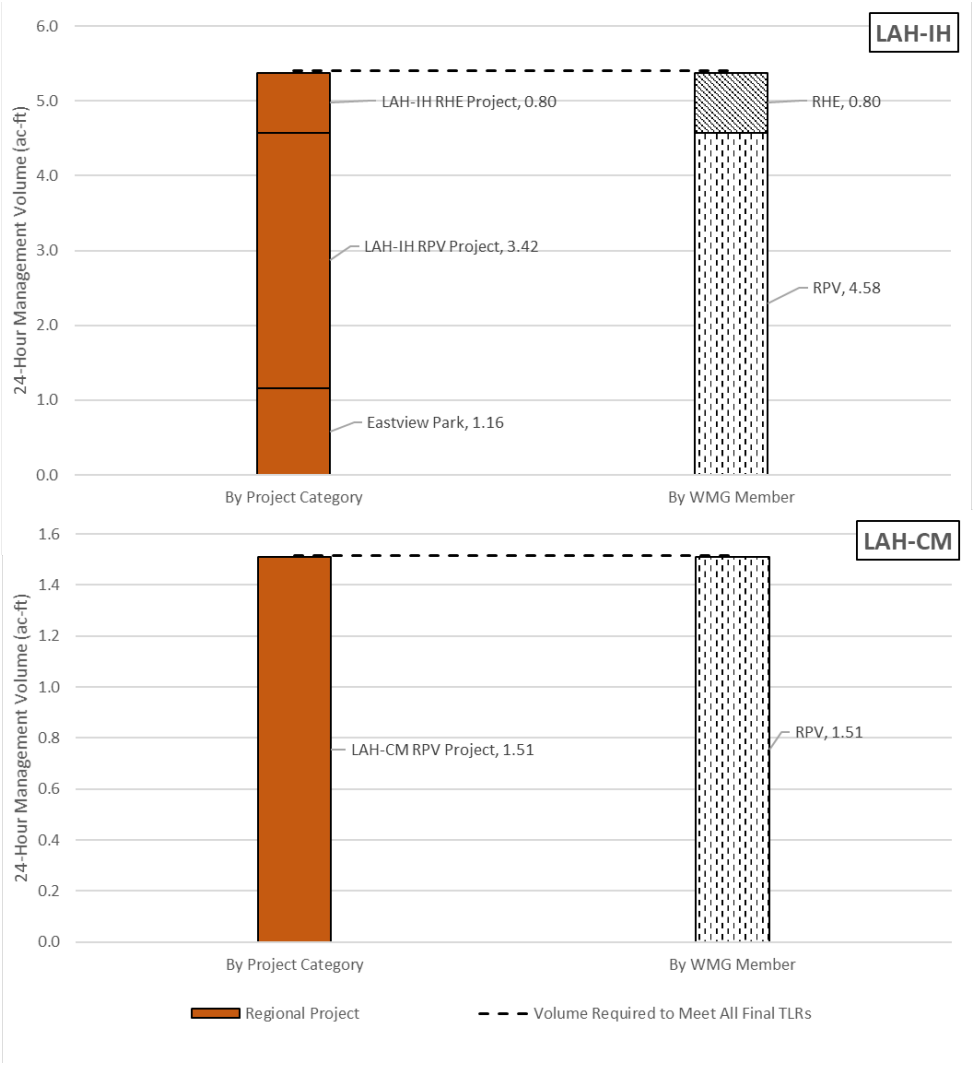
The 24-hour management capacity of the existing and planned stormwater control measures are summarized in Table 17. The 24-hour management volume breakdown by project category and Peninsula WMG agency is shown in Figure 13. To spatially represent the RAA output, the 24-hour management volume is also illustrated in Figure 14, where the 24-hour management volume of a regional project was reflected to its drainage area.

As shown Figure 13 and Figure 14, three additional projects (LAH-IH RPV Project, LAH-IH RHE Project and LAH-CM RPV Project) were necessary to fully capture the 85th percentile, 24-hour runoff from the non-horizontal shaded area shown in the figure. The 24-hour management volume need of each of the additional projects is quantitatively shown in Figure 13. As shown in Table 17, the cumulative management capacity of the Eastview Park Regional Project, LID redevelopment and the three additional regional projects are sufficient to fully capture the 85th percentile, 24-hour storm from both analysis regions in the Los Angeles Harbor WMA. Hence, reasonable assurance is demonstrated.

Table 17. Peninsula Los Angeles Harbor WMA RAA Summary

Analysis Region	85th Percentile 24-Hour Runoff Volume			BMP Load Reduction Summary												
				LID Redevelopment			Regional Project			Distributed Project			Total Load Reduction			RAA Achieved?
				Absolute		%	Absolute		%	Absolute		%	Absolute		%	
LAH-IH	5.4 [1]	ac-ft	100%	0.03	ac-ft	0.6%	5.4	ac-ft	100%	0	ac-ft	0%	5.4	ac-ft	100%	Yes
LAH-CM	1.5[1]	ac-ft	100%	<0.01	ac-ft	0.5%	1.5	ac-ft	100%	0	ac-ft	0%	1.5	ac-ft	100%	Yes

[1]Please see Section 7.6 and Table 11 on how the representative 24-hour management volume was selected for each analysis region.



Note: RPV = Rancho Palos Verdes; RHE = Rolling Hill Estates
Due to comparatively low volumes, LID redevelopment is not shown in the figure

Figure 13. 24-Hour Management Volume Breakdown in Los Angeles Harbor WMA.

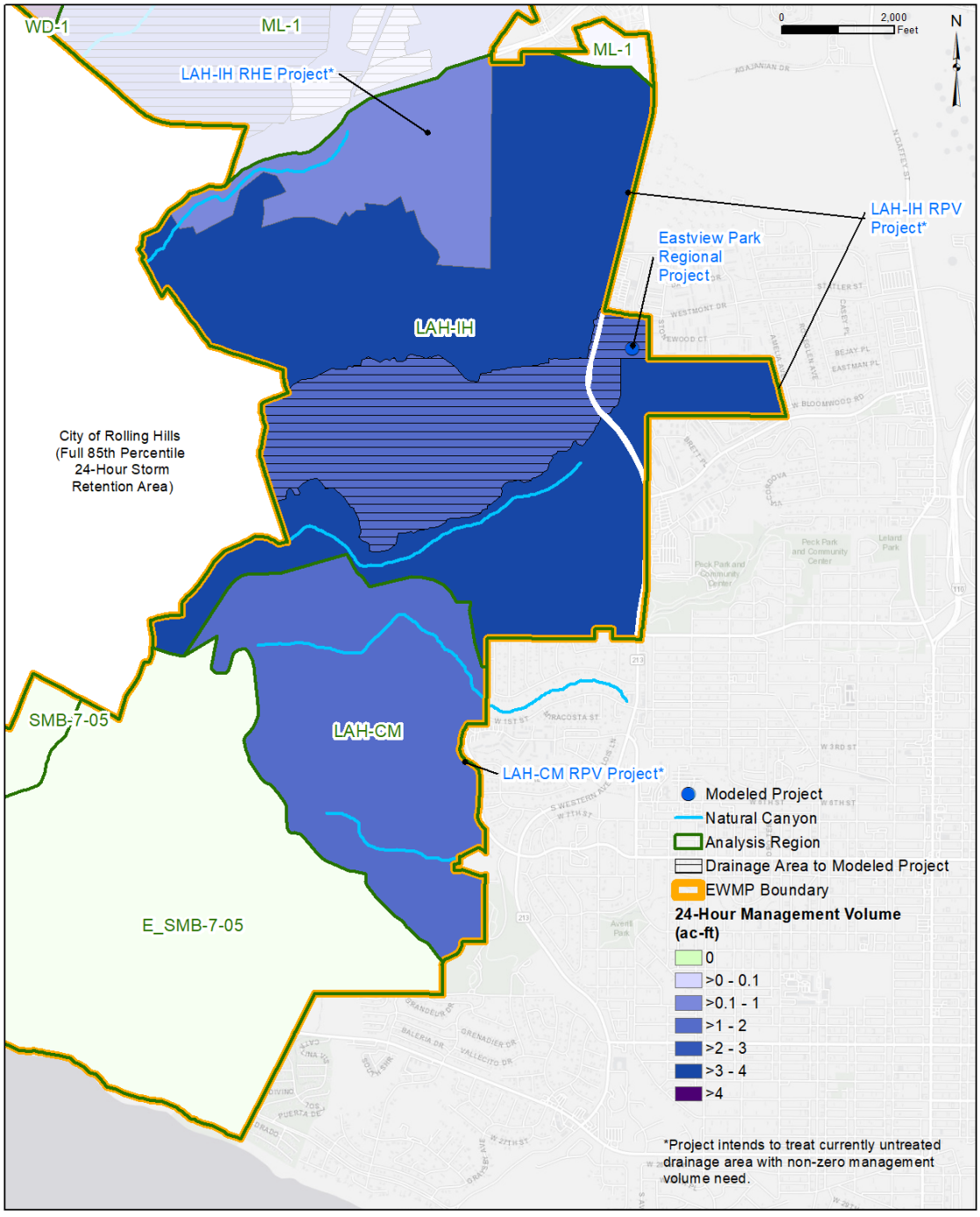


Figure 14. 24-Hour Management Volume in Peninsula LA Harbor WMA

10. DRY WEATHER RAA RESULT

The dry weather RAA was completed in accordance with the approach outlined in Section 4.2. The Peninsula WMG has attempted to eliminate non-exempt dry weather MS4 discharges using a suite of structural BMPs and non-structural source controls (e.g., water conservation incentives, enhanced IDDE efforts, enhanced education/outreach, and inspection/enforcement to prevent sources of non-stormwater flow). To date, monitoring has shown that the WMG has been successful in this endeavor, and successfully eliminated most of the non-exempt dry weather flows. The Peninsula WMG plans to capture and intercept the remaining dry weather flow with regional dry weather capture projects, such as the Palos Verdes Peninsula Multi-Benefit Flow Diversion Project and the Torrance Airport Stormwater Project. The analysis summary of dry weather flows is shown in Table 18. A WMA-specific discussion of the dry weather RAA is presented in the following subsections.

Table 18. Dry Weather RAA Summary

Watershed Management Area	Analysis Region	Is non-exempt dry weather flow currently non-existent and/or sufficiently treated or diverted?	Are sufficient structural BMP proposed to intercept, treat or divert 100% of dry weather runoff?	Is dry weather reasonable assurance demonstrated through monitoring?
Santa Monica Bay	All	Yes	n/a	Yes
Machado Lake	ML-1	Yes	n/a	Yes
Wilmington Drain	WD-1	No	Proposed	Yes[1]
	WD-Solano	Yes	n/a	Yes
Los Angeles Harbor	LAH-IH	Yes	n/a	Yes
	LAH-CM	Yes	n/a	Yes

[1] Assuming completion of the Palos Verdes Peninsula Multi-benefit Flow Diversion Project and/or the Torrance Airport Stormwater Capture Project will sufficiently manage all dry weather flows.

10.1. Santa Monica Bay WMA

As shown in Section 2, dry weather pollutants of concern in the Santa Monica Bay WMA include bacteria, trash and marine debris, PCBs, DDT, arsenic, and mercury.

For dry weather indicator bacteria in Santa Monica Bay, final compliance deadlines for dry weather have passed. Therefore, a RAA is not required. However, the following discussion is provided for informational purposes. Historic summer-dry and winter-dry weather monitoring data at all Peninsula SMBBB compliance monitoring locations show

water quality to be better than that of the reference beach based on long-term average exceedance rates. Dry weather exceedance rates at these beaches have historically ranged from 0 – 3% across both seasons. In addition, compliance monitoring locations SMB-7-1 through SMB-7-5 are open beach sites located on segments of shoreline that have all been removed from the States 303(d) list of impaired waterbodies, with no observed dry weather discharges affecting water quality. Therefore, reasonable assurance of compliance has successfully been demonstrated for this WBPC.

For DDT and PCBs, the annual TMDL based WLA accounts for both dry and wet weather. As summarized in Section 7.1.2 Four complete years of nearshore receiving water quality data have been collected under the Peninsula CIMP in the Santa Monica Bay and analyzed for total DDT and PCBs. Only one (1) out of forty (40) samples or 2.5% resulted in detection of 4,4'- DDT at a concentration between the method detection limit and the reporting limit. This sample was collected during a summer dry weather sampling event in the fourth year of CIMP monitoring. None of the forty (40) receiving water samples collected over the past four years have resulted in detections of Total PCBs above the Ocean Plan objective for total PCBs. Therefore, dry weather reasonable assurance is demonstrated.

As discussed in Section 7.1.3, there's no existing data or evidence tying arsenic and mercury pollutants to MS4 discharges. Both pollutants have been added to the outfall monitoring sites for the Santa Monica Bay in response to recent 303(d) listings, however sufficient data are not yet available to support the dry weather RAA.

For trash and marine debris, compliance with the Santa Monica Bay Debris TMDL is being met through a phased retrofit of catch basins throughout the Peninsula Santa Monica Bay WMA along with source controls to meet the final compliance deadline.

In summary, reasonable assurance of compliance during dry weather is demonstrated for the Peninsula Santa Monica Bay WMA.

10.2. Machado Lake WMA

As part of the Peninsula CIMP, the Peninsula WMG completed a non-stormwater runoff source investigation study (Peninsula WMG, 2018). According to the study findings, no dry weather flow is observed through Machado Lake WMA. Therefore, reasonable assurance of compliance during dry weather is demonstrated for the Peninsula Machado Lake WMA.

10.3. Wilmington Drain WMA

According to non-stormwater runoff source investigation study findings, dry weather flow is only observed in the WD-1 analysis region and has been determined to be associated with natural flows, i.e., rising groundwater or springs entering the MS4. The dry weather runoff and pollutants have been accounted for as part of the wet weather RAA summarized in Section 9.2. In addition, Peninsula WMG has planned to intercept and divert 100% of dry weather runoff draining to the WD-1 analysis region with the Palos Verdes Peninsula Multi-benefit Flow Diversion Project and the Torrance Airport Stormwater Capture project.

In summary, reasonable assurance of compliance during dry weather is demonstrated for the Peninsula Wilmington Drain WMA.

10.4. Los Angeles Harbor WMA

The Peninsula WMG is addressing dry weather pollutants of concern in the Los Angeles Harbor WMA via 100% non-exempt dry weather flow capture. As part of the Peninsula CIMP, the Peninsula WMG have performed a non-stormwater runoff source investigation study. According to the study findings, dry weather flow is not observed in both LAH-IH and LAH-CM analysis regions. Therefore, reasonable assurance of compliance during dry weather is demonstrated for Peninsula Los Angeles Harbor WMA.

11. BMP COST OPINION

The capital, operation and maintenance (O&M) and 20-year life-cycle costs of the proposed projects were estimated for EWMP planning purposes. For the Torrance Airport Stormwater Capture Project, the presented costs were extracted from the Safe Clean Water Program Feasibility Study submitted in October 2020 (City of Torrance, 2020). The cost of the remaining projects was estimated based on key modeling parameters using the cost functions presented in the WMMS 2.0 Phase II Report (LACFCD, 2020c). The cost functions are summarized in Table 19.

Table 19. WMMS 2.0 Cost Function

BMP Type	BMP Component	Capital Cost[1]	Annual O&M Cost[1]	Life Cycle Cost[1]
Pervious Pavement		$253(A)	$5.1 (A)	$253(A) + $5.1(A) (Yr)
Subsurface Retention + Infiltration	Diversion	$7,000(In)	$320(In)	[$7000 + $12,000](A) + $12.6(Vf) + $6,000(Yr) + $320 (In)(Yr)
	Pretreatment	$12,000(In)		
	Storage	$12.6(V)	$6,000	
	Diversion	$7,000(In)	$320(In)	

BMP Type	BMP Component	Capital Cost[1]	Annual O&M Cost[1]	Life Cycle Cost[1]
Subsurface Retention + Filtration	Pretreatment	$12,000(In)		[$7000 + $12,000](A) + $12.6(Vf) + $6,000(Yr) + $320 (In)(Yr) + [$177,000 +$70,000](Eff) + [$1,000 + $3,000](Eff)*(Yr)
	Storage	$12.6(V)	$6,000	
	Pump	$177,000(Eff)	$3,000(Eff)	
	Filtration	$70,000(Eff)	$1.000(Eff)	
Subsurface Retention + Diversion to Sewer	Diversion	$7,000(In)	$320(In)	[$7000 + $12,000](In) + $12.6(Vf) + $6,000(Yr) + $320 (In)(Yr) + $177,000(Ps) + $3,000(Ps)(Yr)
	Pretreatment	$12,000(In)		
	Storage	$12.6(V)	$6,000	
	Pump	$177,000(Ps)	$3,000(Ps)	
	Sewer Diversion		$67,000	

[1] A – BMP footprint in ft^2; Eff – Treatment rate in cfs ; In – Inflow rate in cfs; Ps – Sewer diversion rate in cfs; Vf – BMP storage capacity in ft^3;

The resultant project costs are summarized in Table 20. The cost summary does not include already-completed projects (Casaba Estates LID and Rolling Hills Country Club LID) or projects that are not included in the RAA (Harbor City Stormwater Capture Project). The cost of the Palos Verdes Peninsula Multi-benefit Flow Diversion Project will be determined as part of the Project's Safe, Clean Water Program Feasibility Study.

Table 20. Project Cost Opinion Summary

Analysis Region	Lead Agency	Project	Capital	Annual O&M Cost	20-Year Life Cycle Cost
ML-1	Rolling Hills Estates	Palos Verdes Drive East Street Improvement	$2,859,000	$58,000	$4,012,000
ML-1	Rolling Hills Estates	ML-1 RHE Regional Project	$254,000	$40,000	$1,060,000
ML-1	Rancho Palos Verdes	ML-1 RPV Regional Project	$30,000	$40,000	$821,000
WD-1	Rancho Palos Verdes and Torrance	Torrance Airport Stormwater Basin Project Phase 2	$12,000,000	$118,000	$13,700,000
WD-1	Rolling Hills Estates	Rolling Hills Road Street Improvement	$481,000	$10,000	$675,000
LAH-IH	Rancho Palos Verdes	Eastview Park	$781,000	$42,000	$1,619,000
LAH-IH	Rolling Hills Estates	LAH-IH RHE Regional Project	$2,308,000	$47,000	$3,241,000
LAH-IH	Rancho Palos Verdes	LAH-IH RPV Regional Project	$540,000	$41,000	$1,363,000
LAH-CM	Rancho Palos Verdes	LAH-CM RPV Regional Project	$913,000	$9,000	$968,000

12. CONCLUSIONS

To update the RAA for the revised Peninsula EWMP, a modeling approach that utilizes WMMS 2.0 has been applied using the rationale, analytical basis, and process described in this RAA report. The RAA process:

1. Applied an acceptable model tailored to the Peninsula WMG based on available outfall and receiving water data collected through June 2020.
2. Calculated target load reductions (TLRs) necessary to achieve applicable compliance targets.
3. Demonstrated that the existing and proposed suite of projects will attain the TLRs. Where this was not demonstrated, volumetric management needs have been documented to show what needs to be achieved in order to demonstrate compliance.

The revised and updated Peninsula RAA therefore meets the objectives and requirements of the LA MS4 Permit and RAA Guidance Document, demonstrating that a reasonable assurance of compliance will be achieved in each analysis region if the TLRs are fully and appropriately managed.

13. REFERENCES

LACDPW (Los Angeles County Department of Public Works). 2011. *Machado Lake Nutrient TMDL Special Study: Characterization of Water Quality Conditions in the Unincorporated Areas of Los Angeles County within the Machado Lake Watershed Final Report*. September.

LACDPW. 2006. *Los Angeles County Hydrology Map*. Accessed January 2021 from <link>

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LACFCD. 2020b. *WMMS 2.0 Phase II Report: BMP Model and Optimization Framework*. Accessed December 2020 from <link>

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LARWQCB (Los Angeles Regional Water Quality Control Board). 2014b. *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties.* Accessed January 2021 from <link>.

Peninsula WMG (Watershed Management Group). 2020. *Annual Watershed Report – Reporting Year 2019 – 20*. December.

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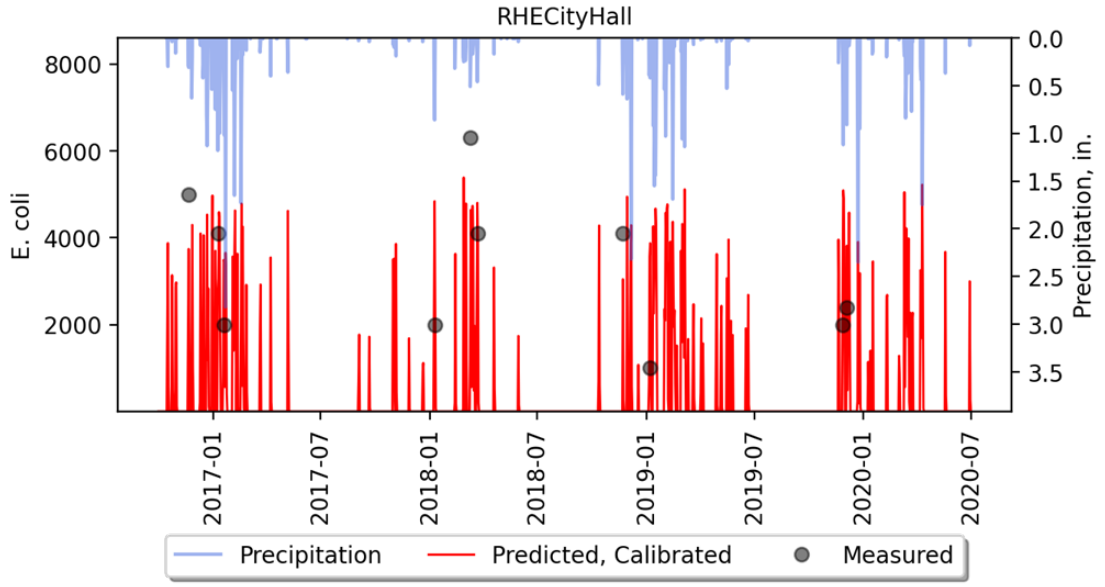
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TDC Environmental, 2013. *Estimate of Urban Runoff Copper Reduction in Los Angeles County from the Brake Pad Copper Reductions Mandated by SB 346. Prepared for Richard Watson & Associates, Inc.*

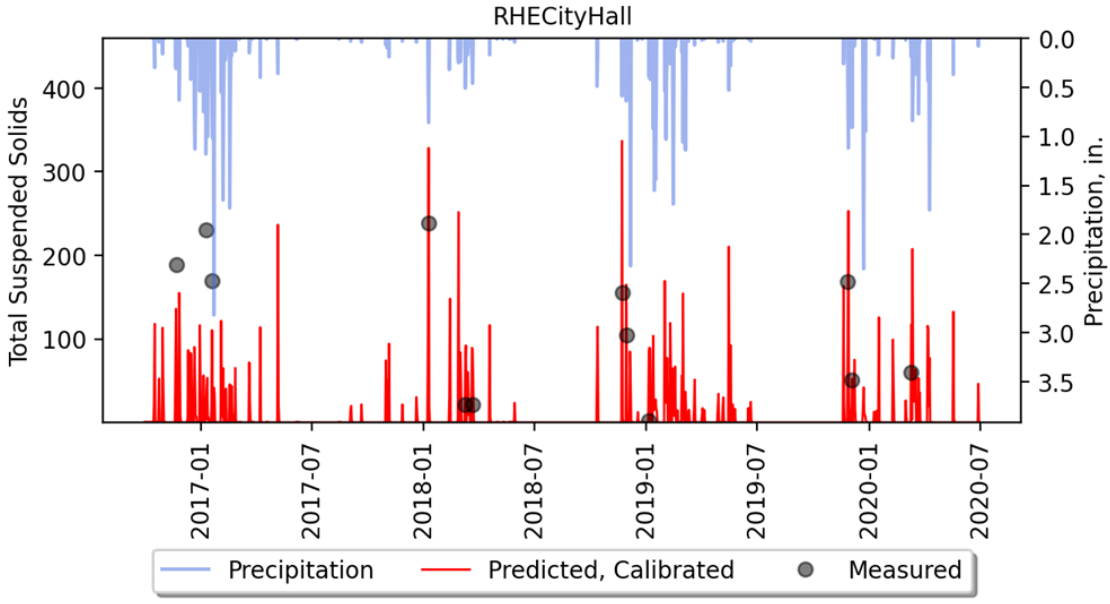
Attachment A

Supplementary Calibration Exhibits

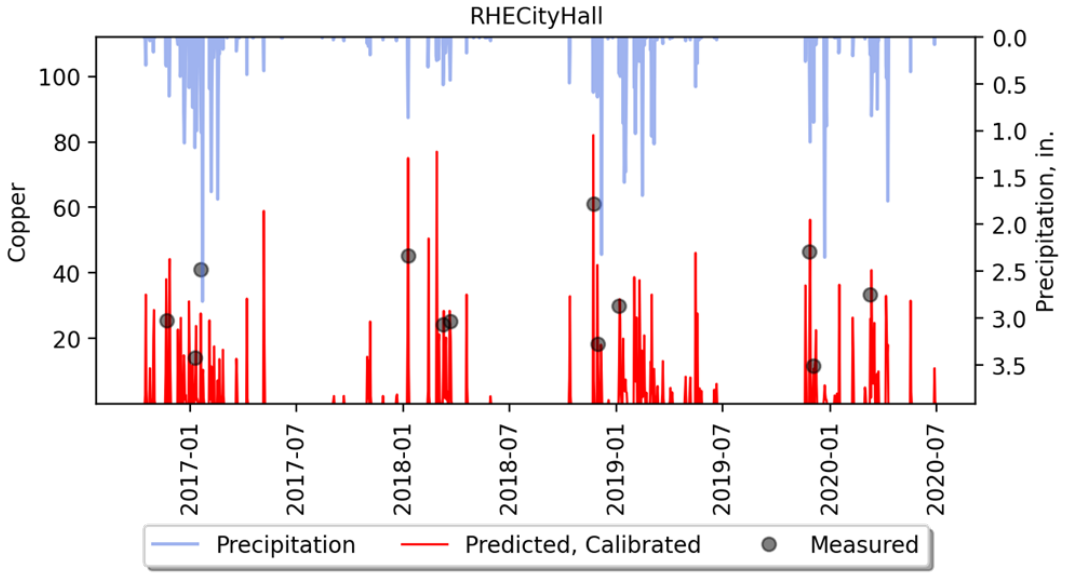
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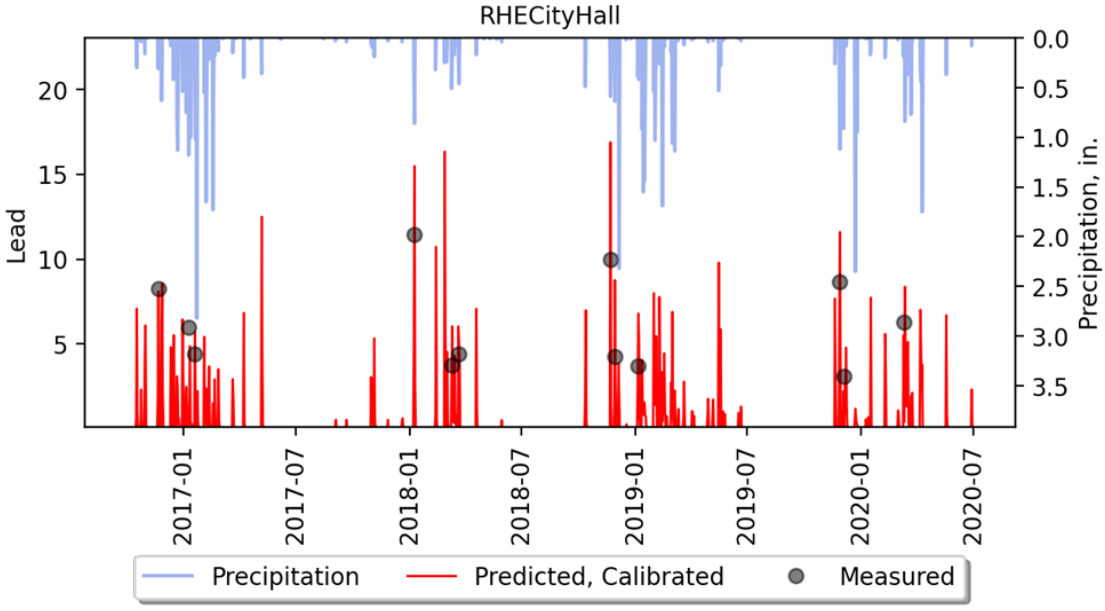
Total Suspended Solids



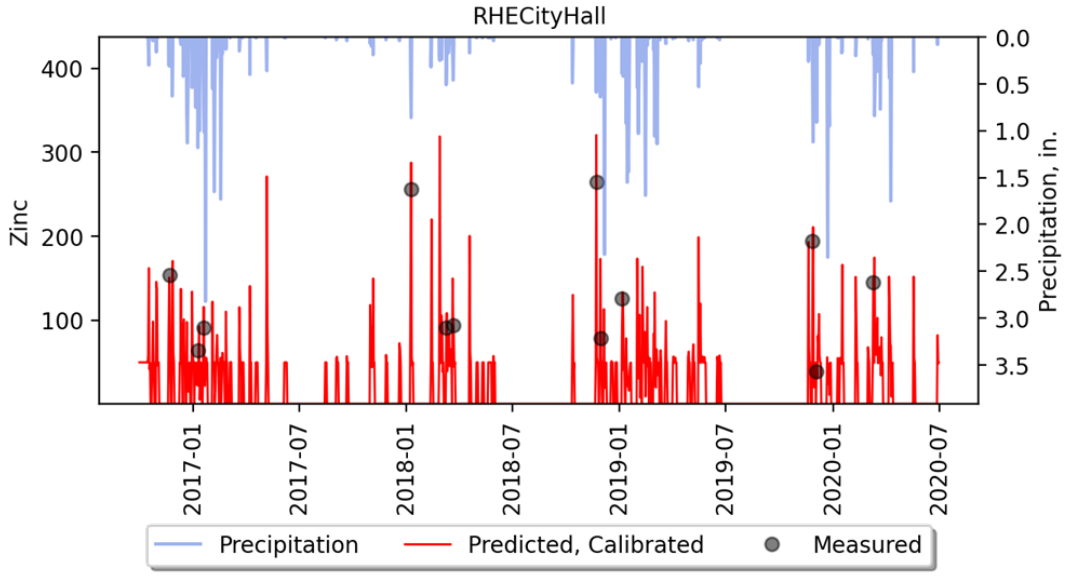
Total Copper



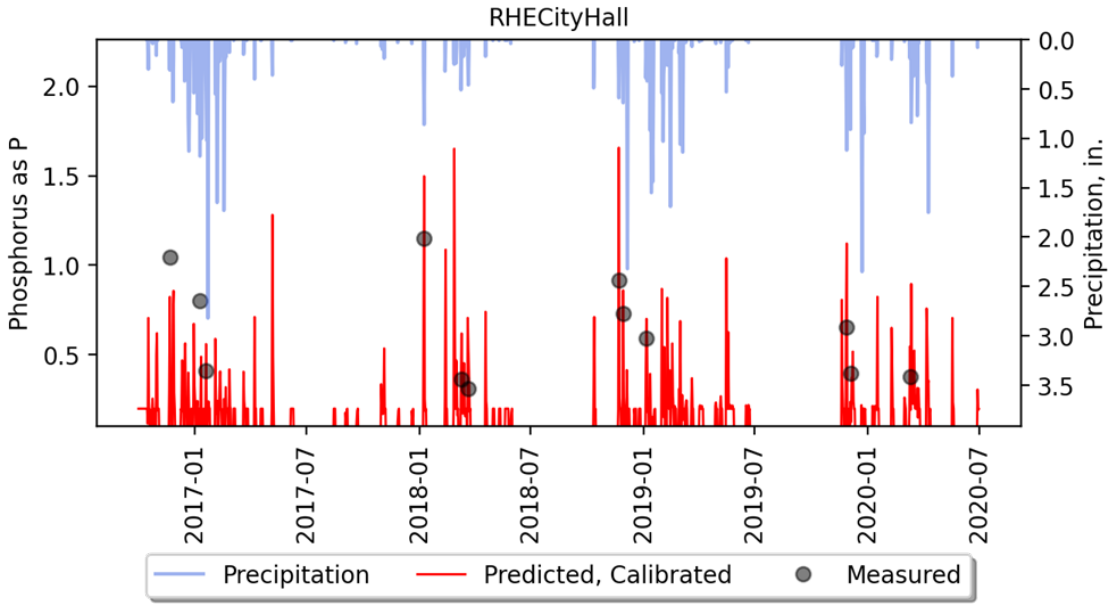
Total Lead



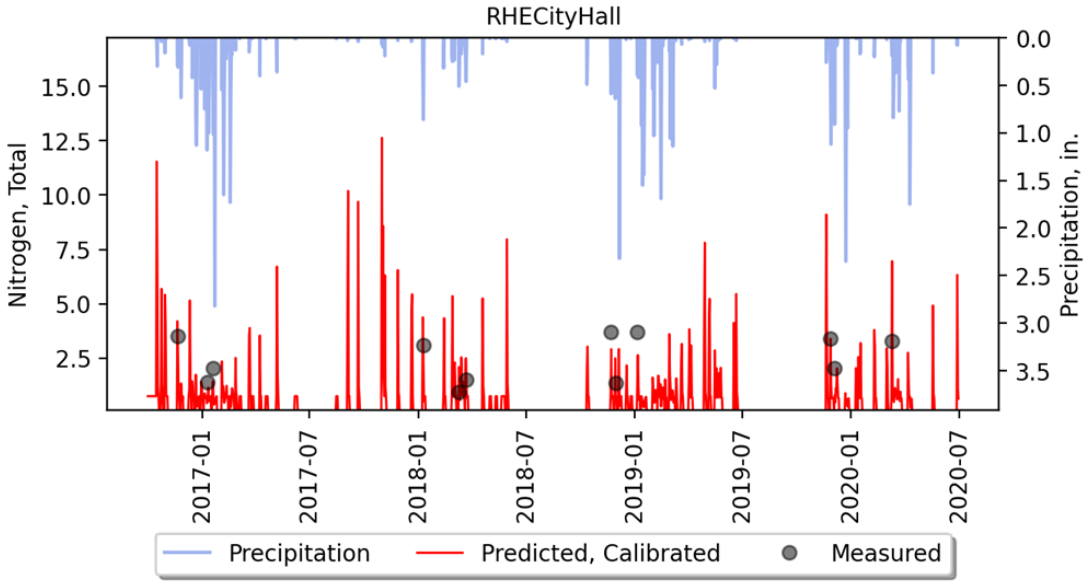
Total Zinc



Total Phosphorus



Total Nitrogen



Appendix 4.2

Requirements for Achieving Receiving Water Limits

APPENDIX 4.2 REQUIREMENTS FOR ACHIEVING RECEIVING WATER LIMITS FOR POLLUTANT CATEGORIES

Provisions of the MS4 Permit describe how compliance with receiving water limits (RWLs) are to be attained for various water body-pollutant combinations (WBPC) identified through adaptive management of the EWMP. Requirements for achieving RWLs for each priority pollutant category is described in the following sections.

WBPCS ADDRESSED BY A TMDL (CATEGORY 1 POLLUTANTS)

For WBPCs addressed by a TMDL, adherence to all requirements and compliance dates set forth in the approved EWMP will constitute compliance with applicable interim TMDL-based water quality-based effluent limits and interim receiving water limits outlined in the Permit. Most of the WBPCs addressed through a TMDL have corresponding interim and/or final compliance milestones that fall within the term of the Permit. However, there are a few WBPCs being addressed by a TMDL for which interim compliance milestones need to be developed within the term of the Permit. Table 5-2 summarizes the applicable TMDL compliance dates and those that have been developed for the EWMP.

During the adaptive management process, if a WBPC within the Peninsula WMG is added to the State's 303(d) list that falls within the same class as those being addressed by a TMDL, the WBPC will be added to the list of Water Quality Priorities and the following actions will be completed following Permit provisions:

- It will be demonstrated that Watershed Control Measures (WCMs) selected to achieve the applicable TMDL provisions will also adequately address MS4 contributions of the pollutant(s) within the same class. Assumptions and requirements of the corresponding TMDL provisions must be applied to the additional pollutant(s), including interim and final requirements and deadlines for their achievement, such that the MS4 discharges of the pollutant(s) will not cause or contribute to exceedances of receiving water limitations.
- The WBPC will be included in the revised Reasonable Assurance Analysis (RAA).
- Dates for their achievement will be developed consistent with those in the applicable TMDL.[1]

303(D) LISTED WATER BODY POLLUTANT COMBINATIONS (CATEGORY 2 POLLUTANTS)

Currently, indicator bacteria (E. coli) in the Wilmington Drain Subwatershed, in addition to Arsenic and Mercury in Santa Monica Bay Subwatershed, are the only 303(d)-listed pollutants within the Peninsula WMG that are not being addressed by a TMDL. These WBPCs are not in the same class as any existing TMDL within the Dominguez Channel or Santa Monica Bay Watershed Management Area portions of the Peninsula EWMP Area. Although a definitive linkage between indicator bacteria in Wilmington Drain and MS4 discharges from the Peninsula WMG has not been demonstrated, the MS4 system may cause or contribute to this impairment. Mercury and arsenic were recently added to the 303(d) list for Santa Monica Bay based on sediment and fish tissue data collected under the Hyperion Treatment Plant NPDES Permit no. CA0109991 between January 2006 and June 2010. There's no existing data or evidence tying

[1] The Peninsula WMG has requested modification of the Machado Lake Nutrient TMDL deadline. That request is pending.

either of these pollutants to stormwater MS4 discharges. No modeling was conducted within the Santa Monica Bay WMA for the updated RAA, as reasonable assurance of compliance is already demonstrated via monitoring data. Therefore, the following actions have been completed as part of the EWMP to address indicator bacteria in Wilmington Drain, in addition to Arsenic and Mercury in Santa Monica Bay:

- WBPC (indicator bacteria) was included in the RAA.
- WCMs were selected to address contributions of indicator bacteria from MS4 discharges coming from the Peninsula WMG, such that these MS4 discharges will not cause or contribute to the exceedance of the receiving water limits coliform bacteria.
- Milestones and dates for BMP implementation have been identified to control MS4 discharges such that they do not cause or contribute to exceedances of receiving water limitations within a timeframe that is as short as practicable, taking into account the technological, operational, and economic factors that affect the design, development, and implementation of the WCMs that are necessary.
- Milestones relate to a specific water quality endpoint (e.g., percent load reduction) and dates relate either to taking a specific action or meeting a numeric water quality endpoint.
- If the identified dates are beyond the term of the Permit, the following will apply per Permit provisions:
    - In drainage areas where retention of all nonstormwater runoff and all stormwater runoff from the 85th percentile, 24-hour storm event will be achieved, efforts will continue to target implementation of WCMs identified in the EWMP, including WCMs to eliminate nonstormwater discharges that are a source of pollutants to receiving waters.
    - For areas where retention of the volume described above is technically infeasible and where the Regional Board determines that MS4 discharges cause or contribute to the water quality impairment, development of a stakeholder-proposed TMDL may be initiated upon approval of the EWMP. For MS4 discharges from these drainage areas to the receiving waters, any extension of this compliance mechanism beyond the term of the Permit will be consistent with the implementation schedule in a TMDL for the WBPC(s) adopted by the Regional Board.

NON 303(D)-LISTED WATER BODY POLLUTANT COMBINATIONS (CATEGORY 3 POLLUTANTS)

There have been no Category 3 Pollutants identified within the Peninsula WMG.

Agenda Item No.: 7.I
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH, CITY CLERK / EXECUTIVE ASSISTANT TO CITY MANAGER**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **APPROVE ROLLING HILLS COMMUNITY ASSOCIATION'S APPLICATION TO LOS ANGELES COUNTY DEPARTMENT OF PUBLIC HEALTH FOR REPLACEMENT OF SEPTIC TANK SERVING THE MAIN GATE AND AUTHORIZE CITY MANAGER TO SIGN**

DATE: **May 23, 2022**

BACKGROUND:
In a letter dated April 11, 2022, the Rolling Hills Community Association (RHCA) requested to install a new septic tank to service the Main Gate. The referenced letter noted that the replaced septic tank would also serve the new kitchen and restroom proposed for the tennis courts common area.

The RHCA leases the tennis courts, and the City Hall campus from the City. Per the lease agreement, the RHCA maintain and operates the tennis courts. To replace the referenced septic tank, located in the area adjacent to the guest lane approaching the Main Gate, a permit is required from the Los Angeles County Department of Public Health. As the owner of the property, RHCA is requesting that the City submit the required forms to the Los Angeles County Department of Public Works to commence the permitting process. RHCA has a contractor, Peninsula Septic Service on standby to implement the tank replacement upon permit issuance.

The City and the RHCA planned separate projects at the tennis courts. The RHCA plans to improve the common areas of the tennis courts to add amenities like a restroom, kitchen, and a gazebo. To comply with the American with Disability Act (ADA), the City plans to bring the walkways of the tennis courts to ADA standards. Over the last three years, these improvements have been placed on hold.

The proposed amenities would add effluent to the existing septic tank and would trigger tank replacement by the Los Angeles Department of Public Health. In light of the City's 8" sewer main project, the RHCA decided to hold off on the septic tank replacement in the event that that the City constructs the 8" line, the effluent from the proposed amenities could be

discharged to the sewer main instead of the septic tank.

The 8" sewer main has been in the design phase for the past 12 months and at the January 2022 City Council Strategic Planning Session, the City Council decided not to dedicate General Fund to construct the 8" sewer main line. Instead, the City Council discussed pursing grant funds for the project. In consideration of the City Council's actions, the RHCA decided to revisit the septic tank replacement project.

At the May 9, 2022 City Council meeting, staff was directed to communicate with the RHCA that the Council was in support and requested a copy of the latest plans including the location of the new septic tank.

DISCUSSION:
The RHCA has provided their application including plans as requested. It is attached for Council's review.

FISCAL IMPACT:
There is no fiscal impact to complete the permitting forms requested by the RHCA.

RECOMMENDATION:
Approve as presented.

ATTACHMENTS:
CL_AGN_220523_RHCA_LACoDPH_Application_Septic.pdf
CL_AGN_220523_RHCA_GeoTech_Septic.pdf

ENVIRONMENTAL HEALTH

Land Use Program

5050 Commerce Drive, Baldwin Park, CA 91706
◆ Telephone: (626) 430-5380 ◆ http://publichealth.lacounty.gov/eh/EP/lu/lu_main.htm

COUNTY OF LOS ANGELES
Public Health

Onsite Wastewater Treatment System (OWTS) Review Application Submission Process

Completed and signed Application for Onsite Wastewater Treatment System Review, corresponding fees and associated documents may be mailed or hand-carried to:

Environmental Health Headquarters
5050 Commerce Drive
Baldwin Park, Ca 91706
(626) 430-5380

Inglewood Environmental Health Office
9800 S. La Cienega Boulevard, Suite 850
Inglewood, Ca 90301
(310) 338-3226

Santa Clarita Environmental Health Office
26415 Carl Boyer Drive
Santa Clarita, Ca 91350
(661) 287-7018

Antelope Valley Environmental Health Office
355-A East Avenue K-6
Lancaster, Ca 93536
(661) 723-4549

Calabasas Environmental Health Office*
26600 Agoura Road, Suite 110
Calabasas, Ca 91302
(818) 880-3410

***Corresponding fees are NOT accepted at this location**
Please mail corresponding fees to:

Environmental Health Headquarters
5050 Commerce Drive
Baldwin Park, Ca 91706
Attention: Land Use Program

Please call for office hours prior to application submission
Make checks or money orders payable to: **LOS ANGELES COUNTY DEPARTMENT OF PUBLIC HEALTH**
DO NOT SEND CASH

Additional Information:

- Effective August 1, 2018 – Two (2) copies of your application and associated documents will be required.
  - One (1) hard copy is to be submitted to any of the above-listed office
  - One (1) electronic copy is to be submitted to: dlanduse@ph.lacounty.gov
- Incomplete Application for Onsite Wastewater Treatment System Review will not be accepted.
- **Payment of corresponding fees is required**. Review of your Onsite Wastewater Treatment System will not begin until after payment is received.
- Applications and corresponding fees for Onsite Wastewater Treatment System Reviews are nontransferable.
- Allow **twenty (20) business days** for work plan review and response.
- Field personnel cannot accept payments.

For more detailed information, please download our *Professional Guide to Requirements and Procedures for OWTS* at:
http://publichealth.lacounty.gov/eh/docs/ep_lu_OWTS_procedures.pdf

Revised July 2018

ENVIRONMENTAL HEALTH

Land Use Program

5050 Commerce Drive, Baldwin Park, CA 91706
◆ Telephone: (626) 430-5380 ◆ http://publichealth.lacounty.gov/eh/EP/lu/lu_main.htm

COUNTY OF LOS ANGELES
Public Health

REQUIRED DOCUMENTS FOR YOUR APPLICATION FOR ONSITE WASTEWATER TREATMENT SYSTEM (OWTS) REVIEW

INCOMPLETE APPLICATONS FOR ONSITE WASTEWATER TREATMENT SYSTEM REVIEW WILL NOT BE ACCEPTED

To be completed by a Land Use Program Representative

Required	Document / Information	Provided? Yes	Provided? No
X	Application for Onsite Wastewater Treatment System Review		
X	Corresponding Fees		
X	Completed Los Angeles County Department of Public Works Building and Safety Division Agency Referral		
X	Site / Floor Plan Site/Floor plan of residence/business; Plot-to-Scale; 11" x 17"; Directional compass		
X	Plot Plan Plot plan of overall property; Include encroachments/easements; Plot-to-Scale; 11" x 17"; Directional compass		
	Feasibility Report Must include qualified professional stamp and signature; Detailed information regarding feasibility report requirements may be found in our *Professional Guide to Requirements and Procedures for OWTS*		
	Grading Plan Required if grading is required on the property		
	Cross Sectional View Required when proposing to install a new/replacement dispersal system		
	Proof of Potable Water Source / Water Quality Detailed information regarding Proof of Potable Water Source/Water Quality requirements may be found in our *Professional Guide to Requirements and Procedures for OWTS*		
	System Evaluation Report Required for projects with no OWTS verification or an OWTS that is 15 years or older		
	Tank Specifications Required for septic tank replacements		
	Calibration Certificate Required for water meter used during the percolation test of a seepage pit		
	Other:		
	Other:		

For more detailed information, please download our *Professional Guide to Requirements and Procedures for OWTS* at:
http://publichealth.lacounty.gov/eh/docs/ep_lu_OWTS_procedures.pdf

ENVIRONMENTAL HEALTH

Land Use Program

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◆ Telephone: (626) 430-5380 ◆ http://publichealth.lacounty.gov/eh/EP/lu/lu_main.htm

COUNTY OF LOS ANGELES
Public Health

ONSITE WASTEWATER TREATMENT SYSTEM (OWTS) REVIEW SERVICE FEES

ONSITE WASTEWATER TREATMENT SYSTEM – TYPE OF SERVICE **All projects require: Completed Building and Safety Agency Referral Form, Floor Plan (Plot-to-Scale), Site/Plot Plan (Plot-to-Scale)**	FEE
PROJECT REVIEW ☐New System ☐Replacement System ☐Activating/Testing 100% FEA ☐Other	
☐ 4301 Conventional Wastewater Treatment System REQUIRED DOCUMENTS (include, but are not limited to): Feasibility Report, Tank Specifications, Proof of Water Source	$1528.00
☐ 4302 Non-Conventional Wastewater Treatment System REQUIRED DOCUMENTS (include, but are not limited to): Feasibility Report, Advanced Treatment Specifications, Maintenance Agreement with Certified Installer, Covenant and Agreement, Proof of Water Source	$1986.00
SYSTEM EVALUATION ☐Tank Replacement ☐Addition of Building/Structure ☐Expansion of 10% or less ☐Other	
☐ 4303 Without Verification of Prior System Approval REQUIRED DOCUMENTS (include, but are not limited to): Tank Specifications, System Evaluation by Licensed Contractor	$522.00
☐ 4304 With Verification of Prior System Approval REQUIRED DOCUMENTS (include, but are not limited to): Approved OWTS Records, System Evaluation by Licensed Contractor (if system is more than 15 years old)	$447.00
POST-COASTAL COMMISSION APPROVAL	
☐ 4305 Conventional or Non-Conventional Wastewater Treatment System REQUIRED DOCUMENTS (include, but are not limited to): Copy of Coastal Development Permit with All Restrictions	$451.00
PRE-COASTAL COMMISSION APPROVAL	
☐ 4306 Conventional Wastewater Treatment System	$1528.00
☐ 4307 Non-Conventional Wastewater Treatment System	$1936.00
ADDITIONAL REVIEW and/or INSPECTION	
☐ 7422 EHS III / EHS IV Hourly Rate (e.g. Third (3rd) Submittals, Site Revisits, Approved Plan Extension Review, etc.)	NO. OF HOURS:_____ X $167.00/HR
☐ 7422 Graywater Dispersion Field / Percolation Evaluation	$334.00

Applications are nontransferable. Allow **twenty (20) business days** for work plan review and response.
Field personnel cannot accept payments. **DO NOT SEND CASH.**
Make checks or money order payable to:
LOS ANGELES COUNTY DEPARTMENT OF PUBLIC HEALTH

WORK SITE ADDRESS	2 Portuguese Bend Road - Gate House & Tennis Court
CITY / ZIP/PARCEL (APN) #	Rolling Hills CA 90274
EMAIL CORRESPONDANCE TO	kraig@rhca.net

FOR OFFICE USE ONLY				
Tigran Khachatryan (626) 430-5380 tkhachatryan@ph.lacounty.gov		Bitania Girma (310) 338-3226 bgirma@ph.lacounty.gov	SR REC'D BY / DATE REC'D:	SITE / PERMIT #:
Chris Gibson (661) 287-7018 chgibson@ph.lacounty.gov		Kenneth Mattison (661) 723-4549 kmattison@ph.lacounty.gov	PAYMENT REC'D BY / DATE REC'D:	INVOICE #:
Veronica Aranda (818) 880-3411 varanda@ph.lacounty.gov		Richard Jefferson (818) 880-3410 rjefferson@ph.lacounty.gov	CHECK NO.:	

Revised July 2018

ENVIRONMENTAL HEALTH

Land Use Program

5050 Commerce Drive, Baldwin Park, CA 91706
◆ Telephone: (626) 430-5380 ◆ http://publichealth.lacounty.gov/eh/EP/lu/lu_main.htm

COUNTY OF LOS ANGELES
Public Health

APPLICATION FOR ONSITE WASTEWATER TREATMENT SYSTEM (OWTS) REVIEW

ALL FIELDS ARE REQUIRED. INCOMPLETE APPLICATIONS WILL NOT BE ACCEPTED.

WORK SITE ADDRESS	CITY	ZIP CODE
2 Portuguese Bend - Gatehouse	Rolling Hills	90274
APN	B&S PLAN CHECK NO. (found on B&S Agency Referral)	

DESCRIPTION OF PROJECT (E.G. NEW RESIDENCE, POOL ADDITION, ADDITION TO RESIDENCE, TANK REPLACEMENT, FIRE REBUILD, ETC.)
Septic Tank Replacement

PROPERTY OWNER(S) NAME		
City of Rolling Hills		
ADDRESS (CHECK HERE IF SAME AS WORK SITE ADDRESS ☑)	CITY	ZIP CODE
	Rolling Hills	90274
EMAIL	TELEPHONE	MOBILE
Kraig@rhca.net	(310) 544-6222	

CONTRACTOR LICENSE HOLDER NAME	CONTRACTOR QUALIFICATION (PLEASE SELECT ALL THAT APPLY) ☐ CLASS A ☐ CLASS B ☐ C-42 ☐ C-36	CONTRACTOR LICENSE NUMBER
ADDRESS	CITY	ZIP CODE
EMAIL	TELEPHONE	MOBILE

QUALIFIED PROFESSIONAL NAME	AGENCY	LICENSE NUMBER
ADDRESS	CITY	ZIP CODE
EMAIL	TELEPHONE	MOBILE

Applications are nontransferable. Allow **twenty (20) business days** for work plan review and response.
Field Personnel cannot accept payments. **DO NOT SEND CASH.**
Make checks or money order payable to: **LOS ANGELES COUNTY DEPARTMENT OF PUBLIC HEALTH**

REQUIRED SUPPORTING DOCUMENTS:
Submit one (1) electronic copy to: dlanduse@ph.lacounty.gov and
Attach one (1) hard copy of all supporting documents.

PROJECT APPROVALS ARE CONTINGENT UPON COMPLIANCE WITH ALL THE REGULATIONS, ORDINANCES, AND LAWS OF THE STATE OF CALIFORNIA, THE COUNTY OF LOS ANGELES, THE DEPARTMENT OF PUBLIC HEALTH, AND THE ENVIRONMENTAL HEALTH LAND USE PROGRAM.

EnviroServer® ES Maintenance Agreement
Exhibit "C"

Date of Agreement: _____ ***Start-up Date:*** _____

Service Provider:

PENINSULA SEPTIC SERVICE, INC.
1840 S. Gaffey Street, #53
San Pedro, CA 90731

Property Owner Information:

NAME: City of Rolling Hills / Rolling Hills Community Association

INSTALLATION ADDRESS: _____

HOME TELEPHONE NUMBER: _____

ASSESSOR'S PARCEL NUMBER: _____

PARCEL LEGAL DESCRIPTION: _____

Equipment Information:
(If more than one MicroSepTec/EnviroServer® System is covered by this Agreement, see Addendum "A" listing each specific)

Model #: _____ **Serial #:** _____ **Capacity (gpd):** _____

The EnviroServer® ES series consists of the following standard components: extended storage fiberglass tank, 3 adjustable risers, air diffuser assembly, air compressor, biomedia, re-circulation pump (air-lift), audible and visual alarm, high level alarm float, compressor failure sensor and effluent filter.

This EnviroServer® ES system contains the following components:

- ❑ Telemetry & Interface Control Board
- ❑ UV Disinfection
- ❑ Low Pressure Effluent Pump Assembly
- ❑ High Pressure Effluent Pump Assembly
- ❑ Headworks Box
- ❑ Drip Irrigation Kit_____ft

This system(s) is installed to service 1 structure(s). The EnviroServer® shall, at times, be referred to in the Agreement as "System". The system shall only include the EnviroServer(s)® identified by the serial number(s) set forth above or on an attached addendum. The System shall not include any residential electrical wiring, telephone wiring, plumbing, drainage or dispersal systems external to the System. Property Owner agrees to an express service lien on the property until all amounts due are paid in full.

IMPORTANT:

- All provisions on this agreement and any addendum attached hereto, constitutes a recordable instrument, which shall be recorded against the property described above. Read them carefully. No substitutions or changes will be effective without joint approval of property owner and service provider.
- *Any and all fees, costs, expenses or other amounts due hereunder are payable at time of service.*

Signed by: _____
Property Owner

Signed by: _____
Service Provider
PENINSULA SEPTIC SERVICE, INC.

_____
Date System was inspected and approved by the appropriate regulatory agency.

EnviroServer® ES Maintenance Agreement

1. Services During the term of this Maintenance Agreement ("Agreement'), Service Provider, or its agent, shall perform the following maintenance services with respect to the System. (Service Provider) shall be responsible for delivering and performing only those Services specifically identified below and shall not be responsible for any site work, engineering, plumbing, electrical, or any other items pertaining to the installation of the System, including, without limitation, retaining walls, other structures or grading, which may be contiguous to the System, geology, structural engineering, surveying, preparation of the overall plot plan or contour lines on the plot plan. In order to assist it in carrying out its duties and responsibilities pursuant to this Agreement, (Service Provider) may subcontract with or otherwise engage the services of one or more third parties.

   1.1. Preventative Maintenance Service (Service Provider) shall, at six-month intervals, perform scheduled Preventive Maintenance Service for the System during the (Service Provider's) normal business hours. All Preventive Maintenance Service shall be performed on-site at the property address of the System identified on the face of this Agreement. Preventive Maintenance Service means the cleaning, lubricating, inspecting, testing, sampling and adjusting of System and the replacement of defective parts. Preventive Maintenance Service also includes upgrades required for the System to the extent the manufacturer or third party suppliers make such upgrades available. The Property Owner agrees to the Preventive Maintenance Service rates set forth on Exhibit A.

   1.2. Remedial Maintenance Services (Service Provider) shall provide on-site Remedial Maintenance Service in response to an "Alarm One" reported by Property Owner, or by the on-board computer with forty-eight (48) hours of (Service Provider's) receipt of notice of the same. Alarm One means an Alarm indicated by visual and audible notification at the property address of System prompted by a malfunction on the System, preventing it from operating within manufacturer's operation specifications. Problems with the System other than Alarm One shall be addressed as Preventive Maintenance Service during normal business hours. If "Alarm One" is caused by a mechanical malfunction during the 2-year warranty period, the Property Owner shall not be responsible for cost of the repair. The Property Owner agrees to the Remedial Maintenance Service Rates set forth on Exhibit A.

   1.3. System Surveillance Pursuant to that certain Monitoring Agreement entered into concurrently herewith, by and between MST Holdings ("MST") and Property Owner, MST shall remotely monitor the System for System alarms on continuous basis for the time of start-up and for so long as the System is in service. System components monitored include, but are not limited to, pump, aerators, and high level alarms.

   1.4. Notice of Alarm Ones Property Owner shall notify (Service Provider) of Alarm Ones by telephone. Property Owner shall cooperate with (Service Provider's) reasonable requests for information and answers to questions under (Service Provider's) standard "trouble report" to determine the cause of the reported problem and whether a Remedial Maintenance Service visit is required.

   1.5. Response to Alarm Ones If (Service Provider) cannot reasonably determine from the trouble report than an Alarm One received during Emergency On-Call hours was caused by something other than a malfunction in System, (Service Provider) shall, within twenty-four (24) hours of receiving and acknowledging receipt of Property Owner's Alarm One, dispatch a service technician to the Property Address of the System as specified on the face of this agreement. Upon arrival, (Service Provider's) service technician shall be given all necessary ingress and aggress to premises.

   1.6. Delay in Response (Service Provider) shall be excused from delays in responding to Service if caused by force majeure, fires, weather conditions, labor controversies, delays in procurement of parts or supplies, or other causes beyond the control of (Service Provider).

   1.7. (Service Provider) shall be responsible for delivering and performing only those Services specifically identified herein and shall not be responsible for any site work, engineering, plumbing, electrical, or any other items pertaining to the installation of the System, including, but not limited to, retaining walls, other structures or grading, which may be contiguous to the System, geology, structural engineering, surveying, preparation of the overall plot plan or contour lines on the plot plan. In order to assist it in carrying out its duties and responsibilities pursuant to this Agreement, (Service Provider) may subcontract with or otherwise engage the services of one or more third parties.

2. Obligations of (Service Provider) and Property Owner (Service Provider) agrees to perform the Services in accordance with generally accepted professional practices, in the same and similar localities, related to the nature of the work accomplished, at the same time the Services are performed.

   2.1. While (Service Provider) will use reasonable efforts to complete its work in accordance with this Agreement, timing and cost requirements are subject to factors beyond (Service Provider's) control, including force majeure events and delays caused by third parties and Property Owner. (Service Provider) shall not be responsible for any delays, cost overruns, or liability resulting from such factors. To facilitate prompt and efficient completion of the Services, Property Owner and its personnel shall cooperate fully with (Service Provider) and its personnel in all respects, including, without limitation, providing information as to Property Owner requirements, providing access to the facilities at which the System is to maintained ("Facilities"), and providing access to all necessary information regarding Property Owner's Systems and Facilities.

   2.2. Property Owner shall be responsible for making, at its own expense, any changes or additions to Property Owner's current Facilities that may be required to support operation of the System.

   2.3. Property Owner shall ensure that:

      2.3.1. No repair attempts or other changes are made to System by anyone other than MST Certified Service Technician.

      2.3.2. The System is pumped on a regular (Every 1-3 years depending on usage).

      2.3.3. The System is not mishandled, misused, neglected, abused, vandalized, damaged by fire, lightning or water, subjected to hazardous chemicals, or otherwise subjected to unusual electrical or physical stress beyond the manufacturer's specified operating capabilities. Property Owner understands that there are no owner serviceable items on the System and that MST's Certified Service Technicians using only manufacturer-approved parts must conduct all repairs and service. The EnviroServer® wastewater treatment system is based on a biological process using natural bacteria and oxygen for efficiently digesting the waste in the water. The following item are examples of what should never by flushed down the drain or toilet because these

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items can overtax or destroy the biological digestion or clog pumps and pipes and constitute misuse and/or abuse of the System: excessive amounts of fat, grease or oil, coffee grounds, disposal diapers, feminine hygiene products, condoms, cigarette butts, gauze bandages, Q-tips, toys, dental floss, construction debris, kitty litter, excessive amounts of disinfectants and cleaning supplies, chemicals, such as paints, varnishes, thinners, waste oils, photographic solutions, pesticides and medicines.

2.3.4. Property Owner is responsible for maintaining continuous phone (if applicable) and electrical service to the System.

2.3.5. Property Owner will insure the System's structural integrity is protected by certain acts, including, but not limited to, construction of a structure on the System, blocking access to the System, or allowing vehicles and other heavy equipment to travel over the System.

2.4. Subject to any obligation (Service Provider) and/or MST may have under applicable federal, state or local law, statute ordinance or regulation, (Service Provider) agrees to use its best efforts to maintain strict confidentiality relating to the Services and shall release any such information only to its employees and subcontractors in the performance of the Services or to Property Owner's authorized representatives and to persons designated by the same to receive such information. Notwithstanding the foregoing, Property Owner hereby acknowledges and agrees that (Service Provider) may need to share information regarding the Services with MST in connection with its provision of services under the Monitoring Agreement.

2.5. (Service Provider) shall perform all Preventive and Remedial Maintenance. These obligations include, but are not limited to, six-month inspections and emergency services available within twenty-four (24) hours of service request.

2.6. Property Owner hereby acknowledges and agrees that this Agreement shall be executed concurrently with the Monitoring Agreement and the Purchase and Sale Agreement, both of which must be executed at the time of the purchase and sale of, and prior to the installation of, the System. Execution of the same is an express prerequisite to sale and installation of the System.

2.7. To the extent any Preventive or Remedial Maintenance Service is required after start up because of Property Owner's failure to comply with the items of this section, (Service Provider) may, at its sole discretion, bill for these services at (Service Provider's) then current and applicable service rates.

3. **Access to Property Owner Facility** (Service Provider), its employees and agents, will be granted access to the System on an as-needed basis for the purpose of repairing failures. Access to Property Owner Facilities shall be restricted to normal business hours, except for emergency services. Access to Property Owner Facilities outside normal business hours must be approved in advance by Property Owner, which approval will not be unreasonably withheld, except in the case of an emergency. (Service Provider) shall have no tenancy, or any other property or other rights in Property Owner Facility. All (Service Provider) personnel shall carry and produce, when requested, a valid identification card. While at any Property Owner Facility, (Service Provider's) personnel, contractors, and subcontractors shall (1) comply with Property Owner's requests regarding personal and professional conduct and (2) otherwise conduct themselves in a professional and businesslike manner.

4. **Acceptance of Services** When (Service Provider) notifies Property Owner that it has completed the Services, Property Owner shall have three (3) days to evaluate the Services to determine whether they reasonably conform to the System specifications and the requirements of the Agreement. (Service Provider's) performance of the Services shall be deemed accepted by Property Owner unless the Property Owner to provide written notice to (Service Provider) before the end of three (3) day evaluation period that the performance does not conform to the specifications. Such notice shall describe with particularity the nature of the nonconformance. If Property Owner gives timely notice that (Service Provider's) performance is nonconforming, (Service Provider) shall have seven (7) days from receipt of the notice to make and submit to Property Owner changes that may reasonably be required to correct the deficiencies described in the notice. Property Owner shall not unreasonably withhold or delay acceptance. (Service Provider's) sole liability, and Property Owner's sole remedy, for nonconformance with the specifications shall be to cure the nonconformance.

5. **Payment** (Service Provider) shall provide all Preventive and Remedial Services on a time and materials basis at (Service Provider's) then current rates for so long as the System is in service.

6. **Expenses** Property Owner shall reimburse (Service Provider) for all expenses reasonably incurred in rendering services to Property Owner pursuant to this Agreement ("Expenses"). Such Expenses shall include, without limitation, reasonable travel expenses (including transportation, lodging, and meals. Property Owner shall also reimburse (Service Provider) for special or unusual expenses incurred at Property Owner's specific request. Expenses shall normally be invoiced upon completion of service. All invoices shall be paid by Property Owner within fourteen (14) days of receipt. Time is of the essence of this payment obligation. Payments not made within such time period shall be subject to late charges equal to the lesser of (i) one and one-half percent (1.5%) per month of the overdue amount or (ii) the maximum amount permitted under applicable law.

7. **Taxes** Property Owner shall pay or reimburse (Service Provider) for all sales, use, transfer, privilege, excise, and all other taxes and all duties, whether international, national, state, or local, however designated, which are levied or imposed by reason of the performance of the Services under this Agreement: excluding, however, income taxes on profits which may be levied against (Service Provider).

8. **Other Fees** Unless otherwise provided in the Agreement or in one of its Exhibits, payment for all other services rendered by (Service Provider) shall be at (Service Provider's) then current rates.

9. **Term and Termination**

9.1. **Term** This Agreement shall commence upon the parties' execution of this Agreement and shall continue in full force and effect until termination as provided in herein.

9.2. **Termination** If either party is in breach of any material term or condition of this Agreement and such breach has remained uncorrected for sixty (60) days after notifying the other party, in writing, of the specific breach, either party may terminate this Agreement upon written notice, subject to local regulatory requirements and/or covenants. Notwithstanding the foregoing, (Service Provider) shall have the right to immediately stop all work for Property Owner and advise regulators of same, if Property Owner fails to pay MST in a timely manner as required hereunder. Any such failure to pay shall constitute a material breach of this Agreement by Property Owner.

Initial Here: BHJ

10. **Limited Warranty** MST warrants the System to be free from defects in material and workmanship for a period of two (2) years from the date of original purchase. MST's sole obligation under this warranty is to provide any parts to the System that need to be replaced provided that such obligation shall automatically terminate in the event the System has been altered by Property Owner or any other third party in any way. This warranty covers only normal, authorized use of the System. MST is not responsible for warranty service should the MST label, logo, or serial number be removed or should the System fail to be properly maintained or fail to function properly as a result of misuse, abuse, improper installation, neglect, improper shipping, damage caused by disasters such as fire, flooding by external means, lightning, improper wiring or electrical current, interaction with non-MST products, service other than by a MST authorized service provider or the discharging of hazardous or flammable materials through the System. This warranty applies only to the System and does not include the chlorine tablets, if applicable, or any of the existing on-site wiring, plumbing, drainage or additional disposal system. In addition to, and not in limitation of anything else contained in this warranty. MST is not responsible for any delay or damages caused by defective components or material, or for loss incurred because of interruption of service, or for any other special or consequential damages or incidental expenses arising from the manufacture, sale, or use of the System. The System is based on a biological process using natural bacteria and oxygen for efficiently digesting the waste in the water. The following items are examples of what should never be flushed down the drain or toilet because these items can overtax or destroy the biological digestion or clog pumps and pipes and constitute misuse and/or abuse of the system: excessive amount of fat, grease or oil, coffee grounds, disposal diapers, feminine hygiene products, condoms, cigarette butts, gauze bandages, Q-tips, toys, dental floss, construction debris, kitty litter, excessive amounts of disinfectants and cleaning supplies, chemicals, such as paints, varnishes, thinners, waste oils, photographic solutions, pesticides, and medicines. MST reserves the rights to revise, change, or modify the construction and design of the System or any component part or parts thereof without incurring any obligation to make such changes or modifications in previously manufactured equipment. MST also reserves the right, in making replacements of component parts under this warranty, to furnish a component part which, in its judgment, it equivalent to the company part replaced.

11. **Disclaimer of Warranties** THE LIMITED WARRANTY AND REMEDY PROVIDED HEREIN IS EXCLUSIVE AND IN LIEU OF ALL OTHER EXPRESS OR IMPLIED WARRANTIES AND ANY STATEMENTS OR REPRESENTATIONS MADE BY ANY PERSON OR FIRM ARE EXPRESSLY VOID. THE LIMITED WARRANTY IS SOLELY FOR THE BENEFIT OF PROPERTY OWNER AND PROPERTY OWNER SHALL HAVE NO AUTHORITY TO EXTEND SUCH WARRANTY TO ANY THIRD PARTY, EXCEPT AS EXPRESSLY SET OUT HEREIN, PROPERTY OWNER EXPRESSLY AGREES AND ACKNOWLEDGES THAT USE OF THE SYSTEM IS AT PROPERTY OWNER'S SOLE RISK. THE SYSTEM IS PROVIDED "AS IS" WITH ALL FAULTS, AND WITHOUT WARRANTY OF ANY KIND, EXCEPT AS EXPRESSLY SET OUT HEREIN. MST DISCLAIMS ALL WARRANTIES, EXPRESS AND IMPLIED, INCLUDING, BUT NOT LIMITED TO, THE IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE. MST DOES NOT WARRANT THAT THE SYSTEM WILL MEET PROPERTY OWNER'S REQUIREMENTS OR THAT THE OPERATION OF THE SYSTEM WILL BE UNINTERRUPTED OR ERROR-FREE, OR THAT DEFECTS IN THE SYSTEM WILL BE CORRECTED. EXCEPT AS EXPRESSLY SET OUT HEREIN, THE ENTIRE RISK AS TO THE RESULTS AND PERFORMANCE OF THE SYSTEM IS ASSUMED BY PROPERTY OWNER. NO ORAL OR WRITTEN INFORMATION OR ADVICE GIVEN BY MST OR MST'S AUTHORIZED REPRESENTATIVES SHALL CREATE A WARRANTY OR IN ANY WAY INCREASE THE SCOPE OF THE LIMITED WARRANTY. SHOULD THE SYSTEM PROVE DEFECTIVE, PROPERTY OWNER (NEITHER MST NOR ITS AUTHORIZED REPRESENTATIVES) ASSUMES THE ENTIRE COST OF ALL NECESSARY SERVICING, REPAIR, OR CORRECTION.

12. **Limitation of Liability** IN NO EVENT SHALL MST BE LIABLE TO PROPERTY OWNER OR ANY THIRD PARTY FOR ANY INCIDENTAL OR CONSEQUENTIAL DAMAGES (INCLUDING, WITHOUT LIMITATION, INDIRECT, SPECIAL, PUNITIVE, OR EXEMPLARY DAMAGES FOR LOSS OF BUSINESS, LOSS OF PROFITS, OR BUSINESS INTERRUPTION) ARISING OUT OF OR CONNECTED IN ANY WAY WITH MST'S PERFORMANCE UNDER THIS AGREEMENT OR USE OF OR INABILITY TO USE THE SYSTEM. IF ANY, OR FOR ANY CLAIM BY ANY OTHER PARTY, EVEN IF MST HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES. MST'S TOTAL LIABILITY TO PROPERTY OWNER FOR ALL DAMAGES, LOSSES, AND CAUSES OF ACTION (WHETHER IN CONTRACT, [INCLUDING NEGLIGENCE] OR OTHERWISE), SHALL NOT EXCEED THE AMOUNT OF THE MAINTENANCE FEES ACTUALLY PAID BY PROPERTY OWNER PURSUANT TO THIS AGREEMENT. NOTWITHSTANDING THE FOREGOING, MST SHALL NOT BE LIABLE FOR DEFECTS IN OR FAILURES OF THE SYSTEM FROM OR DEVELOPED BY THIRD PARTIES, OR FOR DEFAULTS BY, OR DEFECTS IN SERVICES RENDERED BY, THIRD PARTIES.

13. **Indemnification**

13.1. MST, their respective distributors and dealers shall indemnify Property Owner and hold it harmless from any and all claims, losses, deficiencies, damages, liabilities, costs, and expenses (including but not limited to reasonable attorneys' fees and all related costs and expenses) incurred by Property Owner as a result of any claim, judgment, or adjudication against Property Owner arising from (i) any breach or allegation which, if true, would constitute a breach of any of MST's obligations or warranties in this Agreement: (ii) the actions or omissions of MST, its officers, directors, employees, independent contractors, agents, assigns, or any other person or entity working under the supervision of or at the direction of MST, provided that Property Owner (a) promptly notifies MST in writing of any such claim and gives MST the opportunity to defend or settle any such claim at MST's expense and (b) cooperates with MST, at MST's expense, in defending or settling such claim.

13.2. Property Owner shall protect, defend and indemnify MST, their respective agents, distributors, dealers, subcontractors and employees, and hold them harmless from any and all claims, losses, deficiencies, damages, liabilities, costs, and expenses (including but not limited to reasonable attorneys' fees and all related costs and expenses) incurred by them as a result of any claim, judgment, or adjudication against them related to or arising from: (i) any breach or allegation which, if true, would constitute a breach of any of MST's obligations or warranties in this Agreement; (ii) the actions or omissions of MST, its officers, directors, employees, independent contractors, agents, assigns, or any other person or entity working under the supervision of or at the direction of MST, provided that Property Owner (a) promptly notifies MST in writing of any such claim and gives MST the opportunity to defend or settle any such claim at MST's expense and (b) cooperates with MST, at MST's expense, in defending or settling such claim. MST shall have no liability for intellectual property infringement to the extent that the infringement arises from (i) use of the System in combination with any third party Systems; (ii) modifications or maintenance of the System by a party other than MST or an MST authorized agent; (iii) misuse of the System; and (iv) failure of Property Owner to implement any improvement of the System, if the infringement claim would have been avoided by the use of the improvement.

14. **Covenants Running with the Land** (If applicable) It is agreed and understood that this Agreement is made and accepted by the Property Owner as a "covenant running with the land" and that this Agreement shall apply to and be binding upon all successive future owners and occupants as it is to the original Property Owner herein. The Property Owner acknowledges and agrees that this Agreement creates a lien upon the described land and said lien may be foreclosed against said property or owner upon non-payment of any fees, costs, payments or other charges due hereunder when such non-payment exceeds a period of thirty (30) days. The property Owner, by executing this Agreement, expressly vests in MST, or (Service Provider), or its successors and assigns, the right to bring all actions against the owner of the property as herein described or any part hereof for the collections of the any such charges.

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15. **Right of Way and Easement** Property Owner and its successors and assigns, does hereby grant and convey unto MST, (Service Provider), their successors and assigns, a right of way and easement for access, ingress and egress, on, over, above, across and under the property for the purpose of inspecting, maintaining, repairing, replacing, operating, and removing the System during the term of the Agreement.

16. **Arbitration; Governing Law** The rights and obligations of the Parties under this Agreement will be governed by and construed under the substantive laws of the State of California, U.S.A., without regard to choice of law principles. Any dispute, controversy or claim arising out of or relating to this Agreement shall be finally settled by arbitration in Orange County, California, U.S.A. In accordance with the Commercial Arbitration Rules of the American Arbitration Association in effect on the date of this Agreement, and judgment upon the award rendered by the arbitrator(s) may be entered in any court having jurisdiction thereof. The arbitration shall be conducted in the English language. The prevailing Party in such arbitration shall be entitled to reasonable attorney's fees, costs and necessary disbursements.

17. **Miscellaneous**

17.1. **Independent Contractors** The Parties hereto are acting as independent contractors and are not employees, agents or legal representatives of the other Party. Neither Party is authorized to bind the other Party, act as an agent for the other Party, or otherwise act in the name of or on behalf of the other Party.

17.2. **Notices** Notices permitted or required under this Agreement shall be deemed to have been given on the date actually received, when personally delivered, when sent by telecopy followed with written confirmation sent by mail as provided herein or three (3) days after mailing if mailed by registered or certified mail, return receipt requested to the addresses set forth for each party on the face of this Agreement. Notice of change of address shall be effective only upon receipt.

17.3. **Non-Assignability and Binding Effect** Property Owner agrees that its rights and obligations under this Agreement may not be transferred or assigned directly or indirectly without the prior written consent of (Service Provider). (Service Provider) may assign this Agreement to any affiliate or to any successor by merger or sale of substantially all of its assets to which this agreement relates in a manner such that the assignee becomes liable and responsible for the performance and observance of all duties and obligations hereunder. Subject to the foregoing sentence, this Agreement shall be binding upon and inure to the benefit of the Parties, their successors and assigns.

17.4. **Force Majeure** Except for Property Owner's obligation under this Agreement to pay for the System, non-performance of either Party shall be excused to the extent that performance is rendered impossible by strike, fire, flood, governmental acts or orders or restrictions, failure of suppliers, or any other reason where failure to perform is beyond the control and not caused by the negligence of the non-performing Party. In case of threatened or actual non-performance because of any of the above causes, the non-performing Party will exercise commercially reasonable efforts to avoid and cure such non-performance. If the suspension of performance continues for more than sixty (60) days, (Service Provider) may terminate this Agreement effective immediately, without any liability to Property Owner.

17.5. **Partial Invalidity** If any paragraph, provision, or clause in this Agreement shall be found or be held to be invalid or unenforceable in any jurisdiction in which this Agreement is being performed, the remainder of this Agreement shall be valid and enforceable and the Parties shall negotiate, in good faith, a substitute, valid and enforceable provision which most nearly affects the Parties' intent in entering into this Agreement.

17.6. **Waiver** The failure of either Party to enforce at any time the provisions of this Agreement shall in no way be constituted to be a present or future waiver of such provisions, nor in any way affect the validity of either Party to enforce each and every such provision thereafter.

17.7. **Entire Agreement** This Agreement sets forth the entire agreement and understanding of the Parties relating to the subject matter herein and merges all prior discussions between them. No modification of or amendment to this Agreement, nor any waiver of any rights under this Agreement, shall be effective unless in writing signed by the Party to be bound thereby.

17.8. **Section Headings** The section headings contained in this Agreement are for reference purposes only and shall not affect in any way the meaning or interpretation of this Agreement.

17.9. **Counterparts** This Agreement may be executed in any number of counterparts, each of which shall be deemed an original, and all of which shall together constitute one and the same instrument. To the maximum extent permitted by law or any applicable governmental authority, any document may be signed and transmitted by facsimile with the same validity as if it were an ink-signed document.

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be executed by their duly authorized representatives as of the Effective Date.

"(Service Provider)"

PENINSULA SEPTIC SERVICE, INC.
1840 S. Gaffey Street, #53
San Pedro, CA 90731

By: _____

Print Name: _____

Title: _____

"Property Owner"

By: _____

Print Name: _____

Title: _____

Initial Here: EHJ

Recorded at the request: City of Rolling Hills
and mailed to: **Applicants Name**

Los Angeles County
Environmental Health
Land Use Program
5050 Commerce Drive
Baldwin Park, Ca 91706

SPACE ABOVE THIS LINE FOR RECORDERS USE

COVENANT AND AGREEMENT
REGARDING NON-CONVENTIONAL ONSITE WASTEWATER TREATMENT SYSTEM
AND THE USE AND TRANSFER OF OWNERSHIP OF PROPERTY
SUBJECT TO THIS COVENANT AND AGREEMENT

WHEREAS City of Rolling Hills the undersigned property owner(s) (hereinafter referred to as **OWNER)** owns that certain real property described below (hereinafter referred to as **PROPERTY**), which is served, or shall be served, by an Non-Conventional Onsite Wastewater Treatment System constructed and installed pursuant to the County of Los Angeles Uniform Plumbing Code and Health and Safety Code: and

WHEREAS, OWNER represents that they … situated in the County of Los Angeles, State of C…

Ask city for this

Legal Description of PROPERTY:

(if lengthy, include as Exh…

Street location/Location of PROPERTY:
1 Portuguese Bend Rd, Rolling Hills. (Tennis Courts + Gate House)
AIN #7569-015-900

NOW THEREFORE, the undersigned **OWNER**, in consideration for constructing the Non-Conventional Onsite Wastewater Treatment System and/or occupying dwelling(s) on **PROPERTY**, does hereby promise, covenant and agree to comply with at all times all applicable federal, state, and local laws and requirements regarding the construction, operation, repair and maintenance of a Non-Conventional Onsite Wastewater Treatment System approved by the County for the PROPERTY, and that the **OWNER** shall at all times maintain in force a legally valid and binding maintenance and monitoring agreement with an approved servicing company covering such system, and shall provide upon request all maintenance and monitoring information to the County of Los Angeles Department of Public Health or its successor agency (County Health). Said agreement shall include computer monitoring and annual testing required by County Health of the efficiency and effectiveness of the system, including effluent testing as may be applicable. Said testing shall be to ensure the continued ability of the system to meet applicable federal, state, and local laws and requirements, including secondary waste discharge standards. Should the system not be in compliance with said laws and requirements, OWNER shall ensure that maintenance and/or repair is performed on the system, and the system shall be subject to re-testing. If following maintenance and repair, the system is still unable to meet applicable laws and requirements, the system shall be replaced with a new Non-Conventional Onsite Wastewater Treatment System upon approval by County Health. A copy of the maintenance and monitoring agreement shall be filed with County Health. Upon a material change in the maintenance

agreement or a change of the approved servicing company, OWNER shall file the new or replacement maintenance and monitoring agreement with County Health within 30 days of said change.

The County is hereby granted easement rights to inspect the Non-Conventional Onsite Wastewater Treatment System, with reasonable notice to OWNER absent an emergency, to insure compliance with the Covenant and Agreement.

Upon approval of the Non-Conventional Onsite Wastewater Treatment System for the PROPERTY, OWNER shall have this document recorded with the Los Angeles County Recorder's Office against the title of the PROPERTY.

This **COVENANT AND AGREEMENT**, as well as the appurtenant easement for access as set forth above, shall run with the land and shall be binding upon all future owner, heirs, successors, and assigns of the PROPERTY.

This **COVENANT AND AGREEMENT** shall only be terminated by a **RELEASE OF COVENANT AND AGREEMENT** duly executed by an authorized agent of the County of Los Angeles, Division of Environmental Health, or its successor agency; said **RELEASE** shall not be effective until recorded in the County of Los Angeles Recorder's Office.

Dated this_____ day of_____[month], _____ [year]

_____	_____
Print Name	Signature
_____	_____
Print Name	Signature
_____	_____
Print Name	Signature
_____	_____
Print Name	Signature

COAST GEOTECHNICAL, INC.
1200 W. Commonwealth Ave., Fullerton, CA 92833 Ph: (714) 870-1211 Fax: (714) 870-1222 E-mail: coastgeotec@sbcglobal.net

April 5, 2022 W.O. 546817-04

Rolling Hills Community Association
2 Portuguese Bend Road
Rolling Hills, California 90274

Subject: Update Report of Percolation Feasibility Study for Replacement Septic System and Subsequent Reports, Community Tennis Court Facility and Gatehouse, 2 Portuguese Bend Road, Rolling Hills, California

References:

1. Report of Percolation Feasibility Study for Replacement Septic System, Community Tennis Court Facility and Gatehouse, 1 Portuguese Bend Road, Rolling Hills, California; by COAST GEOTECHNICAL, INC., W.O. 546817-01, dated February 1, 2018.

2. Updated and Revised Report of Percolation Feasibility Study for Replacement Septic System, Community Tennis Court Facility and Gatehouse, 2 Portuguese Bend Road, Rolling Hills, California by COAST GEOTECHNICAL, INC., W.O. 546817-02, dated November 1, 2019.

3. Revised Site Map for Report of Percolation Feasibility Study for Replacement Septic System, Community Tennis Court Facility and Gatehouse, 2 Portuguese Bend Road, Rolling Hills, California; by COAST GEOTECHNICAL, INC., W.O. 546817-03, dated March 23, 2020.

Gentlemen:

Submitted herewith is an update letter for the percolation feasibility study performed for the replacement septic system for the community tennis court facility and entry gatehouse at 2 Portuguese Bend Road, City of Rolling Hills, County of Los Angeles.

Our understanding is the project is unchanged as presented in the referenced reports. These reports are opined still applicable, and are updated as of the date on this letter

We appreciate this opportunity to be of service to you.

Respectfully submitted:
COAST GEOTECHNICAL, INC.

Todd D. Houseal
CEG 1914 Exp 4/24

REGISTERED GEOLOGIST
TODD D. HOUSEAL
No. 1914
CERTIFIED
ENGINEERING
GEOLOGIST
STATE OF CALIFORNIA

COAST GEOTECHNICAL, INC.
1200 W. Commonwealth Ave., Fullerton, CA 92833 Ph: (714) 870-1211 Fax: (714) 870-1222 E-mail: coastgeotec@sbcglobal.net

March 23, 2020 W.O. 546817-03

Rolling Hills Community Association
2 Portuguese Bend Road
Rolling Hills, California 90274

Subject: Revised Site Map for Report of Percolation Feasibility Study for Replacement Septic System, Community Tennis Court Facility and Gatehouse, 2 Portuguese Bend Road, Rolling Hills, California

References:

1. Report of Percolation Feasibility Study for Replacement Septic System, Community Tennis Court Facility and Gatehouse, 1 Portuguese Bend Road, Rolling Hills, California; by COAST GEOTECHNICAL, INC., W.O. 546817-01, dated February 1, 2018.

2. Updated and Revised Report of Percolation Feasibility Study for Replacement Septic System, Community Tennis Court Facility and Gatehouse, 2 Portuguese Bend Road, Rolling Hills, California by COAST GEOTECHNICAL, INC., W.O. 546817-02, dated November 1, 2019.

Gentlemen:

Submitted herewith is a Revised Site Map for the percolation feasibility study performed for the replacement septic system for the community tennis court facility and entry gatehouse at 2 Portuguese Bend Road, City of Rolling Hills, County of Los Angeles.

The revision to the original Site Map was to relocate the proposed septic tank location. The new proposed septic tank location is depicted on the attached Revised Site Map, Figure 2A.

We appreciate this opportunity to be of service to you.

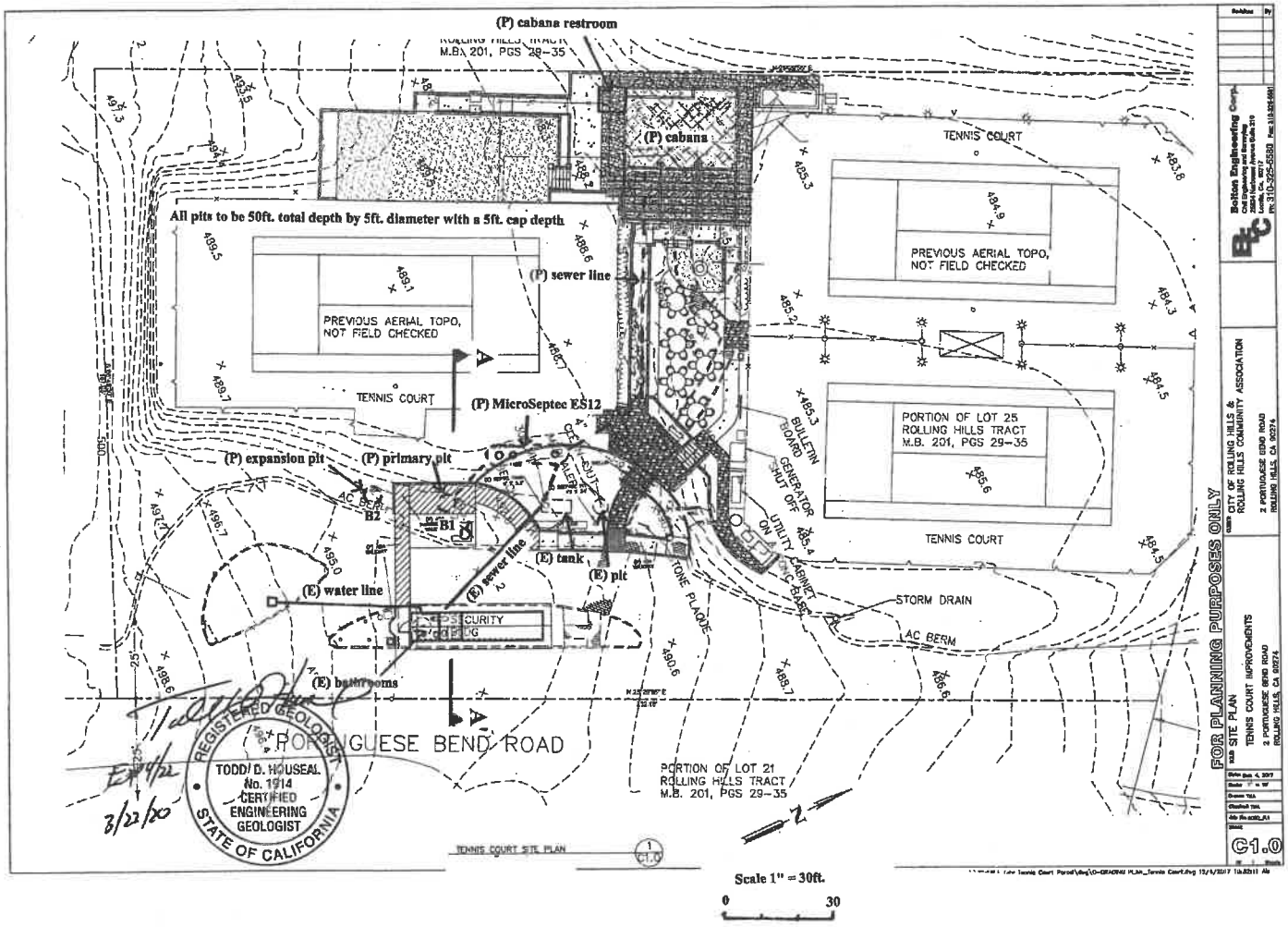
Respectfully submitted:
COAST GEOTECHNICAL, INC.

Todd D. Houseal
CEG 1914 Exp 4/20

REGISTERED GEOLOGIST
TODD D. HOUSEAL
No. 1914
CERTIFIED
ENGINEERING
GEOLOGIST
STATE OF CALIFORNIA

REVISED SITE MAP

(3/23/20/ revision-relocated septic tank)



COAST GEOTECHNICAL, INC.	W.O. 546817	Figure 2R

COAST GEOTECHNICAL, INC.
1200 W. Commonwealth Ave., Fullerton, CA 92833 Ph: (714) 870-1211 Fax: (714) 870-1222 E-mail: coastgeotec@sbcglobal.net

February 1, 2018 W.O. 546817-01

Rolling Hills Community Association
1 Portuguese Bend Road
Rolling Hills, California 90274

Subject: Report of Percolation Feasibility Study for Replacement Septic System, Community Tennis Court Facility and Gatehouse, 1 Portuguese Bend Road, Rolling Hills, California

Gentlemen:

Submitted herewith is the percolation feasibility study performed for septic system servicing the community tennis court facility and entry gatehouse at 1 Portuguese Bend Road, City of Rolling Hills, County of Los Angeles. This report completes our work scope for the project outlined in our proposal dated October 8, 2017.

PURPOSE

The purpose of the percolation study is to determine if the subject site has sufficient area with suitable percolation, physiographic and geologic characteristics for construction of a seepage pit onsite absorption system, in general accordance with County of Los Angeles guidelines.

The client is proposing to upgrade the existing community tennis court and community entry area as depicted on appended Figure 2 of this report. As part of this upgrade the client is proposing to replace the existing septic system servicing the facilities.

Our understanding of County guidelines is that for this type of development the client must abandoned the existing septic system in accordance with applicable codes, and assess the property per County guidelines for a new onsite waste water disposal system.

This report addresses testing of the property for a new onsite waste water disposal system consisting of an advanced treatment septic tank and seepage pit(s).

WORK SCOPE

The project work scope consisted of the following:

1. Location of two borings drilled two feet in diameter, one to a depth of 50 feet and the other to 60 feet.
2. Geologic logging of the borings.
3. Presaturation and percolation testing of borings.
4. Analysis of data.
5. Preparation of this report.

To facilitate compliance with the County of Los Angeles Guidelines, each County requirement is stated below followed by our statement.

Item 1

Item 1 requests the location of the property including the legal description.

- The site is identified as 1 Portuguese Bend Road in the City of Rolling Hills. The site is identified by APN 7569-015-900.
- The site is shown on a Vicinity Map appended as Figure 1.

Item 2

Item 2 request the owner's name, address, and phone number.

- The property is owned by the Rolling Hills Community Association with the mailing address as shown in the title block of this report.
- The association manager, Ms. Kristen Raig, can be reached at 310-544-6222.

Item 3

Item 3 requests the type of proposed sewage system.

- The parcel is developed with tennis courts, common areas, and the gatehouse for the community entry gate as depicted on appended Figure 2. The client is proposing to upgrade the tennis court area with new landscaping and outdoor improvements that include a new sink, and construct ADA compliant parking and access to the bathroom facility within the gatehouse. For the proposed new septic system the property will need to be assessed for both a new primary septic system and a future expansion system.
- The existing septic system is depicted on attached Figure 2. This system will need to be abandoned in accordance with County code.
- The proposed new system will consist of seepage pits and an advanced treatment septic tank, and will be located as shown on Figure 2.

Item 4

Item 4 requests description of the on-site materials.

- Earth materials at the location of the primary and expansion seepage pit is composed of colluvium underlain by bedrock. Effluent will be disposed of into bedrock which is generally composed of tan white to yellow interbedded diatomaceous siltstones, clayey siltstones, and sandstones, with beds of fractured siliceous siltstones. Percolation rates are anticipated to vary within the strata from minimal rates in the clayey siltstones to high rates in the fractured siliceous siltstones.
- Appended Figures 2 and 3 show site conditions and a cross section, respectively. Geologic logs of the exploratory borings are presented on Plates A and B.

Item 5

Item 5 requests a scaled grading plan.

a. Figure 2 is a site plan that shows the property at a 1"= 30ft. scale.

b. Figure 2 shows topography for the site. The proposed septic system will be located in a landscape and parking area between the tennis courts and gatehouse building.

c. No hydrophytic plants or oak trees were observed in the vicinity of the proposed seepage pits.

d. No wells, abandoned wells, or springs are present on the site. Water is from metered City service which is located on Portuguese Bend Road.

e. No drainage courses or flood zones are present in the vicinity of the seepage pits.

f. The percolation test boring locations are indicated on Figure 2.

g. Bedrock outcrops were not observed in the area of the proposed seepage pits.

h. The existing and proposed improvements are shown on Figure 2.

i. The approximate location and dimensions of the existing septic tank and seepage pit is shown on Figure 2. The location and dimensions of the proposed septic tank and seepage pit(s) is also shown on Figure 2. Section A-A' depicted on Figure 3 is a geologic cross-section that indicates cap-off depth and any setback distances for the proposed septic system.

j. By the County guidelines septic tank capacity for this type of project is based on fixture count.

The proposed plan depicted on Figure 2 has been enlarged to show the existing and proposed fixtures and is attached as Figure 4. The plan shows two existing toilets and two existing bathroom sinks in the gatehouse and a proposed sink in the tennis court area.

Based on our interpretation of the County plumbing code, fixture counts are deferred to the California Plumbing Code Table 702.1. This table shows a public toilet to have a fixture count of six, a lavatory to have a count of one, and an outdoor sink (for this report considered a kitchen sink) a count of two. This provides a fixture count of 16. Based on Table H-2.1 of the County plumbing code this fixture count requires the use of a 1000 gallon septic tank.

Due to a high percolation rate an advanced treatment system will be required. The County requires that the advanced treatment system be capable of treating effluent based on bedroom count and to have adequate capacity. Based on Table H-2.1, a bedroom count of three can also service a fixture count of 20, requiring the system to be able to treat 900 gallons of effluent per day.

The client is proposing to utilize a MicroSeptec ES6, which will service up to three bedrooms, which based on Table H-2.1 equates to a fixture count of 20, is able to treat 900 gallons of effluent per day, and has a tank capacity of 1708 gallons. A cross-section view of the ES6 septic tank and risers is attached as Figure 5.

The client is advised that the recommended advanced septic tank is not the only type allowed by the County. Alternate advanced septic tanks are available and can be utilized provided they comply with all project and County requirements. To use an alternate tank portions of this report would need to be rewritten and a new site map prepared showing the selected advanced septic tank.

k. Testing indicates that one seepage pit would be sufficient for a 1000 gallon septic tank size.

l. The proposed system and expansion pit is depicted on Figure 2.

m. The project contractor shall provide documentation of washing of any filler material (if used) by the supplier.

n. Pertinent setback distances are indicated on Figures 2 and 3.

o. The tank and pits are located in or near an area that may be subject to traffic load, traffic rated lids and risers are recommended.

Item 6

Item 6 requests a copy of the approved grading plan

- Figure 2 is a copy of the proposed site plan. It is not anticipated that significant grading will be required for the proposed improvements.

Item 7

Item 7 requests a historic high groundwater level determination.

- Drilling of the test boring did encountered groundwater at a depth of 60 feet below ground surface. Boring 1 was backfilled with eight feet of tamped soil and capped with two feet of concrete. The concrete was allowed to cure prior to the presoak.

Item 8

Item 8 requests a floor plan of the building with room usage.

- The existing floor plan for the gatehouse and the proposed outdoor sink showing usage and fixtures that will contribute to the proposed disposal system is attached as Figure 4. Figure 4 is an enlargement of a portion of Figure 2.

Item 9

Item 9 requests a final county geologic review sheet required by Building and Safety.

- It is not known if a geotechnical report was required by the County.

Item 10

Item 10 requests percolation test data

a. Todd Houseal, a Certified Engineering Geologist, performed the percolation testing.

b. Percolation testing was performed at the plotted locations shown on Figure 2. The percolation test borings consisted of 24" diameter boreholes. The boreholes were located at the approximate location of the proposed primary and expansion pit. The amount of water used to fill the boreholes was determined from a calibrated water meter. Calibration for the water meter is appended as Figure 6. The water used during the percolation testing was obtained from a fire hydrant located on Portuguese Bend Road.

c. The required presoak for B1 and B2was performed on December 26, 2017. Water was added to the boring utilizing a calibrated water meter.

Boring No.	Start meter reading	End meter reading	Disposed volume (gals)	Time	Water depth after Presoak
1	1439000	1440200	1200	10:50-11:02am	20ft
2	1442200	1443400	1200	11:33-11:46am	14ft

During the presoak, test waters did not rise to the proposed cap depth of five feet bgs.

d. Since the presoak test waters did not reach the proposed cap level of five feet bgs the County deems that the percolation rate exceeds the needed minimum requirement of 0.83 gallons per square foot per day and has a rate that exceeds 5.12 gallon per square foot per square foot per day requiring the use of a septic system that reduces the effluent nitrogen level. Determination of a percolation rate is not required.

e. In conversation with the County Environmental Health Department over current percolation test procedures our understanding is that for projects where a high percolation rate is present (test waters do not reach the cap level at the presoak stage) a modified test procedure can be used, provided testing is sufficient to show that adequate waters can be disposed of.

Testing was conducted after the presoak and consisted of continuously adding water to the test hole until the required volume of water was disposed of.

Boring No.	Start meter reading	End meter reading	Disposed volume (gals)	Time	Water depth after testing
1	1440200	1442200	2000	11:02-11:32am	8ft
2	1443400	1445400	2000	11:46-12:20pm	8ft

a. Prior to leaving the jobsite at 1pm, the water level in Boring 1 was observed to be at 27feet and in Boring 2 at 22 feet. The next day, prior to 24 hours, at 10am the water level in Boring 1 was observed at 39 feet and in Boring 2 at 35 feet. The following day, prior to 48hours, at 8am the water level in Boring 1 was observed at 46.5 feet and in Boring 2 at 41.5 feet. The borings were observed to be dry at 72 hours.

b. Testing indicates that the test waters percolate into facture zones within the subsurface bedrocks. Based on testing and logging of the borings these zones are located at several elevations within the upper portion of the borehole, with minimal fractures in the lower portion.

c. Testing of a seepage pit must demonstrate that it can dispose of five times the capacity of the proposed septic tank over 24 hours. Calculations presented on Plates 1 and 2 indicate that BH1 disposed of 6820 gallons of water over 24 hours and BH2 6585 gallons of water over 24 hours. Each pit exceeds the required volume of 5000 gallons disposed over 24 hours. One pit is adequate for both the primary and expansion system. **We recommend all future pit(s) be fifty foot total depth, drilled five feet diameter with a five foot cap**. This recommendation is based on the proposed location of the seepage pits as shown on Figure 2.

d. Test data and calculations appended show favorable conditions for the primary and expansion seepage pits for the onsite effluent system.

Item 11

Item 11 requests a conclusion on the suitability of the site for the proposed system.

- Information obtained from the percolation testing indicates that the property has adequate area and physical parameters for the proposed primary seepage pit and tank, and future seepage pit.

Item 12

Item 12 requests a signed statement that this report presents an accurate and complete disclosure of all facts known relating to the proposed on-site sewage disposal system.

- It is our opinion that this report presents an accurate and complete disclosure of all facts that are known and relate to the existing on-site sewage disposal system and future expansion area..
- The client is advised that an onsite sewage disposal system is considered temporary only with eventual failure and requirement for replacement with a new system.
- Life expectancy of a system varies widely dependent on usage, construction and maintenance. Coast Geotechnical, Inc. makes no warranty or guarantee of the system or length of effectiveness.
- COAST GEOTECHNICAL, INC. shall be consulted if the system loads change from those anticipated; if the pit locations change significantly; if an alternate advanced treatment system is utilized and during pit construction so the holes may be down hole logged.
- This submittal is intended to represent a complete feasibility report that conforms with the applicable provisions of the Los Angeles County Code-Title 28 Plumbing Code and the feasibility report requirements of the Department of Public Health-Environmental Health.

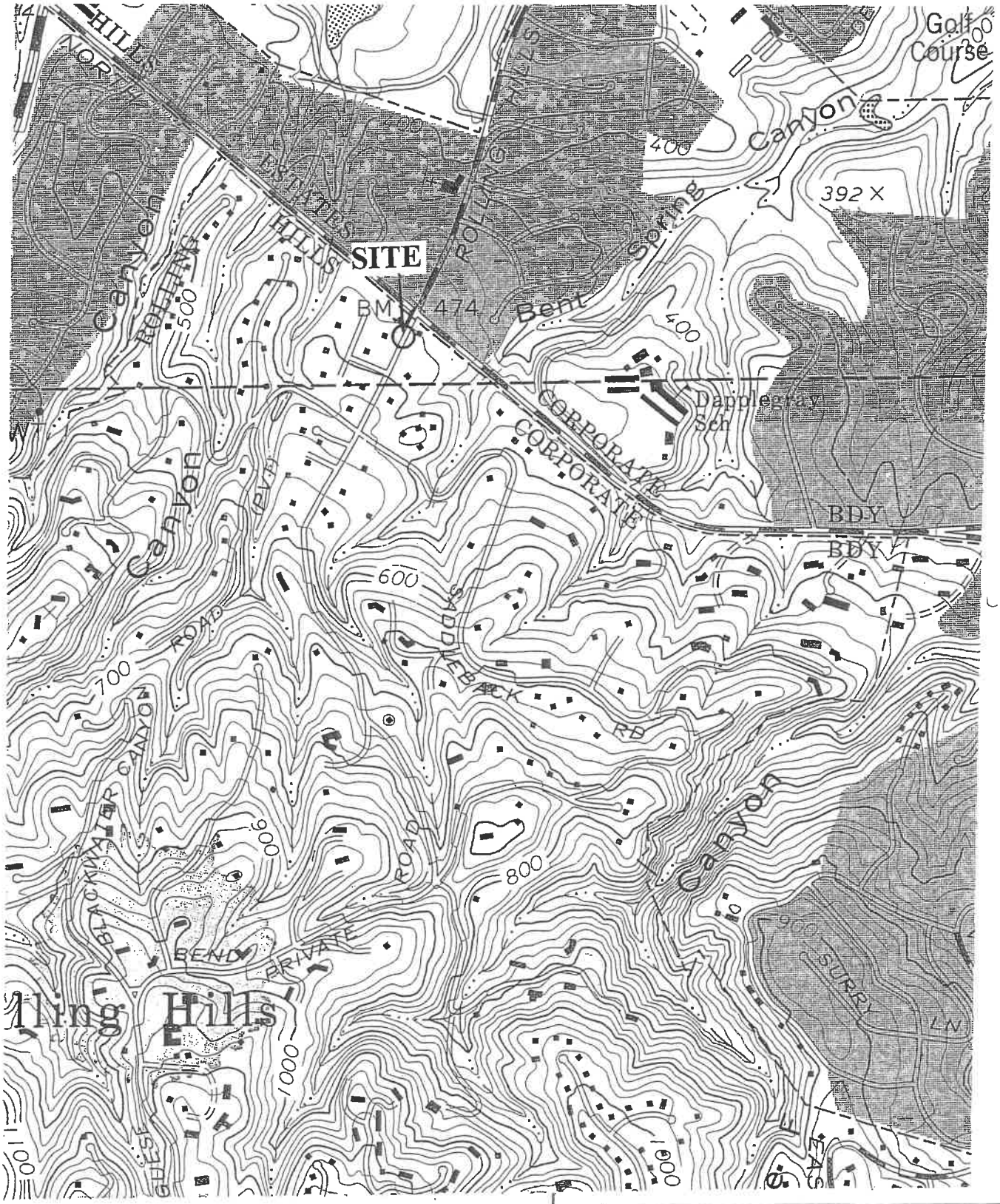
We appreciate this opportunity to be of service to you.

Respectfully submitted:
COAST GEOTECHNICAL, INC.

Todd D. Houseal
CEG 1914 Exp 4/18

REGISTERED GEOLOGIST
TODD D. HOUSEAL
No. 1914
CERTIFIED
ENGINEERING
GEOLOGIST
STATE OF CALIFORNIA

SITE VICINITY MAP

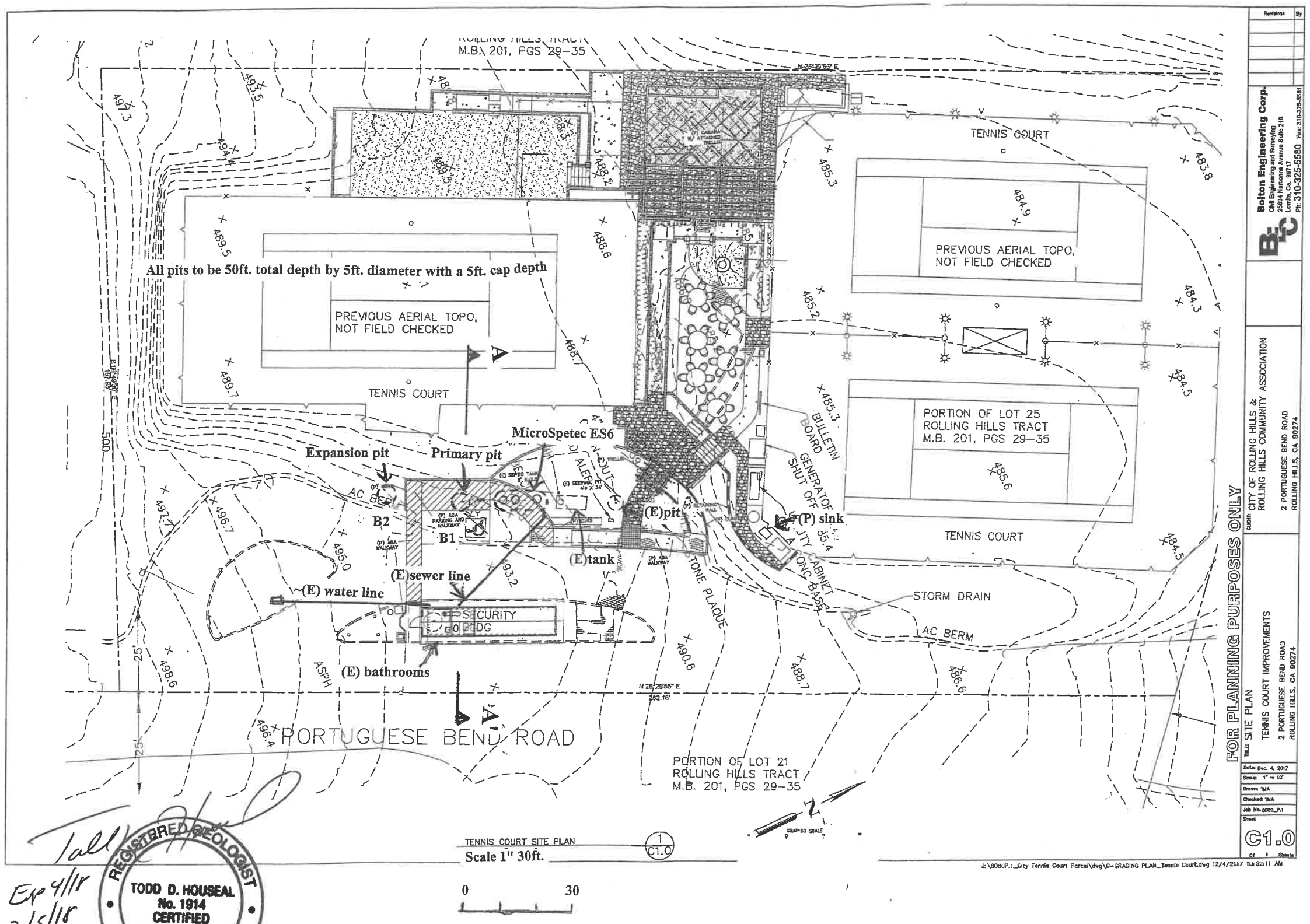


Torrance USGS Topographic Map

COAST GEOTECHNICAL, INC.

W.O. 546817 Figure 1

SITE MAP

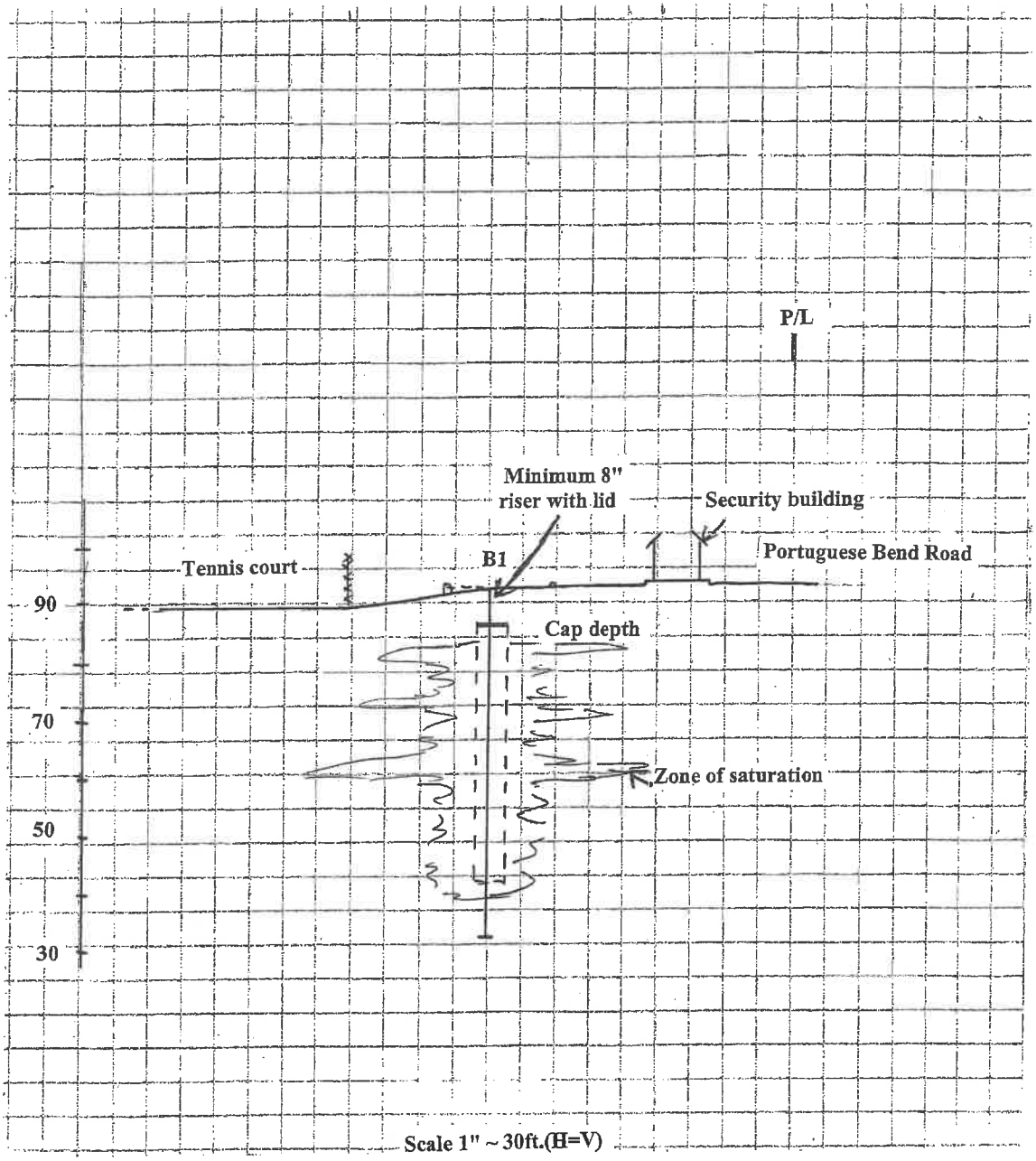


REGISTERED GEOLOGIST
TODD D. HOUSEAL
No. 1914
CERTIFIED ENGINEERING GEOLOGIST
STATE OF CALIFORNIA

Exp 4/18
2/5/18

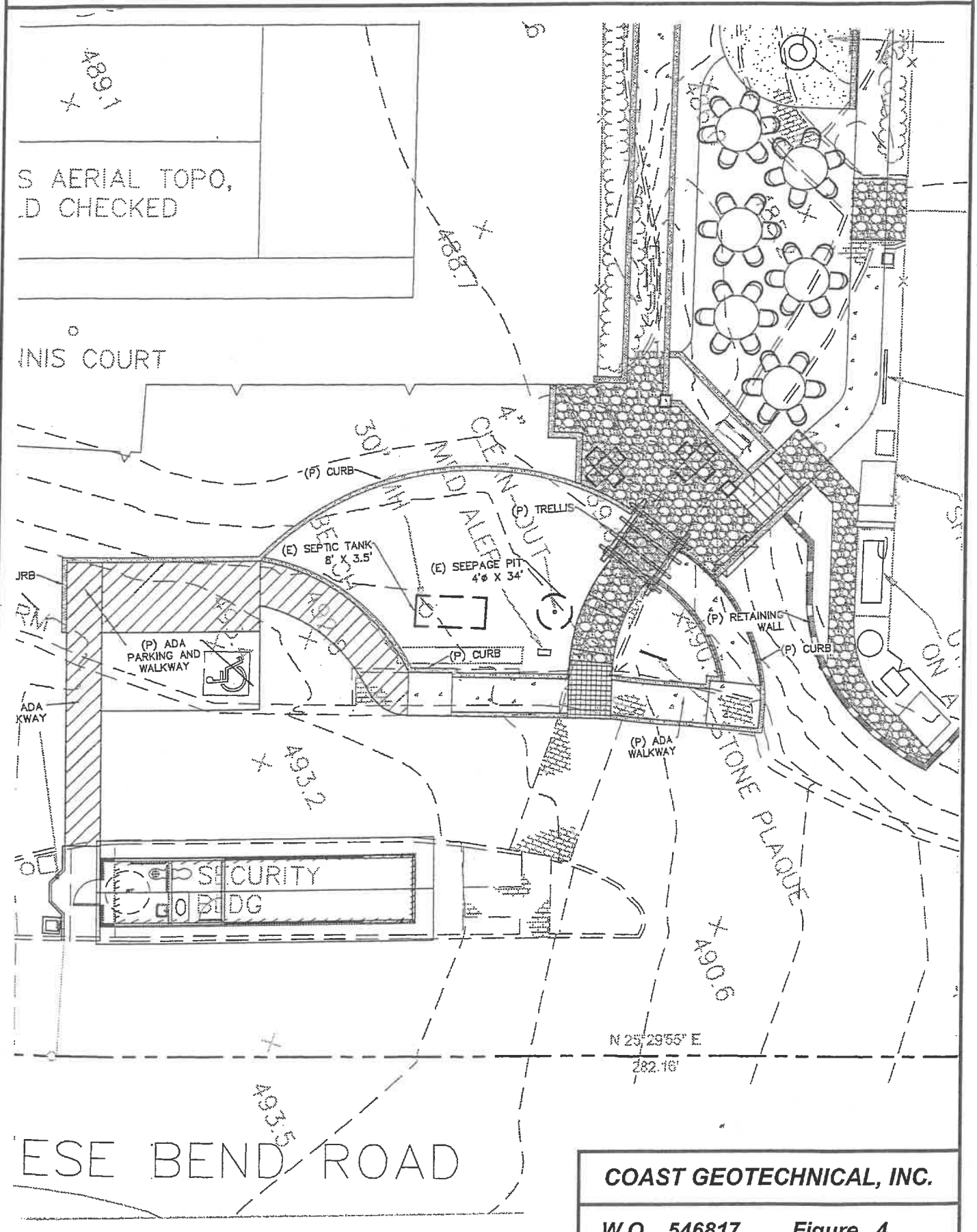
COAST GEOTECHNICAL, INC.	W.O. 546817	Figure 2

GEOTECHNICAL SECTION A-A'



COAST GEOTECHNICAL, INC.	
W.O. 546817	Figure 3

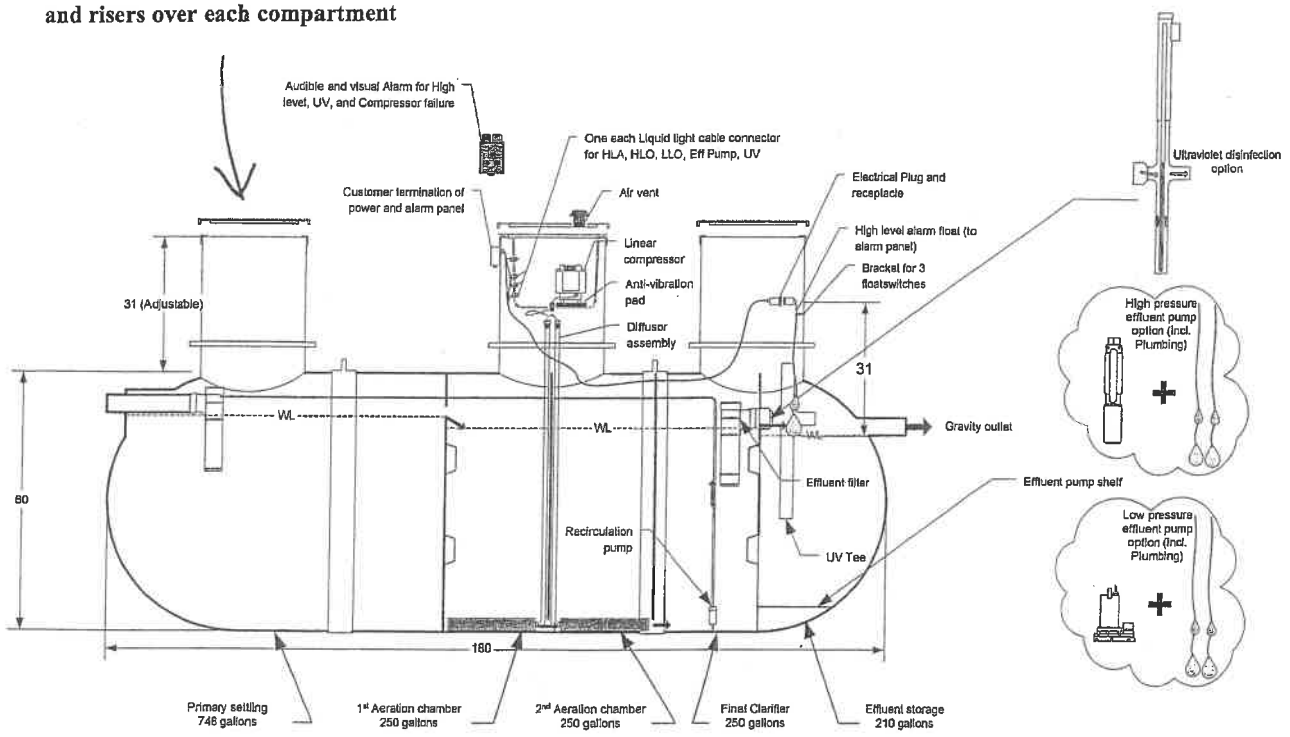
FLOOR PLANS



COAST GEOTECHNICAL, INC.	
W.O. 546817	Figure 4

SEPTIC TANK SECTION

24" diameter traffic traded lid and risers over each compartment



MicroSepTec

ENVIROSERVER ES6

OVERVIEW

SIZE	FSCM NO	DWG NO	REV
		ES6-0001	A
SCALE 1/32 : 1	TGE	SHEET 6 OF 11	

8 7 6 5 4 3 2 1

Hydraulic Volume (gal):

MODEL	A. PRIMARY SETTLING	B. 1st AERATION CHAMBER	C. 2nd AERATION CHAMBER	D. FINAL CLARIFIER	E. EFFLUENT STORAGE	TOTAL GALLONS
ES6:	748	250	250	250	210	1708
ES12:	1566	502	502	486	380	3436

- Extended Storage of sludge in primary compartment. Sludge needs to be pumped every one to three years depending on usage
- Exactly the same treatment configuration as EnviroServer SM Model, therefore achieving the same clean effluent quality
- Requires less maintenance due to less moving parts
- Requires only 115 Volt / 15 Amp Service
- 22% Energy savings compared to SM Model
- Tank delivered with components already assembled, allowing for quick & easy installation
- Entire system installed below ground
- Includes audible and visual local alarm for detection of high water level in tank and of compressor failure. Alarm can be mounted indoor or outdoor away from tank
- System includes effluent filter to protect dispersal field from solids carry-over during upset conditions
- Disinfection offered as an option, may be required when using shallow dispersal fields
- Optional effluent pumps for pressurized discharge
- Optional Telemetry & Controller for effluent pump and additional equipment

Design and specifications are subject to change without notice

Daily Power Consumption (kWh):

EnviroServer	ES6	ES12
Gravity Output	3.6	7.2
Low Pressure Discharge	4.0	7.9
High Pressure Discharge	4.9	9.7

Specifications:

EnviroServer	ES6	ES12
Treatment Capacity*	600 gpd	1200 gpd
Length	180"	242"
Diameter	60"	72"
Electrical Hookup	115 VAC, 15 Amp	

*Based on typical household waste

COAST GEOTECHNICAL, INC.

W.O. 546817 Figure 5

WATER METER CERTIFICATION

METER TEST REPORT

WESTERLY METER SERVICE CO.
403 East Carlin Street
Compton, California 90222
Telephone (310) 637-9000

Professional
Testing and Repair
to AWWA Standards

Date 8-31-17

Invoice No.

Customer Coast Geotechnical P.O. No.

MAKE	SERIAL NUMBER	METER SIZE	PERCENT ACCURANCY 2 GPM	CC GPM	T.D. GPM		REMARKS
DLJ	002980	2"	99.7	99.8	100.2		Test

WE CERTIFY THAT THE TEST RESULTS SHOWN IN THIS REPORT ARE CORRECT TO THE BEST OF OUR KNOWLEDGE AND BELIEF. OUR TEST FACILITY IS CERTIFIED TO AN ACCURACY OF 0.2% AND IS TRACEABLE TO THE NATIONAL INSTITUTE OF STANDARDS & TECHNOLOGY
WESTERLY METER SERVICE CO.
BY:

COAST GEOTECHNICAL, INC.

W.O. 546817 Figure 6

FIELD LOG OF BORING NO. 1

Project Name: RHCA W.O. 546817 Log by: TDH

Method: BUCKET AUGER 24" Start: Finish: Date:

Wt. Of Kelly Bar: Drop

Samples			Blows			Depth	DESCRIPTION
Type	No.	Depth	6"	6"	6"	(FT)	
							DARK GREY SILTY CLAY, ROCK FRAGMENTS, MOIST, FIRM TO STIFF, MOIST (QC)
							BUFF TAN TO YELLOW CLAYEY SILTSTONE, SILTY CLAYSTONE, MOIST, FIRM, SOME FRACTURED SILICEOUS SILTSTONE
						10	
							(TM) (BEDROCK)
						20	
							FRACTURED SILICEOUS SILTSTONE, HARD, OPEN TO CLOSED FRACTURES
						30	
							YELLOW TAN CLAYSTONE TO SILTSTONE, DIATOMACEOUS, FIRM, MOIST, MINOR RUST STAINS AND BLACK SPECKLES
						40	
						50	
							EOBC 60 - WET @ 60' - NO CAVE

COAST GEOTECHNICAL, INC. **Plate A**

FIELD LOG OF BORING NO. 2

Project Name: RHCA W.O. 546817 Log by: TDH

Method: BUCKET AUGER 24" Start: Finish: Date:

Wt. Of Kelly Bar: Drop

Samples			Blows			Depth	DESCRIPTION
Type	No.	Depth	6"	6"	6"	(FT)	
							GRAY BLACK DIATOMACEOUS CLAY, SILTY, ROCK FRAGMENTS
							FIRM TO STIFF, MOIST (QC)
							BUFF TAN DIATOMACEOUS SILTSTONE / CLAYSTONE
						10	WITH THIN ZONES OF FRACTURE SILTSTONE
							FRACTURED SILTSTONE, HARD, DAMP
							(TM)
						20	(BEDROCK)
							FRACTURED HARD SANDY SILTSTONE, OPEN, HARD
							YELLOW BUFF TO TAN BUFF SILTY CLAYSTONE,
						30	DIATOMACEOUS, MOIST, FIRM
							THIN FRACTURE ZONE
						40	
							YELLOW, WHITE RUST STAINED DIATOMACEOUS
							SILTY CLAYSTONE, FIRM, MOIST
						50	
							EOB @ 50' - NO H2O - NO CAVING

COAST GEOTECHNICAL, INC. **Plate B**

PERCOLATION TEST RESULTS

FOR BORING 1

INSIDE SURFACE AREA OF TEST BORING

Diameter of test boring = 2 feet

Total depth = 50 feet

Cap-off depth = 5 feet

Length of boring tested = 45 feet

Inside surface area = $2 \pi r h$ = 282.7 square feet

VOLUME OF WATER USED IN PERCOLATION TEST

Volume of water added during test = 2000 gallons

Volume of water in hole at end of test and disposed of over 24hrs = 728 gallons

Total volume of water disposed over 24 hours = 2728 gallons

SYSTEM DESIGN

The County requires that the proposed seepage pit(s) be capable of disposing of 5X the required septic tank volume over 24 hours. Required volume is 1000 gallons.

For required tank capacity of 1000 gallons * 5 = 5000 gallons (needed)

Waters disposed = Water volume added + water volume disposed after 24 hours

Water volume disposed after 24hrs = (water level at 24 hours – water level at end) *23.5

Water volume disposed after 24hrs = (39-8) * 23.5 =728 gallons

Water volume added during testing = 2000 gallons

2000 gallons + 728 gallons = 2728 gallons (disposed)

Conversion factor for 2ft test hole to 5ft. seepage pit is x2.5

2.5 * 2728 gallons (disposed) = 6820 gallons (disposed)

6820 gallons (disposed) > 5000 gallons (needed) ------ one seepage pit is adequate

Percolation Study 1 Portuguese Bend Road Rolling Hills, California	Work Order 546817 Plate No. 1

COAST GEOTECHNICAL, INC.

PERCOLATION TEST RESULTS

FOR BORING 2

INSIDE SURFACE AREA OF TEST BORING

Diameter of test boring = 2 feet

Total depth = 50 feet

Cap-off depth = 5 feet

Length of boring tested = 45 feet

Inside surface area = $2 \pi r h$ = 282.7 square feet

VOLUME OF WATER USED IN PERCOLATION TEST

Volume of water added during test = 2000 gallons

Volume of water in hole at end of test and disposed of over 24hrs = 634 gallons

Total volume of water disposed over 24 hours = 2634 gallons

SYSTEM DESIGN

The County requires that the proposed seepage pit(s) be capable of disposing of 5X the required septic tank volume over 24 hours. Required volume is 1000 gallons.

For required tank capacity of 1000 gallons * 5 = 5000 gallons (needed)

Waters disposed = Water volume added + water volume disposed after 24 hours

Water volume disposed after 24hrs = (water level at 24 hours – water level at end) *23.5

Water volume disposed after 24hrs = (35-8) * 23.5 =634 gallons

Water volume added during testing = 2000 gallons

2000 gallons + 634 gallons = 2634 gallons (disposed)

Conversion factor for 2ft test hole to 5ft. seepage pit is x2.5

2.5 * 2634 gallons (disposed) = 6585gallons (disposed)

6585 gallons (disposed) > 5000 gallons (needed) ------ one seepage pit is adequate

Percolation Study 1 Portuguese Bend Road Rolling Hills, California	Work Order 546817 Plate No. 2

COAST GEOTECHNICAL, INC.

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 7.J
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH,**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **ACCEPT EMERGENCY STORM DRAIN REPAIR AT 1 MIDDLERIDGE LANE NORTH AS COMPLETE, FILE NOTICE OF COMPLETION, AND RELEASE RETENTION AFTER 30 DAY LIEN PERIOD TO EC CONSTRUCTION**

DATE: **May 23, 2022**

BACKGROUND:
On December 30, 2021, the easement adjacent to Middleridge Lane South developed multiple sinkholes during a storm event. As a result the RHCA contacted LA County Department of Public Works (LACDPW) on January 3, 2022 to request assistance and repair. On January 6, 2022, LACDPW informed the RHCA and City that they had found documentation confirming that the City of Rolling Hills was responsible for maintenance of the subject drain via a 1972 signed agreement between the Los Angeles County Flood Control District and the City. On January 9, 2022 the City Manager sent an email update to the Council and adjacent neighbors updating them on the above and the steps being taken to address the issues. While the city initially tried to engage LA County through our General Services agreement, they were unable to commit time and resources due to extenuating circumstances including lack of manpower due to COVID-19 and other emergency projects.

Staff contacted private contractors who visited the site and provided feedback on repair scope of work, schedule, and cost. In the meantime, the RHCA, in anticipation of projected rain directed staff to place sandbags and tarp over the sink holes. Staff also received a phone call from the resident at 1 Middleridge Lane North regarding potentially related concerns.

On Tuesday, January 18, 2022, EC Construction (ECC) was on site to investigate as to whether the broken drainpipe was the cause of the upper sinkhole and determine a more clear scope of work. The coupling (pipe connector) was the issue at the upper and lower sinkholes. During this visit ECC also visited 1 Middleridge Lane North at staff request due to assess potential stormwater drain issues in the canyon. At that time, it was challenging for them to ascertain what exactly might be happening in the canyon and so direction was focused on the more imminent sinkhole issues at 1 Middleridge Lane South.

On Monday, January 24, 2022, the City Council unanimously adopted Resolution No. 1287, directed the City Attorney to draft a construction contract with ECC and authorized the City Manager to execute. On Monday, February 7, 2022, the final executed contract was received and work commenced thereafter. On Tuesday February 8, 2022, ECC took a second look at 1 Middleridge Lane North and reported that there was a sinkhole in the resident's yard coming from a stand pipe with a metal cover. The 24" Corrugate Metal Pipe (CMP) empties in the aforementioned canyon. ECC advised the resident, that if the resident's grounds crews could hand dig around the sinkhole and expose the CMP- they could return in few days to provide some insight into what might be required to address. On February 9, 2022, the resident at 1 Middleridge Lane North contacted staff to follow-up on their concerns.

Work at 1 Middleridge Lane South was completed on Friday, February 11, 2022. At this time ECC was able to gain further insight into the potential issues and found the bottom of the CMP was gone and water was eroding the dirt under the CMP, causing it to collapse and create the sink hole. The catch basin in the street at the intersection of Middleridge Lane North & South was determined to be the source of water flowing through the CMP on the property. The exit point is down the canyon between 1 Middleridge North and the property to the North. ECC pointed out that this was a much more difficult repair because of the terrains as well as the trees / vegetation requiring removal in order to replace the CMP.

ON March 14, 2022, the City Council passed Resolution 1293 directing the City Attorney to draft a construction contract and authorizing the City manager to execute, approve the resolution for emergency work, and appropriate $48,645 from the General Fund Reserves to Fund 40 for the repair.

DISCUSSION:
The work completed and originally described ECC's estimate to repair the issue was as follows:

1. Remove existing vegetation as required to access damaged pipe.
2. Excavate dirt and remove approx 100 LF of existing 24” CMP.
3. Install 100 LF of new 24” CMP.
4. Backfill pipe with 1 sack slurry, 1’ over new pipe, backfill the remaining with dirt to finish grade.

FISCAL IMPACT:
The repair to the storm drain line was an unexpected expense and not budgeted in the FY 2021-2022 adopted budget.

The final cost was $47,028.56 which includes an additional $4728.56 for the breaking and removal of four concrete encasements surrounding the old CMP Pipe that were found during the work and not included as part of the original estimate.

RECOMMENDATION:
Approve as presented.

ATTACHMENTS:
PW_STW_220303_SDRepair_1MiddleridgeLaneN.pdf
PW_STW_220418_MiddleridgeLaneN_INV 19092_revised.pdf
PW_STW_220430_MiddleridgeLaneN_Inv 19111_Retention.pdf

PW_STW_220418_MiddleridgeLaneN_CP_Release.pdf

BID PROPOSAL AND CONTRACT

2213 CHICO AVE./SO. EL MONTE, CA 91733
Phone: (626) 444-9596 Fax: (626) 444-3077
California Contractors License #366814

DATE: 3/3/2022

TO City of Rolling Hills
2 Portuguese Bend Rd
Rolling Hills, CA 90274

JOB ADDRESS

1 Middleridge Lane N

We agree to furnish all labor, materials, equipment and supervision necessary to complete the following:

STORM DRAIN REPAIR

1. Remove existing vegetation as required to access damaged pipe.
2. Excavate dirt and remove approx 100 LF of existing 24" CMP.
3. Install 100 LF of new 24" CMP.
4. Backfill pipe with 1 sack slurry, 1' over new pipe, backfill the remaining with dirt to finish grade.

COST……..$42,300.00

Note: The homeowner at 1 Middleridge Lane N had a photo of a concrete culvert that appeared to be in the canyon between properties. This proposal does not include removing that structure or constructing a new culvert.

Exclusions: permits, inspection fees, SWPPP plan, engineering, survey, relocation of underground utilities, night or weekend work, concrete, slurry, and striping.

The above described work will be performed in a workman like manner and in accordance with standard practices.
TERMS: Unless credit arrangements have been made, in writing, in advance, the invoice for the work described herein is due and payable on presentation. 1 ½ % per month will be charged on a daily basis on all accounts or portions thereof not paid within 10 days of the date of the invoice. Customer agrees to pay reasonable attorney fees and collection costs incurred by E.C. Construction Co. for the collection of both principal and interest due to customer's failure to pay per this agreement.
Unless otherwise specified, if this proposal is not accepted within_____30_____days from bid date, we reserve the right of cancellation.

APPROVE AND ACCEPTED

_____

Date_____20___

Respectfully Submitted,

E.C. CONSTRUCTION CO.

By_____

E. C. CONSTRUCTION CO.
2213 CHICO AVENUE
SOUTH EL MONTE, CA 91733
Phone: (626) 444-9596 **Fax:** (626) 444-3077
Contrs Lic # 366814

Invoice

Invoice Number
19092
Invoice Date
4/18/2022

Bill To: CITY OF ROLLING HILLS
Attn: Christian Horvath
2 PORTUGUESE BEND ROAD
ROLLING HILLS, CA 90274

Re: STORM DRAIN REPAIR
1 MIDDLERIDGE LANE N

ROLLING HILLS, CA 90274

Our Job No	Customer Job No	Customer PO	Payment Terms	Due Date
220309		Contract3-21-22	Net 30 Days	5/18/2022

Description	Price
STORM DRAIN REPAIR- BASE CONTRACT AMOUNT $42,300.00	42,300.00
CO#1 BREAK & REMOVE 4 CONCRETE ENCASEMENTS SURROUNDING OLD CMP PIPE $4,728.56	4,728.56
10% RETENTION -4,702.86	-4,702.86
AMOUNT DUE THIS INVOICE $42,325.70	

Subtotal	$	42,325.70
Sales Tax (if applicable)	$	0.00
Total Due	**$**	**42,325.70**

Thank you for your business!
All Sales Taxes Paid

E. C. CONSTRUCTION CO.
2213 CHICO AVENUE
SOUTH EL MONTE, CA 91733
Phone: (626) 444-9596 **Fax:** (626) 444-3077
Contrs Lic # 366814

Invoice

Invoice Number
19111
Invoice Date
4/30/2022

Bill To: CITY OF ROLLING HILLS
Attn: Christian Horvath
2 PORTUGUESE BEND ROAD
ROLLING HILLS, CA 90274

Re: STORM DRAIN REPAIR
1 MIDDLERIDGE LANE N

ROLLING HILLS, CA 90274

Our Job No	Customer Job No	Customer PO	Payment Terms	Due Date
220309			Net 30 Days	5/30/2022

Description	Price
REQUEST FOR RELEASE OF RETENTION	4,702.86

Subtotal	$	4,702.86
Sales Tax (if applicable)	$	0.00
Total Due	**$**	**4,702.86**

Thank you for your business!
All Sales Taxes Paid

CONDITIONAL WAIVER AND RELEASE UPON FINAL PAYMENT

(California Civil Code No. 3262 (d) (3))

Upon receipt by the undersigned of a check from

CITY OF ROLLING HILLS
(MAKER OF CHECK)

in the sum of $4,702.86

payable to E. C. CONSTRUCTION COMPANY
(PAYEE OF PAYEES OF CHECK)

and when the check has been properly endorsed and has been paid by the bank upon which it is drawn, this document shall become effective to release any mechanic's lien, stop notice or bond right the undersigned has on the job of :

CITY OF ROLLING HILLS
(OWNER)

located at STORM DRAIN REPAIR @ 1 Middleridge Lane N., Rolling Hills, CA 90274
(JOB DESCRIPTION)

This release covers the final payment to the undersigned for all labor, services, equipment or material furnished on the job, except for disputed claims for additional work in the amount of $0. Before any recipient of this document relies on it, the party should verify evidence of payment to the undersigned.

Date: 4/30/22

E. C. CONSTRUCTION CO.
(COMPANY NAME)

By: Catherine Hernandez
CATHERINE HERNANDEZ
OFFICE MANAGER

NOTE: Release effective when check clears the bank with proper endorsements.

CONDITIONAL WAIVER AND RELEASE UPON PROGRESS PAYMENT

(California Civil Code No. 3262 (d) (1))

Upon receipt by the undersigned of a check from

CITY OF ROLLING HILLS
(MAKER OF CHECK)

in the sum of $42,325.70

payable to E. C. CONSTRUCTION CO.
(PAYEE OF PAYEES OF CHECK)

and when the check has been properly endorsed and has been paid by the bank upon which it is drawn, this document shall become effective to release pro tanto any mechanic's lien, stop notice or bond right the undersigned has on the job of :

CITY OF ROLLING HILLS
(OWNER)

located at STORM DRAIN REPAIR ON 1 MIDDLERIDGE LANE N.
(JOB DESCRIPTION)

to the following extent. This release covers a progress payment for labor, services, equipment or material furnished to:

CITY OF ROLLING HILLS
(YOUR CUSTOMER)

Through 4/18/2022 only and does not cover any retention or items furnished after said date. Before any recipient of this document relies on it, said party should verify evidence of payment to the undersigned.

Exceptions
This document does not affect any of the following:
(1) Retentions.
(2) Extras for which the claimant has not received payment.
(3) The following progress payments for which the claimant has previously given a conditional waiver and release but has not received payment:
Date(s) of waiver and release:
Amount(s) of unpaid progress payment(s):
(4) Contract rights, including (A) a right based on rescission, abandonment, or breach of contract, and (B) the right to recover compensation for work not compensated by the payment.

Date: 4/18/2022

E. C. CONSTRUCTION CO.
(COMPANY NAME)

By: Catherine Hernandez
Catherine Hernandez, Office Manager

NOTE: Single or joint payee may be used. Release effective when check clears the bank with proper endorsements.

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 7.K
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **JOHN SIGNO, DIRECTOR OF PLANNING & COMMUNITY SERVICES**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **ADOPT RESOLUTION NO. 1299 ACCEPTING CALRECYCLE SB1383 GRANT**

DATE: **May 23, 2022**

BACKGROUND:
On January 24, 2022, the City Council directed staff to file an application for the SB 1383 Local Assistance Grant Program and prepare a resolution in support of the application. On February 1, 2022, staff submitted an application to the Department of Resources Recycling and Recovery (CalRecycle) for a one-time grant program meant to provide aid in the implementation of regulations adopted by CalRecycle. This non-competitive grant program provides $57,000,000 of funding to local jurisdictions to assist with the implementation of regulation requirements associated with SB 1383.

On February 14, 2022, the City Council adopted Resolution No. 1288, attached, authorizing the submittal of the CalRecycle Local Assistance Grant Program application and related authorizations. Although the City had already submitted its application to meet the deadline, the resolution is still required by CalRecycle.

On March 14, 2022, the City Council adopted Ordinance No. 374 adding Chapter 8.10 to the Rolling Hills Municipal Code relating to edible food recovery in compliance with SB 1383. The Ordinance was sent to CalRecycle as a supplement to the grant application.

On April 24, 2022, CalRecycle awarded the City of Rolling Hills in the first round of the SB 1383 Local Assistance Grant Program. The City initially requested $20,000 but was awarded $20,183.

DISCUSSION:
The program provides funding to assist local jurisdictions with meeting the requirements below:

- Provide organics collection services to all residents and businesses
- Conduct education and outreach to the community

- Secure access to recycling and edible food recovery capacity
- Establish edible food recovery program
- Procure recyclable and recovered organic products
- Monitor compliance and conduct enforcement

Staff will be working with CalRecycle in the next few weeks on further steps, including possibly revising the grant budget and activities. Grant funds will be used to implement the requirements in Chapter 8.10 regarding food recovery. The grant term ends on April 2, 2024 for first round recipients.

FISCAL IMPACT:
The City is awarded a grant amount of $20,183.

RECOMMENDATION:
Approve as presented.

ATTACHMENTS:
Revised 1383 Award RFA 001.pdf
Exhibit A: 2022Jan3SB1383LocalAssistTermsConditions.pdf
Exibit B: 2022Apr25ProcsReqsAmended.pdf
ResolutionNo1288_SB1383_Grant_F_E.pdf
ResolutionNo1299_CalRecycle_SB1383_GrantAcceptance.pdf

Request for Approval

To: **Zoe Heller**
Acting Deputy Director, Materials Management and Local Assistance Division

From: **Michelle Martin**
Branch Chief, Financial Resources Management Branch

Request Date: **April 14, 2022**

Decision Subject: Awards for the SB 1383 Local Assistance Grant Program, (Greenhouse Gas Reduction Fund, Fiscal Year 2021–22)

Action By: **April 25, 2022 (Revised May 6, 2022)**

Summary of Request

Staff requests approval of grant awards for the SB 1383 Local Assistance Grant Program (Program) for fiscal year (FY) 2021–22. Staff received 475 eligible applications totaling $54,929,783 for this grant program.

Funding

The FY 2021–22 Budget Act allocates $60,000,000 to be used to provide grants to local jurisdictions to assist in the implementation of regulations adopted by the Department of Resources Recycling and Recovery pursuant to Chapter 395 of the Statutes of 2016; $3,000,000 (5 percent) has been allocated for administrative costs.

Table 1. Funding

Fund Source	Amount Available	Amount to Fund Item	Amount Remaining	Line Item
Greenhouse Gas Reduction Fund (FY 2021–22)	$57,000,000	$41,782,906 ~~$42,936,276~~	$15,217,094 ~~$14,063,724~~	Local Assistance/Grants
Total	**$57,000,000**	**$41,782,906 ~~$42,936,276~~**	**$15,217,094 ~~$14,063,724~~**	

Background and Findings

Statutory Authority

Senate Bill (SB) 1383 Lara, Chapter 395, Statutes of 2016, set methane emissions reduction targets for California in a statewide effort to reduce emissions of short-lived climate pollutants. SB 170 Budget Act of 2021 authorizes CalRecycle to award grants to local jurisdictions to assist in the implementation of programs to meet these statutory requirements.

Program Background

The SB 1383 Local Assistance Grant Program provides funding to assist local jurisdictions

with meeting the requirements below:

- Provide organics collection services to all residents and businesses
- Conduct education and outreach to the community
- Secure access to recycling and edible food recovery capacity
- Establish edible food recovery program
- Procure recyclable and recovered organic products
- Monitor compliance and conduct enforcement

Criteria and Process

The Eligibility Criteria and Evaluation Process was approved by the Deputy Director on December 28, 2021, and presented at the January 2022 CalRecycle Monthly Public Meeting. The Notice of Funds Available was placed on the CalRecycle website on January 4, 2022, with an appropriate notice sent to stakeholders.

Applications were due February 1, 2022, with a secondary due date of March 1, 2022, for Resolution submission. CalRecycle received 476 applications requesting $54,947,783. Staff reviewed the applications in accordance with the approved evaluation criteria; 399 applications met the application requirements and adopted their enforceable ordinance, or similarly enforceable mechanism, by April 1, 2022, and are therefore eligible for first round funding. Subsequently, one application is ineligible. In addition, first round awardees will receive additional remaining funds from entities who did not apply. The remaining 82 ~~76~~ applications will be moved to the second funding round, tentatively scheduled for award in September 2022. Please note that if a participant in a Regional or Joint Powers Authority application did not meet the application requirements, the entire application was moved to the second funding round.

The types of projects recommended for funding include: green, blue, and brown bins, education and outreach materials, record keeping subscriptions, refrigerators for food rescue, side loaders for collection, and personnel and administrative costs.

Recommendation

Staff recommends approval of 393 ~~399~~ grant awards as listed below for $41,782,906 ~~$42,936,276~~.

Table 2. Recommended Awards

Applicant	Award Amount
Alameda County	$208,136
Almonte Sanitary District	$20,143
Alto Sanitary District	$20,118
Bolinas Community Public Utility District	$20,106
~~Butte County~~	~~$84,761~~
Calaveras County	$58,808
Cambria Community Services District	$20,558
Castro Valley Sanitary District	$77,526
City of Agoura Hills	$29,860
City of Alameda	$115,019

Applicant	Award Amount
City of Albany	$25,065
City of Alhambra	$122,592
City of Aliso Viejo	$71,231
City of American Canyon	$30,346
City of Anaheim	$499,168
City of Antioch	$160,065
City of Arcadia	$82,290
City of Artesia	$24,261
City of Atwater	$45,859
City of Auburn	$21,419
City of Avalon	$20,391
City of Avenal	$21,214
City of Azusa	$70,912
City of Bakersfield	$561,069
City of Baldwin Park	$108,044
City of Banning	$46,456
City of Barstow	$35,142
City of Beaumont	$75,280
City of Bell Gardens	$60,548
City of Bellflower	$110,191
City of Belmont	$38,334
City of Benicia	$39,237
City of Berkeley	$165,580
City of Beverly Hills	$48,099
City of Blythe	$27,181
City of Bradbury	$20,103
City of Brawley	$39,540
City of Brea	$64,641
City of Brentwood	$94,180
City of Brisbane	$20,450
City of Buellton	$20,534
City of Buena Park	$116,064
City of Burbank	$147,552
City of Burlingame	$42,951
City of Calabasas	$35,333
City of Calexico	$58,085
City of California City	$21,388
City of Calimesa	$21,006
City of Calipatria	$20,640
City of Camarillo	$99,269
City of Canyon Lake	$21,084
City of Capitola	$20,992
City of Carlsbad	$163,804
City of Carmel-by-the-Sea	$20,395
City of Carpinteria	$21,297

Applicant	Award Amount
City of Carson	$130,217
City of Cathedral City	$77,093
City of Ceres	$69,946
City of Cerritos	$71,562
City of Chico	$158,151
City of Chino	$125,307
City of Chino Hills	$117,523
City of Chowchilla	$25,453
City of Citrus Heights	$124,781
City of Claremont	$51,351
City of Clovis	$172,729
City of Coachella	$68,429
City of Coalinga	$24,633
City of Colfax	$20,214
City of Colton	$77,411
City of Commerce	$21,257
City of Concord	$183,213
City of Corcoran	$29,887
City of Corona	$239,839
City of Coronado	$32,537
City of Costa Mesa	$159,969
City of Covina	$69,850
City of Cudahy	$34,501
City of Culver City	$57,127
City of Cupertino	$83,693
City of Cypress	$69,424
City of Daly City	$154,077
City of Dana Point	$47,803
City of Davis	$98,687
City of Del Mar	$20,419
City of Del Rey Oaks	$20,164
City of Delano	$73,002
City of Diamond Bar	$80,961
City of Dinuba	$38,400
City of Dixon	$29,493
City of Downey	$158,060
City of Duarte	$31,269
City of Dublin	$92,204
City of East Palo Alto	$43,802
City of Eastvale	$96,334
City of El Cajon	$146,529
City of El Centro	$64,444
City of El Cerrito	$36,045
City of El Monte	$165,163
City of El Segundo	$24,509

Applicant	Award Amount
City of Elk Grove	$252,058
City of Emeryville	$21,237
City of Encinitas	$88,813
City of Escondido	$214,802
City of Exeter	$21,081
City of Fairfield	$167,333
City of Fillmore	$23,307
City of Firebaugh	$20,799
City of Folsom	$117,019
City of Fontana	$302,539
~~City of Fort Bragg~~	~~$20,728~~
City of Foster City	$47,314
City of Fountain Valley	$78,475
City of Fowler	$20,649
City of Fremont	$331,140
City of Fresno	$771,586
City of Fullerton	$197,528
City of Galt	$37,835
City of Garden Grove	$244,098
City of Gardena	$86,072
City of Glendale	$288,291
City of Glendora	$73,665
City of Goleta	$46,605
City of Gonzales	$20,835
City of Grand Terrace	$21,219
City of Grass Valley	$21,254
City of Greenfield	$26,964
City of Guadalupe	$20,820
City of Half Moon Bay	$21,210
City of Hawaiian Gardens	$21,422
City of Hawthorne	$123,637
City of Hayward	$223,823
City of Hemet	$120,150
City of Hercules	$37,480
City of Hermosa Beach	$28,442
City of Hesperia	$136,396
City of Hidden Hills	$20,188
City of Highland	$78,625
City of Holtville	$20,613
City of Hughson	$20,718
City of Huntington Beach	$278,482
City of Huntington Park	$84,089
City of Imperial	$29,623
City of Indian Wells	$20,534
City of Industry	$20,042

Applicant	Award Amount
City of Irvine	$383,742
City of Irwindale	$20,142
City of Jurupa Valley	$153,370
City of Kerman	$23,745
City of King City	$22,137
City of Kingsburg	$21,286
City of La Canada Flintridge	$29,489
City of La Habra	$89,545
City of La Mesa	$84,993
City of La Mirada	$69,565
City of La Palma	$22,792
City of La Puente	$57,524
City of La Quinta	$59,159
City of La Verne	$47,655
City of Lafayette	$36,767
City of Laguna Hills	$44,821
City of Laguna Niguel	$92,870
City of Laguna Woods	$23,629
City of Lake Elsinore	$92,298
City of Lake Forest	$120,168
City of Lakewood	$114,080
City of Lancaster	$228,449
City of Larkspur	$21,199
City of Lawndale	$47,128
City of Lemon Grove	$38,158
City of Lemoore	$38,812
City of Lindsay	$21,287
City of Livermore	$129,580
City of Lomita	$29,823
City of Lompoc	$60,915
City of Long Beach	$660,196
City of Los Alamitos	$21,134
City of Los Altos	$44,027
City of Los Banos	$61,445
City of Lynwood	$99,511
City of Malibu	$21,134
City of Manhattan Beach	$50,437
City of Manteca	$124,088
City of Marina	$31,922
City of Martinez	$52,930
City of Maywood	$40,025
City of Mendota	$21,224
City of Menifee	$141,516
City of Menlo Park	$50,108
City of Merced	$129,234

Applicant	Award Amount
City of Mill Valley	$21,535
City of Millbrae	$32,752
City of Milpitas	$107,661
City of Mission Viejo	$133,671
City of Modesto	$310,078
City of Monrovia	$55,258
City of Montebello	$89,694
City of Monterey	$41,028
City of Monterey Park	$86,123
City of Moorpark	$51,738
City of Moreno Valley	$296,171
City of Mountain View	$117,739
City of Murrieta	$163,340
City of Napa	$112,923
City of National City	$89,461
City of Needles	$20,526
City of Newark	$69,886
City of Newport Beach	$122,038
City of Norco	$37,822
City of Norwalk	$149,559
City of Novato	$76,407
City of Oakdale	$33,778
City of Oakland	$614,794
City of Oakley	$61,481
City of Oceanside	$250,127
City of Ojai	$20,731
City of Ontario	$257,526
City of Orange	$194,618
City of Orinda	$27,916
City of Oroville	$26,204
City of Oxnard	$289,476
City of Pacific Grove	$22,925
City of Pacifica	$54,428
City of Palm Desert	$76,979
City of Palm Springs	$68,329
City of Palo Alto	$96,378
City of Paramount	$78,823
City of Parlier	$23,336
City of Pasadena	$205,808
City of Patterson	$33,872
City of Perris	$112,331
City of Pico Rivera	$90,036
City of Piedmont	$21,110
City of Pinole	$28,327
City of Pittsburg	$106,019

Applicant	Award Amount
City of Placentia	$73,147
City of Placerville	$21,070
City of Pleasant Hill	$49,133
City of Pleasanton	$111,477
City of Point Arena	$20,043
City of Pomona	$214,282
City of Porterville	$84,983
City of Poway	$69,995
City of Rancho Cordova	$113,297
City of Rancho Cucamonga	$247,840
City of Rancho Mirage	$27,523
City of Rancho Palos Verdes	$59,573
City of Rancho Santa Margarita	$68,934
City of Redondo Beach	$94,725
City of Redwood City	$121,076
City of Reedley	$37,794
City of Richmond	$156,235
City of Ridgecrest	$42,732
City of Rio Vista	$20,991
City of Riverside	$458,065
City of Rocklin	$100,341
City of Rolling Hills	$20,183
City of Rolling Hills Estates	$20,796
City of Rosemead	$77,454
City of Sacramento	$727,761
City of Salinas	$226,806
City of San Bernardino	$305,846
City of San Bruno	$64,358
City of San Buenaventura	$149,590
City of San Carlos	$43,047
~~City of San Clemente~~	~~$91,316~~
City of San Dimas	$48,950
City of San Fernando	$35,916
City of San Gabriel	$57,324
City of San Jacinto	$73,283
City of San Jose	$1,452,288
City of San Juan Capistrano	$51,484
City of San Leandro	$124,045
City of San Marcos	$136,747
City of San Marino	$21,274
City of San Mateo	$146,250
City of San Pablo	$44,776
City of San Rafael	$84,201
City of San Ramon	$119,217
City of Sand City	$20,038

Applicant	Award Amount
City of Sanger	$39,578
City of Santa Barbara	$132,171
City of Santa Clara	$185,289
City of Santa Cruz	$80,170
City of Santa Maria	$152,451
City of Santa Monica	$132,049
City of Santa Paula	$44,282
City of Santee	$81,078
City of Sausalito	$20,723
City of Scotts Valley	$21,156
City of Seaside	$46,298
City of Shafter	$29,847
City of Sierra Madre	$21,047
City of Signal Hill	$21,142
City of Simi Valley	$176,441
City of Solana Beach	$21,359
City of Soledad	$35,493
City of Solvang	$20,542
City of South El Monte	$31,042
City of South Gate	$137,101
City of South Lake Tahoe	$34,005
City of South Pasadena	$37,204
City of South San Francisco	$95,643
City of Stanton	$56,800
City of Suisun City	$41,733
City of Sunnyvale	$217,816
City of Taft	$20,702
City of Tehachapi	$21,180
City of Temecula	$159,957
City of Temple City	$52,081
City of Thousand Oaks	$177,791
City of Torrance	$205,140
City of Tracy	$139,987
City of Tustin	$113,786
City of Twentynine Palms	$43,262
City of Union City	$103,597
City of Upland	$111,677
City of Vacaville	$139,198
City of Vallejo	$167,109
City of Vernon	$20,029
City of Villa Park	$20,566
City of Vista	$146,564
City of Walnut	$43,076
City of Walnut Creek	$101,536
City of Wasco	$38,820

Applicant	Award Amount
City of Waterford	$20,879
City of West Covina	$149,841
City of West Hollywood	$51,941
City of West Sacramento	$77,085
City of Westlake Village	$20,804
City of Westmorland	$20,227
City of Whittier	$122,505
City of Wildomar	$53,192
City of Winters	$20,749
City of Woodlake	$20,792
City of Woodland	$86,966
City of Yorba Linda	$96,645
City of Yucaipa	$79,434
Contra Costa County	$246,842
Costa Mesa Sanitary District	$168,262
Del Norte Solid Waste Management Authority • City of Crescent City • Del Norte County	$50,774
~~El Dorado County~~	~~$228,032~~
~~Fresno County~~	~~$240,703~~
Heber Public Utility District	$20,649
Homestead Valley Sanitary District	$20,231
Kern County	$449,757
Las Gallinas Valley Sanitary District	$43,309
Los Angeles County	$1,444,427
Madera County	$106,687
Marin County	$95,294
~~Mendocino County~~	~~$83,134~~
Merced County	$131,133
Midway City Sanitary District	$141,153
Mono County	$20,538
Monterey County	$151,474
Mountain House Community Service District	$35,556
Nevada County	$93,217
Novato Sanitary District	$75,890
Orange County	$181,119
Oro Loma Sanitary District	$191,284
Pebble Beach Community Services District	$20,442
Placer County	$162,553
Regional Waste Management Authority • City of Live Oak • City of Marysville • City of Wheatland • City of Yuba City • Sutter County	$284,735

Applicant	Award Amount
• Yuba County	
Riverside County	$550,518
Rodeo Sanitary District	$20,886
Rubidoux Community Services District	$53,174
Sacramento County	$833,204
San Benito County Integrated Waste Management Regional Agency • City of Hollister • City of San Juan Bautista • San Benito County	$108,766
~~San Bernardino County~~	~~$429,329~~
San Diego County	$703,210
San Luis Obispo County	$163,811
San Luis Obispo County Integrated Waste Management Authority • California Valley Community Service District • Cayucos Sanitary District • City of Arroyo Grande • City of Atascadero • City of El Paso de Robles • City of Grover Beach • City of Morro Bay • City of Pismo Beach • City of San Luis Obispo • Heritage Ranch Community Service District • Nipomo Community Service District • Oceano Community Service District • Templeton Community Service District	$371,025
San Mateo County	$92,465
Santa Barbara County	$188,960
Santa Clara County (CEPA)	$121,713
Santa Cruz County	$186,699
Solano County	$26,912
Sonoma County Waste Management Agency d.b.a. Zero Waste Sonoma • City of Cloverdale • City of Cotati • City of Healdsburg • City of Petaluma • City of Rohnert Park • City of Santa Rosa • City of Sebastopol • City of Sonoma • Sonoma County • Town of Windsor	$725,996

Applicant	Award Amount
Strawberry Recreation District	$20,590
Tamalpais Community Services District	$20,688
Tehama County Solid Waste Management Agency • City of Corning • City of Red Bluff • City of Tehama • Tehama County	$123,787
Town of Apple Valley	$105,811
Town of Atherton	$20,678
Town of Colma	$20,163
Town of Danville	$62,906
Town of Fairfax	$20,737
Town of Hillsborough	$21,120
Town of Loomis	$20,669
Town of Los Altos Hills	$20,825
Town of Moraga	$24,734
Town of Ross	$20,250
Town of San Anselmo	$21,247
Town of Tiburon	$20,930
Town of Truckee	$23,879
Town of Woodside	$20,553
Tulare County	$203,512
Upper Valley Waste Management Agency • City of Calistoga • City of St. Helena • Napa County • Town of Yountville	$95,370
Ventura County	$131,025
West Valley Solid Waste Management Authority • City of Campbell • City of Monte Sereno • City of Saratoga • Town of Los Gatos	$168,481
Yolo County	$37,167
Total Award	**$41,782,906** ~~**$42,936,276**~~

Revisions were made to the RFA because one jurisdiction qualified for round one funding that was inadvertently placed in round two funding. Seven jurisdictions did not qualify for round one funding and are subsequently moved for consideration to round two.

Deputy Director Action

On the basis of the information and analysis in this Request for Approval and the findings set out herein, I hereby conditionally approve the grant awards for the SB 1383 Local Assistance Grant Program as listed in Table 2. Each proposed grantee's award is subject to the following condition:

- The recommended grantee must pay all outstanding debts due to CalRecycle, or bring current any outstanding payments owed to CalRecycle, within 60 days of the date of the award email.

Zoe Heller Digitally signed by Zoe Heller Date: 2022.05.09 13:05:22 -07'00'

Zoe Heller
Acting Deputy Director

Dated

Exhibit A
Terms and Conditions

SB 1383 Local Assistance Grant Program
Fiscal Year 2021–22

The following terms used in this Grant Agreement (Agreement) have the meanings given to them below, unless the context clearly indicates otherwise:

- "CalRecycle" means the Department of Resources Recycling and Recovery.
- "Director" means the Director of CalRecycle or his or her designee.
- "Grant Agreement" and "Agreement" means all documents comprising the agreement between CalRecycle and the grantee for this grant.
- "Grant Manager" means CalRecycle staff person responsible for monitoring the grant.
- "Grantee" means the recipient of funds pursuant to this Agreement.
- "Program" means the SB 1383 Local Assistance Grant Program.
- "State" means the State of California, including, but not limited to, CalRecycle and/or its designated officer.

Air or Water Pollution Violation

The grantee shall not be:

(a) In violation of any order or resolution not subject to review promulgated by the State Air Resources Board or an air pollution control district.

(b) Out of compliance with any final cease and desist order issued pursuant to Water Code Section 13301 for violation of waste discharge requirements or discharge prohibitions.

(c) Finally determined to be in violation of provisions of federal law relating to air or water pollution.

Amendment

No amendment or variation of the terms of this Agreement shall be valid unless made in writing, signed by the parties, and approved as required. No oral understanding or agreement not incorporated into this Agreement is binding on any of the parties. This Agreement may be amended, modified or augmented by mutual consent of the parties, subject to the requirements and restrictions of this paragraph.

Americans with Disabilities Act

The grantee assures the state that it complies with the Americans with Disabilities Act of 1990 (ADA) (42 U.S.C.§ 12101 et seq.), which prohibits discrimination on the basis of disability, as well as all applicable regulations and guidelines issued pursuant to the ADA.

Assignment, Successors, and Assigns

(a) This Agreement may not be assigned by the grantee, either in whole or in part, without CalRecycle's prior written consent.
(b) The provisions of this Agreement shall be binding upon and inure to the benefit of CalRecycle, the grantee, and their respective successors and assigns.

Audit/Records Access

The grantee agrees that CalRecycle, the Department of Finance, the Bureau of State Audits, or their designated representative(s) shall have the right to review and to copy any records and supporting documentation pertaining to the performance of this Agreement. The grantee agrees to maintain such records for possible audit for a minimum of three (3) years after final payment date or grant term end date, whichever is later, unless a longer period of records retention is stipulated, or until completion of any action and resolution of all issues which may arise as a result of any litigation, dispute, or audit, whichever is later. The grantee agrees to allow the designated representative(s) access to such records during normal business hours and to allow interviews of any employees who might reasonably have information related to such records. Further, the grantee agrees to include a similar right of the State to audit records and interview staff in any contract or subcontract related to performance of this Agreement.

[It may be helpful to share the Terms and Conditions (Exhibit A) and Procedures and Requirements (Exhibit B) with your finance department, contractors and subcontractors. Examples of audit documentation include, but are not limited to: expenditure ledger, payroll register entries and time sheets, personnel expenditure summary form, travel expense log, paid warrants, contracts, change orders, invoices, and/or cancelled checks.]

Authorized Representative

The grantee shall continuously maintain a representative vested with signature authority authorized to work with CalRecycle on all grant-related issues. The grantee shall, at all times, keep the Grant Manager informed as to the identity and contact information of the authorized representative.

Availability of Funds

CalRecycle's obligations under this Agreement are contingent upon and subject to the availability of funds appropriated for this grant.

Bankruptcy/Declaration of Fiscal Emergency Notification

If the grantee files for protection under Chapter 9 of the U.S. Bankruptcy Code (11 U.S.C. §901 et seq.) or declares a fiscal emergency at any time during the Grant Term, the grantee shall notify CalRecycle within 15 days of such filing or declaration, pursuant to the procedures set forth in the section entitled "Communications" herein.

Charter Cities

If the grantee is a charter city, a joint powers authority that includes one or more charter cities, or the regional lead for a regional program containing one or more charter cities, the grantee shall not receive any grant funding if such funding is prohibited by Labor Code section 1782. If it is determined that Labor Code section 1782 prohibits funding for the grant project, this Agreement will be terminated and any disbursed grant funds shall be returned to CalRecycle.

Child Support Compliance Act

For any agreement in excess of $100,000, the grantee acknowledges that:

(a) The grantee recognizes the importance of child and family support obligations and shall fully comply with all applicable state and federal laws relating to child and family support enforcement, including, but not limited to, disclosure of information and compliance with earnings assignment orders, as provided in Family Code Section 5200 et seq.

(b) The grantee, to the best of its knowledge, is fully complying with the earnings assignment orders of all employees, and is providing the names of all new employees to the New Hire Registry maintained by the California Employment Development Department.

Communications

All communications from the grantee to CalRecycle shall be directed to the Grant Manager. All notices, including reports and payment requests, required by this Agreement shall be given in writing by email, letter, or fax to the Grant Manager as identified in the Procedures and Requirements (Exhibit B). If an original document is required, prepaid mail or personal delivery to the Grant Manager is required following the email or fax.

Compliance

The grantee shall comply fully with all applicable federal, state, and local laws, ordinances, regulations, and permits. The grantee shall provide evidence, upon request, that all local, state, and/or federal permits, licenses, registrations, and approvals have been secured for the purposes for which grant funds are to be expended. The grantee shall maintain compliance with such requirements throughout the Grant Term. The grantee shall ensure that the requirements of the California Environmental Quality Act are met for any approvals or other requirements necessary to carry out the terms of this Agreement. The grantee shall ensure that all of grantee's contractors and subcontractors have all local, state, and/or federal permits, licenses, registrations, certifications, and approvals required to perform the work for which they are hired. Any deviation from the requirements of this section shall result in non-payment of grant funds.

Conflict of Interest

The grantee needs to be aware of the following provisions regarding current or former state employees. If the grantee has any questions on the status of any person

rendering services or involved with this Agreement, CalRecycle must be contacted immediately for clarification.

Current State Employees (Pub. Contract Code, § 10410):
(a) No officer or employee shall engage in any employment, activity, or enterprise from which the officer or employee receives compensation or has a financial interest and which is sponsored or funded by any state agency, unless the employment, activity, or enterprise is required as a condition of regular state employment.
(b) No officer or employee shall contract on his or her own behalf as an independent contractor with any state agency to provide goods or services.

Former State Employees (Pub. Contract Code, § 10411):
(a) For the two-year period from the date he or she left state employment, no former state officer or employee may enter into a contract in which he or she engaged in any of the negotiations, transactions, planning, arrangements or any part of the decision-making process relevant to the contract while employed in any capacity by any state agency.
(b) For the twelve-month period from the date he or she left state employment, no former state officer or employee may enter into a contract with any state agency if he or she was employed by that state agency in a policy-making position in the same general subject area as the proposed contract within the twelve month period prior to his or her leaving state service.

If the grantee violates any provisions of above paragraphs, such action by the grantee shall render this Agreement void. (Pub. Contract Code, § 10420).

Contractors/Subcontractors

The grantee will be entitled to make use of its own staff and such contractors and subcontractors as are mutually acceptable to the grantee and CalRecycle. Any change in contractors or subcontractors must be mutually acceptable to the parties. Immediately upon termination of any such contract or subcontract, the grantee shall notify the Grant Manager.

Nothing contained in this Agreement or otherwise, shall create any contractual relation between CalRecycle and any contractors or subcontractors of grantee, and no agreement with contractors or subcontractors shall relieve the grantee of its responsibilities and obligations hereunder. The grantee agrees to be as fully responsible to CalRecycle for the acts and omissions of its contractors and subcontractors and of persons either directly or indirectly employed by any of them as it is for the acts and omissions of persons directly employed by the grantee. The grantee's obligation to pay its contractors and subcontractors is an independent obligation from CalRecycle's obligation to make payments to the grantee. As a result, CalRecycle shall have no obligation to pay or to enforce the payment of any moneys to any contractor or subcontractor.

Copyrights

Grantee retains title to any copyrights or copyrightable material produced pursuant to this Agreement. grantee hereby grants to CalRecycle a royalty-free, nonexclusive,

transferable, world-wide license to reproduce, translate, and distribute copies of any and all copyrightable materials produced pursuant this Agreement, for nonprofit, non-commercial purposes, and to have or permit others to do so on CalRecycle's behalf. Grantee is responsible for obtaining any necessary licenses, permissions, releases or authorizations to use text, images, or other materials owned, copyrighted, or trademarked by third parties and for extending such licenses, permissions, releases, or authorizations to CalRecycle pursuant to this section.

Corporation Qualified to do Business in California

When work under this Agreement is to be performed in California by a corporation, the corporation shall be in good standing and currently qualified to do business in the State. "Doing business" is defined in Revenue and Taxation Code Section 23101 as actively engaging in any transaction for the purpose of financial or pecuniary gain or profit.

Discharge of Grant Obligations

The grantee's obligations under this Agreement shall be deemed discharged only upon acceptance of the final report by CalRecycle. If the grantee is a non-profit entity, the grantee's Board of Directors shall accept and certify as accurate the final report prior to its submission to CalRecycle.

Disclaimer of Warranty

CalRecycle makes no warranties, express or implied, including without limitation, the implied warranties of merchantability and fitness for a particular purpose, regarding the materials, equipment, services or products purchased, used, obtained and/or produced with funds awarded under this Agreement, whether such materials, equipment, services or products are purchased, used, obtained and/or produced alone or in combination with other materials, equipment, services or products. No CalRecycle employees or agents have any right or authority to make any other representation, warranty or promise with respect to any materials, equipment, services or products, purchased, used, obtained, or produced with grant funds. In no event shall CalRecycle be liable for special, incidental or consequential damages arising from the use, sale or distribution of any materials, equipment, services or products purchased or produced with grant funds awarded under this Agreement.

Discretionary Termination

The Director shall have the right to terminate this Agreement at his or her sole discretion at any time upon 30 days written notice to the grantee. Within 45 days of receipt of written notice, grantee is required to:

(a) Submit a final written report describing all work performed by the grantee.
(b) Submit an accounting of all grant funds expended up to and including the date of termination.
(c) Reimburse CalRecycle for any unspent funds.

Disputes

In the event of a dispute regarding performance under this Agreement or interpretation of requirements contained therein, the grantee may, in addition to any other remedies

that may be available, provide written notice of the particulars of such dispute to the Branch Chief of Financial Resources Management Branch, Department of Resources Recycling and Recovery, PO Box 4025, Sacramento, CA 95812-4025. Such written notice must contain the grant number.

Unless otherwise instructed by the Grant Manager, the grantee shall continue with its responsibilities under this Agreement during any dispute.

Drug-Free Workplace Certification

The person signing this Agreement on behalf of the grantee certifies under penalty of perjury under the laws of California, that the grantee will comply with the requirements of the Drug-Free Workplace Act of 1990 (Gov. Code, § 8350 et seq.) and will provide a drug-free workplace by taking the following actions:

(a) Publish a statement notifying employees that unlawful manufacture, distribution, dispensation, possession or use of a controlled substance is prohibited and specifying actions that will be taken against employees for violations.
(b) Establish a drug-free awareness program to inform employees about all of the following:
    (1) The dangers of drug abuse in the workplace.
    (2) The grantee's policy of maintaining a drug-free workplace.
    (3) Any available counseling, rehabilitation, and employee assistance programs.
    (4) Penalties that may be imposed upon employees for drug abuse violations.
(c) Require that each employee who works on the grant:
    (1) Receive a copy of the drug-free policy statement of the grantee.
    (2) Agrees to abide by the terms of such statement as a condition of employment on the grant.

Failure to comply with these requirements may result in suspension of payments under the Agreement or termination of the Agreement or both and grantee may be ineligible for award of any future State agreements if CalRecycle determines that the grantee has made a false certification, or violated the certification by failing to carry out the requirements as noted above.

Effectiveness of Agreement

This Agreement is of no force or effect until signed by both parties.

Entire Agreement

This Agreement supersedes all prior agreements, oral or written, made with respect to the subject hereof and, together with all attachments hereto, contains the entire agreement of the parties.

Environmental Justice

In the performance of this Agreement, the grantee shall conduct its programs, policies, and activities that substantially affect human health or the environment in a manner that ensures the fair treatment of people of all races, cultures, and income levels, including minority populations and low-income populations of the state.

Failure to Perform as Required by this Agreement

CalRecycle will benefit from the grantee's full compliance with the terms of this Agreement only by the grantee's:

(a) Investigation and/or application of technologies, processes, and devices which support reduction, reuse, and/or recycling of wastes.
(b) Cleanup of the environment.
(c) Enforcement of solid waste statutes and regulations, as applicable.

Therefore, the grantee shall be in compliance with this Agreement only if the work it performs results in:

(a) Application of information, a process, usable data or a product which can be used to aid in reduction, reuse, and/or recycling of waste.
(b) The cleanup of the environment.
(c) The enforcement of solid waste statutes and regulations, as applicable.

If the Grant Manager determines that the grantee has not complied with the Grant Agreement, the grantee may forfeit the right to reimbursement of any grant funds not already paid by CalRecycle, including, but not limited to, the 10 percent withhold.

Force Majeure

Neither CalRecycle nor the grantee, its contractors, vendors, or subcontractors, if any, shall be responsible hereunder for any delay, default, or nonperformance of this Agreement, to the extent that such delay, default, or nonperformance is caused by an act of God, weather, accident, labor strike, fire, explosion, riot, war, rebellion, sabotage, flood, or other contingencies unforeseen by CalRecycle or the grantee, its contractors, vendors, or subcontractors, and beyond the reasonable control of such party.

Forfeit of Grant Funds/Repayment of Funds Improperly Expended

If grant funds are not expended, or have not been expended, in accordance with this Agreement, or if real or personal property acquired with grant funds is not being used, or has not been used, for grant purposes in accordance with this Agreement, the Director, at his or her sole discretion, may take appropriate action under this Agreement, at law or in equity, including requiring the grantee to forfeit the unexpended portion of the grant funds, including, but not limited to, the 10 percent withhold, and/or to repay to CalRecycle any funds improperly expended.

Generally Accepted Accounting Principles

The grantee is required to use Generally Accepted Accounting Principles in documenting all grant expenditures.

Grant Manager

The Grant Manager’s responsibilities include monitoring grant progress, and reviewing and approving Grant Payment Requests and other documents delivered to CalRecycle pursuant to this Agreement. The Grant Manager may monitor grantee performance to ensure that the grantee expends grant funds appropriately and in a manner consistent with the terms and conditions contained herein. The Grant Manager does not have the authority to approve any deviation from or revision to the Terms and Conditions

(Exhibit A) or the Procedures and Requirements (Exhibit B), unless such authority is expressly stated in the Procedures and Requirements (Exhibit B).

Grantee Accountability

The grantee is ultimately responsible and accountable for the manner in which the grant funds are utilized and accounted for and the way the grant is administered, even if the grantee has contracted with another organization, public or private, to administer or operate its grant program. In the event an audit should determine that grant funds are owed to CalRecycle, the grantee is responsible for repayment of the funds to CalRecycle.

Grantee's Indemnification and Defense of the State

The grantee agrees to indemnify, defend and save harmless the state and CalRecycle, and their officers, agents and employees from any and all claims and losses accruing or resulting to any and all contractors, subcontractors, suppliers, laborers, and any other person, firm or corporation furnishing or supplying work services, materials, or supplies in connection with the performance of this Agreement, and from any and all claims and losses accruing or resulting to any person, firm or corporation who may be injured or damaged by the grantee as a result of the performance of this Agreement.

Grantee's Name Change

A written amendment is required to change the grantee's name as listed on this Agreement. Upon receipt of legal documentation of the name change, CalRecycle will process the amendment. Payment of Payment Requests presented with a new name cannot be paid prior to approval of the amendment.

In Case of Emergency

In the event of an emergency, or where there is an imminent threat to public health and safety or the environment, the grantee may choose, at its own risk, to incur grant-eligible expenses not previously included in the approved Budget, subject to subsequent approval by the Grant Manager of both the Budget change and the need to implement the Budget change on an emergency basis. The grantee shall notify the Grant Manager of the emergency and the Budget change at the earliest possible opportunity. CalRecycle reserves the right to accept or reject the grantee’s determination that the circumstances constituted an emergency or a threat to public health and safety or the environment. If the Grant Manager determines that the circumstances did not constitute an emergency or a threat to public health or safety, the Budget change will be disallowed.

No Agency Relationship Created/Independent Capacity

The grantee and the agents and employees of grantee, in the performance of this Agreement, shall act in an independent capacity and not as officers or employees or agents of CalRecycle.

No Waiver of Rights

CalRecycle shall not be deemed to have waived any rights under this Agreement unless such waiver is given in writing and signed by CalRecycle. No delay or omission on the part of CalRecycle in exercising any rights shall operate as a waiver of such right or any other right. A waiver by CalRecycle of a provision of this Agreement shall not prejudice or constitute a waiver of CalRecycle's right otherwise to demand strict compliance with that provision or any other provision of this Agreement. No prior waiver by CalRecycle, nor any course of dealing between CalRecycle and grantee, shall constitute a waiver of any of CalRecycle's rights or of any of grantee's obligations as to any future transactions. Whenever the consent of CalRecycle is required under this Agreement, the granting of such consent by CalRecycle in any instance shall not constitute continuing consent to subsequent instances where such consent is required and in all cases such consent may be granted or withheld in the sole discretion of CalRecycle.

Non-Discrimination Clause

(a) During the performance of this Agreement, grantee and its contractors shall not unlawfully discriminate, harass, or allow harassment against any employee or applicant for employment on the bases enumerated in Government Code Section 12900 et seq.
(b) The person signing this Agreement on behalf of the grantee certifies under penalty of perjury under the laws of California that the grantee has, unless exempted, complied with the nondiscrimination program requirements (Gov. Code, § 12990, subd. (a-f) and California Code of Regulations, Title 2, Section 8103). (Not applicable to public entities.)

Order of Precedence

The performance of this grant shall be conducted in accordance with the Terms and Conditions (Exhibit A), Procedures and Requirements (Exhibit B), Project Summary/Statement of Use, Work Plan, and Budget of this Agreement, or other combination of Exhibits specified on the Grant Agreement Coversheet attached hereto (collectively referred to as "Terms"). Grantee's CalRecycle-approved Application (Grantee's Application) is hereby incorporated herein by this reference. In the event of conflict or inconsistency between the articles, exhibits, attachments, specifications or provisions that constitute this Agreement, the following order of precedence shall apply:
(a) Grant Agreement Coversheet and any Amendments thereto
(b) Terms and Conditions
(c) Procedures and Requirements
(d) Project Summary/Statement of Use
(e) Budget
(f) Work Plan
(g) Grantee's Application
(h) All other attachments hereto, including any that are incorporated by reference.

Ownership of Drawings, Plans and Specifications

The grantee shall, at the request of CalRecycle or as specifically directed in the Procedures and Requirements (Exhibit B), provide CalRecycle with copies of any data, drawings, design plans, specifications, photographs, negatives, audio and video

productions, films, recordings, reports, findings, recommendations, and memoranda of every description or any part thereof, prepared under this Agreement. Grantee hereby grants to CalRecycle a royalty-free, nonexclusive, transferable, world-wide license to reproduce, translate, and distribute copies of any and all such materials produced pursuant to this Agreement, for nonprofit, non-commercial purposes, and to have or permit others to do so on CalRecycle's behalf.

Payment

(a) The approved Budget, if applicable, is attached hereto and incorporated herein by this reference and states the maximum amount of allowable costs for each of the tasks identified in the Work Plan, if applicable, which is attached hereto and incorporated herein by this reference. CalRecycle shall reimburse the grantee for only the work and tasks specified in the Work Plan or the Grantee's Application at only those costs specified in the Budget and incurred in the term of the Agreement.
(b) The grantee shall carry out the work described in the Work Plan or in the Grantee's Application in accordance with the approved Budget, and shall obtain the Grant Manager's written approval of any changes or modifications to the Work Plan, approved project as described in the Grantee's Application or the approved Budget prior to performing the changed work or incurring the changed cost. If the grantee fails to obtain such prior written approval, the Director, at his or her sole discretion, may refuse to provide funds to pay for such work or costs.
(c) The grantee shall request reimbursement in accordance with the procedures described in the Procedures and Requirements (Exhibit B).
(d) Ten percent will be withheld from each Payment Request and paid at the end of the grant term, when all reports and conditions stipulated in this Agreement have been satisfactorily completed. Failure by the grantee to satisfactorily complete all reports and conditions stipulated in this Agreement may result in forfeiture of any such funds withheld pursuant to CalRecycle's 10 percent) retention policy.
(e) Lodgings, Meals and Incidentals: Grantee's Per Diem eligible costs are limited to the amounts authorized in the California State Administrative Manual (contact the Grant Manager for more information).
(f) Payment will be made only to the grantee.
(g) Reimbursable expenses shall not be incurred unless and until the grantee receives a Notice to Proceed as described in the Procedures and Requirements (Exhibit B).

Personnel Costs

If there are eligible costs pursuant to Exhibit B, Procedures and Requirements, any personnel expenditures to be reimbursed with grant funds must be computed based on actual time spent on grant-related activities and on the actual salary or equivalent hourly wage the employee is paid for his or her regular job duties, including a proportionate share of any benefits to which the employee is entitled, unless otherwise specified in the Procedures and Requirements (Exhibit B).

Real and Personal Property Acquired with Grant Funds

(a) All real and personal property, including equipment and supplies, acquired with grant funds shall be used by the grantee only for the purposes for which CalRecycle

approved their acquisition for so long as such property is needed for such purposes, regardless of whether the grantee continues to receive grant funds from CalRecycle for such purposes. In no event shall the length of time during which such property, including equipment and supplies, acquired with grant funds, is used for the purpose for which CalRecycle approved its acquisition be less than five (5) years after the end of the grant term, during which time the property, including equipment and supplies, must remain in the State of California.

(b) Subject to the obligations and conditions set forth in this section, title to all real and personal property acquired with grant funds, including all equipment and supplies, shall vest upon acquisition in the grantee. The grantee may be required to execute all documents required to provide CalRecycle with a security interest in any real or personal property, including equipment and supplies, and it shall be a condition of receiving this grant that CalRecycle shall be in first priority position with respect to the security interest on any such property acquired with the grant funds, unless pre-approved in writing by the Grant Manager that CalRecycle will accept a lower priority position with respect to the security interest on the property. Grantee shall inform any lender(s) from whom it is acquiring additional funding to complete the property purchase of this grant condition.

(c) The grantee may not transfer Title to any real or personal property, including equipment and supplies, acquired with grant funds to any other entity without the express authorization of CalRecycle.

(d) CalRecycle will not reimburse the grantee for the acquisition of equipment that was previously purchased with CalRecycle grant funds, unless the acquisition of such equipment with grant funds is pre-approved in writing by the Grant Manager. In the event of a question concerning the eligibility of equipment for grant funding, the burden will be on the grantee to establish the pedigree of the equipment.

Reasonable Costs

A cost is reasonable if, in its nature or amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. Consideration will be given to:

(a) Whether the cost is of a type generally recognized as ordinary and necessary for the performance of the grant.

(b) The restraints or requirements imposed by such factors as generally accepted sound business practices, arms-length bargaining, federal and state laws and regulations, and the terms and conditions of this Agreement.

(c) Whether the individuals concerned acted with prudence in the circumstances, considering their responsibilities to the organization, its members, employees, clients, and the public at large.

(d) Significant deviations from the established practices of the organization which may unjustifiably increase the grant costs.

Recycled-Content Paper

All documents submitted by the grantee must be printed double-sided on recycled-content paper containing 100 percent post-consumer fiber. Specific pages containing full color photographs or other ink-intensive graphics may be printed on photographic paper.

Reduction of Waste

In the performance of this Agreement, grantee shall take all reasonable steps to ensure that materials purchased or utilized in the course of the project are not wasted. Steps should include, but not be limited to: the use of used, reusable, or recyclable products; discretion in the amount of materials used; alternatives to disposal of materials consumed; and the practice of other waste reduction measures where feasible and appropriate.

Reduction of Waste Tires

Unless otherwise provided for in this Agreement, in the performance of this Agreement, for all purchases made with grant funds, including, but not limited to equipment and tire-derived feedstock, the grantee shall purchase and/or process only California waste tires and California waste tire-derived products. As a condition of final payment under this Agreement, the grantee must provide documentation substantiating the source of the tire materials used during the performance of this Agreement to the Grant Manager.

Reimbursement Limitations

Under no circumstances shall the grantee seek reimbursement pursuant to this Agreement for a cost or activity that has been or will be paid for through another funding source. The grantee shall not seek reimbursement for any costs used to meet cost sharing or matching requirements of any other CalRecycle funded program.

All costs charged against the Agreement shall be net of all applicable credits. The term "applicable credits" refers to those receipts or reductions of expenditures that operate to offset or reduce expense items that are reimbursable under this Agreement. Applicable credits may include, but are not necessarily limited to, rebates or allowances, discounts, credits toward subsequent purchases, and refunds. Grantee shall, where possible, deduct the amount of the credit from the amount billed as reimbursement for the cost, or shall deduct the amount of the credit from the total billed under a future invoice.

Reliable Contractor Declaration

Prior to authorizing any contractor or subcontractor to commence work under this Grant, the grantee shall submit to CalRecycle a Reliable Contractor Declaration (CalRecycle 168) from the contractor or subcontractor, signed under penalty of perjury, disclosing whether of any of the events listed in Section 17050 of Title 14, California Code of Regulations, Natural Resources (https://www.calrecycle.ca.gov/laws/regulations/title14), Division 7, has occurred with respect to the contractor or subcontractor within the preceding three (3) years. If a contractor is placed on CalRecycle's Unreliable List after award of this Grant, the grantee may be required to terminate that contract.

Remedies

Unless otherwise expressly provided herein, the rights and remedies hereunder are in addition to, and not in limitation of, other rights and remedies under this Agreement, at law or in equity, and exercise of one right or remedy shall not be deemed a waiver of any other right or remedy.

Self-Dealing and Arm's Length Transactions

All expenditures for which reimbursement pursuant to this Agreement is sought shall be the result of arm's-length transactions and not the result of, or motivated by, self-dealing on the part of the grantee or any employee or agent of the grantee. For purposes of this provision, "arm's-length transactions" are those in which both parties are on equal footing and fair market forces are at play, such as when multiple vendors are invited to compete for an entity's business and the entity chooses the lowest of the resulting bids. "Self-dealing" is involved where an individual or entity is obligated to act as a trustee or fiduciary, as when handling public funds, and chooses to act in a manner that will benefit the individual or entity, directly or indirectly, to the detriment of, and in conflict with, the public purpose for which all grant monies are to be expended.

Severability

If any provisions of this Agreement are found to be unlawful or unenforceable, such provisions will be voided and severed from this Agreement without affecting any other provision of this Agreement. To the full extent, however, that the provisions of such applicable law may be waived, they are hereby waived to the end that this Agreement be deemed to be a valid and binding agreement enforceable in accordance with its terms.

Site Access

The grantee shall allow the state to access sites at which grant funds are expended and related work being performed at any time during the performance of the work and for ninety (90) days after completion of the work, or until all issues related to the grant project have been resolved.

Stop Work Notice

Immediately upon receipt of a written notice from the Grant Manager to stop work, the grantee shall cease all work under this Agreement.

Termination for Cause

CalRecycle may terminate this Agreement and be relieved of any payments should the grantee fail to perform the requirements of this Agreement at the time and in the manner herein provided. In the event of such termination, CalRecycle may proceed with the work in any manner deemed proper by CalRecycle. All costs to CalRecycle shall be deducted from any sum due the grantee under this Agreement. Termination pursuant to this section may result in forfeiture by the grantee of any funds retained pursuant to CalRecycle's 10 percent retention policy.

Time is of the Essence

Time is of the essence to this Agreement.

Tolling of Statute of Limitations

The statute of limitations for bringing any action, administrative or civil, to enforce the terms of this Agreement or to recover any amounts determined to be owing to

CalRecycle as the result of any audit of the grant covered by this Agreement shall be tolled during the period of any audit resolution, including any appeals by the grantee to the Director.

Union Organizing

By signing this Agreement, the grantee hereby acknowledges the applicability of Government Code Sections 16645, 16645.2, 16645.8, 16646, 16647, and 16648 to this Agreement and hereby certifies that:

(a) No grant funds disbursed by this grant will be used to assist, promote, or deter union organizing by employees performing work under this Agreement.

(B) If the grantee makes expenditures to assist, promote, or deter union organizing, the grantee will maintain records sufficient to show that no state funds were used for those expenditures, and that grantee shall provide those records to the Attorney General upon request.

Venue/Choice of Law

(a) All proceedings concerning the validity and operation of this Agreement and the performance of the obligations imposed upon the parties hereunder shall be held in Sacramento County, California. The parties hereby waive any right to any other venue. The place where the Agreement is entered into and place where the obligation is incurred is Sacramento County, California.

(b) The laws of the State of California shall govern all proceedings concerning the validity and operation of this Agreement and the performance of the obligations imposed upon the parties hereunder.

Waiver of Claims and Recourse against the State

The grantee agrees to waive all claims and recourse against the state, its officials, officers, agents, employees, and servants, including, but not limited to, the right to contribution for loss or damage to persons or property arising out of, resulting from, or in any way connected with or incident to this Agreement. This waiver extends to any loss incurred attributable to any activity undertaken or omitted pursuant to this Agreement or any product, structure, or condition created pursuant to, or as a result of, this Agreement.

Work Products

Grantee shall provide CalRecycle with copies of all final products identified in the Work Plan. Grantee shall also provide CalRecycle with copies of all public education and advertising material produced pursuant to this Agreement.

Workers' Compensation/Labor Code

The grantee is aware of Labor Code Section 3700, which requires every employer to be insured against liability for Workers' Compensation or to undertake self-insurance in accordance with the Labor Code, and the grantee agrees to comply with such provisions before commencing the performance of the work of this Agreement.

January 2022
Amended April 2022
Department of Resources Recycling and Recovery

Exhibit B

Procedures and Requirements

SB 1383 Local Assistance Grant Program

First Round Funding

Fiscal Year 2021–22

Copies of these Procedures and Requirements must be shared with both the Grantee's Finance Department and the staff responsible for implementing the grant activities.

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Introduction

The Department of Resources Recycling and Recovery (CalRecycle) administers the SB 1383 Local Assistance Grant Program. These Procedures and Requirements describe project and reporting requirements, report due dates, report contents, grant payment conditions, eligible and ineligible project costs, project completion and closeout procedures, and records and audit requirements.

This document is attached to, and incorporated by reference, into the Grant Agreement.

Milestones

~~**April 1, 2022:**~~ **Grant Term Begins:** Date CalRecycle sends the award email

~~**October**~~ **November 3, 2022**: **Expenditure Itemization Summary 1 Due**

- Covering expenses from ~~April 1, 2022,~~ the Grant Term Start Date through ~~October~~ November 2, 2022

~~**April**~~ **May 3, 2023**: **Expenditure Itemization Summary 2 Due**

- Covering expenses from ~~October~~ November 3, 2022, through ~~April~~ May 2, 2023

~~**October**~~ **November 2, 2023**: **Expenditure Itemization Summary 3 Due**

- Covering expenses from ~~April~~ May 3, 2023, through ~~October~~ November 1, 2023

~~**April**~~ **May 2, 2024: Expenditure Itemization Summary 4 Due**

- Covering expenses from ~~October~~ November 2, 2023, through May 2, 2024

~~**April**~~ **May 2, 2024**: **Final Report Due**

- Covering activities from ~~April 1, 2022~~ the Grant Term Start Date through ~~April~~ May 2, 2024

~~**April**~~ **May 2, 2024**: **Grant Term End**

Note: These dates are subject to change. If they change, Grant Managers will notify the Awardees immediately.

Grants Management System (GMS)

GMS is CalRecycle's web-based grant application and Grants Management System. Access to GMS is secure; grantees must log in using a WebPass. WebPass accounts are tied to a specific email address. If an email address changes, or if it becomes inactive, the grantee must create a new WebPass account to continue accessing GMS. Establish or manage a WebPass at CalRecycle's WebPass page (https://secure.calrecycle.ca.gov/WebPass/).

Accessing the Grant

Grantees must log in to GMS (https://secure.calrecycle.ca.gov/Grants) using their web pass. After logging in, locate the grant in the **My Awarded/Open Grants** table and select the **Grant Management** link. The **Grant Management Module** includes the following sections:

- **Summary tab**: Shows approved budget, paid and remaining amounts. (This section is available to the grantee in read-only mode.)
- **Payment Request tab**: Grantee uploads expenditure documentation.
- **Reports tab**: Grantee uploads required reports.
- **Documents tab**: Grantee uploads all other grant documents that are not supporting documents for an expenditure or a report. This section also provides access to documents that were uploaded within other sections of GMS.

Follow the instructions in GMS to work in the system. The following sections describe the reports, transactions, and supporting documents CalRecycle requires.

Contact Updates

Access to the grant is limited to those listed in the **Contacts** tab of the **Application Module** with the "Allow Access" check box marked. A contact may be listed but not granted access by not checking the box. Please note, if a contact is granted access to a grant, they will be able to edit contacts, submit payment requests, upload reports, and view all documents. Those with access may update contact information for all contact types except Signature Authority. Email the assigned Grant Manager regarding any changes to Signature Authority information.

Prior to Commencing Work

Prior to commencing work under this grant, the grantee's Grant Manager or primary contact and authorized grant Signature Authority should review the Terms and Conditions (Exhibit A) and the Procedures and Requirements (Exhibit B) to identify key grant administrative requirements. Evaluation of the grantee's compliance with these requirements is a major focus of grant audits.

Reliable Contractor Declaration

Prior to authorizing a contractor or subcontractor to commence work under this grant, the grantee shall submit to the Grant Manager a declaration from the contractor or subcontractor, signed under penalty of perjury, stating that within the preceding three (3) years, none of the events listed in section 17050 of Title 14 (https://www.calrecycle.ca.gov/Laws/Regulations/Title14/), California Code of Regulations, Natural Resources, Division 7, has occurred with respect to the contractor or subcontractor. The grantee must submit this form for each contractor and subcontractor working under the grant.

If a contractor or subcontractor is placed on the CalRecycle Unreliable Contractor List (https://www.calrecycle.ca.gov/Funding/Unreliability/) after award of this grant, the grantee may be required to terminate the contract. Obtain the Reliable Contractor Declaration form (CalRecycle 168) from CalRecycle's Grant Forms web page (https://www.calrecycle.ca.gov/Funding/Forms/).

The grantee must upload a scanned copy of each signed Reliable Contractor Declaration form in GMS. To upload the form:

1. Go to the **Reports** tab.
2. Click on **Reliable Contractor Declaration** under **Report Type**.
3. Click the **Add Document** button.
4. Select Reliable Contractor Declaration in the **Document Type** drop down box, enter a document title, click the **Browse** button to search and upload the document, and then **Save**.
5. Click on the **Submit Report** button.

For further instructions regarding GMS, including login directions, see the "Grants Management System" section (above).

Grant Term

The Grant Term begins on the date CalRecycle sends the award email ~~April 1, 2022~~ and ends on ~~April~~ May 2, 2024. The grantee must make all grant-eligible program expenditures and incur all grant-eligible costs within this period. Expenditures made or costs incurred prior to ~~April 1, 2022~~ the grant term start date or after the grant term end date will be considered ineligible.

The Final Report, final Expenditure Itemization Summary, and Certification Document are due on ~~April~~ May 2, 2024.

Eligible Costs

Grantees may incur eligible costs only during the Grant Term, which starts on the date CalRecycle sends the award email and ends on May 2, 2024 ~~April 1, 2022 and ends April 2, 2024~~. All grant expenditures must be for activities, products, and costs specifically included in the approved Budget. Costs must be incurred after the term start date. All services must be provided and goods received during this period in order to be eligible costs.

Eligible costs include:

- Personnel
- Consultants
- Safety Equipment
- Vehicles/Trucks
    - For compost procurement activities - Vehicles/tractors, turf tires, forklifts or compost slingers

  Note: The Grantee needs to own and control the vehicle, however they may allow participants to use the vehicle for grant implementation purposes only.

- Education and Outreach materials
    - Print Media
    - Television, radio, video, and social media
    - Materials offered in other languages
- Door-to-Door Outreach
- Signage
- Recordkeeping or tracking software
    - Software to match donor with food bank
    - Recordkeeping/reporting software
    - Procurement tracking software
    - Apps for food recovery
- Inspections and Enforcement
- Training
- Tablet/Electronic Devices (seven inches or more measured diagonally) used for the purposed of organic tracking and Education and Outreach
    - Maximum price of $500 (excluding sales tax) and limit to one (exceptions may be approved on a case-by-case basis)
    - Accessories used for security, protection, and charging

- Equipment
    - For larger items, The Grantee needs to own and control the equipment, however, they may allow participants use of said equipment for grant implementation purposes.
- Bins (green and blue only) and lids
    - Includes, but is not limited to, curbside, small household food waste pail, labeling, and liners
- Procurement of recovered/recycled organic products
- Equipment
    - Food distribution - included refrigeration, coolers, and packing materials

Ineligible Costs

Any costs not specifically included in the approved Budget and not directly related to grant implementation will be considered ineligible. The grantee should contact the Grant Manager if clarification is needed.

Ineligible costs include, but are not limited to:

- Costs incurred prior to ~~April 1, 2022~~ the Term Start Date or after ~~April~~ May 2, 2024
- Development, purchase, or distribution of strictly promotional give-away items Stuff We All Get, (SWAG) (https://www.calrecycle.ca.gov/Funding/SWAG/)
- Purchase or lease of land or buildings
- Equipment or services not directly related to grant implementation
- Food dehydrators or liquefiers
- Disposal costs
- Costs currently covered by or incurred under any other CalRecycle loan, grant, or contract
- Cell phones
- Purchase of data plans and/or mobile service plans/hotspots
- Costs related to website host and web page domain
- Audit expenses
- Sponsorship or licensing fees for events/programs
- Out-of-state travel
- Conferences and symposiums
- Food or beverages (e.g., as part of meetings, workshops, or events)
- Travel costs exceeding the state-approved rates for mileage, per diem, lodging, etc.
    - Refer to the Memorandum (https://www.calhr.ca.gov/employees/Pages/travel-reimbursements.aspx) for travel policies.
    - Reimbursement rates are subject to change at any time by the State of California without prior notification.
- Personnel costs not directly related to grant activities
- Fines or penalties due to violation of federal, state, or local laws, ordinances, or regulations
- Any costs for construction projects by charter cities prohibited by Labor Code section 1782
- Any costs not consistent with local, state, or federal laws, guidelines, and regulations

- The total amount of indirect costs charged to the grant shall not exceed 10 percent of the grant funds reimbursed. These costs are expenditures not capable of being assigned or not readily itemized to a particular project or activity but considered necessary for the operation of the organization and the performance of the program. The costs of operating and maintaining facilities, accounting services, and administrative salaries as well as contractor's indirect costs in their contracts, are examples of indirect costs. All indirect costs charged to the grant must be associated with grant activities.
- Costs deemed unreasonable or not related to the project by the Grant Manager

Modifications

The grantee must submit any proposed revision(s) to the project in writing to the Grant Manager. The grantee may not incur costs or make expenditures based on the revision without first receiving the Grant Manager's written approval. Proposed revisions must be accompanied by a summary of proposed changes or modifications, including justification for the proposed changes. If approved, the Grant Manager will upload the final revised changes to GMS and notify the grantee. The grantee should retain the approval document(s) for audit purposes. See the "Audit Record/Access" section of the Terms and Conditions (Exhibit A).

Acknowledgements

The grantee shall acknowledge CalRecycle's support each time a project is funded, in whole or in part, by this Agreement is publicized in any medium, including news media, brochures, or other types of promotional materials. The acknowledgement of CalRecycle's support must incorporate the CalRecycle logo. Initials or abbreviations for CalRecycle shall not be used. The Grant Manager may approve deviation from this requirement on a case-by-case basis where such deviation is consistent with CalRecycle's Communication Strategy and Outreach Plan.

The following items require acknowledgement of funding from CalRecycle and pre-approval from the CalRecycle Grant Manager prior to incurring the expense:

- All television, radio and video scripts
- Functional premiums, if the per unit price is greater than $6.00
- Advertisements
- Audio and/or visual material
- Brochures
- Newspaper ads
- Pamphlets
- Other outreach

All publicity and education materials must include the following:

1. "Funded by a grant from CalRecycle." Exception: The acknowledgement line is not required on small items where space constraints would not allow for this line or if it would interfere with the message.
    - There are two acceptable Spanish translations: "Financiado por una beca del CalRecycle" or "Patrocinado por fondos del CalRecycle." For other languages, the Grantee must work with a certified translator or person fluent in reading and writing that language. All exceptions must be pre-approved in writing by the CalRecycle Grant Manager.

2. CalRecycle logo (https://www.calrecycle.ca.gov/gallery/) as reflected on the CalRecycle website, can be obtained from the Office of Public Affairs at opa@calrecycle.ca.gov.
3. Press Releases – the only requirement is to place the name of "CalRecycle" as an acknowledgement in the body of the release.

Reporting Requirements

The Grant Agreement requires a Final Report; however, the Grant Manager may require additional status information at any time during the Grant Term. Failure to submit the Final Report with appropriate documentation by the due date may result in forfeiture by the grantee of any unspent funds received under this agreement, and repayment of all funds to CalRecycle.

The grantee must upload all reports in GMS. For further instructions regarding GMS, including login directions, see the "Grants Management System" section (above).
To upload a report:

1. Go to the **Reports** tab.
2. Click on the appropriate Report Type.
3. Click on the **Add Document** button.
4. Choose the Document Type, enter a document title, click the **Browse** button to search and upload the document, and then **Save**.
    - Select the **Back** button to upload another document and continue the process until all required documents as listed below are uploaded.
    - The maximum allowable file size for each document is 35MB.
5. Click the **Submit Report** button to complete your report submittal. The **Submit Report** button will not be enabled until all required reporting documents are uploaded.

Failure to comply with the specified reporting requirements may be considered a breach of the Grant Agreement and may result in the termination of the Grant Agreement, and/or forfeiture by the grantee of claims for costs incurred that might otherwise have been eligible for grant funding. The grantee must report any problems or delays immediately to the Grant Manager.

Electronic and Original Signatures

CalRecycle now allows for certified e-Signature or original wet signature on documents or forms that certify legally binding information.

Note: E-signatures must include the first and last name of the Signature Authority, be in the Adobe Digital ID format (or through another certified digital signature program) and cannot be the "Fill and Sign" function within Adobe. Any documents using the "Fill and Sign" method is considered incomplete and may be sent back to the grantee.

If you have questions, email grantassistance@calrecycle.ca.gov.

Progress Report

Grantees with awards over $1,000,000 will need to collect and submit information on any jobs created or paid by the grant on a bi-annual basis. Grant Managers will work with Grantees on when and how to submit the information. CalRecycle will provide a report template at a later date. Progress reports must include the following:

- Jobs
  - Provide number of jobs created and paid for in whole or in part by this grant during the reporting period. Include job title or classification, job permanence, total project work hours, hourly pay rates or salaries, as well as benefits from the job, such as healthcare, paid vacation or sick leave and hiring strategy.
- Jobs provided to members of Priority Populations.
  - In addition to the item, above, provide the same jobs information for any positions filled by members of priority populations. More information about Priority Populations can be found at California Air Resources Board Priority Population Investments webpage (www3.arb.ca.gov/cc/capandtrade/auctionproceeds/communityinvestments.htm).

Note: This requirement is subject to change at CalRecycle's discretion. If any reporting requirement changes, Grant Managers will notify the Awardees.

Final Report

The Final Report is due ~~**April**~~ **May 2, 2024 (report template will be provided at a later date)**. This report should cover grant activities **from ~~April 1, 2022~~ the Term Start Date** through ~~**April**~~ **May 2, 2024**. The grantee must include the following items in the Final Report:

1. The Grant Number, grantee's name, and Grant Term.
2. The following disclaimer statement on the cover page:
   "The statements and conclusions of this report are those of the grantee and not necessarily those of the Department of Resources Recycling and Recovery (CalRecycle), its employees, or the State of California. The state makes no warranty, express or implied, and assumes no liability for the information contained in the succeeding text."

Note: This requirement is subject to change at CalRecycle's discretion. If any reporting requirement changes, Grant Managers will notify the Grantees.

Grant Payment Information

- CalRecycle will make grant payments to only the grantee. It is the grantee's responsibility to pay all contractors and subcontractors for purchased goods and services. CalRecycle will make payments to the grantee as promptly as fiscal procedures permit.
- The grantee must provide a Reliable Contractor Declaration (CalRecycle 168) (https://www.calrecycle.ca.gov/Funding/forms/) signed under penalty of perjury by the grantee's contractors and subcontractors in accordance with the "Reliable Contractor Declaration" section of the Terms and Conditions (Exhibit A). The declaration must be received and approved by the Grant Manager prior to

commencement of work. See the "Reliable Contractor Declaration" section in Terms and Conditions (Exhibit A) for more information.

Expenditure Itemization Summary and Documentation
The grantee must submit the EIS and Certification Document (a template will be provided at a later date) in GMS. For further instructions regarding GMS, including login directions, see the "Grants Management System" section (above). Please refer to the "Milestones" section (above) for required due dates.

- **Expenditure Itemization Summary (EIS)**
  - All expenditures must be itemized and arranged by the reporting and expenditure categories as contained in the grantee's Budget tab.
  - Grantees are required to maintain supporting documentation pertaining to the EIS and may be required to provide them at the request of the Grant Manager at any time.
- **Certification Document**
  - The Signature Authority will need to certify under penalty of perjury that information provided in the EIS is correct.

Note: This requirement is subject to change at CalRecycle's discretion. If any expenditure reporting requirement changes, Grant Managers will notify the Awardees.

Failure to submit the EIS and Certification Document by the due date may result in the forfeiture by the grantee of claims for costs incurred that might otherwise have been eligible for grant funding.

To submit an EIS:

1. Go to the **Payment Request** tab.
2. Click on the **Create a Payment Request** button.
   a. Choose **Advance Reconcile** for the **Transaction Type** and enter the amount spent in each budget subcategory.
   b. When the transaction is complete, click the **Save** button.
   c. After the transaction is saved, the **Upload Supporting Documents** button will appear in the lower right corner.
3. Click the **Upload Supporting Documents** button.
   a. Choose the **Document Type**, enter a **document title**, click the **Browse** button to search and upload the document, and then **Save**.
   b. Select the **Back** button to upload another document and continue this process until all required supporting documents as listed below are uploaded.
   c. The maximum allowable file size for each document is 35MB.
4. Click the **Submit Transaction** button, located on the transaction page, to complete your payment request. The **Submit Transaction** button will not be enabled until all required supporting documents are uploaded.

Note: Once a transaction is saved, select the transaction number from the **Payment Request** tab to access it again. Please do not create multiple transactions for the same requested funds.

Unspent Funds
Funds that are unspent at the end of the grant term must be returned by check to CalRecycle by June 15, 2024 ~~May 16, 2024~~. Checks should be made payable to the Department of Resources Recycling and Recovery. Checks must contain the Grant Number (i.e., OWR1-21-xxxx), specify "SB 1383 Local Assistance Grant Unspent Funds," and be mailed to:

CalRecycle Accounting
SB 1383 Local Assistance Grant Unspent Funds
PO Box 4025
Sacramento, CA 95812-4025

Unspent funds due to CalRecycle but left unpaid may result in ineligibility for future grant and payment program funding. If there are questions or other issues related to expenditures, work with your Grant Manager to resolve these issues.

Audit Considerations

The grantee agrees to maintain records and supporting documentation pertaining to the performance of this grant subject to possible audit for a minimum of three (3) years after Final Report approval date or Grant Term end date, whichever is later. CalRecycle may stipulate a longer period of records retention in order to complete any action and/or resolution of all issues which may arise as a result of any litigation, dispute, or audit, whichever is later.

Examples of audit documentation include, but are not limited to, competitive bids, grant amendments, copies of any agreements with contractors or subcontractors if utilized, expenditure ledger, payroll register entries, time sheets, Expenditure Itemization Summary forms, payment supporting documentation, paid warrants, contracts and change orders, samples of items and materials developed with grant funds, invoices, and cancelled checks. Please refer to the Terms and Conditions (Exhibit A) for more information.

RESOLUTION NO. 1288

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROLLING HILLS AUTHORIZING SUBMITTAL OF THE CALRECYCLE SB 1383 LOCAL ASSISTANCE GRANT PROGRAM APPLICATION AND RELATED AUTHORIZATIONS

THE CITY COUNCIL OF THE CITY OF ROLLING HILLS, CALIFORNIA DOES HEREBY RESOLVE, DECLARE, DETERMINE, AND ORDER AS FOLLOWS:

Section 1. Recitals.

A. Public Resources Code sections 48000 et seq. authorize the Department of Resources Recycling and Recovery ("CalRecycle") to administer various grant programs in furtherance of the State of California's efforts to reduce, recycle, and reuse solid waste generated in the state thereby preserving landfill capacity and protecting public health and safety and the environment; and

B. In furtherance of this authority CalRecycle is required to establish procedures governing the application, awarding, and management of the grants; and

C. CalRecycle grant application procedures require, among other things, an applicant's governing body to declare by resolution certain authorizations related to the administration of CalRecycle grants; and

D. The City Council of the City of Rolling Hills ("City") desires to authorize the City Manager or her designee to submit an application to CalRecycle for the SB 1383 Local Assistance Grant Program for which it is eligible and execute all documents necessary to implement and secure payment thereunder.

Section 2. The City of Rolling Hills is authorized to submit the SB 1383 Local Assistance Grant Program application to CalRecycle.

Section 3. The City Manager or her designee is authorized to execute in the name of the City of Rolling Hills all documents necessary to implement and secure payments under the SB 1383 Local Assistance Grant Program.

Section 4. This Resolution shall take effect immediately upon its adoption by the City Council, and the City Clerk shall certify to the passage and adoption of this Resolution and enter it into the book of original resolutions.

PASSED, APPROVED, AND ADOPTED this 14th day of February 2022.

BEA DIERINGER
MAYOR

ATTEST:

CHRISTIAN HORVATH
CITY CLERK

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) §§
CITY OF ROLLING HILLS)

The foregoing Resolution No. entitled:

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROLLING HILLS AUTHORIZING SUBMITTAL OF THE CALRECYCLE SB 1383 LOCAL ASSISTANCE GRANT PROGRAM APPLICATION AND RELATED AUTHORIZATIONS

was approved and adopted at a regular meeting of the City Council on the 14th day of February 2022, by the following roll call vote:

AYES: Pieper, Mirsch, Wilson, Black, Mayor Dieringer

NOES:

ABSENT:

ABSTAIN:

CHRISTIAN HORVATH
CITY CLERK

RESOLUTION NO. 1299

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROLLING HILLS AUTHORIZING ACCEPTANCE OF GRANT FUNDING FROM CALRECYCLE IN THE AMOUNT OF $20,183; AND AUTHORIZING THE CITY MANAGER, OR DESIGNEE, TO EXECUTE ANY NECESSARY DOCUMENTS TO MEET THE GRANT REQUIREMENTS FOR THE SB 1383 LOCAL ASSISTANCE GRANT PROGRAM

THE CITY COUNCIL OF THE CITY OF ROLLING HILLS, CALIFORNIA DOES HEREBY RESOLVE, DECLARE, DETERMINE, AND ORDER AS FOLLOWS:

Section 1. Recitals.

A. The City of Rolling Hills ("City") applied to the Department of Resources Recycling and Recovery ("CalRecycle") for the SB 1383 Local Assistance Grant Program for a one-time grant meant to aid in the implementation of regulations adopted by CalRecycle.

B. The SB 1383 Local Assistance Grant Program is a non-competitive grant program that provides $57,000,000 of funding to local jurisdictions to assist with the implementation of regulation requirements associated with SB 1383.

C. CalRecycle awarded the City a one-time grant in the amount of $20,183 to aid in the implementation of the SB 1383 requirements.

D. The City Council desires to accept the grant funds from CalRecycle and to direct the City Manager, or designee, to execute any necessary documents to meet the grant requirements.

Section 2. The City Council hereby accepts the award of the SB 1383 Local Assistance Grant Program grant in the amount of $20,183 from CalRecycle to be used for implementation of the SB 1383 requirements.

Section 3. The City Council hereby authorizes the City Manager, or her designee, to execute any necessary documents to meet the grant requirements. The City Manager, or her designee, is also authorized to take necessary action to comply with the grant requirements.

Section 4. This Resolution shall take effect immediately upon its adoption by the City Council, and the City Clerk shall certify to the passage and adoption of this Resolution and enter it into the book of original resolutions.

PASSED, APPROVED, AND ADOPTED this 23rd day of May, 2022.

_____
JAMES BLACK, M.D.
MAYOR

ATTEST:

_____
CHRISTIAN HORVATH
CITY CLERK

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) §§
CITY OF ROLLING HILLS)

The foregoing Resolution No. 1299 entitled:

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROLLING HILLS AUTHORIZING ACCEPTANCE OF GRANT FUNDING FROM CALRECYCLE IN THE AMOUNT OF $20,183; AND AUTHORIZING THE CITY MANAGER, OR DESIGNEE, TO EXECUTE ANY NECESSARY DOCUMENTS TO MEET THE GRANT REQUIREMENTS FOR THE SB 1383 LOCAL ASSISTANCE GRANT PROGRAM

was approved and adopted at a regular meeting of the City Council on the 23rd day of May, 2022, by the following roll call vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____
CHRISTIAN HORVATH
CITY CLERK

Agenda Item No.: 7.L
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **ROBERT SAMARIO, FINANCE DIRECTOR**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **REPORT BY BUDGET/AUDIT/FINANCE COMMITTEE ON MEETING HELD ON MAY 9, 2022**

DATE: **May 23, 2022**

BACKGROUND:
Annually, the City Manager presents a budget to the Finance/Audit/Budget Committee followed by a budget workshop with the City Council. In preparing the proposed budget for Fiscal Year 2022-2023, the priorities and goals discussed at the 2022 City Council Strategic Planning Session were taken into consideration and programmed accordingly.

DISCUSSION:
The Committee met on May 9th to receive a presentation of the FY 22/23 proposed budget..

REVENUE PROJECTIONS FOR FISCAL YEARS 2021/22 AND 2022-2023

The development of the fiscal year 2022/23 projected revenues began with a projection of current year revenues. With only nine months of revenues recorded, the year-end revenue totals were projected based on several factors, including prior year results, current year trends, and other pertinent data.

By far, the largest General Fund revenue is derived from property taxes. The current year adopted budget of $1,249,800 assumed a 4% growth. Staff expects actual revenues at year end will be $1,281,715 representing a growth of 4.8%. For fiscal year 2022/23, staff recommends again using a growth rate assumption of 4%, which would translate into a projected revenue of $1,333,000. The 4% growth rate consists of a CPI factor of 2%, which is the maximum increase allowed under Proposition 13, plus another 2% growth based on re-assessments for resales and home improvements.

A related revenue is Property Transfer Tax. Whenever a real estate property is sold in the City of Rolling Hills, a transfer tax is levied at $1.10 for every $1,000 in the sale price. The tax is split 50/50 between the City of Rolling Hills and Los Angeles County. In fiscal year 2020/21, revenues totaled $96,433. This fiscal year revenues are expected to reach $117,986. For

fiscal year 2022/23, staff recommends an assumed growth of 2% as a conservative approach given the recent spike in mortgage rates will likely result in fewer home sales.

The second largest General Fund revenue is from Building & Other Permits. These revenues have experienced a dramatic decline as a result of the pandemic, dropping to $183,378 in fiscal year 2020/21. Before the pandemic, building-related permit revenues exceeded $700,000. With the pandemic seemingly waning, revenues have experienced a moderate rebound. Based on revenues received through March 31, 2022, staff estimates revenues at year end at $472,969. Accordingly, staff proposes estimated revenues for fiscal year 2022/23 of $475,000, recognizing that if the current trend continues, revenue could be higher.

Motor Vehicle In Lieu (MVIL) tax revenues are fairly flat from the prior year. Projected fiscal year 2021/22 revenues of $246,694 are 4.2% higher than last year. Staff recommends a assuming a 2% growth and total revenues for next fiscal year $252,000. The unknown is to what degree higher interest rates, which affect rates offered on car loans, will affect new car sales. Otherwise, MVIL taxes trend downward absent new car sales as the tax rate is applied on a depreciating scale.

In total, staff recommends total General Fund budgeted revenues of $2,399,289, which are $274,989 higher than fiscal year 2021/22 adopted revenues, buoyed primarily by the increase in property taxes and building permit revenues.

The committee had no concerns with the revenue projections as presented.

GENERAL FUND EXPENDITURE PROJECTION FOR FISCAL YEAR 2022-2023

The proposed budget for the upcoming fiscal year projects $3,137,956 in expenditures. The proposed expenditures would result in a deficit of $738,667 before transfers and a deficit of $2,008,167 after transfers in and out. The following highlights the proposed expenditures:

- Increased allocations to Emergency Preparedness for wildfire mitigation measures, Block Captain Program, fire fuel abatement in the Preserve, citywide emergency alert drill, Emergency Information System (EIS) support, Alert Southbay subscription and as-needed consulting services.
- 3.5% Cost of Living Adjustment to salaries
- Increased City Attorney fee based on BBK's activities of the last two fiscal years
- Fees for the November 2022 Municipal Election
- Fees for records management
- Increased Finance Department fee for grants management, reimbursement support, restricted funds management, benefits/pension activities for city personnel, and technology implementation.
- Update to the 1990 General Plan and companion environmental assessment.
- Contracted code enforcement services.
- Fee for a grant writer to pursue fund for sewer project
- Budget for expanded resident services (i.e., outdoor movie night).
- Budget for Human Resource support.
- Anticipated subsidy to absorb the cost increase to residents' refuse fees.
- Capital Improvement Cost for the City Hall ADA design, and construction.

OTHER FUNDS FOR FISCAL YEAR 2022-2023

Majority of the restricted funds such as Proposition C, Measure R, Measure M, and Measure A are expected to roll the revenue to future years to save up for eligible projects. The following summarizes the anticipated activities of the other restricted funds for next fiscal year:

- Measure W's expenditure plan for FY 2022-2023 was previously approved by the City Council in March 2022 and submitted to the Los Angeles County for approval. It is anticipated that $80,000 of Measure W would be spent on eligible storm water compliance measures.
- The City of Beverly Hills expressed interest in $45,200 of Prop A exchange.
- The Coronavirus State and Local Fiscal Recovery funds (American Rescue Plan Act - ARPA) is expected to provide half of the overall allocation.
- The Capital Projects fund includes $96,000 for Pacific Architecture Engineers' design fee recently approved by the City Council for the development of layout Option 3 and $1M for construction of the City Hall ADA Improvement project.
- The Refuse fund anticipates absorbing the expected refuse rate increase for residents.
- The newly established Fund 16 Cal OES captures the grants awarded to the city in the last two years with transfers from the Utility Fund (Southern California Edison Rule 20 credits) for grant match.

The committee expressed concern with some expenditure numbers specific to employees. Staff has corrected those items and they will be presented as part of the Budget Workshop. The committee asked for clarifications on expense line item fluctuations. Staff explained that they were re-assigning expenditures to more appropriate categories to ensure clarity and transparency. The committee expressed concerns about proposed election costs being high. Staff has been able to subsequently converse with Los Angeles County's Registrar, Recorder and County Clerk and has modified the projected costs based on their input. The committee expressed concern about more clearly understanding the difference between what constitutes as core budget ongoing expenditures versus one-time capital expenses. Staff has broken out these numbers to help present a clearer picture during the workshop. The committee expressed concerns about stormwater compliance costs. Staff explained that the number do not necessarily reflect Measure W offsets which come later and replenish monies expended by the general fund. The committee requested seeing fund sources and expenditures broken out. The committee expressed concern about expenditures related to the general plan updates and recommend delaying the process of updating elements for the time being unless absolutely required. The Committee expressed concerns with the overall budget and projected deficit spending.

FISCAL IMPACT:
None.

RECOMMENDATION:
Receive and File

ATTACHMENTS:

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 7.M
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH, CITY CLERK / EXECUTIVE ASSISTANT TO CITY MANAGER**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **ADOPT RESOLUTION NO. 1298 MEMORIALIZING A REDUCTION IN THE SELF-INSURANCE FUND RESERVES FROM $500,000 TO $250,000**

DATE: **May 23, 2022**

BACKGROUND:
At the May 9, 2022 City Council meeting, the Council unanimously voted to reduce the Municipal Self-Insurance Reserve Fund Balance to $250,000 and directed staff to prepare a resolution memorializing the reduction.

DISCUSSION:
None.

FISCAL IMPACT:

None.

RECOMMENDATION:

Approve as presented.

ATTACHMENTS:
ResolutionNo1298_AdministrativeFinancialPolicy.pdf
FN_POL_220518_AdminProcedures_BudgetDebtPolicies.pdf

RESOLUTION NO. 1298

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROLLING HILLS APPROVING THE FINANCIAL, BUDGET AND DEBT POLICIES IN THE ADMINISTRATIVE POLICY/PROCEDURES

THE CITY COUNCIL OF THE CITY OF ROLLING HILLS, CALIFORNIA, DOES HEREBY RESOLVE, DECLARE, DETERMINE, AND ORDER AS FOLLOWS:

Section 1. Recitals.

A. Each year, the City Council reviews the City's policies to identify whether changes need to be made.

B. The Finance Committee considered the Financial, Budget and Debt Policies in the Administrative Policy/Procedures and recommended reducing the self-insurance fund from $500,000 to $250,000.

C. On May 9, 2022, the City Council considered the Finance Committee's recommendation to amend the Financial, Budget and Debt Policies.

Section 2. The City Council hereby approves the Financial, Budget and Debt Policies in the Administrative Policy/Procedures, attached hereto as Exhibit A and incorporated herein by reference.

Section 3. This Resolution shall take effect immediately upon its adoption by the City Council, and the City Clerk shall certify to the passage and adoption of this Resolution and enter it into the book of original resolutions.

PASSED, APPROVED, AND ADOPTED this 23rd day of May, 2022.

_____
JAMES BLACK, M.D.
MAYOR

ATTEST:

_____
CHRISTIAN HORVATH
CITY CLERK

EXHIBIT A

CITY OF ROLLING HILLS	ADMINISTRATIVE POLICY/PROCEDURES
FINANCIAL, BUDGET AND DEBT POLICIES	
Original Version Effective: 09/24/2007	See end of document for complete policy history
Current Version Effective: 05/23/2022	

Policy Framework:

The purpose of the Financial, Budget and Debt Policies is to guide the City Council and other City officials in developing sustainable, balanced budgets and managing the City's finances in a prudent manner consistent with best practices. The City's commitment to adopting and operating within a balanced budget is a core financial value and policy of the City.

The City of Rolling Hills Financial Policies represents the City's framework for planning and management of the City's fiscal resources. Adherence to the Financial Policies promote sound financial management which can lead to unqualified annual audits, provide assurance to the taxpayers that tax dollars are being collected and spent per City Council direction and provide a minimum of unexpected impacts upon taxpayers and users of public services.

The City Council Finance / Budget Committee shall serve as the City's audit committee for the purpose of recommending the selection of an auditor to the City Council, meeting with the City Auditor, reviewing the annual audit and necessary financial statements, responding to conflicts between management and the auditor and responding to fraudulent activities. The City Council will conduct a competitive process for the selection of the independent external auditor every 6 years to be in conformance with California Government Code Section 12410.6(b). Any non- audit work performed by the independent external auditor, if allowed, will be done under a separate contract approved by the City Council.

The City Manager shall be responsible for developing and, as appropriate, implementing and managing these policies as well as subsidiary policies that execute the City's Financial Policies.

The City's Financial Policies shall be in conformance with all state and federal laws, generally accepted accounting principles (GAAP) and standards of the Governmental Accounting Standards Board (GASB) and the Government Finance Officers Association (GFOA).

1. Financial Reporting Entity:

The City of Rolling Hills was incorporated in 1957 under the general laws of the State of California. The City operates under the Council-Manager form of government. The City Council consists of five members elected at large for overlapping four-year terms. The Mayor and Mayor Pro-Tem are selected from the City Council members and serve a one-year term. The City Council appoints a City Manager, City Attorney and City Treasurer. In addition, the City Council appoints the members of advisory Commissions and Committees.

The City, directly or by contract, provides municipal services as authorized by statute. Services provided include:

- Public safety through the Los Angeles County Sheriff and Fire Department
- Refuse collection by contract with a private hauler
- Water through California Water Service Company
- Sewer through Los Angeles County Sanitation Districts
- Recreation
- Public improvements
- Planning and zoning
- General administrative and support services

2. Financial Reporting Policies:

The City's accounting and financial reporting systems will be maintained in conformance with all state and federal laws, generally accepted accounting principles (GAAP) and standards of the Governmental Accounting Standards Board (GASB) and the Government Finance Officers Association (GFOA). Further, the City will make every attempt to implement all changes to governmental accounting practices at the earliest practical time.

- The financial report should be in conformity with GAAP, demonstrate compliance with finance related legal and contractual provisions, disclose thoroughly with detail sufficient to minimize ambiguity and potential for misleading interferences.

- An annual audit will be performed by an independent public accounting firm with an audit opinion to be included with the City's published Comprehensive Annual Financial Report.

- The City's budget should satisfy criteria as a financial and programmatic policy document, as a comprehensive financial plan, as an operations guide for all organizational units and as a communications device for all significant budgetary issues, trends, and resource choices.

- The City shall evaluate the fiscal impact of proposed changes in employee benefits to be provided. Prior to assuming liability for expanded benefits,

a viable funding plan with estimates of long term impacts shall be incorporated into the analysis.

- The City shall endeavor to avoid committing to new spending for operating or capital improvement purposes until an analysis of all current and future cost implications is completed.

- The City shall endeavor to maintain cash reserves sufficient to fully fund the next present value of accruing liabilities, obligations to employees for vested payroll and benefits and similar obligations as they are incurred.

- The City shall prepare and present to the City Council monthly interim revenue and expenditure reports and a Mid-Year Review to allow evaluation of potential discrepancies from budget assumptions.

3. Internal Control Accounting Policies:

To provide a reasonable basis for making management's required representations concerning the finances of the City.

- Accounting Records – Maintain accounting records in accordance with Generally Accepted Accounting Principles (GAAP).

- Monthly Posting – Post a monthly record, which maintains each month's activities separate and distinct from another month's work. This provides visibility in locating errors and fixing corrections. Accounting ledgers will be reviewed and reconciled on a monthly basis to supporting documentation – Cash Receipts, Accounts Payable, Payroll and Monthly Journal Entries.

- Sequential Number – Sequentially numbered instruments will be used for checks and cash receipts. Pre-numbered receipts are controlled and accounted for by an individual with no accounting handling responsibilities. The City's pre-numbered checks and pre-numbered cash receipts should be safeguarded in the Vault. All copies of voided receipt forms are retained, accounted for, and documented.

- Audit Trail – The City's accounting records and systems shall provide an audit trail (e.g. paper document) that allows for the tracing of each transaction from its original document to completion.

4. Operating Management Policies:

The budget process is intended to weigh all competing requests for City resources within expected fiscal constraints. Requests for new, on-going programs made outside the budget process will be discouraged.

- Budget development will consider multi-year implications of current decisions and allocations and use conservative revenue forecasts.

- Revenues will not be dedicated for specific purposes, unless required by law or Generally Accepted Accounting Practices (GAAP). All non-restricted revenues will be deposited in the General Fund (or other designated fund as approved by the City Manager) and appropriated by the City Council.

- Current revenues will fund current expenditures. City revenues will be managed to protect programs from short-term fluctuations that impact expenditures.

- The City will endeavor to identify entrepreneurial solutions to cover or recover costs of operating program.

- The City shall strive to avoid returning to the City Council for new or expanded appropriations during the fiscal year. Exceptions may include emergencies, unforeseen impacts, mid-year adjustments or new opportunities.

- Additional personnel will be requested after service needs have been thoroughly examined and is substantiated for new program initiatives or policy directives.

- All non-Enterprise user fees and charges will be evaluated at least every three years to determine the direct and indirect cost recovery rate. The analysis will be presented to the City Council.

- The City shall endeavor to maintain adequate cash reserves to fund 100% replacement of capital equipment. Replacement costs will be based upon equipment lifecycle financial analysis developed by the Finance Director and approved by the City Manager.

- Balanced revenue and expenditure forecasts will be prepared to examine the City's ability to absorb operating costs due to changes in the economy, service demands, and capital improvements. The forecast will be updated annually and include a four-year outlook.

- Cash and investment programs will be maintained in accordance with the Government Code and the adopted investment policy will ensure that proper controls and safeguards are maintained. City funds will be managed in a prudent and diligent manner with an emphasis on safety of principal, liquidity, and financial return on principal, in that order. Pursuant to State law, the City, at least annually, revises and the City Council affirms a detailed investment policy.

5. Capital Management Policies:

- Capital improvement projects are defined as infrastructure or equipment purchases or construction which results in a capitalized asset and having a useful (depreciable) life of at least one year with a cost of $5,000 or more per the City's resolution Number 953.
- The Finance Department shall utilize the straight-line method of calculating depreciation over the estimated useful life for all classes of assets.
- The capital improvement plan will attempt to include, in addition to current operating maintenance expenditures, adequate funding to support, repair and replace deteriorating infrastructure and avoid a significant unfunded liability.
- Capital improvement lifecycle costs will be coordinated with the development of the City's operating budget. Future operating, maintenance, and replacement costs associated with new capital improvements will be forecast, matched to available revenue sources and be included in the operating budget. Capital project contract awards or purchases will include a fiscal impact statement disclosing the expected operating impact of the project or acquisition and when such cost is expected to occur.

6. Reserve Policies:

It is the goal of the City to obtain and maintain a General Fund operating reserve (Rainy day fund) in the form of cash, of at least 40% of prior year audited annual General Fund revenues to cover normal seasonal cash flow variations, as well as unforeseen emergency or catastrophic impacts upon the City.

- One-time revenue windfalls should be designated as a reserve or used for one-time expenditures. The funds should not be used for on-going operations. For purposes of this policy, one-time revenue windfalls shall include:

  CalPERS rebates
  Tax revenue growth in excess of 10% in a single year
  Unexpected revenues (e.g., litigation settlement)
  Any other revenues the City Council may elect to designate as extraordinary

- All unexpended General Funds from the prior fiscal year will be deposited in the General Fund Reserve Fund (Rainy Day Fund.)
- The City will strive to maintain the Municipal Self-Insurance Fund with a July 1 balance of $250,000.
- The City will strive to transfer $250,000 annually into the Utilities Fund for the purpose of building up the necessary balance for underground projects.
- Enterprise Fund (e.g., for refuse collection) user fees and charges will be examined annually to ensure that they recover all direct and indirect costs of the service,

provide for capital improvements and maintenance and maintain adequate reserves. Moreover, maintenance of cash reserves will provide a de facto rate stabilization plan. Rate increases shall be approved by the City Council following formal noticing and public hearing. Rate adjustments for enterprise operations will be based on five-year financial plans unless a conscious decision is made to the contrary. The current cash reserves shall be adjusted annually and will be equal to the proposed annual General Fund subsidy to the Refuse Fund and will be budgeted as a Transfer into the Refuse Fund.

- The City has established a PARS Pension Rate Stabilization Program Section 115 Trust. The Trust was created to fund the City's unfunded PERS Pension Liability and as funds are available they would be deposited into the Trust in order to maintain adequate reserves.

7. Budget Policies:

The function of the City of Rolling Hills is primarily administrative.

A. Categories of Funds

- The City's annual budget contains fifteen different funds managed in conformance with the City's Fund Balance Policy:

  General Fund
  Community Facility Fund
  Self-Insurance Fund
  Refuse Fund Traffic Fund Transit Fund - Proposition A
  Transit Fund - Proposition C
  Transit Fund – Measure R
  Transit Fund – Measure M
  LA County Measure W
  Capital Projects Fund
  Citizens Options for Public Safety Fund (COPS) Fund
  California Law Enforcement Equipment Program (CLEEP) Fund.
  Utility Fund
  OPEB (Post-Employment Benefits Other Than Pensions) Fund

- Each fund is considered to be a separate accounting entity for budgeting and financial reporting purposes.
- The operations of each fund are accounted for by providing a separate set of self-balancing accounts which are comprised of each fund's assets, liabilities, equity, revenues and expenditures, as appropriate.
- The City resources are allocated to and for individual funds based upon the purpose of the spending activities.
- All funds and reserves will be evaluated annually for long-term adequacy and use requirements in conjunction with development of the City's long-term budget assumptions.

- For approved capital projects unexpended budget appropriations would be reviewed annually by the Finance/Budget/Audit Committee for recommendation for carryover to the following fiscal year.

B. Operating Budget Guidelines

- The Budget is detailed - Expenditures are authorized line by line, item by item. Line items are used to limit precisely the amount and narrowly define what can be spent.
- The Budget is annual - The annual budget period is from July 1 to June 30. The time span of the authority to spend is restricted to one year. Each year the regular cycle of budgeting is repeated.
- The budget is comprehensive – The budget is prepared for all funds expended by the City.
- The City adopts a budget by June 30 of each year.
- Comparative Data - Comparative data from the prior year is presented in the annual budget in order to provide an understanding of changes in the City's financial position and operation.
- Public Hearing - The City Council reviews a tentative budget and adopts the final budget. A public hearing is conducted to receive comments prior to adoption.

C. Financial Review

Throughout the fiscal year, monthly financial reports comparing actual amounts with budgeted amounts are prepared by the Finance Director and submitted to the City Manager and members of the City Council. As these reports are reviewed, attention is drawn to variances between budgeted amounts and actual amounts.

D. Budgeted Revenues & Expenditures

The City reviews fees and charges to keep pace with the cost of providing the service.

8. <u>Debt Management Policies:</u>

The City will seek to avoid incurring debt. While the City is disposed to funding capital improvements and expenditures on a cash basis, the City will consider, and when necessary, enter into debt financing for citywide public improvement projects such as sewers and utility undergrounding.

- Lease Equipment - Office Equipment has been leased on a monthly basis with the expense incurred at the time of payment.

Policy Administrative History:

Adopted September 24, 2007
Revised and Adopted March 24, 2008
Revised and Adopted February 23, 2009
Revised and Adopted March 8, 2010
Reviewed and Adopted February 28, 2011
Revised and Adopted May 23, 2011
Reviewed and Adopted May 14, 2012
Reviewed and Adopted April 22, 2013
Revised and Adopted September 9, 2013
Reviewed and Adopted March 24, 2014
Reviewed and Adopted April 27, 2015
Reviewed and Revised April 25, 2016
Reviewed and Adopted April 24, 2017
Reviewed and Adopted April 22, 2019
Reviewed and Adopted May 11, 2020
Reviewed and Adopted May 23, 2022

Agenda Item No.: 7.N
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH, CITY CLERK / EXECUTIVE ASSISTANT TO CITY MANAGER**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **UPDATE ON RESTRICTED TRANSPORTATION FUND PROJECTS**

DATE: **May 23, 2022**

BACKGROUND:
The Proposition A, Proposition C, and Measure R and Measure M Local Return programs are four one-half cent sales tax measures approved by Los Angeles County voters to finance a countywide transit development program.

By ordinance, Metro is responsible for administering the programs and establishing guidelines. The Proposition A tax measure was approved in 1980, the Proposition C tax measure was approved in 1990, Measure R was approved in 2008 and Measure M was approved in 2016. Collection of the taxes began on July 1, 1982; April 1, 1991; July 1, 2009; and July 1, 2017, respectively, while each year, more than $1 billion is generated in local transportation revenue.

As a condition of voter approval, 25 percent of the Proposition A tax revenues, 20 percent of the Proposition C tax revenues, 15 percent of Measure R and 17 percent of Measure M tax revenues are earmarked for the Local Return Programs to be used by cities and the County of Los Angeles in developing and/or improving local public transit, paratransit and related transportation infrastructure.

Local Return funds are allocated and distributed monthly to jurisdictions on a “per capita” basis by Metro.

Transportation Development Act (TDA) Article 3

Transportation Development Act (TDA) Article 3 bicycle and pedestrian funds are available to local agencies in Los Angeles County (all cities and the County) on an annual basis. The final amount is subject to revision based on actual receipts. These funds may be used for operations, maintenance, design, and construction of pedestrian and bicycle facilities and

amenities (including wheelchair ramps).

TDA Article 3 local funds are allocated to local agencies on a per-capita basis. The amount of each agency's allocation is detailed in Metro's Funding Allocation Procedure (FAP). Fifteen (15) percent of the total annual allocation amount will be designated to the City and the County of Los Angeles, with 30 percent going to the City and 70 percent going to the County, to cover their maintenance costs on seven pre-determined regionally significant Class I bicycle facilities. These percentages were Metro Board approved and are based on previous maintenance expenditures on these facilities by the City and the County.

TDA Article 3 funds may be used for the following activities relating to pedestrian and bicycle facilities (including sidewalk wheelchair ramps):

- Engineering expenses leading to construction.
- Maintenance of bicycling trails
- Right-of-way acquisition.
- Construction and reconstruction.
- Retrofitting existing bicycle and pedestrian facilities, including installation of signage, to comply with the Americans with Disabilities Act (ADA).
- Route improvements such as signal controls for cyclists, bicycle loop detectors, rubberized rail crossings and bicycle-friendly drainage grates.
- Purchase and installation of bicycle facilities such as secure bicycle parking, benches, drinking fountains, changing rooms, rest rooms and showers which are adjacent to bicycle trails, employment centers, park-and-ride lots, and/or transit terminals and are accessible to the general public.

DISCUSSION:
Measures R & M

On March 24, 2022, in order to avoid allocated Measure R & M local return funds from lapsing, staff filed for Capital Reserves Projects. The intent was to ensure that funds could be preserved for upcoming capital re-investments to the City Hall Campus that better serve the Rolling Hills Community while meeting Metro's Active Transportation guidelines. The project description written by staff was as follows: *This project is meant to improve community access for use of the city hall campus. Aspects include creating a pedestrian "ring pathway" around the perimeter, asphalt replacement, drainage improvements, re-evaluating parking striping and ADA accessibility amongst other potential ways for the community to actively engage.*

Prop A & C

As the City does not have any potential Prop A projects due to our boundaries and unique nature, it has been customary to exchange our lapsing funds to jurisdictions that could benefit from them. This year, the City is exploring an exchange of funds with the City of Beverly Hills. Any proceeds go to the General Fund.

TDA3
Metro staff has also communicated that they have some flexibility for communities like Rolling Hills to tie-in other non-vehicle based modes that a pedestrian/equestrian community may use. As such, staff is currently applying for a project related to both the overall future vision for

the City Hall campus pedestrian and mobility improvements combined with the requests of the Rolling Hills Needs of Seniors Committee. The project description provided to Metro is as follows:

As a result of COVID-19, the Rolling Hills Needs of Seniors Committee (NSC) has requested improvements to the City Hall Campus in order to provide usable community outdoor space and walking track for pedestrians who want to exercise, improved equestrian hitching posts and /or bicycle racks, and adjacent gathering/sitting areas (both shaded and unshaded). They have also requested improved lighting for early morning or evening hour usage. This project will require the city to perform a topographic survey, enlist a landscape architect, contractors and materials.

At the time of Agenda preparation, staff does not know if the project submitted will be approved as presented or require modification.

FISCAL IMPACT:
None.

RECOMMENDATION:
Receive and file.

ATTACHMENTS:

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 10.A
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH, CITY CLERK / EXECUTIVE ASSISTANT TO CITY MANAGER**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **DISCUSS 2022 SCE RELIABILITY REPORT AND WILDFIRE DETECTION CAMERAS ON THE PENINSULA (DIERINGER)**

DATE: **May 23, 2022**

BACKGROUND:
On May 9, 2022, during her meeting with the City Manager, Councilmember Dieringer requested a representative from Southern California Edison (SCE) attend the May 23, 2022 City Council meeting to answer her questions on the 2022 Reliability Report and installation of wildfire cameras on the Peninsula.

DISCUSSION:
None.

FISCAL IMPACT:
None.

RECOMMENDATION:
None.

ATTACHMENTS:

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 10.B
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH, CITY CLERK / EXECUTIVE ASSISTANT TO CITY MANAGER**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **DISCUSS EXISTING CELLULAR SERVICE ISSUES (BLACK)**

DATE: **May 23, 2022**

BACKGROUND:
At a recent Council Meeting Mayor Black requested to agendize this item for further discussion.

DISCUSSION:
None.

FISCAL IMPACT:
None.

RECOMMENDATION:
None.

ATTACHMENTS:

Agenda Item No.: 11.A
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **ROBERT SAMARIO, FINANCE DIRECTOR**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **CITY COUNCIL FISCAL YEAR 2022-23 BUDGET WORKSHOP**

DATE: **May 23, 2022**

BACKGROUND:
On May 9, 2022, staff presented the proposed fiscal year 2022-23 revenue and expenditure budgets for all funds to the Budget Committee, with the focus of the presentation being on the General Fund. The recommended budget for the General Fund included $4,407,456 in expenditures, including $1,269,000 in transfers to other funds, of which $1,096,000 was a transfer to the Capital Improvement Fund primarily for the City Hall Improvements Capital Project. With estimated revenues of $2,399,289, the recommended budget presented to the Budget Committee would have resulted in an operating deficit of $738,667 and an overall deficit of $2,008,167.

The Budget Committee directed staff to break down the recommended budget between on-time and ongoing components, and make whatever adjustments are needed to eliminate the ongoing deficit. This will allow Council to determine which one-time costs, such as capital, can be appropriately funded from the use of reserves.

DISCUSSION:
REVENUE PROJECTIONS FOR FISCAL YEARS 2021/22 AND 2022-2023

The development of the fiscal year 2022/23 projected revenues began with a projection of current year revenues. With only nine months of revenues recorded, the year-end revenue totals were projected based on several factors, including prior year results, current year trends, and other pertinent data.

By far, the largest General Fund revenue is derived from property taxes. The current year adopted budget of $1,249,800 assumed a 4% growth. Staff expects actual revenues at year end will be $1,281,715 representing a growth of 4.8%. For fiscal year 2022/23, staff recommends again using a growth rate assumption of 4%, which would translate into a projected revenue of $1,333,000. The 4% growth rate consists of a CPI factor of 2%, which is

the maximum increase allowed under Proposition 13, plus another 2% growth based on re-assessments for resales and home improvements.

A related revenue is Property Transfer Tax. Whenever a real estate property is sold in the City of Rolling Hills, a transfer tax is levied at $1.10 for every $1,000 in the sale price. The tax is split 50/50 between the City of Rolling Hills and Los Angeles County. In fiscal year 2020/21, revenues totaled $96,433. This fiscal year revenues are expected to reach $117,986. For fiscal year 2022/23, staff recommends an assumed growth of 2% as a conservative approach given the recent spike in mortgage rates will likely result in fewer home sales.

The second largest General Fund revenue is from Building & Other Permits. These revenues have experienced a dramatic decline as a result of the pandemic, dropping to $183,378 in fiscal year 2020/21. Before the pandemic, building-related permit revenues exceeded $700,000. With the pandemic seemingly waning, revenues have experienced a moderate rebound. Based on revenues received through March 31, 2022, staff estimates revenues at year end at $472,969. Accordingly, staff proposes estimated revenues for fiscal year 2022/23 of $475,000, recognizing that if the current trend continues, revenue could be higher.

Motor Vehicle In-Lieu (MVIL) tax revenues are fairly flat from the prior year. Projected fiscal year 2021/22 revenues of $246,694 are 4.2% higher than last year. Staff recommends a assuming a 2% growth and total revenues for next fiscal year $252,000. The unknown is to what degree higher interest rates, which affect rates offered on car loans, will affect new car sales. Otherwise, MVIL taxes trend downward absent new car sales as the tax rate is applied on a depreciating scale.

In total, staff recommends total General Fund budgeted revenues of $2,619,971, which includes one-time revenues for the ARPA grant of $220,682. As such, ongoing revenues of $2,399,289 are $274,989 higher than fiscal year 2021/22 adopted revenues, buoyed primarily by the increase in property taxes and building permit revenues.

GENERAL FUND EXPENDITURE PROJECTION FOR FISCAL YEAR 2022-2023

The revised recommended budget, as shown in the attached schedule, totals $4,369,997 which is made up of $2,983,131 in on-going costs and $1,386,266 in one-time costs. The ongoing costs in many cases have been trimmed to what essential costs and services.

The one-time costs include a $1,096,000 transfer to the Capital Improvement Fund primarily for the City Hall Improvements Capital Project. The balance of $285,200 in one-time costs were identified within the various expenditure accounts, including the following:

- Project Management - $45,000
- Grant Writer - $17,000
- Agenda system Granicus enhancements - $19,400

- Information Technology enhancements - $8,800
- Records Management - $45,000
- Special Project Study & Consulting (General Plan update) - $150,000

The following highlights the proposed expenditures:

- Block Captain Program, fire fuel abatement in the Preserve, Emergency Information System (EIS) support, Alert Southbay subscription
- 3.5% Cost of Living Adjustment to salaries
- Increased City Attorney fee based on BBK's activities of the last two fiscal years
- Fees for the November 2022 Municipal Election
- Increased Finance Department fee for grants management, reimbursement support, restricted funds management, benefits/pension activities for city personnel, and technology implementation.
- Contracted code enforcement services.
- Anticipated subsidy to absorb the cost increase to residents' refuse fees.
- Capital Improvement Cost for the City Hall ADA design, and construction.

OVERALL GENERAL FUND BALANCING

Based strictly on ongoing revenues and ongoing costs, the General Fund deficit is now down to $480,984. The one-time costs of $1,386,266 would be offset by one-time ARPA revenues of $220,682, leaving a one-time deficit of $1,165,584. On a combined basis, including all revenues and expenditures, the General Fund budget would require the use of reserves of $1,646,568 to balance.

OPTIONS FOR BALANCING THE GENERAL FUND

Staff have developed several options for addressing the projected operating deficit $480,984, which are included in the attached schedule of balancing options. The balancing options provide a number of cost reductions and revenue enhancements that in total range from approximately $535,000 to $610,000. With respect to one-time costs of $1,386,266, Council can choose which, if any, can be funded from reserves. From a policy perspective, the use of reserves (a one-time source) can appropriately be used to fund one-time costs, such as capital. Given General Fund reserve balances are currently in excess of 150% of the operating budget, Council has some latitude in the use of reserves for any one-time cost deemed to be a high priority.

OTHER FUNDS FOR FISCAL YEAR 2022-2023

Majority of the restricted funds such as Proposition C, Measure R, Measure M, and Measure A are expected to roll the revenue to future years to save up for eligible projects. The following summarizes the anticipated activities of the other restricted funds for next fiscal year:

- Measure W's expenditure plan for FY 2022-2023 was previously approved by the City Council in March 2022 and submitted to the Los Angeles County for approval. It is anticipated that $80,000 of Measure W would be spent on eligible storm water compliance measures.
- The City of Beverly Hills expressed interest in $45,200 of Prop A exchange.
- The Coronavirus State and Local Fiscal Recovery funds (American Rescue Plan Act -

ARPA) is expected to provide half of the overall allocation.
- The Capital Projects fund includes $96,000 for Pacific Architecture Engineers' design fee recently approved by the City Council for the development of layout Option 3 and $1M for construction of the City Hall ADA Improvement project.
- The Refuse fund anticipates absorbing the expected refuse rate increase for residents.
- The newly established Fund 16 Cal OES captures the grants awarded to the city in the last two years with transfers from the Utility Fund (Southern California Edison Rule 20 credits) for grant match.

FISCAL IMPACT:

The fiscal impact will be determined when the Fiscal Year 2022/23 Budget has been adopted.

RECOMMENDATION:

Review the proposed Fiscal Year 2022/23 budget and provide staff with comments. With the Council's direction, staff will bring the Fiscal Year 2022/23 Budget and the three-year CIP to the City Council Meeting for adoption on June 13, 2022.

ATTACHMENTS:
CL_AGN_220523_FY2023_Revenue Budget Recommendations.pdf
CL_AGN_220523_FY2023_Recommended Budget_General Fund Exp.pdf
CL_AGN_220523_FY2023 Summary of Sources and Uses of Funds_General Fund.pdf
CL_AGN_220523_Twelve Year History_ Rev Exp and Reserves.pdf
CL_AGN_FY22-23_OptionsToCloseBudgetDeficit_v2.pdf
CL_AGN_220523_FY2023 Recommended Budget - Other Funds.pdf

CITY OF ROLLING HILLS
General Fund Revenues
FY 2022 and 2023 Projection

	FY 2021 Revenues	Adopted Budget	Revenues 03/31/22	FY 2022 Year-End Projection	FY 2022 Projected Growth	FY 2023 Projection	FY 2023 Projected Growth
Property Taxes	$ 1,222,947	$1,249,800	$ 775,950	$ 1,281,715	4.8%	$ 1,333,000	4.0%
Sales Taxes	23,262	4,800	18,014	18,550	-20.3%	19,300	3.0%
Property Transfer Tax	93,449	40,200	96,433	117,986	26.3%	121,500	2.0%
Disaster Grants	50,000	20,000	13,040	13,040	-73.9%	-	N/A
Motor Vehicle In Lieu	236,725	246,100	124,694	246,694	4.2%	252,000	2.0%
Building & Other Permits	183,378	300,000	354,727	472,969	157.9%	475,000	Flat
Variance, Planning & Zoning	49,158	22,000	14,596	19,461	-60.4%	20,000	Flat
Animal Control Fees	472	1,000	160	213	-54.9%	250	Flat
Franchise Fees	10,753	14,900	10,274	13,699	27.4%	14,000	Flat
Fines & Traffic Violations	4,293	14,300	3,712	4,950	15.3%	4,500	Flat
RHCA Lease Revenue	68,988	68,000	51,743	68,991	0.0%	69,000	Flat
Interest on Investments	90,251	80,000	22,670	30,227	-66.5%	60,239	N/A
Public Safety Aug Fund	1,003	800	895	1,193	19.0%	1,000	Flat
Burglar Alarm Response	500	600	-	-	-100.0%	500	Flat
Miscellaneous Revenue	3,275	37,800	35,071	36,000	999.2%	5,000	Flat
Transfers In - ARPA				220,682	100.0%	220,682	Flat
Transfers In - Refuse Fund	24,000	24,000	18,000	24,000	0.0%	24,000	Flat
TOTALS	$ 2,062,454	$2,124,300	$ 1,539,978	$ 2,570,369	24.6%	$ 2,619,971	

CITY OF ROLLING HILLS
General Fund
Projected FY 2021-22 and Recommended FY 2022-23 Expenditures

	Department/Object Account	FY 2021-22 Adopted Budget	FY 2021-22 Year-End Projections	FY 2022-23 Recommended Presented to FAB - May 9	FY 2022-23 Recommended Revised - Version 2 Ongoing	FY 2022-23 Recommended Revised - Version 2 One-Time	FY 2022-23 Recommended Revised - Version 2 Total
01 - CITY ADMINISTRATOR							
702	Salaries -Full Time	$ 429,100	$ 408,639	$ 451,448	$ 474,258	$ -	$ 474,258
710	Retirement CalPERS-Employer	29,000	36,431	30,508	39,769	-	39,769
712	CalPERS Unfunded Liability	59,026	57,063	65,095	65,095	-	65,095
715	Workers Compensation Insurance	7,700	7,271	8,100	8,100	-	8,500
716	Group Insurance	55,000	76,111	11,446	71,316	-	71,316
717	Retiree Medical	30,300	37,159	35,231	35,231	-	35,231
718	Employer Payroll Taxes	28,400	25,071	29,876	36,997	-	36,997
719	Deferred Compensation	4,300	3,732	4,523	4,559	-	4,559
720	Auto Allowance	4,800	5,067	4,800	4,800	-	4,800
XXX	Phone Allowance	1,300	-	1,300	1,970	-	1,970
740	Office Supplies	38,040	25,184	11,000	11,000	-	11,000
745	Equipment Leasing Costs	14,850	11,048	11,450	11,450	-	11,450
750	Dues & Subscriptions	15,240	4,596	16,240	16,240	-	16,240
755	Conference Expense	10,000	9,052	10,000	10,000	-	10,000
757	Meetings Expense	2,000	3,357	2,000	2,000	-	2,000
759	Training & Education	5,000	-	5,000	5,000	-	5,000
761	Auto Mileage	500	-	500	500	-	500
765	Postage	20,000	12,468	21,100	21,000	-	21,000
770	Telephone	5,700	5,959	-	-	-	-
775	City Council Expense	10,000	2,440	10,000	10,000	-	10,000
776	Miscellaneous Expenses	-	564	6,200	6,200	-	6,200
780	Communications/Newsletters and Outreach	6,000	3,007	26,560	5,000	-	5,000
785	Codification	5,000	3,749	5,000	5,000	-	5,000
790	Advertising	1,000	-	2,400	2,400	-	2,400
795	Other Gen Admin Expense	4,900	2,422	1,050	1,050	-	1,050
801	City Attorney	91,000	119,887	120,000	120,000	-	120,000
802	Legal Expense - Other	3,000	-	3,000	3,000	-	3,000
820	Website	6,000	12,179	6,000	6,000	-	6,000
850	Election Expense City Council	-	222	36,000	15,000	-	15,000
890	Consulting Fees	161,400	69,903	62,000	-	62,000	62,000
XXX	Records Management			46,700	1,700	45,000	46,700
955	Disaster Emergency Equipment	-	2,784		-	-	-
	Total City Administrator	**1,048,556**	**945,366**	**1,044,527**	**994,635**	**107,000**	**1,102,035**

8100	0.669	12673	8491	
4000		12700		
12100		8500		
		4200		

CITY OF ROLLING HILLS
General Fund
Projected FY 2021-22 and Recommended FY 2022-23 Expenditures

	Department/Object Account	FY 2021-22 Adopted Budget	FY 2021-22 Year-End Projections	FY 2022-23 Recommended Presented to FAB - May 9	FY 2022-23 Recommended Revised - Version 2 Ongoing	FY 2022-23 Recommended Revised - Version 2 One-Time	FY 2022-23 Recommended Revised - Version 2 Total
05 - Finance							
750	Dues & Subscriptions	200	-	2,000	2,000		2,000
810	Annual Audit	17,630	17,110	18,500	18,500		18,500
890	Consulting Fees	99,500	116,167	120,000	120,000	-	120,000
	Total Finance	**117,330**	**133,277**	**140,500**	**140,500**	**-**	**140,500**
15- PLANNING & DEVELOPMENT							
702	Salaries	237,200	189,687	234,237	236,748	-	236,748
703	Salaries - Part-Time			26,600	26,587	-	26,587
710	Retirement CalPERS-Employer	17,750	14,345	18,673	18,100	-	18,100
715	Workers Compensation Insurance	3,800	3,581	4,000	4,000	-	4,200
716	Group Insurance	30,900	23,162	32,510	44,275	-	44,275
718	Employer Payroll Taxes	18,790	14,663	19,672	20,237	-	20,237
719	Deferred Compensation	1,200	-	-	-	-	-
720	Auto Allowance	2,400	1,467	2,400	1,200	-	1,200
XXX	Phone Allowance	600	-	600	600	-	600
758	Planning Commission Meetting	-	1,415	-	-	-	-
761	Auto Mileage	-	50	300	300	-	300
770	Telephone	-	1,281	-	-	-	-
776	Miscellaneous Expense	2,000	1,301	-	-	-	-
750	Dues & Subscription	850	-	1,000	1,000	-	1,000
755	Conference Expense	5,000	-	5,000	5,000	-	5,000
759	Training & Education	1,000	-	1,000	1,000	-	1,000
790	Publication	-	3,208	15,000	15,000	-	15,000
801	City Attorney	-	811		-	-	-
802	Legal Expenses-Other	-	23,169	20,000	20,000	-	20,000
872	Property Development-Legal Exp	100,000	33,336	80,000	80,000	-	80,000
878	Build Inspect. LA County	150,000	191,785	150,000	150,000	-	150,000
xxx	Willdan Building			50,000	50,000	-	50,000
881	Storm Water Management	275,800	231,435	280,000	97,142	-	97,142
882	Variance & CUP Expense	7,000	10,613	-	-	-	-
884	Special Project Study & Consulting	180,000	79,584	170,000	20,000	150,000	170,000
886	Consulting Fees	-	-	87,880	87,880	-	87,880

CITY OF ROLLING HILLS
General Fund
Projected FY 2021-22 and Recommended FY 2022-23 Expenditures

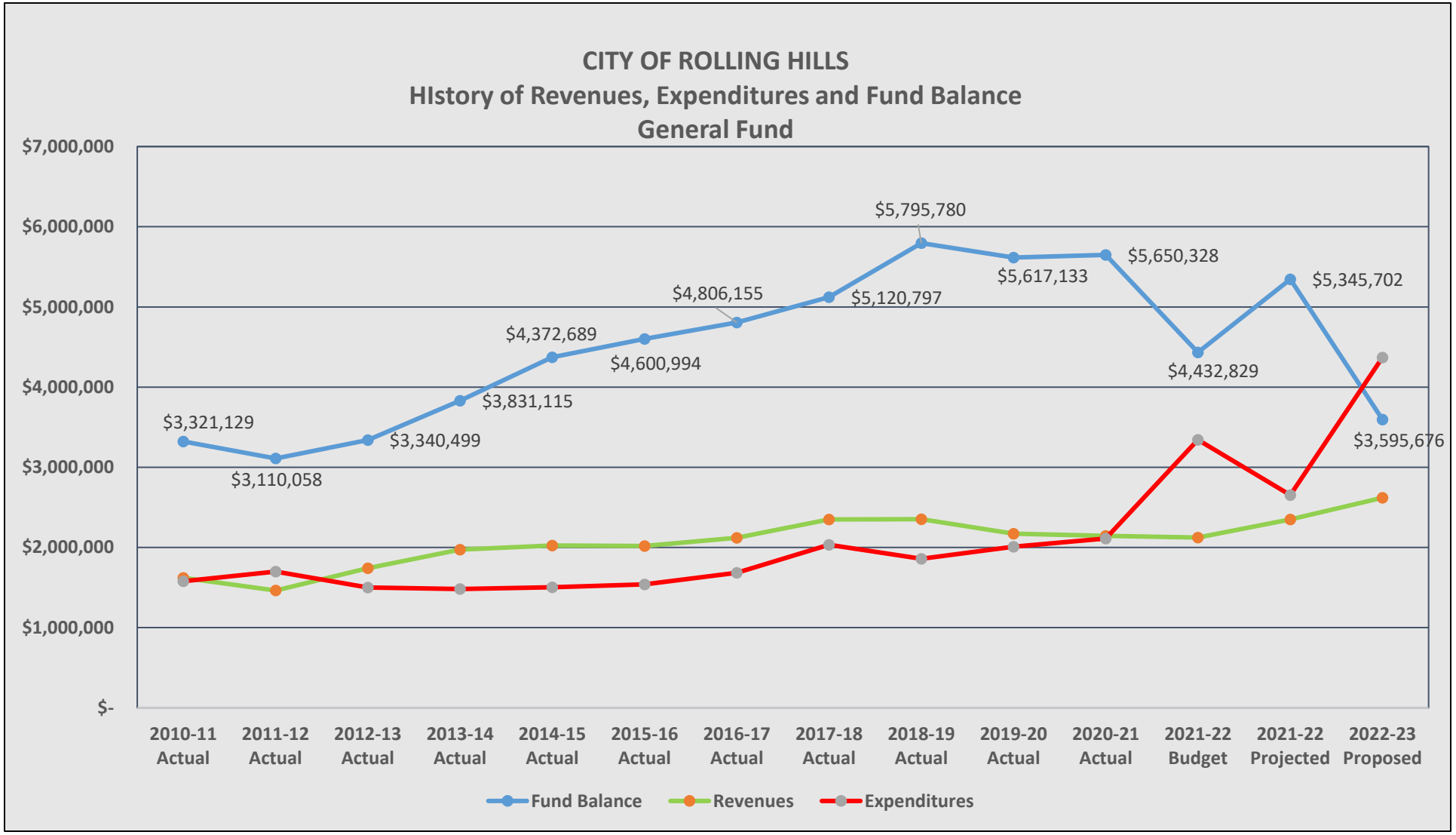
Department/Object Account	FY 2021-22 Adopted Budget	FY 2021-22 Year-End Projections	FY 2022-23 Recommended Presented to FAB - May 9	FY 2022-23 Recommended Revised - Version 2 Ongoing	FY 2022-23 Recommended Revised - Version 2 One-Time	FY 2022-23 Recommended Revised - Version 2 Total
950 Capital Outlay	26,400	-	-	-	-	-
Total Planning & Development	**1,060,690**	**824,891**	**1,198,872**	**879,069**	**150,000**	**1,029,269**
25 - Public Safety						
830 Law Enforcement	220,380	181,251	225,000	225,000	-	225,000
833 Other Law Enforcement Expenses	3,000	3,651	4,000	4,000	-	4,000
837 Wild Life Mgmt & Pest Control	50,000	1,883	10,000	10,000	-	10,000
838 Animal Control Expense	6,000	4,398	6,000	6,000	-	6,000
Total Public Safety	**279,380**	**191,183**	**245,000**	**245,000**	**-**	**245,000**
65 - NON-DEPARTMENTAL						
895 Insurance & Bond Expense	30,260	21,816	25,000	29,657	-	29,657
901 South Bay Comm. Organization	20,100	4,017	15,000	15,000	-	15,000
915 Community Recognition	16,000	5,624	20,000	20,000	-	20,000
916 Civil Defense Expense	650	-	-	-	-	-
917 Emergency Preparedness	137,360	195,894	218,845	188,200	-	188,200
985 Contingency	25,000	-	-	-	-	-
Total Non-Departmental	**229,370**	**227,351**	**278,845**	**252,857**	**-**	**252,857**
75 - CITY PROPERTIES						
925 Utilities	33,810	35,493	85,212	85,212	-	85,212
930 Repairs & Maintenance	36,963	26,793	35,000	35,000	-	35,000
932 Area Landscaping	28,500	12,760	25,000	12,500	-	12,500
XXX Capital Outlay - Buildings & Equip	250,000	-	-	-	-	-
XXX IT Services	-	-	50,000	54,000	8,866	62,866
XXX Granicus Services	-	-	30,000	8,000	19,400	27,400
XXX Computer Hardware Fund	-	-	5,000	5,000	-	5,000
Total City Properties	**349,273**	**75,046**	**230,212**	**199,712**	**28,266**	**227,978**
TOTALS BEFORE TRANSFERS	**3,084,599**	**2,397,113**	**3,137,956**	**2,711,773**	**285,266**	**2,997,639**
OPERATING TRANSFERS OUT						
699 Traffic Safety Fund	10,000	10,000	5,000	-	5,000	5,000
Capital Improvement Fund	88,000	88,000	1,096,000	-	1,096,000	1,096,000

CITY OF ROLLING HILLS
General Fund
Projected FY 2021-22 and Recommended FY 2022-23 Expenditures

Department/Object Account	FY 2021-22 Adopted Budget	FY 2021-22 Year-End Projections	FY 2022-23 Recommended Presented to FAB - May 9	FY 2022-23 Recommended Revised - Version 2 Ongoing	FY 2022-23 Recommended Revised - Version 2 One-Time	FY 2022-23 Recommended Revised - Version 2 Total
Refuse Collection Fund	159,200	159,200	168,500	168,500	-	168,500
Total Transfers Out	**257,200**	**257,200**	**1,269,500**	**168,500**	**1,101,000**	**1,269,500**
GENERAL FUND TOTALS	**$ 3,341,799**	**$ 2,654,313**	**$ 4,407,456**	**$ 2,880,273**	**$ 1,386,266**	**$ 4,267,139**

CITY OF ROLLING HILLS
Summary of Proposed One-Time vs Ongoing Revenues and Expenditures
GENERAL FUND

	FY 2022-23 Recommended
ONGOING	
Operating Revenues - Ongoing	$ 2,399,289
Operating Expenditures - Ongoing	2,880,273
Net Operating Surplus (Deficit)	(480,984)
ONE-TIME	
One-time Revenues	
ARPA Grant	220,682
One-Time Costs	
Operating Expenditures	290,266
Capital Improvements	1,096,000
	1,386,266
Net Use of Reserves for One-Time Costs	(1,165,584)
TOTAL USE OF RESERVES	$ (1,646,568)


CITY OF ROLLING HILLS
HIstory of Revenues, Expenditures and Fund Balance
General Fund
$7,000,000
$6,000,000
$5,000,000
$4,000,000
$3,000,000
$2,000,000
$1,000,000
$-
$3,321,129
$3,110,058
$3,340,499
$3,831,115
$4,372,689
$4,600,994
$4,806,155
$5,120,797
$5,795,780
$5,617,133
$5,650,328
$4,432,829
$5,345,702
$3,595,676
2010-11 Actual
2011-12 Actual
2012-13 Actual
2013-14 Actual
2014-15 Actual
2015-16 Actual
2016-17 Actual
2017-18 Actual
2018-19 Actual
2019-20 Actual
2020-21 Actual
2021-22 Budget
2021-22 Projected
2022-23 Proposed
Fund Balance
Revenues
Expenditures

CITY OF ROLLING HILLS
Schedule of Proposed Options for Balancing the General Fund Ongoing Budget
Fiscal Year 2022-23

	Description	Amount	Impact
1	Eliminate funding of contracted part-time Code Enforcement services	$87,880	Workload will be spread among the current positions, prolonging the processing of cases, reducing productivity on all other positions, and reducing the overall service level to residents.
2	Delay fire fuel abatement in the Preserve slated for FY 22-23 to future years when projected revenue is more aligned with projected expenditures.	$82,000	Not leverage the fire fuel abatement work performed to date and will not diminish risk of wildfires originating from the Preserve.
3	Reduce support for the Block Captain Program	$25,000	Constrain Block Captain Program initiatives such as educational programs for community, support for zone meetings, and community emergency prepardness events.
4	Reinstate building permit multiplier to 2.5% pre FY18-19 level. Multiplier was reduced to 2.25% commencing in FY 2018-2019.	$20,000 - $75,000	Financial burden on development applicants. Revenue level depends on the level of building activities.
5	Cost recover publication expenses associated with development projects.	$15,000	Financial burden on development applicants.
6	Cost recover staff time on processing development applications.	$30,000 - $50,000	Financial burden on development applicants. Could deter development activities and or improve submittal quality and ultimately improve efficiency on the developers' activities.
7	Use of one-time ARPA revenues	$220,682	No impact
8	Eliminate funding for Community Recognition	$20,000	Eliminate holiday open house, and appreciation lunch for volunteers. There would be no community events sponsored by the city. Lost opportunity for city officials to engage the community socially.
9	Eliminate Repairs & Maint	$35,000	Deferr repairs needed at City Hall and the campus. Lost of functionality, and heavier financial burden from anticipated increases in improvement cost over time.
10	Fund deficit using reserves	As needed	Short term solution, reducing rainy day fund.
11	Defer capital improvements	As Needed	Liability associated with deferred maintenance and heavier financial burden from anticipated increases in improvement costs over time.
	Total	$535,562 - $610,562	
	Ongoing Budget Deficit	$480,984	

CITY OF ROLLING HILLS
Fiscal Year 2022 Projections and FY 2023 Recommended Budget

	FY 2021 Actuals	Adopted Budget	Amended Budget	Actuals Thru 03/31/22	FY 2022 Year-End Projection	FY 2023 Recomm'd
10 - COPS FUND						
Revenues						
570 COPS Allocation	$ 156,727	$ 160,000	$ 160,000	$ 163,403	$ 165,000	$ 165,000
670 Interest Earned	147	-	-	-	-	-
	156,874	160,000	160,000	163,403	165,000	165,000
Expenditures						
840 COPS Program Expenditures	176,180	160,000	160,000	104,914	179,852	165,000
Revenues Over (Under) Expenditures	$ (19,453)	$ -	$ -	$ 58,489	$ (14,852)	$ -
11 - CLEEP FUND						
Revenues						
670 Interest Earned	$ 27	$ 50	$ 50	$ -	$ 1,100	$ 2,000
Expenditures						
840 CLEEP Technology Program	-	1,100	1,100	2,000	1,100	2,000
Revenues Over (Under) Expenditures	$ 27	$ (1,050)	$ (1,050)	$ (2,000)	$ -	$ -
13 - TRAFFIC SAFETY FUND						
Revenues						
699 Transfers In - General Fund	$ 5,460	$ 10,000	$ 10,000	$ -	$ 4,390	$ 5,000
Expenditures						
927 Road Striping - Delineators	5,460	10,000	10,000	4,390	4,390	5,000
Revenues Over (Under) Expenditures	$ -	$ -	$ -	$ (4,390)	$ -	$ -
15 - ARPA FUND						
586 American Rescue Plan Act	$ -	$ -		$ 220,682	$ 220,682	$ 220,682
16 - CAL OES FUND						

	FY 2021 Actuals	Adopted Budget	Amended Budget	Actuals Thru 03/31/22	FY 2022 Year-End Projection	FY 2023 Recomm'd
Revenues						
588 Crest Road FEMA Grant - 4434-526-112R	$ -	$ -	$ 1,145,487	$ -	$ 75,000	$ -
590 Vegetation Management FEMA Grant - HMGP-4382-175-13R	-	-	242,625	-	75,000	-
591 Eastfield Undergrounding FEMA Grant - DR-4382-177-7R-CA	-	-	1,971,882	-	-	-
589 Safety Element Disaster Grants - DR 4344 PL0521	-	-	-	13,040	13,040	-
699 Transfers In - Utility Fund - 4434-526-112R	-	-	381,819	-	25,000	-
699 Transfers In - Utility Fund - DR4382-177-7R	-	-	657,294	-	-	-
699 Transfers In - General Fund	-	-	80,875	-	25,000	-
Total Revenues	-	-	4,479,982	13,040	213,040	-
Expenditures						
957 Crest Road East Project - 4434-526-112R	-	-	1,527,306	-	100,000	-
959 Veg. Mgmt Mitig. Proj. - HMGP-4382-175-13R	-	-	323,500	99,787	100,000	-
960 Eastfield Drive Utility U.G. - 4382-177-7R	-	-	2,629,176	-	-	-
958 Safety Element DR4344-PL0521	-	-	-	11,258	11,258	-
Total Expenditures	-	-	4,479,982	111,045	211,258	-
Revenues Over (Under) Expenditures	$ -	$ -		$ (98,005)	$ 1,782	$ -
25 - PROPOSITION A FUND						
Revenues						
500 Grant Revenues	$ 38,067	$ 38,000	$ 38,000	$ 35,462	$ 47,283	$ 45,000
670 Interest Earned	165	600	600	-	200	200
Total Revenues	38,232	38,600	38,600	35,462	47,483	45,200
Expenditures						
905 Prop A Exchange	84,000	-	-	-		45,200
Revenues Over (Under) Expenditures	$ (45,768)	$ 38,600	$ 38,600	$ 35,462	$ 47,483	$ -
26 - PROPOSITION C						
Revenues						
501 Grant Revenue-Prop C	$ 31,575	$ 31,500	$ 31,500	$ 29,416	$ 39,221	$ 37,000
670 Interest Earned	125	650	650	-	200	200
Total Revenues	31,700	32,150	32,150	29,416	39,421	37,200
Expenditures						
906 Prop C Gifted	65,000	-	-	-	-	-
Revenues Over (Under) Expenditures	$ (33,300)	$ 32,150	$ 32,150	$ 29,416	$ 39,421	$ 37,200
27- MEASURE R TRANSIT						
Revenues						

	FY 2021 Actuals	Adopted Budget	Amended Budget	Actuals Thru 03/31/22	FY 2022 Year-End Projection	FY 2023 Recomm'd
502 Measure R Grant Revenues	$ 23,714	$ 24,000	$ 24,000	$ 22,061	$ 29,414	$ 28,000
670 Interest Earned	206	1,000	1,000	-	200	200
Total Revenues	23,920	25,000	25,000	22,061	29,614	28,200
Expenditures						
907 Measure R Gifted	-	-	-	-	-	-
Revenues Over (Under) Expenditures	$ 23,920	$ 25,000	$ 25,000	$ 22,061	$ 29,614	$ 28,200
29 - MEASURE M						
Revenues						
507 Measure M Local Return	$ 26,869	$ 26,500	$ 26,500	$ 24,966	$ 33,288	$ 31,000
670 Interest Earned	167	1,100	1,100	-	200	200
Total Revenues	27,036	27,600	27,600	24,966	33,488	31,200
Expenditures						
909 Measure M Gifted	-	-	-	-		
Revenues Over (Under) Expenditures	$ 27,036	$ 27,600	$ 27,600	$ 24,966	$ 33,488	$ 31,200
30 - MEASURE W						
Revenues						
508 Grant Revenues	$ 103,577	$ 110,000	$ 110,000	$ 104,742	$ 104,742	$ 105,000
670 Interest Earned	-	900	900			-
Total Revenues	103,577	110,900	110,900	104,742	104,742	105,000
Expenditures						
907 Storm Water Management	-	38,750	38,750	2,926	50,000	80,000
Revenues Over (Under) Expenditures	$ 103,577	$ 72,150	$ 72,150	$ 101,817	$ 54,742	$ 25,000
35 - MEASURE A						
Revenues						
502 Grant Revenue	$ -	$ 26,100	$ 26,100	$ -	$ -	$ -
670 Interest Earned	-	900	900	-	-	-
Total Revenues	$ -	$ 27,000	$ 27,000	$ -	$ -	$ -
40 - CAPITAL PROJECTS FUND						
Revenues						
699 Transfers from General Fund	$ -	$ 88,000	$ 121,235	$ -	$ 88,000	$ 1,096,000
Expenditures						

	FY 2021 Actuals	Adopted Budget	Amended Budget	Actuals Thru 03/31/22	FY 2022 Year-End Projection	FY 2023 Recomm'd
890 Consulting Fees	800	-	-	-	-	96,000
XXX 1 Middleridge Lane South Storm Drain	-	-	33,235	32,616	75,000	-
947 Non-Building Improvements	-	300,000	300,000	-	-	-
948 City Hall Improvements	33,561	-	-	13,673	13,673	1,000,000
Total Expenditures	34,361	300,000	333,235	46,289	88,673	1,096,000
Revenues Over (Under) Expenditures	$ (34,361)	$ (212,000)	$ (212,000)	$ (46,289)	$ (673)	$ -
41- UTILITY FUND						
Revenues						
550 Rule 20A Power Utility Grant Project	$ -	$ 763,638	$ -	$ -		$ -
Expenditures						
803 Legal & Other Outside Counsel	-	-	-	1,452	-	
883 Sewer Feasibility Study	2,560	-	-	-	-	
886 Underground Utility Project	4,560	763,638	-	-	-	
887 Sewer Feasibility Project	41,585	-	-	40,321	40,321	
999 Transfers Out - Cal OES Fund	-	-	1,039,113	-	25,000	-
Total Expenditures	48,705	763,638	1,039,113	41,773	65,321	-
Revenues Over (Under) Expenditures	$ (48,705)	$ -	$ (1,039,113)	$ (41,773)	$ (65,321)	$ -
50 - REFUSE FUND						
Revenues						
441 Construction & Demo Permits	$ 31,450	$ 24,000	$ 24,000	$ 11,550	$ 15,400	$ 20,000
665 Service Charges	753,500	753,500	753,500	565,128	753,504	780,000
618 Transfers In - General Fund	68,706	159,200	159,200	-	159,200	168,500
Total Revenues	853,656	936,700	936,700	576,678	928,104	968,500
Expenditures						
776 Misc Expense	3,918	-	-	-	-	
815 Refuse Service Contract	886,143	912,700	912,700	684,522	912,700	944,500
999 Transfers Out	24,000	24,000	24,000	18,000	24,000	24,000
Total Expenditures	914,061	936,700	936,700	702,522	936,700	968,500
Revenues Over (Under) Expenditures	$ (60,405)	$ -	$ -	$ (125,844)	$ (8,596)	$ -

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 12.A
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH, CITY CLERK / EXECUTIVE ASSISTANT TO CITY MANAGER**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **PRESENTATION OF EDUCATIONAL VIDEOS ON FIRE FUEL MANAGEMENT IN THE CANYON; RECOGNIZE LEAD BLOCK CAPTAIN GENE HONBO, BLOCK CAPTAIN DEBRA SHRADER, AND LOS ANGELES COUNTY FIRE DEPARTMENT FORESTRY DIVISION TREVOR MOORE FOR THEIR LEADERSHIP IN COMPLETING THE PROJECT; AND DIRECT STAFF TO DISSEMINATE THE VIDEOS THROUGH THE BLOCK CAPTAIN PROGRAM.**

DATE: **May 23, 2022**

BACKGROUND:
At the City Council meeting on October 25, 2021, lead Block Captain Gene Honbo received approval of his storyboards depicting new educational videos for the Rolling Hills community on "Fuel Load Management in the Canyons." The city engaged WorldWise Productions, who had previously produced the Home Hardening Videos, to do three days of video shoots including local canyon and property footage. Deputy Forrester Trevor Moore of the Los Angeles County Fire Department was involved in the videos and together with the Forestry Division, provided support on the content.

The videos have been vetted by the Block Captains, approved at the highest level of the Los Angeles County Fire Department and are ready for official presentation to the City Council and subsequent distribution to the community via the City Website https://www.rolling-hills.org

The six video series takes residents through an easy to follow education on how to identify and cure potential fire fuel issues on their properties and in the canyons covering the following topics:

1. Introduction to Canyon Management
2. Fire Risks
3. Creating Fire Safe Canyons
4. Techniques to Follow
5. Environmental Concerns

6. Canyon Management Overview

DISCUSSION:
The production of the educational videos is a part of the Block Captain Program's initiative to educate the community on best practices to mitigate wildfire risks.

In 2021, the Hardening the Home educational videos were well received by the community as informative and easy to understand. Anecdotally, the Hardening the Home educational videos sparked actions in the community with reports to City Hall noting many have made improvements as outlined in the videos.

A similar effort is intended with fire fuel management best practices for the canyons to further reduce wildfire risks. To repeat the model of the Hardening the Home effort, the City Council allocated budget and engaged the services of Wildland Res Management to provide private property complimentary inspections by fire experts on vegetation management measures for properties with canyons. As with the Hardening the Home complimentary inspections by Los Angeles County Fire Department Trevor Moore, the complimentary inspections by Wildland Res Management are recommendations and not enforceable by any agency.

The educational videos on fire fuel management in the canyons will be available on the City's website. Staff recommends that the City Council roll out the educational videos through the Block Captain Program.

Spearheading the education video series are Lead Block Captain Gene Honbo, Block Captain Debra Shrader and Los Angeles County Fire Department Deputy Forester Trevor Moore. These individuals donated, and dedicated their time and expertise to completing the project. The City thanks the leaders of this project for their generous offering, their expertise, and community minded efforts in keeping Rolling Hills prepared.

FISCAL IMPACT:
The production of the educational videos cost $25,000 funded with the budget allocated in the Emergency Preparedness account.

RECOMMENDATION:
Approve as presented.

ATTACHMENTS:

Agenda Item No.: 12.B
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **JOHN SIGNO, DIRECTOR OF PLANNING & COMMUNITY SERVICES**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **APPROVE AMENDED PROFESSIONAL SERVICES AGREEMENT WITH CHAMBERS GROUP TO PREPARE A CEQA DOCUMENT FOR THE 6TH CYCLE HOUSING ELEMENT TO ADDRESS COMMENTS FROM THE DEPARTMENT OF FISH AND WILDLIFE**

DATE: **May 23, 2022**

BACKGROUND:

On November 22, 2021, the City Council approved an agreement with Chambers Group to provide environmental consulting services for the City's 6th Cycle Housing Element and Safety Element update. Chambers Group was selected as the environmental consultant to assist the City with preparation of the environmental document for adoption of the City's updated Housing and Safety elements because of the firm's high level of experience and expertise.

The City had initially planned a single environmental document covering the Housing Element and Safety Element, but this was bifurcated at the time the Safety Element was adopted in March 28, 2022, due to comments received from an agency to include mitigation measures that address potential housing development described in the Housing Element. Chambers Group will be preparing an environmental document for the Housing Element that will consider mitigation measures to address the concerns. Specifically, the concerns involved the potential impacts of housing to be developed on vacant lots. As such, Chambers Group will do a reconnaissance level biological survey/report on the vacant lots to be included in the environmental document. Once completed, the environmental document will be circulated for public review and brought to the Planning Commission and City Council at the same time as the Housing Element.

DISCUSSION:

At the direction of the City Council, a mitigated negative declaration (MND) is being prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines that includes mitigation measures to address potentially significant impacts on biological resources. Much of the MND will be based on the environmental document prepared before the original document was bifurcated, however, Chambers Group will be refining the entire document as it pertains

to development of housing. Chambers Group is currently preparing the proposal which will be delivered to the Council at the meeting. An amendment to the agreement will also be brought to Council for consideration.

FISCAL IMPACT:
If approved, the City will fund the amended agreement with Chambers Group from the General Fund reserves. The estimated amount is $50,000. Staff's recommendation includes a 20% contingency up to $60,000.

RECOMMENDATION:
Authorize the preparation of a contract amendment approved to form by the City Attorney in a not to exceed amount of $60,000; and authorize the City Manager to execute such an agreement.

ATTACHMENTS:
Agreement for Planning Services - Chambers-EXECUTED.pdf

AGREEMENT FOR PROFESSIONAL SERVICES

PLANNING SERVICES

This Agreement is made and entered into by and between the City of Rolling Hills (hereinafter referred to as the "City"), and Chambers Group, Inc., a California Corporation (hereinafter referred to as "Consultant").

RECITALS

A. The City does not have the personnel able and available to perform the services required under this Agreement.

B. The City desires to contract for consulting services for certain projects relating to planning.

C. The Consultant warrants to the City that it has the qualifications, experience, and facilities to perform properly and timely the services under this Agreement.

NOW, THEREFORE, the City and the Consultant agree as follows:

1.0 SCOPE OF THE CONSULTANT'S SERVICES. The Consultant agrees to provide the services and perform the tasks set forth in the Scope of Work, attached to and made part of this Agreement as Exhibit A, except that, to the extent that any provision in Exhibit A conflicts with this Agreement, the provisions of this Agreement shall govern. The Scope of Work may be amended from time to time in writing and signed by both parties by way of written amendment to this Agreement.

2.0 TERM OF AGREEMENT. This Agreement will become effective upon execution by both parties and will remain in effect for a period of one year from said date unless otherwise expressly extended and agreed to by both parties or terminated by either party as provided herein.

3.0 CITY AGENT. The City Manager, or her designee, for the purposes of this Agreement, is the agent for the City; whenever approval or authorization is required, Consultant understands that the City Manager, or her designee, has the authority to provide that approval or authorization.

4.0 COMPENSATION FOR SERVICES. The City shall pay the Consultant for its professional services rendered and costs incurred pursuant to this Agreement in accordance with Exhibit B, the Scope of Work's fee and cost schedule for the services attached to and made part of this Agreement subject to a do not exceed amount in the amount of $45,493.62. No additional compensation shall be paid for any other expenses incurred, unless first approved by the City Manager, or her designee.

4.1 The Consultant shall submit to the City, by no later than the 10th day of each month, its bill for services itemizing the fees and costs incurred during the previous month. The City shall pay the Consultant all uncontested amounts set forth in the Consultant's bill within 30 days after it is received.

5.0 CONFLICT OF INTEREST. The Consultant represents that it presently has no interest and shall not acquire any interest, direct or indirect, in any real property located in the City which may be affected by the services to be performed by the Consultant under this Agreement. The Consultant further represents that in performance of this Agreement, no person having any such interest shall be employed by it.

5.1 The Consultant represents that no City employee or official has a material financial interest in the Consultant's business. During the term of this Agreement and as a result of being awarded this contract, the Consultant shall not offer, encourage, or accept any financial interest in the Consultant's business by any City employee or official.

5.2 If a portion of the Consultant's services called for under this Agreement shall ultimately be paid for by reimbursement from and through an agreement with a developer of any land within the City or with a City franchisee, the Consultant warrants that it has not performed any work for such developer/franchisee within the last 12 months, and shall not negotiate, offer, or accept any contract or request to perform services for that identified developer/franchisee during the term of this Agreement.

6.0 TERMINATION. Either the City Manager or the Consultant may terminate this Agreement, without cause, by giving the other party ten (10) days written notice of such termination and the effective date thereof.

6.1 In the event of such termination, all finished or unfinished documents, reports, photographs, films, charts, data, studies, surveys, drawings, models, maps, or other documentation prepared by or in the possession of the Consultant under this Agreement shall be returned to the City. Consultant shall prepare and shall be entitled to receive compensation pursuant to a close-out bill for services rendered in a manner reasonably satisfactory to the City and fees incurred pursuant to this Agreement through the notice of termination.

6.2 If the Consultant or the City fail to fulfill in a timely and proper manner its obligations under this Agreement, or if the Consultant or the City violate any of the covenants, agreements, or stipulations of this Agreement, the Consultant or the City shall have the right to terminate this Agreement by giving written notice to the other party of such termination and specifying the effective date of such termination. The Consultant shall be entitled to receive compensation in accordance with the terms of this Agreement for any work satisfactorily completed hereunder. Notwithstanding the foregoing, the Consultants shall not be relieved of liability for damage sustained by virtue of any breach of this Agreement and any payments due under this Agreement may be withheld to off-set anticipated damages.

7.0 INSURANCE.

7.1 Without limiting Consultant's obligations arising under paragraph 8 - Indemnity, Consultant shall not begin work under this Agreement until it obtains policies of insurance required under this section. The insurance shall cover Consultant, its agents, representatives, and employees in connection with the performance of work under this Agreement, and shall be maintained throughout the term of this Agreement. Insurance coverage shall be as follows:

7.1.1 General Liability Insurance insuring City of Rolling Hills, its elected and appointed officers, agents, and employees from claims for damages for personal injury, including death, as well as from claims for property damage which may arise from Consultant's actions under this Agreement, whether or not done by Consultant or anyone directly or indirectly employed by Consultant. Such insurance shall have a combined single limit of not less than $1,000,000.

7.1.2 Automobile Liability Insurance covering bodily injury and property damage for all activities of the Consultant arising out of or in connection with the work to be performed under this Agreement in an amount of not less than $1,000,000 combined single limit for each occurrence. If Consultant or Consultant's employees will use personal automobiles in any way on this project, Consultant shall obtain evidence of personal automobile liability coverage for each such person.

7.1.3 Worker's Compensation Insurance for all Consultant's employees to the extent required by the State of California. If the Consultant has no employees for the purposes of this Agreement, the Consultant shall sign the "Certificate of Exemption from Workers' Compensation Insurance" which is attached hereto and incorporated herein by reference as "Exhibit B." Consultant shall similarly require all authorized subcontractors pursuant to this Agreement to provide such compensation insurance for their respective employees.

7.1.4 Professional Liability Coverage for professional errors and omissions liability insurance for protection against claims alleging negligent acts, errors, or omissions which may arise from the Consultant's operations under this Agreement, whether such operations are by the Consultant or by its employees, subcontractors, or subconsultants. The amount of this insurance shall not be less than one million dollars ($1,000,000) on a claims-made annual aggregate basis, or a combined single-limit-per-occurrence basis. When coverage is provided on a "claims made basis," Consultant will continue to renew the insurance for a period of three (3) years after this Agreement expires or is terminated. Such insurance will have the same coverage and limits as the policy that was in effect during the term of this Agreement, and will cover Consultant for all claims made by City arising out of any errors or omissions of Consultant, or its officers, employees, or agents during the time this Agreement was in effect.

7.2 Deductibility Limits for policies referred to in subparagraphs 7.1.1 and 7.1.2 shall not exceed $5,000 per occurrence.

7.3 Additional Insured. City of Rolling Hills, its elected and appointed officers, agents, and employees shall be named as additional insureds on policies referred to in subparagraphs 7.1.1 and 7.1.2.

7.4 Primary Insurance. The insurance required in subparagraphs 7.1.1 and 7.1.2 shall be primary and not excess coverage.

7.5 Evidence of Insurance. Consultant shall furnish City, prior to the execution of this Agreement satisfactory evidence of the insurance required issued by an insurer authorized to do business in California, and an endorsement to each such policy of insurance evidencing that each carrier is required to give City at least 30 days prior written notice of the cancellation of any policy during the effective period of the Agreement. All required insurance policies are subject to approval of the City Attorney. Failure on the part of Consultant to procure or maintain said insurance in full force and effect shall constitute a material breach of this Agreement or procure or renew such insurance, and pay any premiums therefore at Consultant's expense.

8.0 INDEMNIFICATION. Consultant shall indemnify, defend with counsel approved by City, and hold harmless City, its officers, officials, employees and volunteers from and against all liability, loss, damage, expense, cost (including without limitation reasonable attorneys fees, expert fees and all other costs and fees of litigation) of every nature arising out of or in connection with Consultant's negligent or willful misconduct during performance of work hereunder or its failure to comply with any of its obligations contained in this Agreement, regardless of City's passive negligence, but excepting such loss or damage which is caused by the sole active negligence or willful misconduct of the City. Should City in its sole discretion find Consultant's legal counsel unacceptable, then Consultant shall reimburse the City its costs of defense, including without limitation reasonable attorneys fees, expert fees and all other costs and fees of litigation. The Consultant shall promptly pay any final judgment rendered against the City (and its officers, officials, employees and volunteers) covered by this indemnity obligation. It is expressly understood and agreed that the foregoing provisions are intended to be as broad and inclusive as is permitted by the law of the State of California and will survive termination of this Agreement.

9.0 GENERAL TERMS AND CONDITIONS.

9.1 Non-Assignability. The Consultant shall not assign or transfer any interest in this Agreement without the express prior written consent of the City.

9.2 Non-Discrimination. The Consultant shall not discriminate as to race, creed, gender, color, national origin or sexual orientation in the performance of its services and duties pursuant to this Agreement, and will comply with all applicable laws, ordinances and codes of the federal, state, county and city governments.

9.3 Compliance with Applicable Law. The Consultant and the City shall comply with all applicable laws, ordinances and codes of the federal, state, county and city governments.

9.4 Independent Contractor. This Agreement is by and between the City and the Consultant and is not intended, and shall not be construed, to create the relationship of agency, servant, employee, partnership, joint venture or association, as between the City and the Consultant.

9.4.1 The Consultant shall be an independent contractor, and shall have no power to incur any debt or obligation for or on behalf of the City. Neither the City nor any of its officers or employees shall have any control over the conduct of the Consultant, or any of the Consultant's employees, except as herein set forth, and the Consultant expressly warrants not to, at any time or in any manner, represent that it, or any of its agents, servants, or employees are in any manner employees of the City, it being distinctly understood that the Consultant is and shall at all times remain to the City a wholly independent contractor and the Consultant's obligations to the City are solely such as are prescribed by this Agreement. Each Consultant employee shall remain in the fulltime employ of Consultant, and the City shall have no liability for payment to such Consultant employee of any compensation or benefits, including but not limited to workers' compensation coverage, in connection with the performance of duties for the City.

9.5 Copyright. No reports, maps, or other documents produced in whole or in part under this Agreement shall be the subject of an application for copyright by or on behalf of the Consultant.

9.6 Legal Construction.

9.6.1 This Agreement is made and entered into in the State of California and shall in all respects be interpreted, enforced, and governed under the laws of the State of California.

9.6.2 This Agreement shall be construed without regard to the identity of the persons who drafted its various provisions. Each and every provision of this Agreement shall be construed as though each of the parties participated equally in the drafting of same, and any rule of construction that a document is to be construed against the drafting party shall not be applicable to this Agreement.

9.6.3 The article and section, captions and headings herein have been inserted for convenience only and shall not be considered or referred to in resolving questions or interpretation or construction.

9.6.4 Whenever in this Agreement the context may so require, the masculine gender shall be deemed to refer to and include the feminine and neuter, and the

singular shall refer to and include the plural.

9.7 Counterparts. This Agreement may be executed in counterparts and as so executed shall constitute an agreement which shall be binding upon all parties hereto.

9.8 Final Payment Acceptance Constitutes Release. The acceptance by the Consultant of the final payment made under this Agreement shall operate as and be a release of the City from all claims and liabilities for compensation to the Consultant for anything done, furnished or relating to the Consultant's work or services. Acceptance of payment shall be any negotiation of the City's check or the failure to make a written extra compensation claim within ten (10) calendar days of the receipt of that check. However, approval or payment by the City shall not constitute, nor be deemed, a release of the responsibility and liability of the Consultant, its employees, sub-consultants, and agents for the accuracy and competency of the information provided or work performed; nor shall such approval or payment be deemed to be an assumption of such responsibility or liability by the City for any defect or error in the work prepared by the Consultant, its employees, sub-consultants, and agents.

9.9 Corrections. In addition to the above indemnification obligations, the Consultant shall correct, at its expense, all errors in the work which may be disclosed during the City's review of the Consultant's report or plans. Should the Consultant fail to make such correction in a reasonably timely manner, such correction shall be made by the City, and the cost thereof shall be charged to the Consultant.

9.10 Files. All files of the Consultant pertaining to the City shall be and remain the property of the City. The Consultant will control the physical location of such files during the term of this Agreement and shall provide City with the files upon termination of the Agreement. Consultant will be entitled to retain copies of such files upon termination of this Agreement in accordance with law.

9.11 Waiver; Remedies Cumulative. Failure by a party to insist upon the performance of any of the provisions of this Agreement by the other party, irrespective of the length of time for which such failure continues, shall not constitute a waiver of such party's right to demand compliance by such other party in the future. No waiver by a party of a default or breach of the other party shall be effective or binding upon such party unless made in writing by such party, and no such waiver shall be implied from any omissions by a party to take any action with respect to such default or breach. No express written waiver of a specified default or breach shall affect any other default or breach, or cover any other period of time, other than any default or breach or period of time specified. All of the remedies permitted or available to a party under this Agreement, or at law or in equity, shall be cumulative and alternative, and invocation of any such right or remedy shall not constitute a waiver or election of remedies with respect to any other permitted or available right of remedy.

9.12 Mitigation of Damages. In all such situations arising out of this Agreement, the parties shall attempt to avoid and minimize the damages resulting from

the conduct of the other party.

9.13 Partial Invalidity. If any provision in this Agreement is held by a court of competent jurisdiction to be invalid, void or unenforceable, the remaining provisions will nevertheless continue in full force without being impaired or invalidated in any way.

9.14 Attorneys' Fees. The parties hereto acknowledge and agree that each will bear his/her or its own costs, expenses, and attorneys' fees arising out of and/or connected with the negotiation, drafting and execution of the Agreement, and all matters arising out of or connected therewith except that, in the event any action is brought by any party hereto to enforce this Agreement, the prevailing party in such action shall be entitled to reasonable attorneys' fees and costs in addition to all other relief to which that party or those parties may be entitled.

9.15 Entire Agreement. This Agreement constitutes the whole agreement between the City and the Consultant, and neither party has made any representations to the other except as expressly contained herein. Neither party, in executing or performing this Agreement, is relying upon any statement or information not contained in this Agreement. Any changes or modifications to this Agreement must be made in writing appropriately executed by both the City and the Consultant.

9.16 Warranty of Authorized Signatories. Each of the signatories hereto warrants and represents that he or she is competent and authorized to enter into this Agreement on behalf of the party for whom he or she purports to sign.

10.0 NOTICES. Any notice required to be given hereunder shall be deemed to have been given by depositing said notice in the United States mail, postage prepaid, and addressed as follows:

CITY:
Elaine Jeng, P.E.,
City Manager
2 Portuguese Bend Road
Rolling Hills, CA 90274
TEL (310) 377-1521
FAX (310) 377-2866

CONSULTANT:
Victoria Boyd
Project Manager
5 Hutton Centre Drive, Suite 750
Santa Ana, CA 92707
TEL (949) 261-5414 ext. 7220

11.0. DISCLOSURE REQUIRED. (City and Consultant initials required at 11.1)

11.1 Disclosure Required. By their respective initials next to this paragraph, City and Consultant hereby acknowledge that Consultant is a "consultant" for the purposes of the California Political Reform Act because Consultant's duties would require him or her to make one or more of the governmental decisions set forth in Fair Political Practices Commission Regulation 18700.3(a) or otherwise serves in a staff capacity for which disclosure would otherwise be required were Consultant employed by the City. Consultant hereby acknowledges his or her assuming-office, annual, and

leaving-office financial reporting obligations under the California Political Reform Act and the City's Conflict of Interest Code and agrees to comply with those obligations at his or her expense. Prior to consultant commencing services hereunder, the City's Manager shall prepare and deliver to consultant a memorandum detailing the extent of Consultant's disclosure obligations in accordance with the City's Conflict of Interest Code.

City Initials EHJ
Consultant Initials

11.2 Disclosure Not Required. By their initials next to this paragraph, City and Consultant hereby acknowledge that Consultant is not a "consultant" for the purpose of the California Political Reform Act because Consultant's duties and responsibilities are not within the scope of the definition of consultant in Fair Political Practice Commission Regulation 18700.3(a) and is otherwise not serving in staff capacity in accordance with the City's Conflict of Interest Code.

City Initials EHJ
Consultant Initials

This Agreement is executed on November 22, 2021, at City of Rolling Hills, California.

CITY OF ROLLING HILLS:

Elaine Jeng, P.E., City Manager

CONSULTANT:

By: Mike McEntee, President

ATTEST:

Christian Horvath, City Clerk

APPROVED AS TO FORM:

Michael Jenkins, City Attorney

EXHIBIT A

SCOPE OF SERVICES

Scope of Work

Project Understanding

The City of Rolling Hills is updating both the General Plan Housing and Safety Elements, and is requesting preparation of an Initial Study/Mitigated Negative Declaration (IS/MND), in order to comply with CEQA for the adoption of the updated elements. It is our understanding that the IS/MND will evaluate policies with no specific projects at this time, however, depending on HCD's ruling, changes to the City Zoning Map may need to be analyzed for compliance with the Regional Housing Needs Assessment (RHNA) allocation. If finalized project information allows for additional technical analysis to boost substantial information in the IS/MND (i.e. specific housing development locations are identified), this can be provided to the City and an additional scope and cost will be prepared.

Housing Element Update

It is our understanding that the City is in the process of updating its 6th cycle Housing Element to cover the 2021-2029 planning cycle. The Housing Element will include the policies, strategies, and actions that the City will undertake to facilitate the construction of new housing and preservation of existing housing to meet the needs of the current and future population. Based on RHNA numbers, the City is required to plan for 45 homes, including 29 affordable to lower income households. It is still unknown exactly how the City will meet its RHNA allocation.

Safety Element Update

It is our understanding that throughout history, the City has dealt with various natural hazards including earthquakes, wildfires, droughts, and land movement. Developments in high landslide areas have occurred and the City has been identified as being located in a "Very High Fire Hazard Severity Zone (VHFHSZ)". As a result, the City has amended its building and safety codes to include special requirements such as fire-rates materials for new construction.

Approach to the Scope of Work

Chambers Group will perform the applicable tasks identified in the Request for Proposal (RFP). Based on our experience with similar types of Projects, we believe that the appropriate CEQA document for the Proposed Project would be a Mitigated Negative Declaration (MND). Chambers Group will commence work on this Proposed Project as soon as we receive written Notice to Proceed (NTP). We will accomplish the scope of work, which consolidates the tasks, as described in the following scope.

Task 1: Project Initiation

Task 1.1: Initial Meeting and Data Acquisition

After receiving NTP, the Chambers Group Project Manager, Victoria Boyd, will be prepared to meet with the City, for a Project Initiation/Kick-Off Meeting via teleconference to discuss the project description, specific project issues, upcoming construction schedules and CEQA schedule; as well as receive any pertinent project information or reports.

Chambers Group will review all available Project-related data and reports provided by the City. Following the review of existing data, any gaps in the data and recommendation for correcting the gaps would be discussed with the City. Chambers Group will work closely with the City to determine what additional data must be collected in support of the CEQA document being prepared. It is assumed that the documents are accurate, and that Chambers Group can use these documents in the environmental analysis of the Project.

Task 1.2: Project Description

Chambers Group will develop a comprehensive description for the Project that will form the basis for the analysis of the potential impacts on the environment, based on the information provided by the City. The Project Description will

include a narrative and graphical presentation of the proposed Project, including components, location and boundaries, regional and vicinity maps, and a statement of the Project goals and objectives.

Deliverables: Meeting notes from the initial meeting. A finalized Project schedule based on items discussed during the initial meeting. One electronic portable document format (PDF) copy and one electronic copy in Microsoft Word format of the Project Description for one round of review by the City.

Task 2: Preparation of the Appropriate CEQA Document and Supporting Technical Studies

Task 2.1: Administrative Draft IS

Utilizing the Project Description completed under Task 1, Chambers Group will prepare an Administrative Draft IS pursuant to the requirements of the Public Resources Code and State CEQA Guidelines. Based on the results of the IS, Chambers Group will prepare an IS Checklist to confirm the preparation of an appropriate CEQA Documentation for the Proposed Project, an MND in this case. The IS will be prepared using the most recent revision of the IS Environmental Checklist Form suggested in the CEQA Guidelines Appendix G.

In compliance with CEQA Section 15063, the IS will contain the following, in brief form:

- A description of the Project, including the location of the Project;
- An identification of the environmental setting;
- A preliminary identification of environmental effects by use of a checklist, matrix, or other method, with some evidence to support the entries; and
- A preliminary discussion of the ways to mitigate the significant effects identified; if any.

The environmental factors outlined in the CEQA checklist include:

Aesthetics	GHG Emissions	Public Services
Agricultural and Forestry Resources	Hazards and Hazardous Materials	Recreation
Air Quality	Hydrology and Water Quality	Transportation
Biological Resources	Land Use and Planning	TCRs
Cultural Resources	Mineral Resources	Utilities and Service Systems
Energy	Noise	Wildfire
Geology and Soils	Population and Housing	Mandatory Findings of Significance

Meetings: This task includes one meeting with City staff to discuss the IS and Chamber Group's recommendation as to the appropriate CEQA document for the Project.

Deliverables: One electronic PDF copy and one electronic copy in Microsoft Word format, and five bound copies of the Administrative Draft IS for one round of review by the City.

Task 2.2: Prepare Administrative Draft MND

If one or more significant impacts are identified during the IS process, including the results from the technical studies, CEQA allows the preparation of an MND when those impacts can be mitigated to a less than significant level.

The following is a list of the required contents of an MND:

- a brief description of the project;
- the location of the project (preferably shown on a map);

- the name of the project proponent;
- a finding that the project will not have a significant effect on the environment;
- mitigation measures included in the project to avoid potentially significant effects; and
- a copy of the IS.

For each CEQA environmental checklist discipline item, the existing environmental setting of the project site and surroundings will be characterized from the existing literature base and a site visit by an environmental analyst. An environmental impacts analysis will be prepared for each checklist entry. Based on CEQA defined significance criteria, Chambers Group will determine the potential for any adverse or significant adverse impacts and present mitigation measures to reduce any such impacts to a level below significance.

Meetings: This task includes participation in up to four check in meetings with City staff to discuss the administrative draft MND.

Deliverables: One electronic PDF copy and one electronic copy in Microsoft Word format, one unbound copy, five bound copies, and 15 compact discs (CDs) of the Administrative Draft MND for one round of review by the City.

Task 3: Tribal Consultation

Task 3.1: Senate Bill 18 (SB 18) Native American Consultation

Senate Bill 18 (SB 18) was signed into law in 2004 and requires City and County governments to consult with California Native American tribes early in the planning process of general plans, specific plans, and amendments to either of these types of planning tools. The intent of the bill was to provide structured and consistent methods for providing Native American tribes an opportunity to participate in local land use decisions at an early planning stage. Early involvement of the tribes is intended to allow for consideration of cultural places in the land-use planning process. Tribes have 90 days to respond to an SB 18 consultation request. The nature of SB 18 consultation is to ask local tribes to inform an agency where significant cultural areas are located with the intent of protecting them. This type of information is highly confidential to the tribes and their willingness to divulge important data is directly correlated with the relationship the tribe has with the respective City or County. This relationship value also extends to the cultural resources team assisting with the consultation effort. Chambers Group has been working with southern California tribal groups for many years, and has developed positive working relationships with the various tribal groups throughout the area.

Our recommended scope of work includes requesting a search of the sacred lands files at the Native American Heritage Commission (NAHC), preparing notification letters for the City, and keeping detailed information on responses and follow up questions for the tribe. This data will be provided to the City in the form of a Tribal Consultation Memo which will be submitted after the 90-day response window ends. Based on experience working with the City, we anticipate that the NAHC will return a list of contacts with approximately 25 tribal points of contact. Chambers Group will prepare up to 25 SB 18 letters with the expectation that up to three respondents will request conferencing with the City. Chambers Group anticipates the need for setting up to three separate conference calls with tribes, and coordinating the conclusion of consultation through emails. Should any Tribes request a site visit it is assumed that the City will cover this expense and provide the tribe(s) an opportunity to visit the site at their expense. Should the City require further support to meet with the Tribes, or require further calls to conclude consultation, a contract augment may be required.

Task 3.2: Assembly Bill 52 (AB 52) Tribal Consultation

Assembly Bill 52 (AB 52) required an update to Appendix G to include a new category titled "Tribal Cultural Resources" (TRCs). As a Lead Agency the City is required to conduct AB 52 consultation with requesting tribal groups on a government-to-government basis. In support of the City, Chambers Group will prepare and send notification letters to the list of tribes in which the City has identified for notification under AB 52. If a tribal group affirms a request for consultation the lead agency is required to initiate consultation within 30 days of the request. The intent of this legislation is to require agencies to consult early on in a project with Native American Tribes so their information can

be considered from the beginning of an agency's CEQA review. It differs from SB 18 in that AB 52 consultation is required for all projects requiring a CEQA Initial Study rather than projects requiring just specific or general plans, or their amendments. Chambers Group has proven success in consulting with tribes to determine if there are TCRs on-site and coordinating with tribes and lead agencies to develop mitigation measures (when needed) to ensure the project objectives are in accordance with CEQA. Due to the similarities between AB 52 and SB 18 notification processes, efficiencies can be found in preparing combined consultation letters should agency procedures allow. Chambers Group will prepare up to 20 AB 52 letters with the expectation that up to three respondents will request conferencing with the City. Chambers Group anticipates setting up to three separate conference calls with tribes, and coordinating the conclusion of consultation through emails. As it cannot be assured that the same three tribes will request consultation under SB 18 and AB 52, Chambers Group assumes that a combined total of six respondents will request consultation under one or the other legal structures. Should any Tribes request a site visit it is assumed that the City will cover this expense and provide the tribe(s) an opportunity to visit the site at their expense. Should the City require further support to meet with the Tribes, or require further calls to conclude consultation, a contract augment may be required.

Assumptions:

- This proposal includes a request of the NAHC to provide a list of points of contact to request information regarding the proposed Project area under SB 18. The number of contacts assumed in this scope of work is 25 recipients. Additional addressees may require substantial additional time to coordinate, and may require additional fees.
- This proposal includes SB 18 consultation support with requesting tribal groups, and includes time for meeting with City Staff and tribal members in an online forum for up to three respondents. Additional respondents may require substantial additional time to coordinate, and may require additional fees.
- This proposal assumes the City will provide a list of points of contact to request information regarding the proposed Project area under AB 52. The number of contacts assumed in this scope of work is 20 recipients. Additional addressees may require substantial additional time to coordinate, and may require additional fees.
- This proposal includes AB 52 consultation support with requesting tribal groups, and includes time for meeting with City Staff and tribal members in an online forum for up to three respondents. Additional respondents may require substantial additional time to coordinate, and may require additional fees.
- The City will provide Chambers Group with confirmation on the Project footprint at the time of authorization or NTP. It is assumed that this information will not change once Chambers Group has initiated the tasks above.
- This proposal does not include cultural resources testing, data recovery, analysis, monitoring, or similar programs.

Task 4: Draft Appropriate CEQA Document and Corresponding Notices

After receipt of one set of integrated comments on the Administrative Draft MND from the City, Chambers Group will then revise the MND accordingly. Chambers Group will prepare and distribute copies of the Draft MND to the City, State Clearinghouse, County Clerk, and affected public agencies.

For submittal to the State Clearinghouse (Office of Planning and Research [OPR]), Chambers Group will draft a Notice of Intent (NOI), Notice of Completion (NOC), Summary Form, and the MND with associated appendices. Chambers Group can submit these electronically on behalf of the City. The City must approve Chambers Group as a submitter on the OPR CEQANet Web portal. For submittal to the County Clerk, documents will be sent via mail pending the status of public access to County buildings. Chambers Group will prepare the NOI for distribution during the public review to agencies, interested parties, and property owners (if applicable) adjacent to the Project from an approved distribution list confirmed by the City. We assume that the City will provide the list of adjacent property owners to be included in the mailings. We assume up to no more than 40 mailings of the NOI via regular mail to adjacent property owners, agencies, and other interested parties. To comply with the CEQA guidelines, the City must distribute the NOI through at least one of the following methods:

- Publication at least one time in a newspaper of general circulation in the area affected by the Project.
- Posting of the notice on and off-site in the area where the project is located.
- Direct mailing to the owners and occupants of property contiguous to the project.

Fees associated with coordinating and publishing to public newspapers, websites, or posting of a physical notice at the Project will require a change order as these tasks are not included in this scope and associated fees for newspaper postings vary.

Note: AB 52 Tribal Consultation must begin prior to public review.

Deliverables: An electronic PDF copy, one unbound copy, five bound copies, and 15 CDs of the MND with appendices for the City. One electronic copy of the NOC, NOI, and Summary Form for OPR submittal. One NOI to be filed with the County Clerk. Up to 40 NOIs to be sent via regular mail.

Task 5: Responses to Comments and Final CEQA Document

Based upon comments received from public review, responses to the comments will be prepared. A draft of these responses will be provided to the City for review. It is assumed that Chambers Group will coordinate with City to address public comments received and comments will be addressed based on available data. We anticipate no more than 15 comment letters with an average of five comments each (75 comments total) will be received and addressed. The cost estimate for this task is based on the assumption that no new technical analysis will be required in response to the public comments. If more comments than assumed are received or additional analysis will be required to respond to comments, Chambers Group will coordinate with the City to identify comments to be addressed by the Chambers Group team and/or provide these services under a separate scope and fee.

Upon receipt of one complete set of comments from the City on the responses, a Final MND will be prepared. This document combined with the Draft MND will constitute the Final MND to be used by the City when considering approval of the project.

Deliverables: One electronic Microsoft Word copy of the Draft Response to Comments for one round of review by the City. One electronic PDF copy, one unbound, five bound and five CDs with copies of the Final MND with appendices for the City.

Task 6: Mitigation Monitoring and Reporting Program (if required)

Following preparation of the MND, Chambers Group will prepare a Draft Mitigation Monitoring and Reporting Program (MMRP) as required by CEQA for review by the City. The Final MMRP incorporating the City's comments will be incorporated into the Final MND.

Deliverables: One electronic PDF copy and one Microsoft Word copy of the Draft MMRP for one round of review by the City. The Final MMRP will be incorporated into Final MND.

Task 7: Findings and Filings

Notice of Determination (NOD)

The NOD is filed following the City's decision to carry out or approve the project for which the MND has been prepared. Chambers Group will prepare the NOD and will file the NOD with the State Clearinghouse and the County Clerk.

Deliverables: One Microsoft Word copy of the Draft NOD for one round of review by the City. An electronic PDF copy of the NOD for the City. One NOD to be filed with the State Clearinghouse and one with the County Clerk. Up to 40 NODs to be sent via regular mail.

No Effect Determination

Pursuant to Fish and Game Code section 711.4, subdivision (c)(1), all project proponents including public agencies subject to CEQA shall pay a filing fee for each project. The filing fee is waived, however, if the project will have no effect on fish and wildlife. If no effect is determined, a No Effect Determination (NED) Request form is submitted to the California Department of Fish and Wildlife (CDFW).

Chambers Group recommends early communication with CDFW during the CEQA process. Chambers Group has assisted Clients, who believed that their projects would have no effect on fish and wildlife, with contacting CDFW early in the CEQA process in order to allow CDFW sufficient time to review the project and make a determination (usually 30 days). The State Clearinghouse or County Clerk will not accept a NOD filed by any lead agency unless it is accompanied by one of the following: (1) a check with the correct Fish and Wildlife filing fee payment, (2) a receipt or other proof of payment showing previous payment of the filing fee for the same project, or (3) a form documenting the determination that the project will have no effect on fish and wildlife. Chambers Group will assist the City in preparing and submitting the NED form to CDFW for the Proposed Project. If the Project is determined to not qualify for a NED, the City will be responsible for Fish and Game filing fees.

Deliverables: One Microsoft Word copy of the Draft NED for one round of review by the City. One electronic PDF copy of the NED Request and one electronic PDF copy of the Draft MND with appendices.

Task 8: Attendance at Public Hearings

Chambers Group's Technical Advisor, Corinne Lytle Bonine and Project Manager, Victoria Boyd will attend one Planning Commission hearing and one City Council hearing to answer any questions that decision makers have on the Proposed Project's environmental document and impacts analysis. If needed, technical staff may also join in attendance at hearings at an additional cost. This scope assumes that hearings would be no longer than three hours each. Chambers Group may also attend any other additional meetings requested by the City on a time and materials basis.

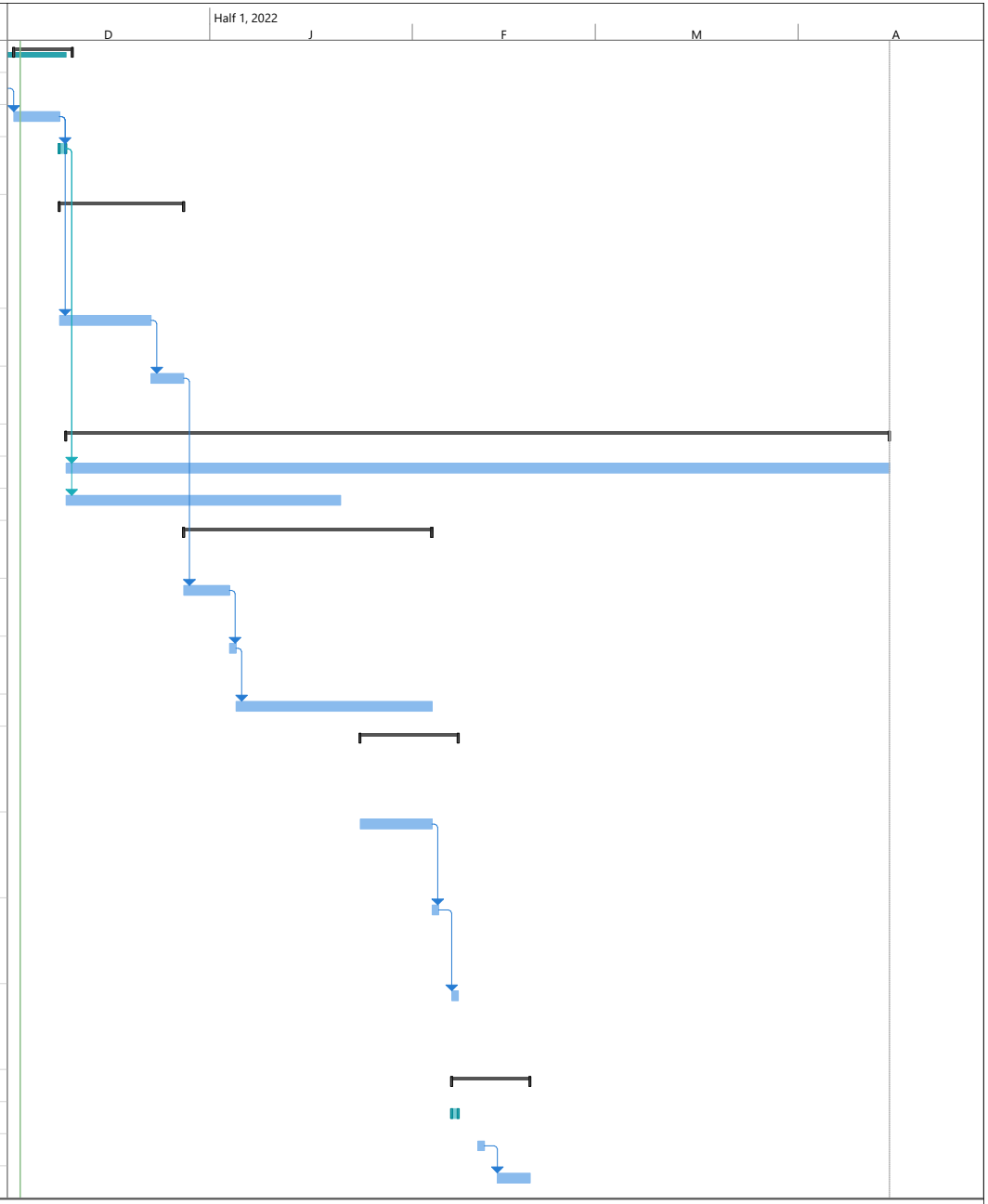
Task 9: Analyze Specific Projects/Zoning Map Changes for Housing Sites (Optional Task)

It is understood that the City may have a need for Chambers Group to analyze specific projects and / or zoning map changes for housing sites, depending on HCD's ruling. However, depending on project type and location, the scope and cost can vary greatly. Therefore, we have provided a range of additional cost analysis that may be required if specific details are provided.

Service	Approximate Cost*
Additional Analysis in IS/MND	$2,000 - $6,000
Air Quality / Greenhouse Gas / Energy Analysis / Noise	$4,000 - $10,000
Biological Survey and Technical Memorandum	$5,000 - $15,000
Cultural Report	$5,000 - $20,000
Traffic Study (VMT Only or LOS Only)	$20,000 - $50,000

*Actual costs will depend on the project features, level of analysis required, required meetings and public hearings, and level of agency coordination required.

ID	Task Name	Duration	Start	Finish	Predecessors
1	**Task 1: Project Initiation**	**7 days**	**Thu 12/2/21**	**Fri 12/10/21**	
2	Initial Meeting	1 day	Wed 12/2/20	Wed 12/2/20	
3	Project Description	1 wk	Thu 12/2/21	Wed 12/8/21	2
4	City Review of Project Description	1 day	Thu 12/9/21	Thu 12/9/21	3
5	**Task 2: Preparation of the Appropriate CEQA Document and Supporting Technical Studies**	**13 days**	**Thu 12/9/21**	**Mon 12/27/21**	
6	Prepare Admin Draft IS/MND	2 wks	Thu 12/9/21	Wed 12/22/21	3
7	City Review of Admin Draft IS/MND	3 days	Thu 12/23/21	Mon 12/27/21	6
8	**Tasks 3: Tribal Consult**	**90 days**	**Fri 12/10/21**	**Thu 4/14/22**	
9	SB 18	90 days	Fri 12/10/21	Thu 4/14/22	4
10	AB 52	30 days	Fri 12/10/21	Thu 1/20/22	4
11	**Task 4: Public Draft IS/MND and Notices**	**28 days**	**Tue 12/28/21**	**Thu 2/3/22**	
12	Prepare Public Draft IS/MND and Notices	1 wk	Tue 12/28/21	Mon 1/3/22	7
13	City Review of Public Draft IS/MND And Notices	1 day	Tue 1/4/22	Tue 1/4/22	12
14	Public Circulation	30 edays	Tue 1/4/22	Thu 2/3/22	13
15	**Task 5: Response to Comments and Final IS/MND**	**11 days**	**Mon 1/24/22**	**Mon 2/7/22**	
16	Prepare Draft Final IS/MND with Response to Comments and MMRP	9 days	Mon 1/24/22	Thu 2/3/22	
17	City Review of Draft Final IS/MND with Response to Comments and MMRP	1 day	Fri 2/4/22	Fri 2/4/22	16
18	Prepare Final MND with Response to Comments and MMRP	1 day	Mon 2/7/22	Mon 2/7/22	17
19	**Task 6: Public Hearings**	**10 days**	**Mon 2/7/22**	**Fri 2/18/22**	
20	Planning Commission	1 day	Mon 2/7/22	Mon 2/7/22	
21	City Council	1 day	Fri 2/11/22	Fri 2/11/22	
22	Prepare and submit NOD	1 wk	Mon 2/14/22	Fri 2/18/22	21



Project: City of Rolling Hills
Date: Fri 12/3/21

Task
Split
Milestone
Summary
Project Summary
Inactive Task
Inactive Milestone
Inactive Summary
Manual Task
Duration-only
Manual Summary Rollup
Manual Summary
Start-only
Finish-only
External Tasks
External Milestone
Deadline
Progress
Manual Progress

EXHIBIT B

FEE AND COST SCHEDULE

Fee Schedule

The services described in each task will be performed on a fixed fee basis. The costs for each task are shown below. A Standard Rate Sheet is provided on the following page.

Task	Fee
Task 1: Project Initiation	$4,024.00
Task 2: Preparation of the Appropriate CEQA Document and Supporting Technical Studies	$8,272.59
Task 3: Tribal Consultation (SB 18 and AB 52)	$6,034.00
Task 4: Draft Appropriate CEQA Document and Corresponding Notices	$5,894.75
Task 5: Responses to Comments and Final CEQA Document	$7,785.00
Task 6: Mitigation Monitoring and Reporting Program (if required)	$2,224.00
Task 7: Findings and Filings	$2,583.50
Task 8: Attendance at Public Hearings	$4,540.00
Task 9: Analyze Specific Projects/Zoning Map Changes for Housing Sites	See Above
Subtotal	*$41,357.84*
Contingency Fee (10%)	$4,135.78
Total without Optional Task	**$45,493.62**

Project Deliverables

Deliverables for each task item including number of copies of documents, number of rounds for review, and notices prepared, are all described above under each respective task item.

Billing Rates

Effective January 2022

STAFF. Charges for all professional, technical, and administrative personnel directly charging time to the project will be calculated and billed on the basis of the following staff category hourly "Billing Rates." Billing Rates include fringe benefits, burden, and fee.

Staff Title	Rate	Staff Title	Rate
Senior Director	$236.00	GIS Technician 4	$158.00
Director	$210.00	GIS Technician 3	$131.00
Project Manager 3	$200.00	GIS Technician 2	$116.00
Project Manager 2	$180.00	GIS Technician 1	$105.00
Project Manager 1	$160.00		
Environmental Planner 7	$197.00	Cultural Resources Specialist 7	$176.00
Environmental Planner 6	$176.00	Cultural Resources Specialist 6	$155.00
Environmental Planner 5	$166.00	Cultural Resources Specialist 5	$145.00
Environmental Planner 4	$145.00	Cultural Resources Specialist 4	$127.00
Environmental Planner 3	$123.00	Cultural Resources Specialist 3	$111.00
Environmental Planner 2	$112.00	Cultural Resources Specialist 2	$100.00
Environmental Planner 1	$101.00	Cultural Resources Specialist 1	$79.00
Biologist/Botanist 7	$197.00	Project Controls Specialist	$100.00
Biologist/Botanist 6	$176.00	Project Assistant/Tech Editor	$89.00
Biologist/Botanist 5	$166.00	Word Processor	$79.00
Biologist/Botanist 4	$145.00	Clerical/Technician	$68.00
Biologist/Botanist 3	$123.00		
Biologist/Botanist 2	$112.00		
Biologist/Botanist 1	$101.00		
Restoration Construction			
Qualified Applicator (QAL)	$105.00		
Foreman	$85.00		
Restoration Laborer/*Prevailing Maintenance Labor*	$47.00		

City of Rolling Hills INCORPORATED JANUARY 24, 1957

Agenda Item No.: 12.C
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **CHRISTIAN HORVATH, CITY CLERK / EXECUTIVE ASSISTANT TO CITY MANAGER**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **ADOPT RESOLUTIONS NOS. 1295 AND 1296 PERTAINING TO A GENERAL MUNICIPAL ELECTION CONSOLIDATED WITH THE STATEWIDE GENERAL ELECTION TO BE HELD ON TUESDAY, NOVEMBER 8, 2022**

DATE: **May 23, 2022**

BACKGROUND:

The California Voter Participation Rights Act prohibits a political subdivision, such as the City of Rolling Hills, from holding an election other than on a statewide election date if holding an election on a non-concurrent date has previously resulted in a significant decrease in voter turnout, being at least 25% less than its average voter turnout in the previous 4 statewide general elections.

The City of Rolling Hills did not meet the qualifying criteria to continue to conduct stand-alone elections on a non-concurrent date and therefore moved its elections to coincide with the date of the statewide election. On October 24, 2016 the City Council of the City of Rolling Hills adopted Ordinance No. 347 moving the date of the City's General Municipal Election from the first Tuesday after the first Monday in March of odd-numbered years to the first Tuesday after the first Monday in November of even-numbered years beginning in November 2020.

The City's next General Municipal Election will be held on Tuesday, November 8, 2022 for the purpose of electing three members of the City Council to four-year terms. The seats are currently held by Mayor James Black, Mayor Pro Tem Patrick Wilson and Councilmember Leah Mirsch.

DISCUSSION:

Enclosed with this staff report are two routine in nature Resolutions relating to the General Municipal Election to be held on Tuesday, November 8, 2022. The first resolution is required to call and give notice of an election for November 8, 2022, and to request that the Los Angeles County Board of Supervisors direct the Registrar-Recorder/County Clerk to provide full services. The second resolution establishes the regulations for candidates for elective office. The Resolutions are as follows:

- A Resolution of the City Council of the City of Rolling Hills requesting the Board of Supervisors of the County of Los Angeles to order the consolidation of a General Municipal Election to be held on November 8, 2022 with the Statewide General Election to be held in the County of Los Angeles the same day; to authorize the Board of Supervisors of the County of Los Angeles to canvass the returns of said General Municipal Election; and to request that the Registrar-Recorder/County Clerk of said County be permitted to render full services to the City of Rolling Hills relating to the conduct of said General Municipal Election pursuant to California Elections Code Section 10403; and

- A Resolution of the City Council of the City of Rolling Hills, California, adopting regulations for candidates for elective office pertaining to candidate statements submitted to the voters at an election to be held on Tuesday, November 8, 2022.

The City Clerk's Office will handle all candidate filings and publishing of notices. All other elements of the election would be administered by the Los Angeles County Registrar-Recorder/County Clerk's office.

FISCAL IMPACT:

The County has provided an unofficial conservative estimated cost for the November 8, 2022 General Election including any potential ballot measure(s) of $15,000. The $15,000 will be included in the General Fund Account for FY 2022/23.

RECOMMENDATION:

Adopt Resolution Nos. 1295 and 1296 pertaining to the General Municipal Election to be held on November 8, 2022 as presented.

ATTACHMENTS:
ResolutionNo1295_CallElection2022_CountyServices.pdf
ResolutionNo1296_EstablishRegulations_CandidateStatement.pdf

RESOLUTION NO. 1295

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROLLING HILLS REQUESTING THE BOARD OF SUPERVISORS OF THE COUNTY OF LOS ANGELES TO ORDER THE CONSOLIDATION OF A GENERAL MUNICIPAL ELECTION TO BE HELD ON NOVEMBER 8, 2022 WITH THE STATEWIDE GENERAL ELECTION TO BE HELD IN THE COUNTY OF LOS ANGELES THE SAME DAY; TO AUTHORIZE THE BOARD OF SUPERVISORS OF THE COUNTY OF LOS ANGELES TO CANVASS THE RETURNS OF SAID GENERAL MUNICIPAL ELECTION; AND TO REQUEST THAT THE REGISTRAR-RECORDER/COUNTY CLERK OF SAID COUNTY BE PERMITTED TO RENDER FULL SERVICES TO THE CITY OF ROLLING HILLS RELATING TO THE CONDUCT OF SAID GENERAL MUNICIPAL ELECTION PURSUANT TO CALIFORNIA ELECTIONS CODE SECTION 10403

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF ROLLING HILLS, CALIFORNIA, DOES HEREBY RESOLVE, DECLARE, DETERMINE AND ORDER AS FOLLOWS:

Section 1. RECITALS.

A. A General Municipal Election has been called by the City of Rolling Hills to be held in the City of Rolling Hills on November 8, 2022.

B. A Statewide General Election to be held in the County of Los Angeles has been or will be called to be held on November 8, 2022.

C. It is desired, pursuant to the authority found in California Elections Code section 10403, to consolidate said General Municipal Election with said Statewide General Election to be held in the County of Los Angeles.

Section 2. The Board of Supervisors of the County of Los Angeles is hereby respectfully requested to order the consolidation of said General Municipal Election to be held on November 8, 2022, with the Statewide General Election to be held in the County of Los Angeles on November 8, 2022.

Section 3. The Board of Supervisors of the County of Los Angeles is hereby further respectfully requested to place upon the same ballot as that provided for said Statewide General Election to be held in the County of Los Angeles on November 8, 2022, the names of the candidates for the offices of three (3) Councilmembers for the full term of four years, to be submitted to the electors of the City of Rolling Hills at said General Municipal Election.

Section 4. The City of Rolling Hills acknowledges that the consolidated election will be held and conducted in the manner prescribed in Section 10418 of the California Elections Code.

Section 5. The Board of Supervisors of the County of Los Angeles is hereby authorized and respectfully requested to canvass the returns of said General Municipal Election.

Section 6. The Board of Supervisors of the County of Los Angeles is hereby authorized and respectfully requested to authorize and permit the Registrar-Recorder/County Clerk of the County of Los Angeles to:

a) Print and supply ballots for said City of Rolling Hills General Municipal Election;

b) Mail the City's sample ballots and candidate statements of qualifications to the electors of the City of Rolling Hills as part of the same material that will be mailed to the voters of the Statewide General Election to be held in the County of Los Angeles;

c) Perform such other services as may be required for the consolidation and conduct of said City of Rolling Hills General Municipal Election with said Statewide General Election to be held in the County of Los Angeles.

Section 7. The vote centers for the election shall be open as required during the identified voting period pursuant to California Elections Code sections 4007 and 14401.

Section 8. The City shall reimburse the County of Los Angeles in full for the services performed on behalf of the City upon the presentation of a bill by the County.

Section 9. The City Clerk is hereby directed to deliver a certified copy of this resolution to the Board of Supervisors of the County of Los Angeles and to transmit an electronic copy to the Board of Supervisors and the Registrar-Recorder/County Clerk of the County of Los Angeles.

PASSED, APPROVED AND ADOPTED this 23rd day of May, 2022.

_____
JAMES BLACK, M.D.
MAYOR

ATTEST:

_____
CHRISTIAN HORVATH
CITY CLERK

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) SS
CITY OF ROLLING HILLS)

The foregoing Resolution No. 1295 entitled:

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROLLING HILLS REQUESTING THE BOARD OF SUPERVISORS OF THE COUNTY OF LOS ANGELES TO ORDER THE CONSOLIDATION OF A GENERAL MUNICIPAL ELECTION TO BE HELD ON NOVEMBER 8, 2022 WITH THE STATEWIDE GENERAL ELECTION TO BE HELD IN THE COUNTY OF LOS ANGELES THE SAME DAY; TO AUTHORIZE THE BOARD OF SUPERVISORS OF THE COUNTY OF LOS ANGELES TO CANVASS THE RETURNS OF SAID GENERAL MUNICIPAL ELECTION; AND TO REQUEST THAT THE REGISTRAR-RECORDER/COUNTY CLERK OF SAID COUNTY BE PERMITTED TO RENDER FULL SERVICES TO THE CITY OF ROLLING HILLS RELATING TO THE CONDUCT OF SAID GENERAL MUNICIPAL ELECTION PURSUANT TO CALIFORNIA ELECTIONS CODE SECTION 10403

was approved and adopted at a regular meeting of the City Council on the 23rd day of May, 2022, by the following roll call vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____
CHRISTIAN HORVATH
CITY CLERK

RESOLUTION NO. 1296

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROLLING HILLS, CALIFORNIA, ADOPTING REGULATIONS FOR CANDIDATES FOR ELECTIVE OFFICE PERTAINING TO CANDIDATE STATEMENTS SUBMITTED TO THE VOTERS AT AN ELECTION TO BE HELD ON TUESDAY, NOVEMBER 8, 2022.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF ROLLING HILLS, CALIFORNIA, DOES HEREBY RESOLVE, DECLARE, DETERMINE AND ORDER AS FOLLOWS:

Section 1. RECITALS. Section 13307 of the Elections Code of the State of California provides that the governing body of any local agency adopt regulations pertaining to materials prepared by any candidate for a municipal election, including costs of the candidate's statement.

Section 2. GENERAL PROVISIONS. Pursuant to §13307 of the Elections Code of the State of California, each candidate for elective office to be voted for at an Election to be held in the City of Rolling Hills on November 8, 2022, may prepare a candidate's statement on an appropriate form provided by the City Clerk. The statement may include the name, age and occupation of the candidate and a brief description of no more than 400 words of the candidate's education and qualifications expressed by the candidate. The statement shall not include party affiliation of the candidate, nor membership or activity in partisan political organizations. The statement shall be filed in typewritten form in the office of the City Clerk at the time the candidate's nomination papers are filed. The statement may be withdrawn, but not changed, during the period for filing nomination papers and until 5:00 p.m. of the next working day after the close of the nomination period.

Section 3. FOREIGN LANGUAGE POLICY

A. Pursuant to the Federal Voting Rights Act, candidate statements will be translated into all languages required by the County of Los Angeles Registrar-Recorder/County Clerk. The County is required to translate candidate's statements into the following languages: Armenian, Chinese Farsi, Hindi, Japanese, Khmer, Korean, Russian, Spanish, Tagalog/Filipino, Vietnamese, and other required languages as identified.

B. The County will mail sample ballots and candidate statements in a particular language to only those voters who are on the county voter file as having requested a sample ballot in a particular language. The County will make the sample ballot and candidate statements in the required languages available at all vote centers, on the County's website, and in the Election Official's office.

Section 4. PAYMENT

A. Translations

1. The candidate shall not be required to pay for the cost of translating the candidate statement into any required foreign language as specified in (A) of Section 2 above pursuant to Federal and\or State law.
2. The candidate shall be required to pay for the cost of translating the candidate statement into any foreign language that is not required as specified in (A) and/or (B) of Section 2 above, pursuant to Federal and\or State law, but is requested as an option by the candidate.

B. Printing

1. The candidate shall be required to pay for the cost of printing the candidate statement in English in the main voter pamphlet.
2. The candidate shall be required to pay for the cost of printing the candidate statement in a foreign language requested by the candidate per (B) of Section 2 above, in the main voter pamphlet.

The City Clerk shall estimate the total cost of printing, handling, translating, and mailing the candidate's statements filed pursuant to this section, including costs incurred as a result of complying with the Voting Rights Act of 1965 (as amended), and require each candidate filing a statement to pay in advance to the local agency his or her estimated pro rata share as a condition of having his or her statement included in the voter's pamphlet. In the event the estimated payment is required, the estimate is just an approximation of the actual cost that varies from one election to another election and may be significantly more or less than the estimate, depending on the actual number of candidates filing statements. Accordingly, the City Clerk is not bound by the estimate and may, on a pro rata basis, bill the candidate for additional actual expense or refund any excess paid depending on the final actual cost. In the event of underpayment, the City Clerk may require the candidate to pay the balance of the cost incurred. In the event of overpayment, the City Clerk shall prorate the excess amount among the candidates and refund the excess amount paid within 30 days of the election.

Section 5. MISCELLANEOUS.

A. All translations shall be provided by professionally-certified translators.

B. The City Clerk shall not allow bold type, underlining, capitalization, indentations, bullets, leading hyphens to the same extent and manner as in previous City elections.

C. The City Clerk shall comply with all recommendations and standards set forth by the California Secretary of State regarding occupational designations and other matters relating to elections.

Section 6. ADDITIONAL MATERIALS. No candidate will be permitted to include

additional materials in the sample ballot package.

Section 7. That the City Clerk shall provide each candidate or the candidate's representative a copy of this Resolution at the time nominating petitions are issued.

Section 8. That all previous Resolutions establishing City Council policy on payment for candidate's statements are repealed.

Section 9. That this Resolution shall apply only to the election to be held on November 8, 2022 and shall then be repealed.

Section 10. That the City Clerk shall certify to the passage and adoption of this Resolution and enter it into the book of original Resolutions.

PASSED, APPROVED AND ADOPTED this 23rd day of May, 2022.

_____
JAMES BLACK, M.D.
MAYOR

ATTEST:

_____
CHRISTIAN HORVATH
CITY CLERK

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) SS
CITY OF ROLLING HILLS)

The foregoing Resolution No. 1296 entitled:

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROLLING HILLS, CALIFORNIA, ADOPTING REGULATIONS FOR CANDIDATES FOR ELECTIVE OFFICE PERTAINING TO CANDIDATE STATEMENTS SUBMITTED TO THE VOTERS AT AN ELECTION TO BE HELD ON TUESDAY, NOVEMBER 8, 2022.

was approved and adopted at a regular meeting of the City Council on the 23rd day of May, 2022, by the following roll call vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____
CHRISTIAN HORVATH
CITY CLERK

Agenda Item No.: 13.A
Mtg. Date: 05/23/2022

TO: **HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL**

FROM: **JOHN SIGNO, DIRECTOR OF PLANNING & COMMUNITY SERVICES**

THRU: **ELAINE JENG P.E., CITY MANAGER**

SUBJECT: **SUBMITTAL OF "ADOPTION DRAFT" 2021-2029 ROLLING HILLS HOUSING ELEMENT TO HCD**

DATE: **May 23, 2022**

BACKGROUND:

State law requires all cities and counties in California to adopt a Housing Element as part of their General Plans. The Housing Element must be updated every eight years and certified by the State. Through the Housing Element, each jurisdiction must demonstrate that it is accommodating its fair share of the region's housing needs and taking proactive measures to accommodate housing of all types for persons of all incomes. All cities and counties are subject to this requirement, regardless of their size, physical constraints, or real estate market characteristics.

The current Housing Element cycle (referred to as the "6 th Cycle") extends from October 15, 2021 through October 15, 2029. To comply with State law, Rolling Hills must show that it has the capacity to add 45 housing units during this period, including 29 that are affordable to low- and very low-income households. The City is not required to build 45 housing units; rather, it must demonstrate that it has created the opportunity for the private and non-profit sectors to do so. There are numerous other Housing Element requirements, including a mandate to affirmatively further fair housing, programs to remove government constraints to housing development, and requirements to allow specific housing types (such as emergency shelters) in every jurisdiction.

The City's housing strategy is to meet its 45-unit Regional Housing Needs Allocation (RHNA) through a combination of an affordable housing overlay zone on the Rancho Del Mar School site (16 units) and the development of accessory dwelling units (ADUs—at a rate of roughly five units a year). The City published its Draft 6th Cycle Element on December 3, 2021 and circulated this draft for a State-mandated 30-day review period. The Planning Commission convened a hearing on December 16, 2021 to discuss the Draft and provide an opportunity for public comment during the 30-day period.

On January 10, 2022, the Rolling Hills City Council directed staff to submit a working draft of the 2021-2029 Housing Element to the State Department of Housing and Community Development (HCD) for their review. All California cities are required to have their documents reviewed by HCD before adopting them. Once HCD receives the Draft, it has 90 days to issue a "findings" letter indicating the revisions to the document that are needed to receive State certification. Rolling Hills submitted its draft on January 11, 2022 and received its State comments on April 11, 2022. The State indicated that the City had met many of the statutory requirements but indicated the Element required revision before it could be certified. Their findings letter requested 34 changes, some of which were specific and others that were more generalized. The HCD comment letter is included as Attachment "A" of this staff report.

On April 22, 2022, City staff and its Housing Element consultant met with the HCD reviewer by Zoom to go over the State's comments. The reviewer provided guidance on how the City could respond to some of the comments. The City then prepared written responses to each of the 34 HCD comments. The City's responses are included as Attachment "B" of this staff report. Concurrently, the City revised the December Draft to incorporate all changes requested by the State. Both a "tracked change" and "clean" copy were produced, making it easier for City officials, the public, and State reviewers to see the changes between the two documents. The new version of the document is referred to as the "Adoption Draft." (the prior version was referred to as the "HCD Draft)." The tracked change and clean versions are included with this staff report and are referred to as Attachments C and D, respectively.

On May 17, 2022, the Rolling Hills Planning Commission convened a public hearing on the proposed revisions to the Housing Element. The hearing provided an opportunity for public comment as well as an opportunity to discuss proposed changes. No public comments were received at the meeting. At the conclusion of the item, the Commission voted unanimously to forward the latest version of the Housing Element to the City Council, and then on to HCD.

HCD has been much more stringent in its review of 6 th Cycle Housing Elements than it has been during earlier cycles. Housing Elements for the Southern California Association of Governments (SCAG) region, which consists of 190 cities and six counties, were due on October 15, 2021. As of May 10, nearly seven months later, only 13 of the 196 jurisdictions have received State certification. The status of Elements in the SCAG region are as follows:

- 13 are certified
- 100 have been reviewed by HCD, revised, adopted, and then found out of compliance
- 26 are on their second drafts, after their first draft was found out of compliance
- 46 have yet to be adopted, but their first drafts have been found out of compliance (Rolling Hills is in this group)
- 3 are awaiting HCD's responses on their first drafts
- 8 have submitted nothing to HCD yet

DISCUSSION:

The City's comment letter includes a two-page cover letter and an eight-page appendix. The two-page cover letter is "standard" and is almost identical to what every other city has received following HCD's review of their initial draft. The letter reiterates the October 15, 2021 due date, reminds the City that any zoning required to meet the RHNA must be completed by October 15, 2022, and identifies the financial benefits of having a certified element (eligibility for grants).

The “Appendix” to the Element lists HCD’s specific findings. It is organized according to the requirements of the Government Code. To facilitate responses to the State’s questions, the City’s consultant reviewed responses from the 13 jurisdictions that have been found in compliance with Housing Element law, as well as the edits made by these cities in response to HCD.

Comment 1 asked the City to document the effectiveness of its past efforts to help persons with special needs. In response, the City has amended Chapter 2 to describe efforts to assist seniors and facilitate “aging in place” through home retrofits.

Comments 2 through 6 address the AFFH analysis (Appendix A). HCD asked for additional information on how the City complies with fair housing laws, additional tables and maps comparing Rolling Hills to the region, additional explanation of how public input is reflected in the Housing Element, and additional evidence that housing on the Rancho Del Mar site would not result in the concentration of lower income people in a single area. Staff edited Appendix A with responses to all of these comments. HCD is looking for a particular format that links the AFFH analysis to the City’s policies and programs, and the City has provided that format (see pages A-44 to A-47 in the tracked change version).

Comments 7, 8, and 9 address various aspects of the Needs Assessment. This is Chapter 3 of the Housing Element. HCD requested a projection of the future number of “extremely low income households” in Rolling Hills and an analysis of how many lower income homeowners and renters are paying more than 30% of their incomes on rent. They also asked for an estimate of the number of substandard housing units in the city. Chapter 3 of the Element was revised to address these requests.

Comments 10, 11, and 14 address Chapter 4, which is the Sites Inventory. Comment 10 questions the City’s ability to meet its lower income housing needs through ADUs, and specifically asks for more data on the units that were approved in 2021. The City has provided this data. Comment 11 reminds the City that it needs to enter its list of housing sites in an on-line State data base (after adoption). Comment 14 asks the City to show that the 31-acre Rancho Del Mar site is large enough to accommodate an emergency shelter, single room occupancy hotel, and 16-unit affordable housing development. The City has responded to all of these comments through edits to Chapter 4.

Comments 12, 13, and 15-17 address Chapter 5, which is the Constraints Analysis. Comment 12 asks for more detail on the parking requirements for emergency shelters, and the exact wording of the city’s requirement than shelters must be 300 feet apart. Comment 13 reminds the City that it must allow supportive and transitional housing in its residential zones under state law (there is already a Program in the Housing Element to comply). Comment 15 indicates that the City’s ADU requirements need to be updated, but do not specify what needs to change. The City has added a program to its Housing Element to update the standards. Comment 16 reminds the City of its obligation to send the adopted Housing Element to water and sewer service providers. Comment 17 asks for an analysis of dry utilities (gas and electricity). The City has amended Chapter 5 to address Comments 12 and 17 and has amended Chapter 6 to address Comments 13 and 15.

Comments 18-25 also address Chapter 5 (and to a lesser extent, Chapter 6). Comment 18

asks the City to provide more information on the development approval process, including the site plan review process and approval findings. We have edited Chapter 5 (p 5-17) in response. Comment 19 asks for more information on site improvement requirements (specifically with respect to the Rancho Del Mar site). This has been added to P 5-18. Comment 20 reminds the City that it must allow residential care facilities (group homes) under State law. The City has added a program to Chapter 6 to meet this requirement. Comment 21 asks the City to explain its reasonable accommodation procedure. This has been added to Page 5-13. Comment 22 asks the City to identify any other local ordinances that impact the cost and supply of housing. We have added a new section (P 5-22) in response.

Comment 23 requests that the City confirm that it complies with AB 1483, which requires fee information to be posted on line (it does). Comment 24 asks the City to create a written procedure for SB 35 applications (we have added this as a new program in Chapter 6). Comment 25 asks the City to add an analysis of the lag time between when projects are approved and when they are actually constructed. This has been added to Chapter 5 (page 5-24).

Comments 26-34 primarily relate to Chapter 6, which contains the City's housing goals, policies, and programs. Many of these comments are quite vague, as they simply say that because the analysis in Chapters 2-5 did not address the issues in the earlier comments, the State cannot confirm that the programs are adequate.

Comment 26 asks the City to assign timelines and metrics to some of its programs. The City has done this through revisions to Chapter 6. Comment 27 is a global statement that indicates the City may not have identified adequate sites. This is followed by more specific comments on the Rancho Del Mar site (Comment 28) and ADUs (Comment 29). The City has asked the City to provide more information supporting its plan to rely on these sites to meet its need for 29 lower income units. This includes a request to monitor ADU production and actively facilitate development of the school site. Comment 30 links back to the earlier comment (13) that a program is needed to allow supportive and transitional housing.

Comments 31 and 32 are general statements that additional programs might be needed to address constraints and AFFH, but nothing specific is requested. The City has strengthened its programs in response to earlier comments, effectively addressing these two comments. Comment 33 is moot, since HCD retracted it after sending it. Comment 34 asks the City to show how it has incorporated public input. Chapter 1 has been edited to provide a few examples.

None of the proposed revisions to the document substantively change the City's approach to meeting its RHNA, which is to rely on ADUs and the Rancho Del Mar site.

NEXT STEPS:

The City Council hearing on May 23 is an opportunity to discuss the HCD comments, the City's responses, and edits to the document. It is also an opportunity for public comment, which is an important part of the Housing Element process. The Commission may recommend specific actions to the Council related to the contents of the document, the HCD comments, and the HCD review and approval process.

On May 23, the Council will be asked to authorize a re-submittal of the "Adoption Draft" to HCD. Assuming this direction is provided, the document will be sent to HCD on May 24.

State comments are expected back in late July. At that time, HCD may find that the Element is substantially in compliance due to the changes made by the City or it may determine that changes are still needed. If the latter occurs, the City expects a substantially smaller list of objections. The City will meet with HCD again to discuss any remaining changes.

Following the second HCD review, the City will move ahead with Housing Element adoption. A follow-up hearing with the Planning Commission and City Council will be required at that time.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA):

Amendment of the Housing Element is considered a Project under CEQA. The City had initially planned a single CEQA document covering the Housing Element and Safety Element, but this was bifurcated at the time the Safety Element was adopted in March 2022 due to comments received from an agency to include mitigation measures that address potential housing development described in the Housing Element. An amended CEQA document is being prepared for the Housing Element that will consider mitigation measures to address the concerns. Although the Housing Element was expected to be adopted in May 2022, it cannot be adopted without an accompanying CEQA document. Staff will be preparing the amended CEQA document and circulating it for public review. In the meantime, staff is recommending that the Draft Element be sent to HCD for a second review. The amended CEQA document will be issued and circulated when the Housing Element is being considered for adoption.

FISCAL IMPACT:

The Housing Element is a planning document that establishes policies for the City of Rolling Hills and will not have a direct fiscal impact on the City. Certification of the Element provides an indirect positive fiscal impact by reducing legal risks and qualifying the City for State planning grants. The City was awarded $65,000 from HCD through the Local Early Action Planning Grants Program (LEAP) to help fund the Housing Element. Remaining costs are paid through the FY2021-2022 General Fund.

RECOMMENDATION:
Authorize staff to submit the revised Draft Housing Element to HCD for their second review, along with the responses to HCD's comments.

ATTACHMENTS:
A. April 11, 2022 Comment letter from HCD
B. May 9, 2022 City Responses to HCD Comments
C. Tracked Change Adoption Draft Housing Element

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
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April 11, 2022

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

Dear John F. Signo:

RE: City of Rolling Hill's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Rolling Hill's draft housing element received for review on January 11, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review.

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code. The enclosed Appendix describes revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation, including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that

represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City meets housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf.

HCD appreciates the hard work the City's planning staff provided during the course of our review. We are committed to assist the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Gianna Marasovich, of our staff, at Gianna.Marasovich@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Enclosure

APPENDIX
CITY OF ROLLING HILLS

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks),* available at http://www.hcd.ca.gov/community-development/building-blocks/index.shtml and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

The element must provide a cumulative evaluation of the effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness).

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

   Enforcement and Outreach: The element must describe the City's compliance with existing fair housing laws and regulations. For additional information, please see pages 28-30 on HCD's AFFH Guidance Memo at https://www.hcd.ca.gov/community-development/affh/index.shtml.

   Regional Analysis: While the element generally describes some regional data, the element must analyze Rolling Hills relative to the rest of the region regarding integration and segregation (disability, familial status, and income), access to opportunity (education, economic, and environmental), and disproportionate housing needs (cost burdened, overcrowding, and homelessness).

   Other Relevant Factors: The element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element should analyze historical land use, zoning, governmental and nongovernmental spending including transportation investments, demographic trends, historical patterns of

segregation, or other information that may have impeded housing choices and mobility.

Sites Inventory: The element must identify sites throughout the community to foster inclusive communities. While the element identifies and show sites and zoning throughout the community, it also notes the plan to accommodate half of the regional housing need for lower income households at the Palos Verdes Unified School District (PVUSD). The element should discuss whether this strategy potentially isolates housing need for lower income households and include actions as appropriate.

Goals, Actions, Metrics, and Milestones: Goals and actions must significantly seek to overcome contributing factors to fair housing issues. Programs generally must address enhancing housing mobility strategies; encouraging development of new affordable housing in high resource areas; improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing; and protecting existing residents from displacement. Given that most of the City is considered a high and highest resource community (pg. 3-50), the element could focus on programs that enhance housing mobility and encourage development of more housing choices and affordable housing. Programs also need to be based on identified contributing factors, be significant and meaningful. The element must add, and revise programs based on a complete analysis and listing and prioritization of contributing factors to fair housing issues. Furthermore, the element must include metrics and milestones for evaluating progress on programs, actions, and fair housing results. For more information, please see HCD's guidance at https://www.hcd.ca.gov/community-development/affh/index.shtml.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

   Extremely Low-Income Households: The element includes analysis regarding extremely low-income (ELI) households such as the number of households and overpayment but must also identify projected housing needs. The projected housing need for ELI households can be calculated by using available census data to determine the number of very low-income households that qualify as ELI households or presume that 50 percent of the regional housing need allocation (RHNA) for very low-income households qualify as ELI households. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml.

3. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

   Overpayment: While the element identifies the total number of households overpaying for housing, it must quantify and analyze the number of lower-income households overpaying for housing by tenure (i.e., renter and owner).

Housing Stock Condition: The element analyzed the age of the housing stock, discussed code enforcement data, and stated that there are no code enforcement or housing problems in the City. However, the element must estimate the number of units in need of rehabilitation and replacement.

4. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

   Progress in Meeting the RHNA – Accessory Dwelling Unit (ADUs): The element is counting two ADUs as credit towards RHNA. First, the element must demonstrate the availability of these units during the planning period. For example, the element could discuss whether these units have pending or approved building permits. Second, the element must demonstrate affordability based on actual or anticipated rents or other mechanisms ensuring affordability (e.g., deed-restrictions).

   Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

   Zoning for a Variety of Housing Types:

   - *Emergency Shelters*: The element must demonstrate compliance with emergency shelters parking requirements. Pursuant to AB 139 (Chapter 335, Statutes of 2019) emergency shelters are only required to provide sufficient parking to accommodate all staff working in the emergency shelter, provided that the states do not requirement more parking for emergency shelters than other residential or commercial uses within the same zone. Additionally, the element states emergency shelters are not allowed to be within 300 ft from each other; however, state law only allows a maximum of 300 ft separation requirement. The element should describe compliance with these requirements or include programs as appropriate.

   - *Permanent Supportive Housing*: Supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with this requirement and include programs as appropriate.

   - *Emergency Shelters, Single Room Occupancy (SRO), and Multifamily Zoning*: The element identifies a 31-acre site with an overlay zone that will

accommodate the City's lower-income RHNA, allow for emergency shelters by-right, and SROs with a CUP. The element should discuss and analyze the suitability of this site to accommodate these various housing types and the full spectrum of the housing needs (beyond RHNA).

- *Accessory Dwelling Units (ADU):* After a cursory review of the City's ordinance, HCD discovered several areas which were not consistent with State ADU Law. This includes but is not limited to restricting bedroom count and permitting procedures, among others. HCD will provide a complete listing of ADU non-compliance issues under a separate cover. As a result, the element should add a program to update the City's ADU ordinance in order to comply with state law. For more information, please consult HCD's ADU Guidebook, published in December 2020, which provides detailed information on new state requirements surrounding ADU development.

Water Sewer Priority: Water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. The element should discuss compliance with these requirements and if necessary, add or modify programs to establish a written procedure by a date early in the planning period. For additional information and sample cover memo, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/other-requirements/priority-for-water-sewer.shtml.

Availability of Infrastructure: While the element describes infrastructure capacity to accommodate the regional housing need, the element must also provide an analysis on access to dry utilities for the sites identified in the inventory.

5. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7). Transitional housing and supportive housing shall be considered a residential use of property, and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. (Gov. Code, § 65583, subd. (a)(5).)*

   Processing and Permit Procedures: While the element included some information on approving single family homes, the analysis should address the approval body, the number of public hearings, if any, approval findings, and any other relevant information such as any design review requirements. The analysis should address

impacts on housing cost, supply, timing, and approval certainty. For example, the element mentioned the requirement of a site plan review for any proposed development, the use of conditional use permit for single room occupancy units, and that City Council and Planning Commission take field trips to the proposed site as part of the review process. The element should specifically identify timing, approval findings, and criteria for approvals.

On/Off Site Improvements: While the element stated that specific parcels zoned for multifamily such as the PVUSD site will require ingress and egress improvements (p. 5-23), the element should identify typical site improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width), and analyze their impact as potential constraints on housing supply and affordability. For additional information and a sample analysis, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml.

Constraints on Housing for Persons with Disabilities:

- *Group Homes for Seven or More*: The element must discuss how the City defines and permits group homes for seven or more persons. For your information, excluding these uses from residential zones or subjecting the uses to conditional use permits (CUP) is generally considered a constraint and programs should be modified as appropriate with specific commitment to allow the use in residential zones with objectivity and certainty.
- *Reasonable Accommodation*: While the element briefly describes its reasonable accommodation procedures, it must describe the process and decision-making criteria such as approval findings and analyze any potential constraints on housing for persons with disabilities.

Other Local Ordinances: The element must analyze any locally adopted ordinances that directly impacts the cost and supply or residential development (e.g., inclusionary requirements, short term rentals, growth controls).

Zoning, Development Standards and Fees: The element must clarify compliance with new transparency requirements for posting all zoning, development standards and fees on the City's website and add a program to address these requirements, as necessary.

SB 35 Streamlined Ministerial Approval Process: The element must clarify whether there are written procedures for the SB 35 (Chapter 366, Statutes of 2017) Streamlined Ministerial Approval Process and add a program to address these requirements, if necessary.

6. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between*

receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)

Approval Time: The element must analyze the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially hinder the construction of a locality's share of the regional housing need.

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

   To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines and specific commitment. Several programs included various actions but still must include a timeline for implementing each action including, Program 8 – Assist Senior and Disabled Households, Program 9 – Assist Extremely Low-Income Households, Program 12 – Facilitate Communication with Affordable Housing Service Providers…Program 14 – Sewer Feasibility Studies and Phase One Construction, Program 20 – Fair Housing Services Program Administration, Program 22 – Fair Housing Training for Staff.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (*Gov. Code, § *65583, subd. (c)(1).)*

As noted in Finding B4, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning was not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element must be revised, as follows:

Program 2 – Rancho Del Mar Opportunity Site Monitoring: The element identifies one site to accommodate a portion of its lower-income RHNA. While the program includes several actions such as subdividing the site, coordination with the school district, technical assistance and incentives, the program does not commit to these actions nor provide a date for when these actions will occur. Specifically, the element should include timelines for various actions and include commitments to outreaching, coordination, and establishing incentives that facilitate development on this site, as mentioned in the program.

Program 6 – Accessory Dwelling Unit (ADU) Production, Monitoring, and Incentives: The element heavily relies on ADUs to accommodate most of the City's RHNA for all income levels. Given the City's assumptions for ADUs exceed recent trends, the element should include a program to monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning within a specified time period (e.g., six months).

Zoning for a Variety of Housing Types: The element identifies Program 4 and 5 committing to provide a variety of housing types (e.g., SROs, transitional and supportive housing, employee housing, etc.,) and address constraints for people with disabilities. These actions were also identified in the last planning period but have not been completed. HCD encourages the City to utilize HCD's technical assistance resources and model ordinances to ensure effective and efficient implementation. Please see the Housing Hub Site: Housing Planning Hub Site (arcgis.com)

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

   As noted in Finding(s) B5 and B6, the element requires a complete analysis of potential governmental. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008,*

and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)

As noted in Finding B1, the element must include a complete analysis of affirmatively furthering fair housing. Based on the outcome of that analysis, the element must add or modify programs.

D. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

While the element does include quantified objectives (p. 6-20), it must be revised to include quantified objectives for number of housing units that will be rehabilitated for low, moderate, and above moderate households.

E. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)

While the element described various efforts to achieve public participation in the preparation of the housing element update, it should also describe how comments were considered and incorporated into the element.

May 9, 2022

Revisions Made in Response to HCD Comments on 2021-2029 Rolling Hills Draft Housing Element *(HCD's comments are numbered 1-34 in the left-hand margin)*

A. Review of the Previous Element (Element Chapter 2)

1 The element must provide a cumulative evaluation of the effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness).

City Response: A new section has been added to Page 2-4 to evaluate the cumulative effectiveness of past goals, policies, and actions in meeting the needs of special needs populations. See Section 2.3.5 of Adoption document.

B1. Needs Assessment/ Affirmatively Fair Housing (Appendix A: AFFH Analysis)

2 **Enforcement and Outreach:** The element must describe the City's compliance with existing fair housing laws and regulations.

City Response: This has been added to Appendix A: Affirmatively Furthering Fair Housing. Please see page A-4, which lists various federal and state programs which the City implements and abides by. The Element includes a number of programs to increase awareness of fair housing laws (Chapter 6).

3 **Regional Analysis:** While the element generally describes some regional data, the element must analyze Rolling Hills relative to the rest of the region regarding integration and segregation (disability, familial status, and income), access to opportunity (education, economic, and environmental), and disproportionate housing needs (cost burdened, overcrowding, and homelessness).

City Response: Each of the listed items is covered below:

Disability. A map showing the percentage of disabled residents by Census tract was included in the prior draft (Figure A-3), and an analysis was provided. This analysis has been expanded to more deeply interpret the data shown on the map. The City has a higher percentage of disabled residents than many surrounding tracts due to its higher median age (55). In general, health indicators for Rolling Hills confirm the community's designation as a high resource area. See Page A-10.

Familial Status: A map showing familial status by Census tract has been added (Figure A-4) and an analysis of this map has been provided. See Page A-15.

Income: Maps of income by Census tract were included in the prior draft (formerly Figures A-4 and A-5, renumbered A-5 and A-6), and an analysis was provided. The analysis has been expanded by adding a new map (Figure A-7) showing a larger geographic area. An analysis of the map has been added on pages A-12 and A-13.

Access to Education: A map showing regional data on education was included in the previous draft (formerly Figure A-9, now Figure A-11). Additional text has been added interpreting the data on the map for Rolling Hills, surrounding cities, and nearby parts of the region. See Page A-23.

Economic Opportunities: A map showing regional economic opportunity data was included in the previous draft (formerly Figure A-8, now Figure A-10). Additional text has been added interpreting the data on the map for Rolling Hills, surrounding cities, and nearby parts of the region. See Page A-22.

Environmental Factors: A map showing environmental outcomes was included in the previous draft (formerly Figure A-7, now Figure A-9). Additional text has been added interpreting the scores for Rolling Hills, surrounding cities, and nearby parts of the region. See Page A-22.

Cost Burdened: Two maps showing cost burdened households in the region (one for owners and one for renters) were included in the previous draft (formerly Figures A-11 and A-12, now renumbered as Figures A-13 and A-14). Data on these maps has been described in more detail through revisions to the text. See Pages A-30 and A-31.

Overcrowding: A map showing overcrowding was included in the previous draft (formerly Figure A-13, now Figure A-15). Data on the map has been described in more detail through revisions to the text. See Pages A-32 and A-33.

Homelessness: A new map has been added based on data from the County of Los Angeles. It shows the density of the homeless population throughout the County, providing a regional perspective (see new Figure A-17.) A new text section has been added to discuss the data. See Pages A-39 and A-40.

In HCD's subsequent clarification to this comment (correspondence from Gianna Marasovich on 4/26 at 4:38 PM), it was suggested that the City add the tables on pages 75-78 of HCD's AFFH Guidance Memo in response to this comment. We have done this and inserted eight new tables into the AFFH analysis (Appendix A), with data for 2010 and 2020 for Rolling Hills and Los Angeles County in each table, as requested. These tables are found on pages A-6, 7, 11, 13, 20, 29, 31, and 32 (page references are to the tracked changes version). We have also added narrative text that interprets the data.

4

Other Relevant Factors: The element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element should analyze historical land use, zoning, governmental and nongovernmental spending including transportation investments, demographic trends, historical patterns of segregation, or other information that may have impeded housing choices and mobility.

City Response: Please see Page A-41 (tracked change version). Additional data on land use, zoning, infrastructure, and historical patterns is included, and a table has been added showing tenure by race. Information on historical patterns of segregation is included in the section under "local knowledge" on page A-42.

5

Sites Inventory: The element must identify sites throughout the community to foster inclusive communities. While the element identifies and show sites and zoning throughout the community, it also notes the plan to accommodate half of the regional housing need for lower income households at the Palos Verdes Unified School District (PVUSD). The element should discuss whether this strategy potentially isolates housing need for lower income households and include actions as appropriate.

City Response: Please see Page A-43 (tracked change version). We have added a new section called "Distribution of Proposed Housing Sites." Given the City's physical constraints and the small size of the RHNA (29 lower income units), the City's strategy to meet its regional housing need is practical, responsive to economic conditions, and the most effective way to meet State AFFH objectives. As noted in the text, this strategy combines a vacant, developable affordable housing site (Rancho Del Mar) with scattered site ADUs. A single 16-unit affordable housing development plus 40 scattered site ADUs would not result in the isolation of lower income households.

6

Goals, Actions, Metrics, and Milestones: Goals and actions must significantly seek to overcome contributing factors to fair housing issues. Programs generally must address enhancing housing mobility strategies; encouraging development of new affordable housing in high resource areas; improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing; and protecting existing residents from displacement. Given that most of the City is considered a high and highest resource community (pg. 3-50), the element could focus on programs that enhance housing mobility and encourage development of more housing choices and affordable housing. Programs also need to be based on identified contributing factors, be significant and meaningful. The element must add, and revise programs based on a complete analysis and listing and prioritization of contributing factors to fair housing issues. Furthermore, the element must include metrics and milestones for evaluating progress on programs, actions, and fair housing results. For more information, please see HCD's guidance at https://www.hcd.ca.gov/community-development/affh/index.shtml.

City Response: Text edited. See text on pages A-44 to A-47 (tracked change version). The discussion of contributing factors and priorities has been substantially rewritten in response to this comment, and in response to our review of recently certified elements that were deemed to comply with AB 686. We have documented the four categories of programs that address contributing factors (enhancing mobility, new affordable housing development in high resource areas, etc.); we have established priorities in two of these areas; we have ranked these priorities 1, 2, and 3 (disparities in access to opportunity, fair housing education and outreach, access for persons with disabilities), we have identified contributing factors in each case, and we have identified the significant and meaningful actions that are included in Chapter 6 of the Housing Element addressing each contributing factor.

B2. Needs Assessment/ Documentation of projections and existing/projected needs for all income levels (Element Chapter 3)

7

Extremely Low-Income Households: The element includes analysis regarding extremely low-income (ELI) households such as the number of households and overpayment but must also identify projected housing needs. The projected housing need for ELI households can be calculated by using available census data to determine the number of very low-income households that qualify as ELI households or presume that 50 percent of the regional housing need allocation (RHNA) for very low-income households qualify as ELI households. For additional information, see the Building Blocks at

http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml.

City Response: This information was provided in our December 2021 draft on page 6-20 (Table 6-1). As indicated there, the City used the CHAS data (consistent with the link cited by HCD above) to determine that 35 percent of the City's very low income households were extremely low income. We have edited Chapter 3 so that this same data and conclusion is referenced there. Please see Page 3-33 for new text.

B3. Needs Assessment/ Analysis of Household Characteristics, Overpayment, Housing Condition (Element Chapter 3)

8 **Overpayment:** While the element identifies the total number of households overpaying for housing, it must quantify and analyze the number of lower-income households overpaying for housing by tenure (i.e., renter and owner).

City Response: We have edited the document so that this information appears in two places. First, please see Table A-7, which was added to Appendix A (Affirmatively Furthering Fair Housing) to compare cost-burdens among extremely low income and low income renter and owner households in Rolling Hills and Los Angeles County. A new Table also has been added to Chapter 3 showing overpayment for housing by tenure among lower income households (see Page 3-17 of tracked change document, Table 3.11) along with supplemental narrative interpreting the table. This is based on CHAS HUD User data.

9 **Housing Stock Condition:** The element analyzed the age of the housing stock, discussed code enforcement data, and stated that there are no code enforcement or housing problems in the City. However, the element must estimate the number of units in need of rehabilitation and replacement.

City Response: Text edited. There are approximately 700 homes in Rolling Hills. City staff is aware of five houses in need of rehabilitation and replacement. This has been documented and is now included on Page 3-27 (tracked change version). This represents 0.8 percent of the city's housing stock.

B4. Sites Inventory (Element Chapter 4)

10 **Progress in Meeting the RHNA** –The element is counting two ADUs as credit towards RHNA. First, the element must demonstrate the availability of these units during the planning period. For example, the element could discuss whether these units have pending or approved building permits. Second, the element must demonstrate affordability based on actual or anticipated rents or other mechanisms ensuring affordability (e.g., deed-restrictions).

City Response: Text edited. ADU permits were issued for the units in question on October 27, 2020 and May 20, 2021 respectively. Both of these projects involve converting existing two-story stables (located on two separate parcels about a mile apart) into ADUs of approximately 600 square feet each. Neither of these units has a finaled building permit yet. Given the eight year timeframe of the Housing Element, both units are expected to be completed before 2029.

These are market rate units. The assumption that they will be affordable to low income households is based on the size of the units and the fact that they are being created by repurposing existing space

rather than building new space, which presumably would cost more. Current HCD income limits for Los Angeles County indicate that the upper end of the low-income range for a two-person household is $75,700. At 30 percent of household income, monthly housing costs would need to be $1,892 to be considered affordable. The City's survey of comparable properties in 2021 found that ADUs of 400 to 600 square feet in the Palos Verdes Peninsula sub-market were renting for $900 to $1,800 per month. The two new ADUs can be reasonably presumed to rent for comparable rates. Moreover, SCAG's ADU survey for Los Angeles County found that 60% of all ADUs in the coastal region could be presumed affordable to lower income households. As these two ADUs are the smallest of the nine approved units that are listed in the Housing Element (see Table 4-1), it is reasonable to presume they would fall in this range.

This information has been added to Chapter 4 (see Page 4-2).

11 **Electronic Sites Inventory:** Pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD.

City Response: The City intends to comply with this requirement immediately following adoption and concurrently with submittal to HCD, consistent with the Government Code.

12 **Emergency Shelters:** The element must demonstrate compliance with emergency shelters parking requirements. Pursuant to AB 139 (Chapter 335, Statutes of 2019) emergency shelters are only required to provide sufficient parking to accommodate all staff working in the emergency shelter, provided that the states do not requirement more parking for emergency shelters than other residential or commercial uses within the same zone *[sic]*. Additionally, the element states emergency shelters are not allowed to be within 300 ft from each other; however, state law only allows a maximum of 300 ft separation requirement. The element should describe compliance with these requirements or include programs as appropriate.

City Response: Text edited, see Chapter 5 (P 5-11, tracked change version). The City's emergency shelter standards were reviewed by HCD in December 2020 and were determined to be legally compliant. Rolling Hills does not require more parking for emergency shelter than for other residential and commercial uses in this zone. This statement has been added to the text. The RDMO overlay is a residential zone, and the parking standards for other uses (multi-family housing and SROs) in this zone are based on the number of units and or bedrooms, which would be substantially higher than the requirements for a shelter. The separation standard used by the City is consistent with State law and is the same as the standard used by other jurisdictions with recently-certified Housing Elements. The current standard would allow two shelters to be 300 feet apart, as required by the Government Code. The wording in Chapter 5 has been amended for clarity. Please see Page 5-10 (tracked change version) for these edits.

13

Permanent Supportive Housing: Supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with this requirement and include programs as appropriate.

City Response: Text edited, See Chapter 5 (P 5-12). The City acknowledges this requirement and intends to comply with it. It was previously documented on Page 5-12 and also on Page 6-6, where there is a Program to address it (Program 4). The program will be implemented within six months.

14

Emergency Shelters, Single Room Occupancy (SRO), and Multifamily Zoning: The element identifies a 31-acre site with an overlay zone that will accommodate the City's lower-income RHNA, allow for emergency shelters by-right, and SROs with a CUP. The element should discuss and analyze the suitability of this site to accommodate these various housing types and the full spectrum of the housing needs (beyond RHNA).

City Response: We have added text to Page 4-10 which highlights the findings of Appendix B. Appendix B (included in the HCD Draft) demonstrates the suitability of this site for emergency shelters, SROs, and multi-family housing. As a 31-acre property, the site has the capacity for any one of these uses on its own, any combination of these uses, or all three uses (multi-family housing, SRO, and shelter), either in a single development or in three entirely separate developments within the property. As Appendix B notes, the parcel includes multiple subareas, some of which may be more conducive to shelters and SROs and some of which may be better suited for multi-family housing.

15

Accessory Dwelling Units (ADU) (Addressed in Chapter 5): After a cursory review of the City's ordinance, HCD discovered several areas which were not consistent with State ADU Law. This includes but is not limited to restricting bedroom count and permitting procedures, among others. HCD will provide a complete listing of ADU non-compliance issues under a separate cover. As a result, the element should add a program to update the City's ADU ordinance in order to comply with state law. For more information, please consult HCD's ADU Guidebook, published in December 2020, which provides detailed information on new state requirements surrounding ADU development.

City Response: Text edited. See Chapter 5 (P 5-7) As of May 9, 2022, the City has not received supplemental correspondence from HCD regarding ADU non-compliance issues. However, the ADU provisions in the Municipal Code were last updated in February 2020 and the City recognizes that State ADU legislation has changed in the last two years. Accordingly, we have added a new Program to Chapter 6 (see Program 6, new Program 6.10) to update the Municipal Code no later than October 15, 2022 to ensure that it complies with all current ADU regulations. This includes eliminating references to the two-bedroom maximum and updating the permitting procedures so that they are compliant with State law.

16 **Water Sewer Priority:** Water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. The element should discuss compliance with these requirements and if necessary, add or modify programs to establish a written procedure by a date early in the planning period.

City Response: Text edited. See Chapter 1, page 1-8 (tracked change version). The following language has been added. The City will follow through as described:

> *In addition, as required by SB 1087, the City sent an electronic copy of its Housing Element to the appropriate water and sewer providers immediately after adoption. The document was accompanied by a letter reminding these agencies they must have adopted written policies and procedures that grant a priority for service hook-ups to developments that help meet the community's share of the regional need for lower-income housing.*

17 **Availability of Infrastructure:** While the element describes infrastructure capacity to accommodate the regional housing need, the element must also provide an analysis on access to dry utilities for the sites identified in the inventory.

City Response: Text has been added to Chapter 5, P 5-29 (tracked change version). All of the housing opportunity sites would be able to receive gas, electric, and telecommunication services if they are developed. The Rancho Del Mar site currently has access to these services, as it is a former school.

B5. Constraints Analysis (Element Chapter 5)

18 **Processing and Permit Procedures:** While the element included some information on approving single family homes, the analysis should address the approval body, the number of public hearings, if any, approval findings, and any other relevant information such as any design review requirements. The analysis should address impacts on housing cost, supply, timing, and approval certainty. For example, the element mentioned the requirement of a site plan review for any proposed development, the use of conditional use permit for single room occupancy units, and that City Council and Planning Commission take field trips to the proposed site as part of the review process. The element should specifically identify timing, approval findings, and criteria for approvals.

City Response: Text edited. See Chapter 5, P 5-17 and -18 (tracked change version). The City has provided more information on the approval body for single family homes (Planning Commission), the number of public hearings (minimum one hearing, plus one field trip, although more hearings typically occur), and the approval findings (these are described in the text). Design review is conducted privately by the RHCA, and is addressed as a non-governmental constraint on Pages 5-22 and 5-23. The text concludes that the processing and permit procedures do not substantially affect the cost, supply, timing or approval certainty for affordable units, ADUs, or multi-family housing, since these housing types are permitted by right (provided they comply with the objective standards in the Municipal Code) and would be exempt from these requirements. The text also documents the high rate of approval for site plan review applications for single family homes. As the text notes, single family homes are typically multi-million dollar construction projects requiring extensive grading and development on sites with geological hazards and very high fire danger. The review process provides an important opportunity to address public health and safety issues, respond to community concerns regarding construction, and establish approval conditions where necessary.

19 **On/Off Site Improvements:** While the element stated that specific parcels zoned for multifamily such as the PVUSD site will require ingress and egress improvements (p. 5-23), the element should identify typical site improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width), and analyze their impact as potential constraints on housing supply and affordability.

City Response: Text added. See Page 5-18 (tracked change version). Site improvement requirements are documented in the previously submitted draft. The edited text confirms that there would be no special or unique site improvement requirements imposed on the PVUSD site. Off-site improvements are not typically required for new homes. Site improvements are associated with extension of electric service, installation of a septic system, and conformance to lighting standards (there are no street lights). The newly added text describes the site improvements specifically associated with subdivision of land, including street width standards, and requirements to install on-site water and storm drainage systems and to dedicate easements for gas and electric services. The text notes that all streets in Rolling Hills are private.

Constraints on Housing for Persons with Disabilities:

20 • ***Group Homes for Seven or More*:** The element must discuss how the City defines and permits group homes for seven or more persons. For your information, excluding these uses from residential zones or subjecting the uses to conditional use permits (CUP) is generally considered a constraint and programs should be modified as appropriate with specific commitment to allow the use in residential zones with objectivity and certainty.

City Response: Text added. See Page 5-14 (tracked change version). The City does not reference either large or small group homes in its Municipal Code, and treats these uses the same as other residential uses, as required by State law. The newly added text acknowledges that the absence of a definition and explicit listing of large and small residential care facilities as a permitted use could be a constraint. We have also added language to Program 4 (Chapter 6) calling for Code changes to add definitions or large and small residential care facilities, and to list these as permitted uses as required by State law.

21 • ***Reasonable Accommodation*:** While the element briefly describes its reasonable accommodation procedures, it must describe the process and decision-making criteria such as approval findings and analyze any potential constraints on housing for persons with disabilities.

City Response: Text added. See Page 5-13 (tracked change version). As requested, we have added a description of the process and decision-making criteria, including approval findings. No constraints have been identified.

22 **Other Local Ordinances**: The element must analyze any locally adopted ordinances that directly impacts the cost and supply or residential development (e.g., inclusionary requirements, short term rentals, growth controls).

City Response: Text added. See Page 5-22 (tracked change version). We have added a new Section 5.2.9 called "Other Local Ordinances." There are no other ordinances that directly affect the cost or supply of housing in the city.

23 **Zoning, Development Standards and Fees**: The element must clarify compliance with new transparency requirements for posting all zoning, development standards and fees on the City's website and add a program to address these requirements, as necessary.

City Response: Text added. See Page 5-22 (tracked change version). The newly added Section 5.2.9 now includes a summary of AB 1483, requiring the posting of the referenced information on the City's website. The analysis concludes that the City complies with the requirements. In addition, a new program has been added to Chapter 6 to reorganize this information, including a dedicated landing page on ADUs.

24 **SB 35 Streamlined Ministerial Approval Process:** The element must clarify whether there are written procedures for the SB 35 (Chapter 366, Statutes of 2017) Streamlined Ministerial Approval Process and add a program to address these requirements, if necessary

City Response: Text added. See Page 5-22 (tracked change version). The newly added Section 5.2.9 now also addresses the requirement to have written procedures for SB 35 projects. The revised Element now includes a program to prepare written procedures for SB 35 projects and include them on the City's website.

B6. Nongovernmental Constraints (Element Chapter 5)

25 **Approval Time:** The element must analyze the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially hinder the construction of a locality's share of the regional housing need.

City Response: We have added a new section 5.3.4 to the Element that addresses this issue. See Page 5-24. This constraint is beyond the City's control, but we acknowledge that inflated construction costs, shortages of labor and materials, rising interest rates, and factors such as the COVID-19 pandemic, have caused several property owners to postpone their plans, re-evaluate or redesign their projects, or sell their properties. Please note that we have also expanded Program 6 to add a new Action relating to follow-up communication with ADU permit recipients.

C. Programs (Element Chapter 6)

C1. Schedule of Actions

26 To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines and specific commitment. Several programs included various actions but still must include a timeline for implementing each action including, Program 8 – Assist Senior and Disabled Households, Program 9 – Assist Extremely Low-Income Households, Program 12 – Facilitate Communication with Affordable Housing Service Providers…Program 14 – Sewer Feasibility Studies and Phase One Construction, Program 20 – Fair Housing Services Program Administration, Program 22 – Fair Housing Training for Staff.

City Response: The comment references Programs 8, 9, 12, 14, 20, and 22. The following edits have been made to Chapter 6 in response:

- *Program 8 currently includes a commitment to update the City's website to add a dedicated page with "senior resources" by June 2023. We have added a second timeline and commitment, which is to convene a City Council study session before December, 2023 to discuss the needs of seniors, in collaboration with the RHCA Needs of Seniors Committee and non-profit senior organizations (such as Peninsula Seniors).*
- *Program 9 currently includes a commitment to establish a roster of ADUs offered to Extremely Low Income (ELI) households by 2024. A new quantified objective and timeline has been added to the Program, which is to facilitate assistance to 3 ELI homeowners by 2025.*
- *Program 12 currently includes a commitment to facilitate a meeting with affordable housing service providers by December 2022. The Program has been modified to facilitate such a meeting at least once a year during the planning period.*
- *Program 14 has a discrete timeline and specific commitment, which is to complete the Phase 1 project by 2024. The feasibility of future phases depends in the availability of grants. Additional timeline and commitment data has been added to the program.*
- *Program 20 has been modified, as the City seeks to determine the costs and benefits of different fair housing outreach and enforcement strategies. The program commits to a Fair Housing outreach and enforcement strategy by the end of 2022, thus providing a discrete timeline and specific commitment.*
- *Program 22 previously indicated a measurable objective of one staff training per year, starting in 2022. This has been reiterated through an edit to the text.*

C2. Programs relating to Sites

27

As noted in Finding B4, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning was not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element must be revised, as follows:

City Response: See responses to HCD comments numbered 10 through 17, as labeled in the left-hand margins of this document. The City has provided additional analysis demonstrating that the identified sites, which include the 31-acre RDMO site, vacant sites zoned for single family homes, and potential ADUs, are adequate to meet the RHNA of 45 housing units. In response to HCD's comments and the supplemental analysis, we have also added Programs 6.10 and 6.11 to further improve the production of ADUs and Program 23 to support SB 35 applications (see responses to comments 15, 24, and 25 above).

28

Program 2 – Rancho Del Mar Opportunity Site Monitoring: The element identifies one site to accommodate a portion of its lower-income RHNA. While the program includes several actions such as subdividing the site, coordination with the school district, technical assistance and incentives, the program does not commit to these actions nor provide a date for when these actions will occur. Specifically, the element should include timelines for various actions and include commitments to outreaching, coordination, and establishing incentives that facilitate development on this site, as mentioned in the program.

City Response: Text modified, see Chapter 6, Program 2 (P. 6-4 and 6-5 of tracked change version). We have edited the program to provide a timeline for subdivision, coordinate with the school district and prepare a fact sheet for the site, all of which will facilitate its development.

29

Program 6 – Accessory Dwelling Unit (ADU) Production, Monitoring, and Incentives: The element heavily relies on ADUs to accommodate most of the City's RHNA for all income levels. Given the City's assumptions for ADUs exceed recent trends, the element should include a program to monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning within a specified time period (e.g., six months).

City Response: The Element is presuming five ADUs per year, which is a lower number of ADUs than were permitted in 2021. The City has expanded Program 6.2 to add provisions for monitoring ADU production, including taking action within six months in the event the number of ADUs approved is falling short of the projected need during any calendar year. We have also added Program 6.11 to monitor permitted ADUs to support their construction after they are approved.

30

Zoning for a Variety of Housing Types: The element identifies Program 4 and 5 committing to provide a variety of housing types (e.g., SROs, transitional and supportive housing, employee housing, etc.,) and address constraints for people with disabilities. These actions were also identified in the last planning period but have not been completed. HCD encourages the City to utilize HCD's technical assistance resources and model ordinances to ensure effective and efficient implementation. Please see the Housing Hub Site: Housing Planning Hub Site (arcgis.com)

City Response: Staff appreciates HCD's references to the technical assistance and model ordinances and will follow up on available resources. The City's Fifth Cycle Element was certified in July 2021, and there has been insufficient time to adopt all of the program recommendations in its first year while concurrently completing the Sixth Cycle Element. As noted in the revised Program 4, the City intends to adopt provisions for transitional and supportive housing, large and small residential care facilities, and employee housing in its Municipal Code by July 2022. Program 5 addresses density bonuses and is proposed for implementation by the end of 2022.

C3. Programs Relating to Constraints

31

As noted in Finding(s) B5 and B6, the element requires a complete analysis of potential governmental *(sic).* Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

City Response: See responses to HCD's numbered comments 12, 13, 15, 17, 18, 19, 20, 21, 22, 23, 24, and 25, as labeled in the left-hand margins of this document. The City has now provided a complete analysis of potential governmental constraints, as requested by HCD. Please note that as a result of the additional analysis, we have expanded Programs 4 and 6 (see Chapter 6 in the tracked change version), including the addition of new programs supporting ADU monitoring and development. We have also added programs 23 and 24 related to SB 35 and AB 1483.

C4. Programs Relating to AFFH

32 As noted in Finding B1, the element must include a complete analysis of affirmatively furthering fair housing. Based on the outcome of that analysis, the element must add or modify programs.

City Response: See responses to HCD's numbered comments 2 through 6, as referenced in the left-hand margins of this document. The City has now provided a complete analysis of AFFH, as requested by HCD. Please note that as a result of the additional analysis, pages A-44 to A-47 have been added to link the AFFH priorities and contributing factors to the specific programs listed in Chapter 6.

D. Quantified Objectives

33 While the element does include quantified objectives (p. 6-20), it must be revised to include quantified objectives for number of housing units that will be rehabilitated for low, moderate, and above moderate households.

City Response: In an email from HCD's Housing Policy Analyst Gianna Marasovich sent on April 27 (4:37 PM), we were advised that "we determined that Rolling Hills can disregard the Quantified Objectives finding". Accordingly, no edits have been proposed in response to this comment.

E. Public Participation

34 While the element described various efforts to achieve public participation in the preparation of the housing element update, it should also describe how comments were considered and incorporated into the element.

City Response: Text has been added to Page 1-8 indicating how comments were considered and incorporated into the element. Several examples are provided, including the selection of the Rancho Del Mar site for rezoning, the focus on accessory dwelling units as a strategy to meet the RHNA, and the importance of programs to help seniors age in place, given the large number of older adults in the community.



CITY OF ROLLING HILLS

2021-2029 HOUSING ELEMENT

Adoption Draft

Published May 9, 2022

TRACKED CHANGES VERSION

As required by State law, an initial draft of this document (referred to as the "HCD Draft") was circulated for public comment and review for 30 days, beginning on December 3, 2021. More than 30 local agencies and organizations providing housing and related supportive services were notified and invited to comment on the Draft. The Draft was also discussed at a Planning Commission public hearing in December 2021 and a City Council hearing that occurred on January 10, 2022. On January 10, the City Council authorized submittal of the Draft to the California Department of Housing and Community Developlment (HCD) for review. Under State law, HCD had 90 days to issue its findings.

Comments from the State Department of Housing and Community Development (HCD) were received on April 11, 2022. City staff/ consultants met with HCD to review the comments on April 22, 2022. This "Adoption Draft" incorporates revisions that directly respond to and address the HCD comments, A revised document was issued on May 9, 2022. This document was made available for two weeks prior to Council action on the document (seven days is required).

Once adopted, this document will be re-submitted to HCD, inclusive of any changes made during Planning Commission and Council hearings (including changes responding to public comments). HCD will then have 60 days to issue its findings.

ROLLING HILLS
HOUSING ELEMENT
2021-2029

CITY OF ROLLING HILLS

Adoption Draft:
Tracked Change Version

All changes between the January 2022 version and the May 2022 version of this document are highlighted in redlined (tracked changes) font

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Published May 9, 2022

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FOREWORD

This document has been prepared to comply with the requirements of California Government Code Sections 65580-65589, which mandate that all California cities and counties adopt a Housing Element to address local and regional housing needs. The Housing Element is part of the Rolling Hills General Plan and covers the time period 2021-2029. State law requires that the Housing Element is updated every eight years and submitted to the State Department of Housing and Community Development for certification.

Certification of the Housing Element is based on a determination that the City has complied with a variety of State laws addressing regional issues such as affordability, fair housing, density, housing type, overcrowding, and homelessness. These laws apply universally to all cities, including those with limited services and land capacity.

As a community within the Greater Los Angeles region, the City of Rolling Hills is obligated to provide for its "fair share" of regional housing needs as determined by the Southern California Association of Governments. Cities without certified Housing Elements are subject to legal and financial penalties, the loss of eligibility for grants which help fund City operations, and even the potential loss of local control over building and land use decisions. For these reasons, it is in the City's best interest to strive for a compliant element.

In adopting this Element, the City has endeavored to balance State mandates with the overarching goal of preserving the semi-rural, equestrian character of Rolling Hills. The Housing Element responds to local as well as regional needs, including the need to preserve the community's environment, minimize further exposure to wildfire and landslide hazards, and recognize infrastructure and public facility constraints.

Rolling Hills Housing Element
2021-2029

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1.0 Introduction

1.1 Purpose

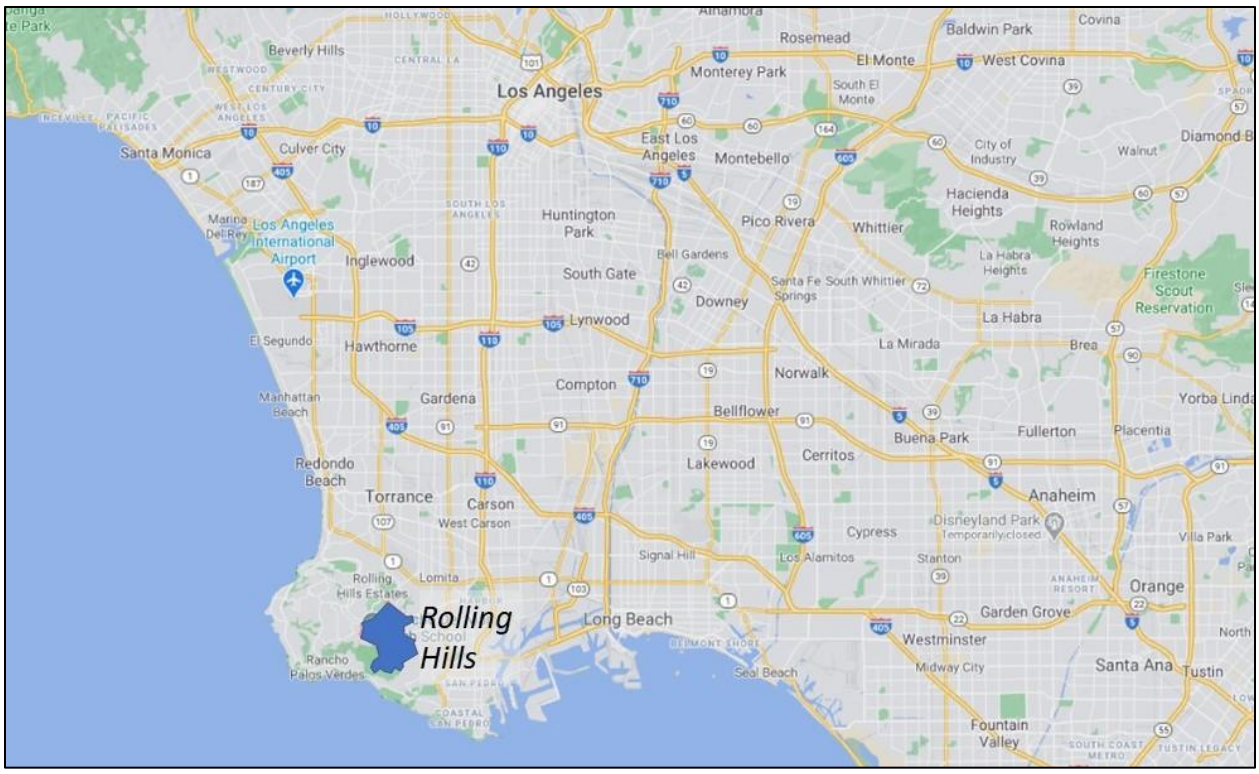
The purpose of the Housing Element is to ensure that a safe, decent supply of housing is provided for current and future Rolling Hills residents. The Element strives to conserve existing housing while providing opportunities for new housing serving a variety of income levels.

State law mandates that all municipal governments prepare and maintain a Housing Element as a component of their General Plans. The following five sections are required:

1. Evaluation of the previous Housing Element
2. Assessment of local housing needs based on demographics, economic, and housing conditions
3. Inventory of potential sites for housing development
4. Analysis of City regulatory framework related to housing development
5. Goals and policies for housing, coupled with specific action programs to be implemented in the coming years.

In addition, the Element must demonstrate the steps the City is taking to promote fair housing practices, and to proactively develop housing for all income groups. The Housing Element describes how the City will provide for its fair share of the region's housing needs over the eight-year planning period (2021 to 2029). It identifies new programs to be implemented, along with on-going programs that create housing opportunities in Rolling Hills.

The Housing Element is the only part of the General Plan that is subject to review and certification by a State agency. Adopted Elements must be submitted to the California Department of Housing and Community Development (HCD). HCD determines if the Element meets the requirements of the California Government Code, which apply equally to all cities and counties of the state regardless of the community's size, physical constraints, or resources. A compliance determination is important to maintain eligibility for State grants, avoid costly lawsuits, and maintain local control over local land use and building decisions.



Source: Google Maps, 2021

Figure 1.1: Vicinity Map

1.2 Community Overview

The city of Rolling Hills is a rural, equestrian residential community, consisting entirely of large lot residential parcels of one acre or more. The community encompasses 2.99 square miles of land (approximately 1,910 acres) on the Palos Verdes Peninsula in the County of Los Angeles (Refer to Figure 1.1, Vicinity Map). The 2020 Census indicates a citywide population of 1,739 residents, making Rolling Hills the fifth smallest of the 88 cities in Los Angeles County.

The land use pattern in Rolling Hills was established in 1936 with the original subdivision and sale of parcels. American landscape architect A.E. Hanson designed the community in the 1930s, establishing an historic Southern California design aesthetic that remains today, 85 years later. Well-known architects like Cliff May and Wallace Neff designed some of the early homes, contributing to the community's historic context.

The entire city is characterized by single-story California ranch-style homes on large lots with three-rail fences and equestrian facilities. There are three points of ingress and egress to the city, each of which has a controlled entry gate. Rolling Hills was planned and conceived to balance development with nature and respect the area's rugged topography. The community was laid out on hilly terrain, with narrow, winding roads traversing steep, wooded canyons. Minimum lot size requirements were established to recognize the area's many natural constraints, including geologic hazards, wildfire, and sensitive biological resources.

The natural landscape is characterized by steep slopes of 25 to 50 percent. Underlying this terrain are ancient landslides, occasionally causing damage or even destroying property, roads, and infrastructure. The City carefully regulates grading and earth movement to protect public safety and minimize the potential for property damage. Geologic studies and grading requirements also add to housing costs.

The entire city lies within a Very High Fire Hazard Severity Zone. This is the most constrained designation used by the California Department of Forestry and Fire Protection (Cal Fire) and requires restrictive construction standards such as the boxing in of eave projections and use of construction materials approved by the California Fire Marshal. Professionally designed landscaping meeting Fire Department fuel reduction standards (i.e., fire-resistant plants around structures) also is required. Fire hazards are complicated by an aging water distribution system, and the high cost of water system improvements on steep terrain.

Rolling Hills is also home to a number of sensitive plant and animal species, several of which are listed or being considered for listing by the U.S. Department of Fish and Wildlife and/or the California Department of Fish and Wildlife. These species include the Palos Verdes Blue butterfly, the California Gnatcatcher, the Pacific Pocket Mouse, the San Diego Horned Lizard, and Brackishwater Snail. The community is also underlain with blue-line streams that are under the jurisdiction of the Army Corps of Engineers.

The City's infrastructure is scaled to meet the needs of a mature, rural community with severe natural hazards. Its water distribution system is designed for very low-density residential land uses. Wastewater treatment generally occurs through private septic tanks. Only a few parcels on the western periphery of the city have access to sanitary sewer. All roads in the community are private and many were built 60 to 80 years ago before modern emergency vehicle standards were in place.

Housing policies and programs in Rolling Hills reflect the city's natural hazards, lack of developable land, and infrastructure limitations. In the past, the City has complied with Government Code housing requirements in ways that respond to these inherent physical constraints. For example, Rolling Hills has adopted provisions for accessory dwelling units in all of its zoning districts, permitted manufactured housing units, and created an affordable housing overlay zone on its most developable land. Its policies also emphasize conservation and maintenance of the existing housing stock, much of which is over 60 years old.

1.3 Legislative Requirements

The provision of adequate housing for families and individuals of all economic levels is an important public goal and has been a focus for state and local governments for more than five decades. Local governments have been required to prepare Housing Elements since 1969. The required contents of the Element have expanded significantly over this time, in response to rising housing costs, increasing competition for resources, and a growing population of individuals with special needs that cannot be met by the private sector alone.

1.3.1 Government Code Requirements

State law requires each municipality to perform the following tasks:

- Identify and analyze the current and projected housing needs of all economic segments of the community.
- Evaluate current and potential constraints to meeting those needs, including constraints due to the marketplace and those imposed by the government.
- Promote and affirmatively further fair housing opportunities and promote housing throughout the community for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.
- Inventory and assess the availability of land suitable for residential use.
- Establish goals, objectives, policies and programs aimed at responding to identified housing needs, market and governmental constraints, and housing opportunities.

> *"The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order. The early attainment of this goal requires the cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians of all economic levels."*
>
> *California Government Code, Section 65580*

1.3.2 Regional Housing Needs Allocation

As part of the Housing Element process, the State of California determines the total need for housing in each region of California. For the 2021-2029 period, the State determined that the need for the six county Southern California region was 1,341,827 housing units. The Southern California Association of Governments (SCAG) is responsible for allocating this total to each of the six counties and 191 cities in the SCAG area. This process is known as the Regional Housing Needs Allocation (RHNA) and occurs every eight years.

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

Each city in California is required to plan for its RHNA. This does not mean the cities must acquire land or construct housing. Rather, it means that they must identify sites where the RHNA can be accommodated and adopt policies and regulations which facilitate housing construction on those sites. Ultimately, the responsibility for constructing housing falls to the private market and non-profit housing developers. Cities are expected to assist by adopting

development standards that support housing at a variety of densities, providing technical assistance and infrastructure, and adopting policies that encourage housing production, conservation, and assistance to persons with special needs.

In Rolling Hills, the RHNA for 2021-2029 is 45 units. This includes 20 very low income units, 9 low income units, 11 moderate income units, and 5 above moderate income units.[1] The 2021-2029 Housing Element demonstrates that the City has the capacity to accommodate this assignment.

1.3.3 HCD Review Authority and Compliance Requirements

Once the Housing Element is adopted, it is submitted to HCD to determine whether, in HCD's view, the Housing Element "substantially complies" with state Housing Element Law. HCD's compliance determination is based in part on a detailed checklist corresponding to specific requirements set forth by the Government Code. Once certified, HCD still has the authority to find a city out of compliance if it finds that city is taking actions that are inconsistent with its Housing Element or failing to implement the programs listed in its Element.

Localities without an HCD-certified Housing Element are subject to a growing number of penalties and potential risks. This includes litigation from housing organizations, developers, and HCD itself. In addition to legal costs, potential consequences include suspension of local control of building matters and court approval of housing development. Courts can also levy costly fines on local governments and mandate streamlined and less rigorous approvals. Cities also become ineligible for numerous state local funding programs, including those supporting infrastructure and roads, as well as housing and planning.

1.4 Relationship to Other General Plan Elements

The Government Code requires internal consistency among the various elements of a General Plan. Section 65300.5 of the Government Code states that "the General Plan and the parts and elements thereof shall comprise an integrated and an internally consistent and compatible statement of policies."

The Rolling Hills General Plan contains the following six elements: 1) Land Use; 2) Housing; 3) Circulation; 4) Open Space and Conservation; 5) Safety; and 6) Noise. The General Plan is internally consistent, meaning that the policies in different elements complement and support one another. The Housing Element reflects the policy direction provided by the other General Plan elements. For example, it references the residential densities established in the Land Use Element and the natural constraints identified in the Safety Element. The City amended its Land Use Element in early 2021 to maintain consistency with its new Housing Plan. It ~~is also~~ adopted a revised ~~revising its~~ Safety Element in March 2022 to comply with new provisions of the Government Code ~~that are triggered by amendments to the General Plan, including adoption of a new Housing Element~~.

[1] *See Section 3.2.5 of this document for a definition of these income categories*

Pursuant to Government Code Section 65400, the City will annually review its progress in implementing this Housing Element. This review will help ensure consistency between this Element and the other General Plan Elements.

1.5 Relationship to Private Land Use Restrictions

Most of the developable property in Rolling Hills is subject to covenants, conditions, and restrictions (CC&Rs) adopted by the Rolling Hills Community Association (RHCA), a non-profit California Corporation and homeowners association. RHCA is governed by elected Rolling Hills residents and oversees and enforces implementation of the CC&Rs. The CC&Rs run with each property in perpetuity and cover all properties in the City except those listed below:

1. City Hall Complex
2. Tennis Court Facility
3. Palos Verdes Peninsula Unified School District property
4. Daughters of Mary and Joseph Retreat Center

CC&Rs represent private contractual obligations between homeowners and are usually established at the time a subdivision or community is built. Development in Rolling Hills has been governed by CC&Rs since the community was planned in the 1930s. The RHCA and the CC&Rs were in force prior to the City's incorporation, which occurred in 1957. The City of Rolling Hills has no jurisdiction over the RHCA or the content or implementation of the CC&Rs.

The CC&Rs limit the density on most parcels in Rolling Hills to one residence per one-acre or two-acre lot. In addition, any construction, remodel, or grading for a building, fence or structure is required under the CC&Rs to adhere to traditional or California ranch and equestrian architectural styles and aesthetics. The uses and purposes of all perimeter easements around each property are required to be dedicated to the RHCA and maintained for the purposes of ingress, egress, construction, and maintenance of all infrastructure constructed as roadways, bridle trials, storm drains, utility access and drainage.

In some instances, State law may supersede the authority of CC&Rs. For example, AB 670 (Cal Civil Code 4751—effective January 1, 2020) limits CC&Rs from placing unreasonable limitations on accessory dwelling units (ADUs). To the greatest extent feasible, the programs in this Housing Element reflect the requirements of State law while maintaining the integrity of the CC&Rs. CC&Rs that directly conflict with State or Federal law are not enforceable.

1.6 Public Participation and Project Timeline

The City of Rolling Hills has made a diligent effort to engage the community in the Housing Element update. The process was structured as a continuation of the previous (2014-2021) Housing Element update, which included an initial phase in 2013-14 when the Element was adopted and a second phase in 2020-2021 when the adopted Element was amended and resubmitted to the State for a compliance determination. The 2020-2021 amendments coincided with the Sixth Cycle engagement processes that were underway throughout Southern

California cities at that time. Although the focus of the 2020-2021 effort was on Fifth Cycle compliance, the process provided an opportunity to engage the community in a broader conversation about housing, the RHNA process, and new State requirements.

SCAG began the RHNA process for the Sixth Cycle in Fall 2019, exploring different methodologies for allocating the regional need to individual cities and counties. As other cities began work on their Sixth Cycle Elements, Rolling Hills was required to first amend its Fifth Cycle Element to accommodate both the current (Fifth) cycle and the prior (Fourth) cycle RHNA allocations due to its non-compliant status. The combined RHNA for the two cycles was 28 units. Accommodating this need meant that Rolling Hills was also required to amend its General Plan and zoning to create additional housing capacity.

The City held a public hearing on the Housing Element on November 25, 2019. The meeting focused on potential sites for rezoning and related development impacts. The meeting was widely noticed through advertisements in the Palos Verdes Peninsula News, an announcement in the City newsletter, posting at City Hall, and an email to the City's interested parties list.

The Draft RHNA numbers were published in March 2020. Rolling Hills did not appeal its allocation, instead focusing its efforts on continued outreach and engagement to certify the Fifth Cycle Element and lay the groundwork for the Sixth Cycle. This outreach included nine public hearings related to the Housing Element on the following dates:

- October 20, 2020 (Planning Commission)
- November 9, 2020 (City Council)
- December 22, 2020 (Planning Commission)
- January 25, 2021 (City Council)
- February 5, 2021 (Planning Commission)
- February 8, 2021 (City Council)
- February 22, 2021 (City Council)
- March 8, 2021 (City Council)
- March 16, 2021 (Planning Commission)

The outcome of these meetings included adoption of the Rancho Del Mar Overlay Zone, new provisions for by-right affordable multi-family housing and emergency shelter, amendments to the Land Use Element of the General Plan, and various changes to the Municipal Code to facilitate housing production. On June 1, 2021, the Planning Commission recommended that the City Council adopt the amended Fifth Cycle Housing Element. The Council took action on June 14, 2021. The Element was submitted to HCD and found to be in compliance on July 7, 2021. As a result of the compliance determination, the City does not have to carry over its prior allocation and may plan only for the 45 units identified in the Sixth Cycle RHNA.

In addition to the public hearings described above, staff conducted direct outreach to Rolling Hills residents in 2020 and 2021 through newsletters, including a survey on Accessory Dwelling Units (ADUs) administered to every household in the city. More than 30 percent of the city's households completed the survey, and a report on the findings was prepared (it is included as Appendix C to this Element).

The City continued its public outreach efforts after adoption of the revised Element in July 2021.

A special session of the Planning Commission was convened on October 19, 2021 to provide an overview of the Sixth Cycle Element and solicit input from the entire community. In addition, public hearings on the HCD Draft Element were convened by the Planning Commission on December 16, 2021 and by the City Council on January 10, 2022. In March 2022, the City convened a public meeting on the Annual Progress Report, providing another opportunity for public input on housing issues as well as an opportunity to evaluate progress in Housing Element implementation. Additional public hearings were ~~will be~~ held on May 17 (Planning Commission) and May 23 (City Council) after the document was ~~is~~ revised and presented for adoption.

The City has endeavored to solicit input from all economic segments of the community, including local renters as well as homeowners. It has also incorporated this input in the Housing Element. In surveys and public hearings, the community generally supported the Rancho Del Mar site as the preferred location for accommodating denser housing, and also supported meeting the RHNA primarily through accessory dwelling units (ADU). Both of these concepts are reflected in this document. Housing advocacy groups also provided letters to the City encouraging ADU development, which helped shape Housing Element programs. In addition, the community was especially concerned about the housing needs of older adults. Thus, policies relating to special needs populations and lower income households focus on the needs of seniors, particularly those who may need assistance with the maintenance of their homes and properties, or adaptive changes to facilitate aging in place.

City staff has also engaged service providers, the development community, and partner agencies such as the School District in the process. As a small community, most residents rely on the City newsletter for information on local government affairs. The City has featured the Housing Element in newsletter articles and encouraged residents to share their views on proposed housing policies. Publication of the "HCD Review Draft" was announced in the City's newsletter during the first week of December 2021. More than 30 stakeholder organizations on the Palos Verdes Peninsula, and in the South Bay, Los Angeles, and Long Beach regions were notified of the document's availability for 30-day review and comment. These agencies were also notified when the document was brought back to the Planning Commission and City Council for adoption.

In addition, as required by SB 1087, the City sent an electronic copy of its Housing Element to the appropriate water and sewer providers immediately after adoption. The document was accompanied by a letter reminding these agencies they must have adopted written policies and procedures that grant a priority for service hook-ups to developments that help meet the community's share of the regional need for lower-income housing.

1.7 Data Sources

The Housing Element is a data-driven document, with policies and programs that are based on analyses of demographics, housing conditions, resource constraints, and forecasts. The primary data sources consulted were:

- Rolling Hills General Plan, as amended
- Rolling Hills Municipal Code
- Southern California Association of Governments (SCAG) Final Regional Housing Needs Allocation Plan, adopted March 4, 2021
- SCAG "pre-approved" Housing Element data set for Rolling Hills, 2020
- City of Rolling Hills Planning Department records (building permits, etc.)
- American Community Survey, 2015-2019
- US Census (1990, 2000, 2010)
- US Census August 12, 2021 data release from the 2020 Census
- Department of Finance Table E-5, population and housing estimates, 2010-2021
- California Economic Development Department (EDD) Labor Force Data
- Rolling Hills Local Hazard Mitigation Plan
- County of Los Angeles (data on homelessness)

2.0 Evaluation of Prior Housing Element

2.1 Purpose

Government Code Section 65588 requires each local government to periodically review its housing element to:

(1) Evaluate the appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal, which is to provide decent housing and a suitable living environment for every Californian.
(2) Evaluate the effectiveness of the housing element in attainment of the community's housing goals and objectives.
(3) Discuss the progress of the city or county in implementation of the housing element.

2.2 2014-2021 RHNA and Actual Housing Production

The City's Regional Housing Needs Allocation (RHNA) for the prior (2014-2021) period was six units. This included two very low income units, one low income unit, one moderate income unit, and two above moderate income units. Rolling Hills also had a "carry-over" requirement of 22 units from the prior (2006-2013) planning period, including six very low, four low, four moderate, and eight above moderate income units. The 2014-2021 Housing Element identified the capacity to meet the combined two-cycle (2006-2021) need.

Actual housing construction during 2014-2021 was five units. There were four new market rate (e.g., "above-moderate income") single-family homes completed on previously vacant lots over the 2014-2021 period.[1] Another three single family homes were approved on vacant lots but have not yet been constructed. There was one accessory dwelling unit (ADU) completed. It is estimated to be a moderate-income unit based on its size (720 square feet). Another six ADUs were approved between September 2020 and September 2021.[2] Three more were pending as of October 15, 2021. All of these units will become available for occupancy during the Sixth Cycle.

There were no new low or very low-income units recorded during the Fifth Cycle, although lower income households may have secured housing in the city through room rentals, on-site employment (caregivers, etc,), or housing provided at nominal or no charge (family members, domestic staff, etc.). Production of deed-restricted lower-income housing units during the 2014-2021 planning period was constrained by the high cost of land and construction, limited opportunities for multi-family housing, and limits to Accessory Dwelling Unit (ADU) development during the first half of the planning period. The latter two constraints were removed over the course of the planning period, placing the City in a better position to meet its targets during the upcoming 2021-2029 period.

[1] There were also 12 new homes built on sites that previously included single family homes, with no net gain in units (e.g., "tear downs")
[2] The six ADUs approved in 2020-2021 were in various states of completion in October 2021 and are all counted toward the Sixth Cycle RHNA rather than the Fifth Cycle.

2.3 Review of Prior Housing Element Goals and Policies

The next section of this chapter systematically evaluates the policies and actions of the previous Housing Element and reports on implementation progress. The 2014-2021 Element included four goals, each of which included related policies. The goals and policies are evaluated below.

2.3.1 Progress on Goal 1: Housing that Meets the Needs of Rolling Hills Residents

This goal expresses one of the main purposes of the Housing Element. It remains relevant and should be carried forward. The City worked to accomplish this goal throughout the 2014-2021 planning period through its planning, zoning, building, code enforcement, and fire safety programs.

Policy 1.1 called for evaluating ways to assist special needs populations. The largest population with special needs in Rolling Hills consists of seniors, including those with disabilities. The City continues to implement programs to assist seniors with housing, transportation, emergency preparedness, and access to social services. The policy should be carried forward. Policy 1.2 called for working with other governmental entities to explore providing affordable housing in the South Bay region. This occurs on an ongoing basis through the city's participation in SCAG, communication and liaison with developers, and meetings with planners and housing organizations on the Palos Verdes Peninsula and throughout Los Angeles County. Policy 1.3 called for encouraging energy conservation and weatherization. The City implements this policy through its planning and building regulations, including Title 24. It also works with residents interested in solar installation and weatherization.

Policy 1.4 expresses the City's commitment to facilitating a variety of housing types. The City made significant progress through its creation of the Rancho Del Mar Overlay zone, permitting of accessory dwelling units by right, and allowance of emergency shelter and single room occupancy dwellings. Given community context, constraints, and development costs, ADUs and home sharing provide the best solution for meeting the needs of all income groups. Policy 1.5 recommends effective community participation. The City produces a twice-monthly newsletter which is delivered to all households and uses its website to keep the community informed. It has used a variety of methods, such as surveys and workshops, to involve the public. Given the community's small size and engaged population, there is a very high level of awareness of housing issues and requirements. Policy 1.6 calls for the City to participate in countywide programs to meet the needs of unsheltered residents. This continues on an ongoing basis.

2.3.2 Progress on Goal 2: Maintain and Enhance the Quality of Residential Neighborhoods

Maintaining the city's neighborhoods as great places to live is the fundamental purpose of the City's General Plan. As a built out community with extreme natural hazards and constraints, this goal is primarily covered by the Land Use and Safety Elements. Nonetheless, it is appropriate to include policies in the Housing Element addressing conservation of the existing housing stock, as well as management of home alterations and additions. There are five policies in the 2013-2021 Element, and they all remain relevant.

Policy 2.1 is to encourage and assist in the maintenance and improvement of existing homes. The City does this through its planning and building processes, and works closely with homeowners to support home improvements. Policy 2.2 requires housing that complies with building code requirements. This could be restated in the updated Element, since compliance with the building code is required under State law. Policy 2.3 requires "compatible design" that minimizes impacts on adjacent neighborhoods. This remains valid, but should reference the zoning ordinance as the source of objective design standards that clarify the meaning of "compatible design."

Policy 2.4 calls for code enforcement to maintain housing, which is still relevant. Policy 2.5 allows for ADUs and Junior ADUs (JADUs) in all residential zones. Consistent with State law, the City implemented regulations allowing ADUs in all zones in 2018 and amended those regulations in 2020. The policy should be retained, as it provides the foundation for related regulations in the Municipal Code.

2.3.3 Progress on Goal 3: Provide Housing Services to Address the Needs of the City's Seniors

Seniors/older adults are the predominant special needs group in Rolling Hills. The Housing Element Needs Assessment confirms that a significant number of the city's seniors have disabilities, are living alone, and may have difficulty covering their housing expenses.

Policy 3.1 calls for housing reference and referral services for seniors, which is still relevant and implemented on an ongoing basis. The Rolling Hills Community Association formed a committee in 2014 to specifically focus on the needs of seniors. Policy 3.2 calls for more information on shared housing, which remains valid. Policy 3.3 recommends reverse mortgage loans for seniors with limited incomes. Given the mixed success of reverse mortgage programs, the City should consider replacing this policy with others relating to the needs of seniors. For instance, it could indicate that affordable senior housing be considered on the Rancho Del Mar site. Policy 3.4 promotes opportunities for live-in care or family members who can assist mobility-impaired or elderly residents. This remains relevant and should be carried forward. Other policies addressing the housing needs of seniors could be considered.

2.3.4 Progress on Goal 4: Fair Housing

Goal 4 directs the city to "Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, disability status, or national origin." The importance of this goal has been elevated by AB 686, and it should be retained. There are four policies listed in the Fifth Cycle Element to implement this goal.

Policy 4.1 indicates the City should "affirm a positive action posture" and enforce all applicable laws and policies. This policy could potentially be simplified to focus on enforcement. Policy 4.2 specifically covers the needs of persons with disabilities. It should be carried forward. Policy 4.3 relates to making information on housing laws available to the community at City Hall. It is implemented on an ongoing basis but should be clarified to include information on the City's website as well as City Hall. Policy 4.4 expresses a commitment to investigate alleged violations of fair housing laws. This should be carried forward, with reference to the partner entities the

City works with on such investigations. Additional policies on fair housing related to economic inclusion and opportunities for lower income households should be considered.

2.3.5 Cumulative Evaluation of Effectiveness of Prior Element in Addressing Special Housing Needs

The State Department of Housing and Community Development has requested that the City include an "a cumulative evaluation of the effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness)."

As a small city with only 640 households and a staff of six full-time employees, the City's capacity for providing services to special needs populations is limited. The greatest emphasis has been on seniors, who are present in 56 percent of the city's households and represent one-third of the population. The City's 5th Cycle Housing Element included a goal addressing the needs of seniors but it did not include a more generalized goal addressing special needs populations. This has been addressed in the 6th Cycle Element by broadening the goal to address other special needs categories.

As noted on P. 2-3, Rolling Hills has worked effectively to meet the needs of seniors through its partnerships with the Rolling Hills Community Association (and their Senior Committee), its support for shared housing and ADU programs, and its code provisions allowing live-in care providers throughout the city. Many older Rolling Hills residents have been able to age in place, retrofit their homes, and continue living in the city as a result of these policies and programs. The 2014-2021 Element also included a policy related to unhoused residents (Policy 1.6) and a policy related to persons with disabilities (Policy 6.2). As noted in Chapter 3, there are no unhoused residents in the city according to the annual "point in time" count, but Rolling Hills continues to participate in intergovernmental meetings, forums, and councils of government activities that recognize the regional nature of homelessness and the importance of regional solutions. The City has also amended its codes to allow emergency shelter by right in at least one zoning district. The City also has adopted a Reasonable Accommodation ordinance for persons with disabilities and supports home improvements to facilitate aging in place and access for residents with disabilities. On a cumulative basis, these measures have contributed to the health, safety, and welfare of all Rolling Hills residents and to the quality of life and condition of housing in the city.

Both the 2014-2021 Needs Assessment and the 2021-2029 Needs Assessment determined that there were not significant housing needs associated with large households, female-headed households, or farmworkers in the city.

2.4 Implementation Status of Prior Housing Element Programs

The 2014-2021 Housing Element included 24 implementation programs. Table 2-1 below indicates the status of each program as of October 2021. The table indicates whether the program has been accomplished or should be carried forward, revised, or deleted.

Table 2-1: Implementation Status of 2014-2021 Housing Element Programs

Prog.	Description	Status
1	Prepare an annual housing progress report	*CARRY FORWARD.* The City filed its annual Housing Progress Report for 2021 on March 29, 2022 ~~in 2020~~ and should continue to do so in future years.
2	Amend the Land Use Element to permit a variety of housing types	*ACCOMPLISHED.* This program may be removed from the Housing Element, as it was accomplished in March 2021. The City amended its General Plan to permit by right multi-family development, emergency shelter, and single room occupancy housing in the Rancho Del Mar Overlay Zone.
3	Create an Affordable Housing Overlay Zone (AHOZ)	*ACCOMPLISHED.* This program may be removed from the Housing Element or merged with the program to periodically evaluate the Overlay Zone and determine if changes are needed (See Program 13). The City adopted a 31-acre Overlay in February 2021 (known as the Rancho Del Mar Overlay zone), allowing for by-right development of up to 16 units of affordable multi-family housing (20 units per acre) on the Rancho Del Mar site on Crest Road West.
4	Determine next steps for PVUSD housing opportunity	*CARRY FORWARD.* The City Manager meets with the PVUSD Superintendent regularly to discuss issues of concern, including the future of the PVUSD property. Other aspects of Program 4, including meeting with developers and providing input to parties interested in this site, should be retained and implemented on an ongoing basis.
5	Adopt zoning for emergency shelter.	*ACCOMPLISHED.* This action was completed in February 2021. The City permits emergency shelter up to 12 beds by right in the Rancho Del Mar Overlay Zoning district. A replacement program should be included, identifying ongoing measures the City will take to address the needs of unhoused residents.

Prog.	Description	Status
6	Adopt zoning for single room occupancy (SRO) units.	*ACCOMPLISHED.* This action was completed in February 2021. The City permits SROs of 6-8 units as a conditional use in the Rancho Del Mar Overlay Zoning district, subject to objective operational and performance standards.
7	Adopt a Reasonable Accommodation Policy	*ACCOMPLISHED.* The City of Rolling Hills adopted a Reasonable Accommodation policy in October 2020. The policy establishes a formal procedure through a which a person with disabilities may request reasonable accommodation in order to have equal access to housing. This program may be replaced with other actions to assist residents with disabilities.
8	Add definitions of Transitional/ Supportive Housing and Employee Housing to Municipal Code	*CARRY FORWARD.* This program has not yet been implemented. The 2014-2021 Housing Element clarifies that supportive and transitional housing may not be subject to requirements or standards other than those that apply to similar dwelling unit types in the same zones. However, the program must still be codified through a Municipal Code amendment.
9	Adopt density bonus requirements	*CARRY FORWARD.* This program has not yet been implemented. Any project including units eligible for a density bonus would be subject to State density bonus rules. The City should amend its Municipal Code for consistency with these rules, and expressly identify opportunities and rules for density bonuses.
10	Adopt and periodically update accessory dwelling unit (ADU) regulations	*REVISE.* The City adopted ADU regulations in 2018 and amended these regulations in January 2020 to incorporate new State laws. This action should be replaced with one or more new actions related to ADUs, including incentives to promote their use as affordable housing.
11	Implement ADU education, outreach, and community engagement measures	*REVISE.* The City has provided information on ADUs to the community since 2018 and should continue to do so in the future. Newsletter articles and web-based information have been provided and a citywide survey on ADUs was administered in 2020. Potential outreach measures are listed in the 2014-2021 Element and should be carried forward. Staff time should be allocated to these activities to ensure they are implemented. This includes coordination with Rolling Hills Community Association to ensure that design review practices do not constrain ADU production or add to their cost. Future activities could include prototype floor plans and designs, FAQs, community workshops, and tenant matching services.

Prog.	Description	Status
12	Develop incentives to encourage ADU production	*REVISE.* This program suggested reaching out to at least five cities and two non-profits to develop a suite of best practices for incentivizing ADUs. Based on the findings, the program recommended incentives such as fee reductions, streamlined permitting, and funding for septic system expansion to make it easier and more affordable to add ADUs. The City has begun implementing this program by participating in a South Bay Cities Council of Governments collaborative that helps residents calculate the cost and revenue for adding an ADU (see https://southbaycities.aducalculator.org/). Additional measures will be considered in the future. ~~has not yet been implemented due to lack of staff but it remains relevant.~~
13	Monitor the effectiveness of the Affordable Housing Overlay Zone (AHOZ) and consider future multi-family housing opportunities	*REVISE.* There are two parts to this program. The first is monitoring the effectiveness of the Rancho Del Mar Overlay Zone to determine if it is achieving its intended purpose. This should be retained. The second part of the program is to evaluate other multi-family housing opportunities. This is occurring through preparation of the Sixth Cycle Element and should continue through 2029.
14	Assist Extremely Low Income (ELI) households	*CARRY FORWARD.* This program is implemented by facilitating housing for family members, caregivers and domestic employees, and by assisting elder Rolling Hills homeowners on fixed incomes with home maintenance, home sharing, ADU construction, and other actions that reduce housing cost burdens. The program should be carried forward.
15	Facilitate communication with affordable housing service providers, developers, and advocates	*CARRY FORWARD.* The program recommends coordinating with affordable housing organizations to facilitate housing assistance and production for lower income households. The City implements this program on an on-going basis and should continue to do so in the future.
16	Provide public information on home sharing programs	*CARRY FORWARD.* This program references a number of home sharing programs in Los Angeles County and suggests that Rolling Hills provide information about these programs on its website and at City Hall. This is a relatively low-cost measure that can help seniors, young adults, and local employees find housing options in the city. It should be retained.

Prog.	Description	Status
17	Provide information about reverse mortgages	*DELETE.* While reverse mortgages may be helpful for some households, there may also be downsides associated with high closing costs, fees, and unfavorable repayment terms. There is also a risk of fraud. The City may not wish to take an advocacy position promoting reverse mortgages due to the risks involved. Local homeowners may still consider this option should they choose to do so. The program could also be revised to focus on consumer protection issues related to reverse mortgages.
18	Undertake sewer feasibility and design studies	*REVISE.* This program should be updated to reflect the current status of sewer feasibility and design studies. A feasibility study was initiated in 2020 and design plans are nearing completion. The updated Housing Element program should reflect the findings of these studies, as well as Council direction.
19	Implement Best Management Practices to improve stormwater	*REVISE.* The City has continued to implement municipal storm water management measures to reduce urban runoff pollution. It will continue to do so in the future as conditions and requirements change. This program could potentially be deleted or combined with Program 18.
20	Maintain code enforcement procedures	*REVISE.* This program called for hiring a full-time Code Enforcement Officer, which was accomplished in 2019. There is an ongoing need for enforcement of planning and building codes in order to conserve housing quality and correct structural deficiencies. Violations have been consistently abated in order to maintain public safety and community standards. The program should be updated and retained.
21	Encourage energy conservation	*CARRY FORWARD.* This program continues to be relevant and informs City actions relating to weatherization, solar installations, and other steps to reduce home energy costs and promote clean energy. The program references various links on the City's website to energy conservation programs, and financial assistance for home energy costs. It should be carried forward.
22	Facilitate new construction and remodels	*CARRY FORWARD.* This is a general program that encourages the City to work with applicants, builders, property owners, and others to produce new market rate housing and to facilitate permits for home improvements. It supports permit streamlining and efficiency, and transparency in the planning and building processes. It should be carried forward.

Prog.	Description	Status
23	Explore solutions to ground stability and landslide problems	CARRY FORWARD. The City implements this program on an ongoing basis through requirements for soils and geology reports, as well as grading standards and grading permit requirements. It continues to allow and support repair work on landslide damaged homes and unstable hillsides. Given past damage caused by landslides and the vulnerability of parts of the city to future damage, this program should be retained. Reference could also be made to programs that reduce wildfire risk and promote defensible space.
24	Make Fair Housing information available to the public	REVISE. This program reflects the City's ongoing commitment to making fair housing information available to the public. Given HCD's guidelines for implementing AB 686 (Affirmatively Furthering Fair Housing), additional fair housing programs should be developed.

3.0 Housing Needs Assessment

3.1 Introduction

Each community's housing plan must be based on an analysis of local housing needs. This analysis is expressly required by the State Government Code (Section 65583(a)), and includes a comprehensive evaluation of local demographics, housing conditions, and market conditions. The analysis includes an assessment of household characteristics in the city, including household type, tenure (rent vs own), overcrowding, and percent of income spent on housing. It also evaluates the special housing needs of older adults, persons with disabilities, large families, and persons in need of emergency shelter.

The needs assessment helps ensure that the city is not only planning for its "fair share" of the *region's* housing needs, but also responding to its own *local* needs. Where appropriate, local conditions are compared to regional conditions or conditions in nearby cities to provide appropriate context. Rolling Hills is a very unique community and it is important to recognize that when planning for housing conservation and production.

Most of the data presented in this chapter is from the American Community Survey (ACS), an ongoing survey performed by the US Census to gauge population and housing conditions in between the decennial censuses. Because most 2020 Census data was not available at the time this report was prepared, the ACS data provides the most accurate information on local demographics. ACS data for Rolling Hills in 2021 is based a five-year average covering 2015-2019. However, the ACS is based on a sample of the population, so there is a margin of error in some of the tables. Other data sources include the California Department of Finance, the County of Los Angeles, and the City of Rolling Hills. In addition, SCAG provided a "pre-HCD certified" data profile for each city in the Los Angeles region in 2019. This is referenced as appropriate throughout this chapter.

The Needs Assessment is broken into five sections as follows:

- Section 3.2 covers population characteristics, such as age, race, and total rate of growth
- Section 3.3 covers household characteristics, such as presence of children and home ownership
- Section 3.4 addresses special housing needs
- Section 3.5 covers housing stock characteristics
- Section 3.6 covers growth forecasts and the RHNA for the 2021-2029 period

The Needs Assessment is supplemented by Appendix "A", which looks specifically at the recent State mandate to "affirmatively further fair housing" through the Housing Element. Appendix A focuses on regional patterns of segregation and inequity in order to inform local fair housing policies.

3.2 Population Characteristics

3.2.1 Total Population

Table 3.1 shows population data for Rolling Hills over a 50-year period. The City's population was 2,050 in 1970 and has declined by more than 300 residents since then. Between 1980 and 1990, Rolling Hills lost nearly 9 percent of its population. The decline was the result of several factors, including smaller households, fewer children, and the loss of homes due to wildfire and landslides. Change between 1990 and 2010 was minimal. There were 1,871 residents in 1990 and 1,860 residents in 2010. The August 12, 2021 US Census data release reported a population of 1,739 residents, a 6.5 percent drop relative to 2010. The Census figure is substantially lower than the Department of Finance estimate of 1,866, which was made on January 1, 2021.

Table 3.1: Rolling Hills Population, 1970-2021[1]

	Population	Percent Change
1970	2,050	--
1980	2,049	0
1990	1,871	-8.7%
2000	1,871	0
2010	1,860	-0.6%
2021 (DOF)	1,866	0.3%
2020 (Census)	*1,739*	*-6.5%*

Sources: US Decennial Census, 1970-2010. California Dept. of Finance, 1/1/21 estimate, 2020 Census (8/12/21 release)

Table 3.2 compares population change in Rolling Hills with the region, the County, and the other cities on the Palos Verdes Peninsula using data from the California Department of Finance. The six-county Los Angeles region grew 14.4 percent between 2000 and 2021, from 16.5 million residents to nearly 19 million residents. Los Angeles County grew by 5.2 percent, reflecting its more urbanized character and larger population base. By contrast, the rate of growth on the Palos Verdes Peninsula during this 21-year period was just 1.1 percent. While Rolling Hills Estates grew by 5.5 percent, the other three cities have roughly the same number of residents today as they did 20 years ago. The Peninsula communities are mature, with limited vacant and re-developable land, high land costs, and environmental constraints that limit population growth.

[1] *The ACS data sets for Rolling Hills for 2015-2019 show a citywide population of 1,513 residents. This is 15 percent below the actual population, which was reported to be 1,739 residents in the 2020 Census data released on August 12, 2021. In addition, SCAG reported the population at 1,939 residents (in 2018), while the State Department of Finance reported 1,866 residents. These discrepancies are due to sampling errors resulting from the small size of Rolling Hills' population. As a result, charts are used (rather than tables) for some of the variables discussed below. This allows the analysis to focus on change over time rather than total values.*

Table 3.2: Comparison of Rolling Hills Growth with Nearby Cities and Region, 2000-2021

	Population		Percent Change
	2000	2021	
Rolling Hills	1,871	1,866(*)	-0.3
Rolling Hills Estates	7,676	8,098	5.5
Rancho Palos Verdes	41,145	41,541	0.9
Palos Verdes Estates	13,340	13,286	-0.4
Los Angeles County	9,542,000	10,044,458	5.3
SCAG Region	16,547,000	18,954,083	14.4

Sources: US Decennial Census, 2000. California Dept. of Finance, 1/1/21 estimate
(*) August 12, 2021 Census data release shows 1,739 residents, which is a 7.1 decrease since 2000

3.2.2 Age

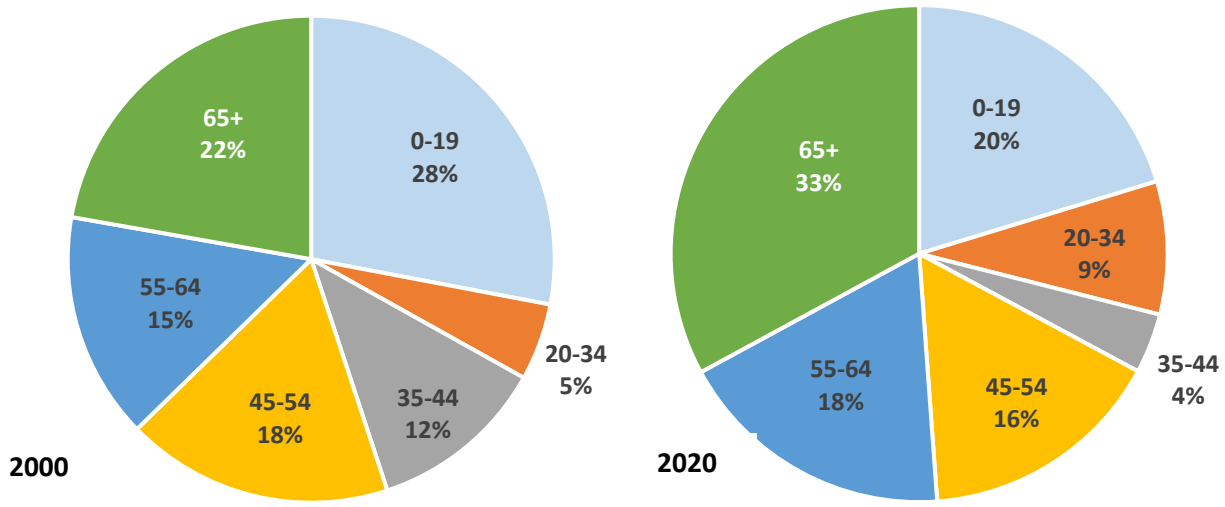
The age structure of the population has a strong influence on housing needs. For example, if a city is experiencing an outmigration of young adults (ages 25-34), it often indicates a shortage of rental housing or entry-level housing opportunities. If a city has a high percentage of residents over 75, it often indicates a need for special housing types, such as assisted living or single-story homes---or programs to assist with home rehabilitation.

Chart 3.1 shows the age distribution of Rolling Hills residents in 2000 and 2020. The chart illustrates significant shifts, including a decrease in the number of children (from 28% of the population in 2000 to 20% in 2020) and an increase in the number of persons over 65 (from 22% of the population in 2000 to 33% in 2020). The percentage of residents aged 20-34 nearly doubled over the 20-year period, likely as a result of adult children moving back home or delaying entry into the housing market due to high housing costs. The percent of residents 35-44 dropped significantly, likely because of limited local housing options for young families and mid-career adults.

The median age in Rolling Hills has steadily increased over the last 40 years. In 1980, it was 38.2. It increased to 45.5 in 1990, 48 in 2000, and in 52 in 2010. By 2020, the median age was 55.3, meaning that half of all residents are older than 55 and half are 55 or younger. By contrast, the median age in Los Angeles County is 36.5. Rolling Hills also has a higher median age than the other cities on the Palos Verdes Peninsula (Rolling Hills Estates: 50.1; Palos Verdes Estates: 52.2; Rancho Palos Verdes: 50.0).

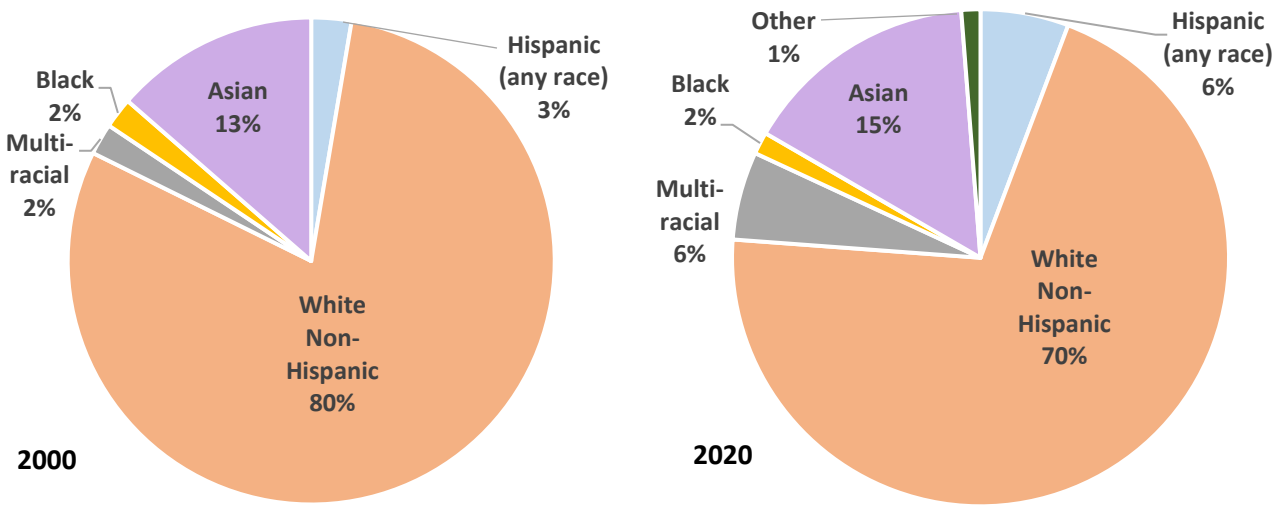
Census data indicates that one-third of Rolling Hills' residents over 65 are 80 or older. This cohort represents more than 10 percent of the City's population, a substantially higher share than in most communities in California.

Chart 3.1: Age Distribution of Rolling Hills Residents, 2000 and 2020



Source: US Census, 2000. ACS, 2021 (for 2015-2019 sample period)

Chart 3.2: Racial Distribution of Rolling Hills Residents, 2000 and 2020



Source: US Census, 2000 and ACS, 2021 (for 2015-2019 sample period)

3.2.3 Race and Ethnicity

Racial and ethnic composition may affect housing needs due to the cultural preferences of certain groups (including extended families, multi-generational families, etc). In addition, certain groups have historically faced discrimination due to the lending policies of financial institutions, former covenants and ownership restrictions, and past racial bias.

Chart 3.2 shows the racial distribution of Rolling Hills residents in 2000 and 2020. The city has become more diverse over time, with the Non-Hispanic White population declining from 80 percent to 70 percent of the total. The Hispanic population (any race) roughly doubled over the 20-year period, although relative to the total population, the numbers are still small. Approximately 6 percent of the City's residents are Hispanic.

The percentage of African-American residents remained at about 2 percent of the population between 2000 and 2020. During this same period, the number of residents of Asian or Pacific Island descent increased from 13 percent to 16 percent of the city's total. According to the Census, the largest Asian ethnic groups in the city are Chinese (6.5 percent) and Korean (5.1 percent). The number of residents indicating they were more than one race more than doubled between 2000 and 2020, with multi-racial residents representing about 6 percent of the 2020 population.

Relative to the County of Los Angeles and the State of California, Rolling Hills and the four cities on the Palos Verdes Peninsula have a substantially higher White Non-Hispanic population. Table 3.3 compares race and ethnicity in Rolling Hills, the Peninsula cities, Los Angeles County, and the State as a whole. Nearly half of the County's residents, and more than one-third of the State's residents, are Hispanic. By contrast, less than 10 percent of the residents in the Peninsula cities are Hispanic. The Peninsula cities tend to have higher percentages of Asian and Pacific Islander residents, and more multi-racial residents.

Table 3.3: Race and Ethnicity in Rolling Hills, Peninsula Cities, Los Angeles County, and State, 2020

	Percent of Total			
	Rolling Hills	**Palos Verdes Peninsula***	**Los Angeles County**	**State of California**
Non-Hispanic White	71.3%	54.4%	26.2%	37.2%
Hispanic (all races)	5.8%	9.7%	48.5%	39.0%
Black/ African American	1.5%	1.6%	7.8%	5.5%
Native American/Alaskan	N/A	0.1%	0.2%	0.4%
Asian	15.6%	28.8%	14.4%	14.3%
Pacific Islander/Hawaiian	N/A	0.6%	0.2%	0.4%
Other	N/A	0.1%	0.3%	0.3%
Multi-Racial	5.8%	4.7%	2.3%	3.0%
TOTAL	100.0%	100.0%	100.0%	100.0%

Sources: US Decennial Census, 2020.
(*) Rolling Hills, Rolling Hills Estates, Rancho Palos Verdes, Palos Verdes Estates

The August 2021 release of 2020 Census data shows that the ACS may have underestimated the diversity of Rolling Hills' population. The 2020 Census indicated that 66 percent of the city's residents are White, 20.5 percent are Asian, 10.4 percent are more than one race, 1.3 percent are Black, and 1.9 percent are Other. The Census further indicated that 7.0 percent of the city's residents were Hispanic (includes all races).

3.2.4 Language

Based on ACS data for 2015-2019, 79 percent of the City's residents speak only English at home.[2] Of the roughly 300 Rolling Hills residents speaking a language other than English at home, 18 percent speak Spanish, 56 percent speak an Asian language, and 26 percent speak another Indo-European language. Most of these residents are bilingual and are fluent in English. About 66 percent of those speaking a foreign language at home indicated they also spoke English "very well." Of the remaining 34 percent, about half spoke an Asian language. Korean and Chinese were the most commonly spoken languages in those households.

Relative to other cities in Los Angeles County and the region, the percentage of "linguistically isolated" persons (i.e., those with limited English) is very low in Rolling Hills. Whereas about 6 percent of Rolling Hills' population is linguistically isolated, the percentage in Los Angeles County is about 24 percent.

3.2.5 Educational Attainment

Rolling Hills residents are highly educated. Among residents 25 or older, 97.6 percent have a high school degree. More than 70 percent have a bachelor's degree or higher, and 39 percent have a graduate or professional degree. These percentages are substantially higher than in the County as a whole.

3.2.6 Health Indicators

Health can impact housing needs both by limiting the income earning potential of residents and by creating the need for supportive services or special housing design. Based on data provided to the City by the Southern California Association of Governments, Rolling Hills health indicators are consistently better than the County as a whole. The City's obesity rate is 16.5 percent, compared to a countywide average of 28.2 percent. Its asthma rate is 10.1 percent, compared to the countywide average of 15.1 percent and its diabetes rate is 8.3 percent, compared to 12.1 percent countywide. On the other hand, Rolling Hills has a higher rate of heart disease than the County as a whole, with 9.7 percent of the population diagnosed with a heart ailment compared to 6.6 percent countywide. This is likely due to the higher percentage of older residents in the city.

[2] *American Community Survey 2015-2019, based on residents 5 years of age or older.*

3.2.7 Employment

Employment affects the demand for housing and the dynamics of the housing market. In most cities, the types of jobs that are present affect the wages paid and the ability of the local workforce to pay for housing in the city. Rolling Hills is unique in this regard, as it has no major employers or land zoned for employment uses. In 2018, the Southern California Association of Governments estimated that there were only 110 jobs in the city.[3] Employers include the City, the School District, Rolling Hills Community Association, the County Fire Department, and the Palos Verdes Transit Authority. The figure excludes construction workers, landscapers, housekeepers, child care providers, care givers, delivery workers, and others who travel to the city intermittently for work.

Data from SCAG collected prior to the COVID-19 pandemic indicates that a majority of employed residents in Rolling Hills commuted to jobs elsewhere in Los Angeles County. The largest percentages of residents commuted to Los Angeles (28.2%), Torrance (8.3%), and Long Beach (5.0%). Beyond Los Angeles County, the next largest commute destination was Orange County, including Anaheim (1.5%) and Huntington Beach (1.5%).

A relatively large percentage of Rolling Hills residents work from home. Prior to the COVID-19 pandemic, census data reported that about 18 percent of the city's employed residents worked from their homes. While data after March 2020 is not available, the percentage likely increased dramatically during the second quarter of 2020 and remained high for the rest of the year. The long-term effects of the pandemic on commute patterns are still unknown. However, the relatively large home sizes in Rolling Hills and the high percentage of the workforce in professional-sector jobs suggests that a substantial number of workers will continue to work remotely in the future.

Recent data from the California Employment Development Department (EDD) indicates there are 600 Rolling Hills residents in the labor force. EDD indicates an unemployment rate of 9.3 percent in June 2021, compared to a countywide average of 10.5 percent. The average annual unemployment rate in Rolling Hills was reported as 4.0 percent in 2019, when the countywide average was 4.4 percent. [4]

Tables 3.4 and 3.5 provides an overview of the Rolling Hills labor force, based on census data. The first table identifies the occupation of residents in the city by category, and the second classifies employed residents by industry.

A majority of the city's residents are in higher-wage professional and management occupations. Approximately 18 percent work in health care. About 13 percent work in education, legal services, arts, and media. Only a small percentage work in the service sector, and even smaller percentages work in the construction, maintenance, and transportation sectors. The largest economic sectors associated with the Rolling Hills workforce are finance, insurance, real estate, health care, and professional, scientific, and management services. The percentage of residents employed in retail sales, wholesaling, and manufacturing is much smaller than in the county as a whole.

[3] *Based on data from the California Employment Development Department*
[4] *California EDD "Labor Force and Unemployment Rate for Cities and Census Designated Places" accessed July 2021*

Table 3.4: Rolling Hills Employed Residents by Occupation

	Number of Residents Employed	Percent of Total
Management, business, and financial services occupations	185	32.9%
Computer, engineering, and science occupations	39	6.9%
Education, legal, community service, arts, and media occupations	72	12.8%
Healthcare practitioners and technical occupations	104	18.5%
Service occupations	24	4.3%
Sales and office occupations	115	20.4%
Natural resources, construction, and maintenance occupations	22	3.9%
Production, transportation, and material moving occupations	2	0.4%
TOTAL	**563**	**100.0%**

Sources: American Community Survey, 2021 (2015-2019 characteristics)

Table 3.5: Rolling Hills Employed Residents by Industry

	Number of Residents Employed	Percent of Total
Construction	24	4.3%
Manufacturing	29	5.2%
Wholesale trade	43	7.6%
Retail trade	30	5.3%
Transport/ warehousing/ utilities	4	0.7%
Information	12	2.1%
Finance/ insurance/ real estate	132	23.4%
Professional, scientific, and management, and administrative and waste management services	85	15.1%
Educational services, and health care and social assistance	146	25.9%
Arts, entertainment, and recreation, and accommodation and food services	39	6.9%
Other services, except public administration	12	2.1%
Public Administration	7	1.2%
TOTAL	**563**	**100.0%**

Sources: American Community Survey, 2021 (2015-2019 characteristics)

There are approximately six times more employed residents in Rolling Hills than jobs in Rolling Hills. The City is not expected to become an employment center in the future. Rolling Hills is currently a housing "reservoir" in that it provides far more housing than employment relative to other cities in Los Angeles County. Nearby communities with large employment bases rely on Rolling Hills to some extent to meet their housing needs, particularly at the upper range of the housing market.

3.3 Household Characteristics

The Bureau of the Census defines a "household" as "all persons who occupy a housing unit. This may include persons living alone, families related through marriage or blood, and unrelated individuals living together. Persons living in retirement or convalescent homes, dormitories, or other group living situations are classified as living in "group quarters" and are not considered households. On the other hand, a property with an occupied accessory dwelling unit may be considered to consist of two households.

Household characteristics provide important indicators of housing needs. These characteristics include household structure (families with and without children, single persons, persons sharing homes, etc.), household size (number of persons per household), tenure (renter vs owner), and household income and poverty status. Again, the US Census 2021 American Community Survey (providing sample data for 2015-2019) is regarded as the definitive source for household data and is referenced in the tables and narrative below. At the time this report was prepared, 2020 Census data for households (other than total number of households) was not yet available.

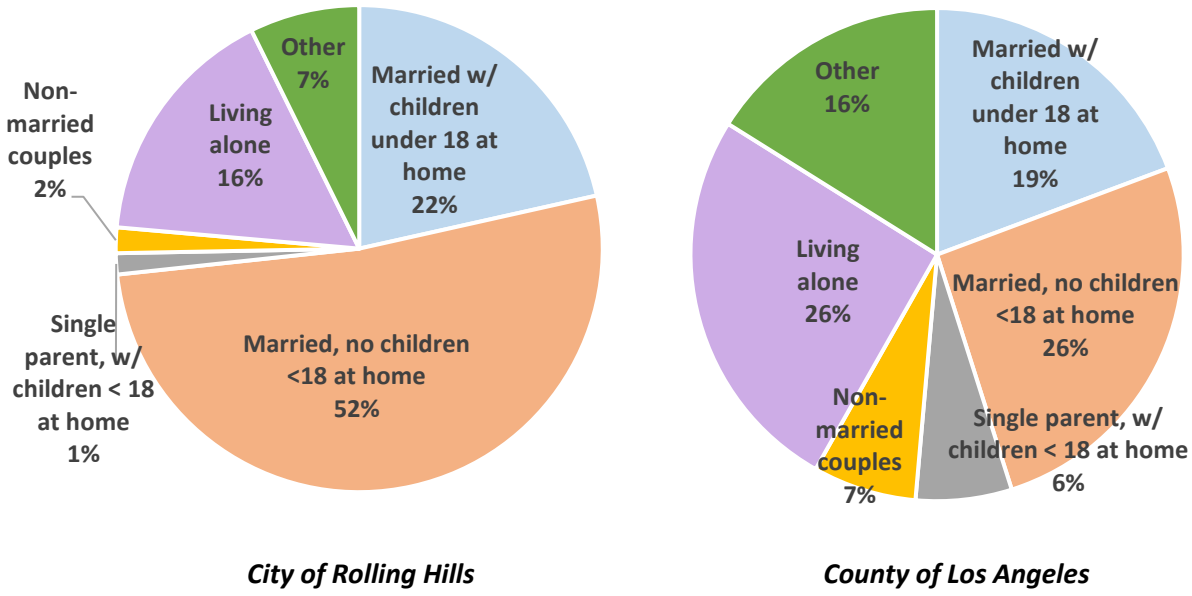
3.3.1 Household Type

Census data for Rolling Hills indicates that there is no group quarters population in the city and that all residents reside in households. Data from the California Department of Finance for January 1, 2021 indicates that there were 667 households in Rolling Hills, an increase of four households from the 2010 Census. The August 2021 release of US 2020 Census data indicates that there are 639 households in the city, which is a decrease of 24 households from 2010. The US Census data is considered more accurate, as it is based on an actual count and not an estimate.

Just over 81 percent of all households in Rolling Hills are classified as families. This percentage remained constant between 2010 and 2020. Non-family households include persons living alone and unrelated persons living in shared homes.

Chart 3.3 shows the distribution of households by category for Rolling Hills and the County of Los Angeles. Relative to the County, Rolling Hills has a much higher percentage of married couple families (74% of all households compared to 45% countywide). The City has smaller percentages of single parent households and non-married couple households than the County and the other cities on the Palos Verdes Peninsula. A much smaller share of Rolling Hills' residents live alone than in the County as a whole.

Chart 3.3: Household Type in Rolling Hills and Los Angeles County, 2021



Source: American Community Survey, 2021 (2015-2019 data)

The data for Rolling Hills reflects the community's single family housing stock. For decades, the city has attracted families with children. Couples tend to keep their homes when their children are grown, resulting in a significant number of homes (more than half) occupied by older couples with adult children and empty nesters. In fact, the Census indicates that 60 percent of the married couple households in Rolling Hills include at one person over 60 years old, compared to 38 percent in the county as a whole.

Household type in Rolling Hills has changed over the last 20 years. The percentage of people living alone has been increasing, growing from 12 percent of the population in 2000 to 16 percent in 2020. The percentage of households with children living at home has been decreasing. It was 33 percent in 2000 and 23 percent in 2020.

3.3.2 Household Size

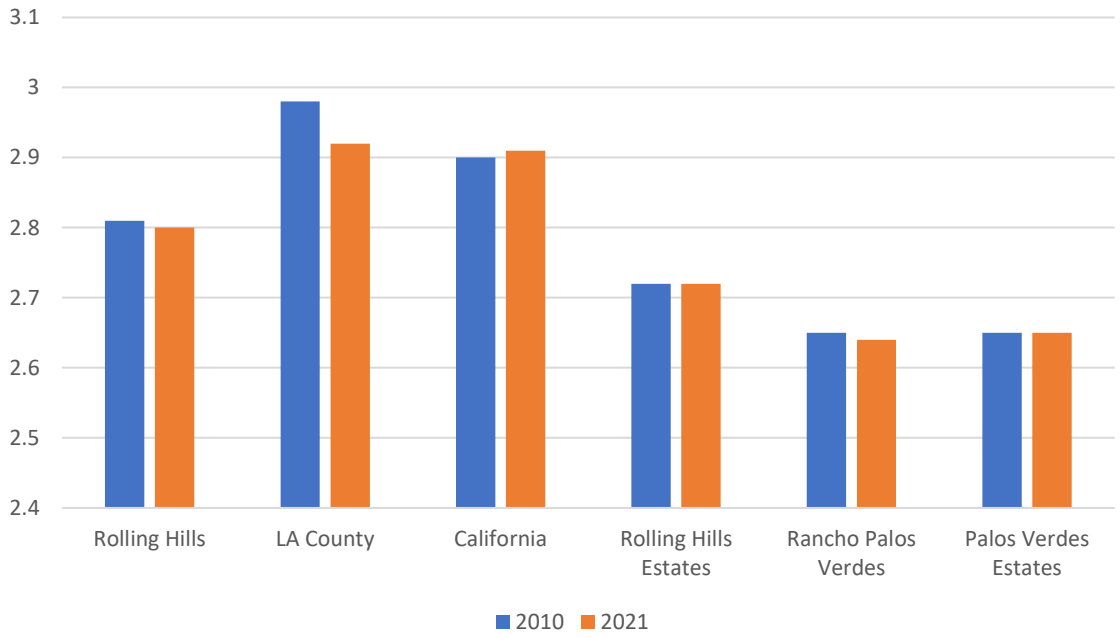
In 2020, the State Department of Finance reported the average household size in Rolling Hills as 2.80 persons. This is almost the same as it was in 2010, when average household size was reported at 2.81 persons. In general, average household size has been falling over time. It was 2.90 in 2000 and was reported as being 3.2 in the Rolling Hills General Plan (1989). Preliminary releases from the US Census (August 2021) show actual household size has fallen even further, and is now 2.72.

ACS data indicates that 16 percent of all households in the City are comprised of one person, 52 percent have two people, 10 percent have three people, and 21 percent have four or more people. By contrast, in Los Angeles County as a whole, 26 percent are comprised of one person, 28 percent of two persons, 17 percent of three persons, and 29 percent of four or more

persons. Rolling Hills has a much higher share of two-person households and smaller shares of one-person households and large households.

Chart 3.4 compares average household size in Rolling Hills, the County, the State and the other three cities on the Palos Verdes Peninsula. Data is shown for 2010 and 2021 for each city, based on California Department of Finance statistics.

Chart 3.4: Household Size in Rolling Hills and Other Jurisdictions, 2010 and 2021



Source: California Department of Finance, Table E-5, 2021

3.3.3 Overcrowding

Overcrowding may result when high housing costs prevent households from buying or renting homes that provide sufficient space for their needs. The Census defines overcrowded households as those with more than 1.01 persons per room, excluding bathrooms, hallways, and porches. Households are considered to be "severely" overcrowded if they have more than 1.51 persons per room.

Although Rolling Hills has a higher number of persons per household than the other cities on the Palos Verdes Peninsula, it does not experience overcrowding. ACS data for 2015-2019 indicate that 98.9 percent of the homes in the city have 1.0 persons per room of less. There are no households with more than 1.51 persons per room. By contrast, in the county at large, 11.3 percent of the households have more than 1.01 persons per room and 4.7 percent have more than 1.51 persons per room. Homes in Rolling Hills are generally large and owner-occupied, reducing the likelihood of future overcrowding.

3.3.4 Tenure

Tenure refers to a household's status as an owner or renter. ACS data for 2015-2019 indicate that 95.3 percent of Rolling Hills' households are homeowners and 4.7 percent are renters. This percentage has remained relatively constant over the last two decades. The 2010 Census indicated that 95.7 percent of the city's households were homeowners and that 4.3 percent were renters. This equated to 28 renter households in the entire city. Because there are no multi-family units at this time, these households are presumed to be renting single family homes.

Renter households in the city are slightly larger than owner-occupied households. The ACS data for 2015-2019 indicates an average household size of 3.07 for renters and 2.60 for owners.

3.3.5 Household Income

Income is the single most important factor in determining housing affordability. While upper income households have more discretionary income to spend on housing, lower income households are more constrained in what they can afford. The State and federal government have developed metrics for classifying households into income categories. These metrics are used to quantify what is considered an "affordable" housing unit and to determine eligibility for housing subsidies and assistance programs. All metrics are benchmarked against the areawide median income, or AMI.

State-Defined Income Categories

The commonly used income categories are as follows:

- Extremely low income 0-30% of AMI
- Very low income 30% to 50% of AMI
- Low income 50% to 80% of AMI
- Moderate income 80% to 120% of AMI
- Above Moderate income More than 120% of AMI

"Affordable housing cost" is defined by State law as being not more than 30 percent of gross household income. "Housing cost" in this context includes rent or mortgage payments, utilities, property taxes, and homeowners (or renters) insurance. The income limits are updated annually by the California Department of Housing and Community Development.

For each income category, a sliding scale is used based on the number of persons per household. This recognizes that larger households must dedicate greater shares of their income for food, health care, transportation, and other expenses. The income categories are calculated by county, resulting in different median incomes from place to place within California.

Table 3.6 shows income categories for Los Angeles County that became effective in April 2021. A two-person household earning less than $75,700 a year would be considered low income. The same household would be considered *very low* income if it earned less than $47,300 a year. For a household of four people, the threshold is $94,600 for low income and $59,100 for very low income.

Table 3.6: Income Limits for Los Angeles County, 2021[5]

Income Category	Household Size							
	1	2	3	4	5	6	7	8
Extremely Low Income	$24,850	$28,400	$31,950	$35,450	$38,300	$41,150	$44,000	$46800
Very Low Income	$41,400	$47,300	$53,200	$59,100	$63,850	$68,600	$73,300	$78,050
Low Income	$66,250	$75,700	$85,150	$94,600	$102,200	$109,750	$117,350	$124,900
Moderate Income	$67,200	$76,800	$86,400	$96,000	$103,700	$111,350	$119,050	$126,700

Source: California Department of Housing and Community Development, 2021

Table 3.7 indicates the monthly housing cost that would be considered "affordable" for households of different sizes in each income category. Using the state's definition of affordability, a low income household of four would be able to afford a monthly housing cost of $2,365. A very low income household of four could afford a monthly housing cost of $1,478. If these households are pay in excess of this amount, they are considered to be "cost-burdened." In a high-priced market like the Palos Verdes Peninsula, many low income households pay significantly more than 30 percent of their incomes on rent or mortgages. Those employed in low-wage professions in the area may commute long distances from areas with more affordable housing.

Table 3.7: Affordable Monthly Housing Costs Based on 2021 Income Limits

Income Category	Household Size							
	1	2	3	4	5	6	7	8
Extremely Low Income	$621	$710	$799	$886	$958	$1,029	$1,100	$1,170
Very Low Income	$1,035	$1,183	$1,330	$1,478	$1,596	$1,715	$1,833	$1,951
Low Income	$1,656	$1,893	$2,129	$2,365	$2,555	$2,744	$2,934	$3,123
Moderate Income	$1,680	$1,920	$2,160	$2,400	$2,593	$2,784	$2,976	$3,168

Source: Barry Miller Consulting, 2021. Based on 30% of monthly income for each household

Market-rate *ownership* housing in the Los Angeles area is generally not affordable to households who are moderate income or below. With an income of $100,000, a household of four could potentially spend $2,500 a month on their housing cost without experiencing a cost-burden. Assuming a 10 percent down-payment and 3 percent interest rate, an "affordable" home would be about $360,000. While there are a few condominiums at this price point in the region's larger cities (Long Beach, Los Angeles, etc.), there is no housing on the Palos Verdes Peninsula in this range. Consequently, "below market" housing programs typically focus on rental housing for low and very low income households, and a mix of subsidized ownership housing and rental housing for moderate income households.

[5] Income limits for low, very low, and extremely low income are set by the federal Department of Housing and Urban Development. However, income limits for moderate income households are set by HCD based on mathematical averages of County income. Consequently, the moderate income numbers are only marginally different from the low income numbers in Los Angeles County. This is not the case in all counties.

Some market-rate rental units are "affordable by design"—meaning they are not subsidized but have rental prices that fall within the affordability ranges of low and moderate income households. For example, a one-bedroom apartment renting for $1,700 a month would be considered affordable to a two-person low-income household. While the supply of such units is limited on the Palos Verdes Peninsula, there are opportunities for market-rate accessory dwellings and small apartments to fill some of this need.

Household Income in Rolling Hills

The federal Department of Housing and Urban Development (HUD) receives custom tabulations of Census data each year to evaluate housing needs for lower income households. The data is referred to as "CHAS" (Comprehensive Housing Affordability Strategy) data and includes documentation of the current number of owner and renter households in each HUD income category for each jurisdiction. At the time the 2021-2029 Housing Element was prepared the CHAS data set was based on 2013-2017 conditions. Table 3.8 provides CHAS data for the City of Rolling Hills.

Table 3.8: Rolling Hills Households by HUD Income Category

Income Category	Owners	Renters	Total (*)
Extremely Low	25	0	**25**
Very Low	35	10	**45**
Low	45	0	**45**
Moderate	25	0	**25**
Above Moderate	465	15	**480**
Total	**595**	**25**	**620**

Source: HUD User Portal CHAS data, based on 2013-2017 ACS. Accessed July 2021
(*) Total number of households does not match Census and DOF totals due to sampling methods. CHAS data is also rounded to the nearest "five" by HUD.

Table 3.8 indicates that 77 percent of the households in Rolling Hills are "above moderate" income (more than 120% of Areawide Median Income). There are 25 "extremely low" income households and 45 "very low" income households in the city, representing four percent and seven percent of total households respectively. Another seven percent meet "low" income criteria.

Table 3.9 provides additional data on income in Rolling Hills, using 2015-2019 American Community Survey data rather than CHAS data. Rolling Hills is among the most affluent cities in California, with a median income exceeding $250,000 a year, and a mean household income of $434,685. The Census indicates that 57.5 percent of the city's households have annual incomes exceeding $200,000, compared to 37.8 percent for all of the Palos Verdes Peninsula cities and 10.2 percent for Los Angeles County.

Table 3.9: Household Income in Rolling Hills, Peninsula Cities, and Los Angeles County

Income Category	Percent of Households in Income Category		
	Rolling Hills	**Palos Verdes Peninsula Cities**	**Los Angeles County**
Less than $10,000	1.2%	3.0%	5.6%
$10,000-$14,999	2.6%	1.6%	4.8%
$15,000-$24,999	2.6%	3.4%	8.4%
$25,000-$34,999	1.2%	3.4%	8.1%
$35,000-$49,999	6.1%	4.7%	11.2%
$50,000-$74,999	3.8%	9.2%	15.9%
$75,000-$99,999	4.2%	9.0%	12.3%
$100,000-$149,999	12.7%	15.5%	15.8%
$150,000-$199,999	8.1%	12.6%	7.8%
$200,000 or more	57.5%	37.8%	10.2%
Median Income	**$250,000+**	**$154,165**	**$68,044**
Mean Income	**$434,685**	**$210,231**	**$99,133**

Source: American Community Survey, 2021 (for 2015-2019)
Data for Palos Verdes Peninsula cities represents weighted average of Rolling Hills, Rolling Hills Estates, Rancho Palos Verdes, and Palos Verdes Estates

While a majority of households are "above moderate" income, the ACS data indicates that 6.4 percent of Rolling Hills' households (or approximately 42 households) have annual incomes of less than $25,000 a year. This compares to 8.0 percent for the Palos Verdes Peninsula and 18.8 percent for Los Angeles County. Approximately 7.3 percent of Rolling Hills' households have incomes between $25,000 and $50,000 a year, compared to 8.1 percent on the Peninsula and 19.3 percent countywide.

The Census also disaggregates household income data by family households, married couples, and non-family households. Non-family households include persons living alone and unrelated individuals in shared homes. Family and married couple household incomes in Rolling Hills are higher than non-family households. Census data indicate that 27 percent of the non-family households in the city (or about 30 households) have annual incomes below $35,000 compared to just 3.1 percent for families and married couples.

An important qualifier about the Census income data is that it does not account for accumulated wealth or savings and is based only on annual income. Given the high cost of housing in Rolling Hills, the very high rate of owner-occupancy (95 percent), and the large number of retired adults in the city, it is likely that most of the lower income households in the city are seniors on fixed incomes. In fact, 68 of the 108 non-family households in the city are comprised of persons over 65 living alone. Many of these households have no mortgage and their housing costs are primarily associated with property taxes, insurance, maintenance, and utilities. Despite accumulated wealth and home equity, a subset of the population on fixed incomes may lack the resources to meet these expenses without financial hardship.

3.3.6 Overpayment

Overpayment refers to the incidence of households spending more than 30 percent of their incomes on housing costs. As noted earlier, this includes monthly utility bills, taxes, HOA dues, and insurance as well as mortgage or rent payments. Overpayment occurs in all income categories but is more challenging for lower income households given the limited resources to pay for other household expenses. As previously indicated, such households are defined by the US Department of Housing and Urban Development as being "cost-burdened."

ACS data indicates that 30.6 percent of all homeowners in Rolling Hills and 32 percent of all renters are paying more than 30 percent of their incomes on housing. About 18 percent of Rolling Hills homeowners are paying more than 50 percent of their incomes on housing. This compares to 16 percent in the county as a whole. Table 3.10 compares rates of overpayment in Rolling Hills with those of Los Angeles County as a whole. At the countywide level, the rate of overpayment is somewhat higher for homeowners and substantially higher for renters. In Los Angeles County, approximately 35.7 percent of all homeowners and 57.6 percent of all renters pay more than 30 percent of their incomes on housing.

Table 3.10: Percent of Income Spent on Housing in Rolling Hills and Los Angeles County

Percent of Income Spent on Housing	Homeowners with no Mortgage		Homeowners with a Mortgage		Renters	
	Rolling Hills	LA County	Rolling Hills	LA County	Rolling Hills	LA County
Less than 20 %	64.3%	73.4%	37.1%	30.0%	54.5%	19.7%
20-24.9 %	10.5%	6.4%	10.1%	14.5%	0	11.5%
25-29.9%	5.0%	4.2%	14.0%	12.1%	13.6%	11.2%
30-34.9%	0.8%	3.0%	7.8%	9.1%	0	9.5%
More than 35%	19.3%	12.9%	30.9%	34.4%	31.8%	48.1%

Source: American Community Survey, 2021 (for 2015-2019)

Not surprisingly, the incidence of overpayment is much greater for homeowners with a mortgage than for those without a mortgage. In Rolling Hills, approximately 44 percent of all homeowners have paid off their mortgages, while 56 percent have a mortgage. For those without mortgages, 20.1 percent pay more than 30 percent of their incomes on housing. For those with mortgages, the figure is 38.6 percent.

Even homeowners without mortgages may still face a cost burden associated with taxes, maintenance, and other home expenses. The ACS reports that 93 percent of Rolling Hills' homeowners with no mortgage payments still have monthly housing costs exceeding $1,000 a month. The median monthly cost for homeowners without mortgages in the city is over $1,500 a month. The comparable figures for Los Angeles County are just 20.3 percent and $608 a month. The data suggests that Rolling Hills seniors on fixed incomes may be particularly cost-burdened due to limited income, monthly HOA fees, and the high cost of maintaining a home in the city.

For homeowners with mortgages, monthly costs are substantially higher. ACS data shows that 89.9 percent of the city's homeowners with mortgages spend over $3,000 a month on housing, with a median well above $4,000 a month (the maximum reported by the Census). This compares to 34.2 percent in Los Angeles County, with monthly median of $2,498.

Data on the City's renter households indicates that a majority are above moderate income households spending more than $3,000 a month on housing. However, the ACS indicates seven renter households paying $1,000 to $1,499 a month, which indicates that at least a few renters in the city occupy guest houses or unregistered accessory dwelling units.

Table 3.11 shows the incidence of overpayment among owners and renters in Rolling Hills who are lower income. Among lower income homeowners, 78 out of 90 are considered cost-burdened, while among the city's 10 lower income renters, eight are considered cost-burdened. About two-thirds of the city's lower income owners are severely cost-burdened, paying more than half of their incomes on housing. While the income data does not fully account for savings and accrued wealth, it does suggest that some of these households might benefit from assistance with home maintenance and monthly housing expenses (for example, through home sharing and ADUs).

Table 3.11: Overpayment among Lower Income Households in Rolling Hills

	Total Households	Number Paying More than 30% of Income on Housing	Number Paying More than 50% of Income on Housing
Homeowners			
Income Under 80% of Areawide Median	90	78	60
Income Under 30% of Areawide Median	25	19	15
Renters			
Income Under 80% of Areawide Median	10	8	4
Income Under 30% of Areawide Median	0	0	0

Source: HUD User CHAS data, 2014-2018

3.4 Populations with Special Needs

The California Government Code recognizes that some segments of the population have more difficulty finding decent, affordable housing than others due to their circumstances. Populations with special needs include older adults, persons with disabilities, large families, farmworkers, families with female heads of households, and persons experiencing (or at risk of) homelessness. These groups are more likely than the population at large to spend a disproportionate amount of their incomes on housing. They are also more likely to face discrimination based on their specific needs or circumstances.

3.4.1 Older Adults

The special needs of older households result from limited income, higher rates of physical disability and health care costs, and changing life circumstances which may require assistance from others. This is the single largest special needs group in Rolling Hills, and it is growing rapidly as the population ages. Table 3.12~~1~~ compares the number of older adults in Rolling Hills with the other cities on the Palos Verdes Peninsula, along with Los Angeles County.

Table 3.12~~1~~: Older Adults in Rolling Hills and Nearby Jurisdictions

Jurisdiction	Percent of all Residents over 65	Percent of all Residents over 75	Percent of households with at least one member over 65
Rolling Hills	32.9%	18.4%	56.0%
Rolling Hills Estates	25.2%	13.9%	46.5%
Palos Verdes Estates	27.0%	13.3%	46.8%
Rancho Palos Verdes	15.5%	13.6%	44.7%
Los Angeles County	13.3%	5.7%	29.7%
California	14.0%	5.9%	30.8%

Source: American Community Survey, 2021 (for 2015-2019)

The percentage of residents over 65 in Rolling Hills was 22 percent in 2000, 28 percent in 2010, and 33 percent in 2020. Moreover, 56 percent of the households in Rolling Hills include at least one person who is 65 years or older. This is almost double the rate for Los Angeles County as a whole. The percentage of Rolling Hills residents over 85 has doubled in the last 20 years, with this cohort representing 4.7 percent of the population in 2020.

The percentage of older residents is likely to continue increasing in the next decade. Nearly one in five Rolling Hills residents is in the 55-64 age cohort (compared to one in nine countywide), and most of this cohort will reach retirement age during the timeframe of this Housing Element. Some of these residents, as well as those already over 65, may seek to "downsize" or adapt their homes to meet changing mobility needs and financial resources.

Older adults in Rolling Hills are more likely to live alone, have one or more disabilities, and be cost-burned by housing than the population at large. Census data indicates that there are 68 households, representing roughly 10 percent of all households in Rolling Hills, comprised of a person over 65 living alone. About 70 percent are female-headed households and 30 percent are male-headed. There may be opportunities among these households for home sharing and accessory dwelling unit (ADU) development. This can provide financial benefits, social benefits, and an added sense of security, as well as housing opportunities for low- and moderate-income workers or other retirees in the community.

At the same time, the City should anticipate an increase in homeowners seeking to adapt their homes to facilitate aging in place. This would include addition of ramps, handrails, kitchen and bath retrofits, and interior changes that improve access for wheelchairs and walkers. The Rolling Hills housing stock is well suited for these improvements, as it is limited to single story

construction. Demand for on-site caregiver quarters, and living space for other domestic employees, will likely increase. At the same time, the substantial cost and demand associated with maintaining a large home and property may compel some residents to seek living arrangements that are not currently available in Rolling Hills, such as condominiums and townhomes. Some of these residents will relocate out of Rolling Hills due to diminished mobility (capacity to drive) or the need for higher levels of care.

Because of resource limitations and the city's small size, the City of Rolling Hills does not provide direct services to seniors. It works with other agencies, non-profits, and the private sector to address the housing needs of local seniors, and to connect residents with service providers. This includes maintaining a comprehensive list of facilities and service providers at City Hall, and a dedicated page on the City's website listing available services for seniors. Rolling Hills has partnered with other Peninsula cities and local non-profits to produce a Senior Resources Guide for the Palos Verdes Peninsula.

Nearby local services include:

- Palos Verdes Peninsula Village, located in Rolling Hills Estates, provides social and educational activities, transportation, and advocacy for seniors in the vicinity. They provide trained volunteers to assist with routine home maintenance activities, computer troubleshooting and set-up, and other day to day activities.

- PV Peninsula Transit Authority Dial-A-Ride, which provides services for persons 62 or older on the Peninsula, and free taxis for medical appointments in the South Bay area.

- Peninsula Seniors, a non-profit 501(c)(3) that has served the four cities on the Palos Verdes Peninsula (including Rolling Hills) since 1982. They primarily provide social activities, health and wellness programs, special events, and educational programs.

- Volunteer block captains within Rolling Hills, providing wellness checks for seniors as well as emergency preparedness and response.

- Homeshare South Bay matches seniors and others in the community with local housing opportunities. Homeshare South Bay is a project of the South Bay Cities Council of Governments, which includes Rolling Hills.

- HELP (Health Care and Elder Law Programs) is a Torrance-based organization that provides counseling to area seniors on elder care, finance, law, and consumer protection. The organization is dedicated to empowering older adults and their families.

- Palos Verdes Peninsula Library District and the Peninsula Center Library (in Rolling Hills Estates) provides programs and resources for seniors.

- There are senior centers in the nearby communities of Torrance, Carson, Wilmington, Harbor City, San Pedro, Manhattan Beach, Redondo Beach, Hawthorne, and El Segundo.

In addition, the Rolling Hills Community Association (RHCA) created a "Needs of Seniors" Committee in 2014 to address the needs of aging Rolling Hills residents. The Committee collects information and makes recommendations to the RHCA Board. Their recent efforts have focused on transportation, health and wellness, home improvement and maintenance, and social events.

3.4.2 Persons with Disabilities

The number of disabled residents is increasing nationwide due to increased longevity and the aging of the population. Physical and mental disabilities can hinder access to housing as well as the income needed to pay for housing. Those with disabilities often have special housing needs related to their limited earning capacity, higher health care costs, mobility or self-care limitations, or need for supportive services.

The Census recognizes six disability types in its data tabulation: hearing, vision, cognitive, ambulatory, self-care, and independent living. These categories are not mutually exclusive and disabled residents may have more than one of these conditions. Current ACS data (2015-2019) for Rolling Hills indicates that 10.6 percent of the City's population has one or more disabilities. This compares to 8.1 percent in the 2000 Census, with the increase attributable to the greater number of older adults. Rolling Hills has a slightly higher percentage of disabled residents than the county as a whole, with the ACS reporting that 9.9 percent of Los Angeles County's residents were disabled in 2020.

The city's older residents are more likely to be disabled than its younger residents. ACS data shows 23 percent of all residents over 65 have one or more disabilities, whereas only 5.5 percent of those aged 18-64 have one or more disabilities and only 1.4 percent of those under 18 have disabilities. The "over 75" population has the greatest incidence of disability, with 33.8 percent affected.

Table 3.1~~2~~3 shows the incidence of disabilities among persons in different age groups in Rolling Hills. The most common disabilities are ambulatory (movement), with older adults most impacted. There were 103 residents reporting an ambulatory difficulty, 66 of whom were over 75. There were 56 residents reporting a hearing difficulty, 46 of whom were over 75. Cognitive difficulties were more likely to affect the younger population (particularly 18-34). This was the only category where rates among older adults were lower than among younger age cohorts.

Table 3.1~~2~~3: Percent of Rolling Hills' Residents with a Disability

Disability Type	Under 18	18-64	Over 65	Total
Hearing Difficulty	0	1.0%	10.0%	3.7%
Vision Difficulty	0	1.0%	2.6%	1.3%
Cognitive Difficulty	1.5%	2.3%	2.0%	2.1%
Ambulatory Difficulty	0	2.9%	16.5%	6.9%
Self-care Difficulty	0	0.5%	6.0%	2.3%
Independent Living Difficulty	N/A	2.3%	8.8%	5.0%

Source: American Community Survey, 2021 (for 2015-2019)

There were 61 residents, including 34 residents over 75 and another 11 aged 65-74, who indicated an independent living difficulty. This represents roughly 5 percent of the City's population and is comparable to the countywide average of 5.4 percent. These residents may require daily assistance from caregivers or family members.

There is an ongoing need to adapt housing to meet the needs of those with disabilities, and to design new homes so they are accessible for all people. This may require widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, grab bars, walk-in baths and showers, and other design changes. It is important that planning and building codes support such changes, and accommodate the needs of those who are disabled or become disabled while living in the homes they currently occupy. Barrier free design is particularly important in any multi-family housing that may be constructed in the future.

In 2020, the City of Rolling Hills amended its municipal code to provide "reasonable accommodation" for persons with disabilities. This complies with state and federal laws and enables those with disabilities to request modifications from standard practices or codes to meet their housing needs.

3.4.3 Persons with Developmental Disabilities

SB 812 requires that each jurisdiction's housing element include an analysis of housing needs for persons with developmental disabilities. This is defined by federal law as a "severe, chronic disability" that:

- Is attributable to a mental of physical impairment or combination of mental and physical impairments
- Is manifested before the individual attains age 18
- Is likely to continue indefinitely
- Results in substantial functional limitations in three or more of the following areas of major life activity:
    - Self-care
    - Receptive and expressive language
    - Learning
    - Mobility
    - Self-direction
    - Capacity of independent living
    - Economic self-sufficiency
- Reflects the need for a combination and sequence of special, interdisciplinary, of generic services, individualized support, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

Examples of developmental disabilities include cerebral palsy, epilepsy, and autism. Many developmentally disabled persons can live and work independently. More severely disabled individuals may require a group living environment with training and supportive services. The most severely disabled individuals may require an institutional environment where medical services and physical therapy are provided. Because developmental disabilities exist in childhood, the transition from living with one's family to living independently is an important consideration in meeting local housing needs.

Data on the number of persons with developmental disabilities is maintained by the California Department of Developmental Services (DDS). DDS coordinates the efforts of a network of 21 non-profit regional centers around the state and provides funding for a variety of programs and services. Rolling Hills is served by the Harbor Regional Center, which is located in Torrance. The Harbor Center serves over 15,000 people with developmental disabilities, with a service area that includes Long Beach, the South Bay, the Palos Verdes Peninsula, and other parts of southern Los Angeles County. About half are children and half are adults.

Data from the DDS is provided by ZIP code. Rolling Hills city represents 7.4 percent of the 25,061 residents in ZIP code 90274. The last available report posted by DDS on their website (June 2017) indicates 154 clients served in 90274, including 65 under age 18 and 89 over age 18. If Rolling Hills' share of the total is pro-rated, this would be equivalent to 12 clients, including five children and seven adults. ZIP code data is also disaggregated by the type of housing occupied by clients. The data indicates that 149 clients in ZIP Code 90274 live with their families or guardians and "fewer than 11" clients live in supported living, care facility, or foster home environments. Overall, about 87 percent of the Harbor Center's clients live with their families.

The Harbor Regional Center is an important resource for those with developmental disabilities, and their families. It provides health assessments, advocacy, family support and training, individual case management and support, early intervention and prevention services, and assistance in finding stable and secure independent living arrangements. Additional resources in the area include the Disability Community Resource Center in Torrance and Southern California Resources Services for Independent Living.

3.4.4 Female-Headed Households with Children

Single-parent households require special consideration and assistance because of their greater needs for day care, health care, and other facilities. In particular, female-headed households with children tend to have lower incomes, thus limiting housing affordability for this group. In most communities, female-headed households are considered to be at greater risk of displacement, poverty, and housing overpayment.

The 2019 ACS indicates that there were five single parent female households with children in Rolling Hills, representing less than one percent of the City's households. The comparable figure for Los Angeles County was 5.1 percent, as the composition of households is substantially more diverse at the countywide level.

ACS data for the small number of female-headed households with children in Rolling Hills may not be entirely reliable due to the small sample size. Nonetheless, the data indicate that these households were above the poverty level, and did not receive supplemental security income, SNAP/food stamps, or other public assistance income in the past 12 months.

Because the very small number of female-headed households in Rolling Hills, as well as their income characteristics, they are not expected to have special housing needs that require City programs.

3.4.5 Large Households

Large households are defined as those with five or more members. Such households are identified in State housing law as a group with special housing needs based on the limited availability of adequately sized, affordable housing units. In instances where large households have lower incomes, they may be more likely to live in overcrowded dwelling units or in units that are substandard. The problem is more acute for large households who are renters, who may face the added risk of eviction or displacement.

Table 3.14~~3~~ shows data on household size in Rolling Hills. The data is broken down for family and non-family households. About 12.3 percent of all households in Rolling Hills have five or more members, including 2.6 percent with seven or more members. All of these households are families. Countywide, 14.3 precent of all households have five or more members and 2.8 percent have seven or more members.

The average number of rooms per unit in a Rolling Hills home is 8.3, compared to 4.6 for Los Angeles County. ACS data indicates the median annual income for large households in Rolling Hills exceeds $250,000. Given the large home sizes in Rolling Hills, the low incidence of overcrowding, and the relatively small percentage of large households, this is not a priority special needs group within the city. Larger households will continue to be housed in the city's larger single family homes.

Table 3.14~~3~~: Number of Persons in Family and Non-Family Households

Household Size	Family	Percentage	Non-Family	Percentage	Total	Percentage
1	N/A	N/A	94	87.0%	94	16.3%
2	287	61.2%	14	13.0%	301	52.2%
3	59	12.6%	0	0	59	10.2%
4	52	11.1%	0	0	52	9.0%
5	51	10.9%	0	0	51	8.8%
6	8	1.7%	0	0	8	1.4%
7 or more	12	2.6%	0	0	12	2.1%
Total	**469**	**100.0%**	**108**	**100.0%**	**577**	**100.0%**

Source: American Community Survey, 2021 (for 2015-2019)

3.4.6 Residents Living in Poverty or With Extremely Low Incomes

Census data indicates that 1.7 percent of Rolling Hills' population—or about 25 residents—are below the federal poverty line. This compares to 14.9 percent for the county as a whole.

According to the 2015-2019 ACS, Rolling Hills residents living below the poverty include 14 people aged 18-59 and 11 people over 60. There are no children under 18 below the poverty line in the city. The data further indicates that the 25 residents include 12 white non-Hispanic persons, four Asian persons, and nine Latino persons.[6]

Census data indicates that only five of the residents below the poverty line are in the labor force, suggesting that some of those tallied by the Census have other sources of income not reported here. Census data indicates that a majority of the adults below the poverty level in Rolling Hills are 18-34 year olds—this likely represents adult children not in the labor force who are living at home. This is further supported by the even lower poverty rate for family households in Rolling Hills—reported at 0.4 percent by the ACS, which is equivalent to three households.

Although Rolling Hills has a very small number of households in poverty, and some of its extremely low income residents have supplemental sources of income, the city is located in a region with significant very low income housing needs. In February 2021, the City amended its zoning regulations to create the Rancho Del Mar Overlay District. Affordable housing and emergency shelter are both permitted by right in this district, subject to specific development standards. Single room occupancy hotels are conditionally permitted. The City also permits home sharing, room rentals, and accessory dwelling units, all of which are beneficial to meeting extremely low income housing needs.

3.4.7 Farmworkers

The special housing needs of farmworkers are a result of low wages and the seasonal nature of agricultural employment. Migrant farmworkers face particular challenges, including severe overcrowding. Farmworker needs are difficult to quantify due to fear of job loss, language barriers, and the documentation status of the farmworker labor force.

The 2015-2019 ACS data indicates that there are no Rolling Hills residents employed in "Farming, Fishing, and Forestry" occupations. This data further indicates that there are no residents in the city employed in the "Agriculture, Forestry, Fishing, Hunting, and Mining" sector. There are also no farmworker jobs in the city, as there is no agricultural land. As a result, the City does not have active programs or policies to address farmworker housing needs.

[6] *As noted earlier, the ACS is based on a sample of the population (roughly 15% for the five-year period). In a small city such as Rolling Hills, the margin of error is high, particularly for the breakdown of poverty status by age, race and ethnicity.*

3.4.8 Homelessness

Homelessness has become an increasing problem throughout California and the entire United States. In Southern California, factors contributing to the rise in homelessness include the lack of housing affordable to low- and very low-income persons, loss of employment and benefits—particularly for low wage workers, health care costs and related personal disabilities, reductions in public subsidies, increasing rates of addiction and substance abuse, and a lack of mental health services.

State law requires that cities address the special needs of unhoused residents within their jurisdictional boundaries. For this purpose, homelessness is defined as including individuals who lack a fixed, regular and adequate nighttime residence, as well as individuals living in shelters and in places not designed for sleeping. The definition does not include those living in substandard or overcrowded housing or persons who are temporarily staying with family and friends. Such individuals are considered to be "at risk" of homelessness.

A "point in time" count of homeless residents in Greater Los Angeles is conducted annually by the Los Angeles Homeless Services Authority (LAHSA). In January 2020, the count identified 54,291 persons experiencing homelessness in Los Angeles County. This is an increase of about 10 percent from 2019, when the count was 49,521. It is an increase of 37 percent from 2016, when the count was 39,587. The 2020 figures precede the onset of the COVID-19 pandemic and its impacts on homelessness.

Data provided by the LAHSA indicates the 2020 count for the city of Rolling Hills was zero. The count for all prior years in the survey (2016-2019) also counted no unsheltered residents in the city. The nature of homelessness and the method of data reporting make it difficult to evaluate the full extent of the challenge of adequately housing the entire population. While there are no unsheltered residents in Rolling Hills, there may be residents who are temporarily staying with friends or relatives because they lack the resources or have underlying conditions which make it difficult to find permanent housing.

There are no emergency shelters in Rolling Hills. The closest facilities are in San Pedro and Wilmington and are less than five miles away. Harbor Rose Lodge (San Pedro) provides homeless support services for individuals and families in Los Angeles County, with no geographic restrictions. It assists with temporary housing and provides support services and referrals. Harbor Interfaith (San Pedro) provides a 90-day emergency shelter and an 18-month transitional housing program. Also in San Pedro, Shawl House and House of Hope provide shelter, transitional housing, counseling specifically for women. The Doors of Hope Shelter in Wilmington also serves single women. The Beacon Light Mission in Wilmington provides a 10-bed men's shelter, as well as food, clothing, and supportive services to men, women, and children.

In February 2021, the City of Rolling Hills amended its zoning regulations to allow emergency shelter "by right" in the Rancho Del Mar Overlay Zone. The 31-acre site overlay zone includes multiple areas of underutilized land that provide opportunities for emergency shelter or supportive service facilities.

The City is committed to coordinating with supportive service providers and meeting the needs of local unhoused residents. A list of nearby social service agencies and shelters is maintained by the City Clerk.

3.5 Housing Stock Characteristics

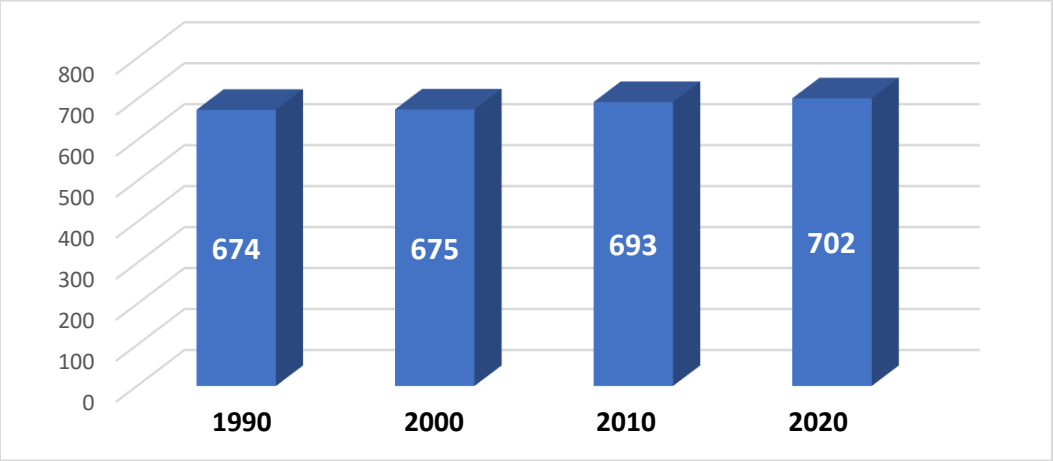
Government Code Section 65583(a) requires the Housing Element to describe the characteristics of the local housing stock, including structural condition. This section of the Element provides an overview of Rolling Hills' housing stock, including the age of structures, the types of structures, the number of bedrooms, and vacancy characteristics. It also includes information on home values and rents.

3.5.1 Housing Unit Count

The US Census reported 674 housing units in the city in 1990, 675 units in 2000, and 693 units in 2010 (see Chart 3.5). The California Department of Finance estimated 719 units in the city as of 2021. However, the August 12, 2021 data release from the 2020 Census indicates the total unit count is 702, which is more consistent with City records. The net number of housing units in the city has increased at a rate of about one unit a year for the last 30 years.

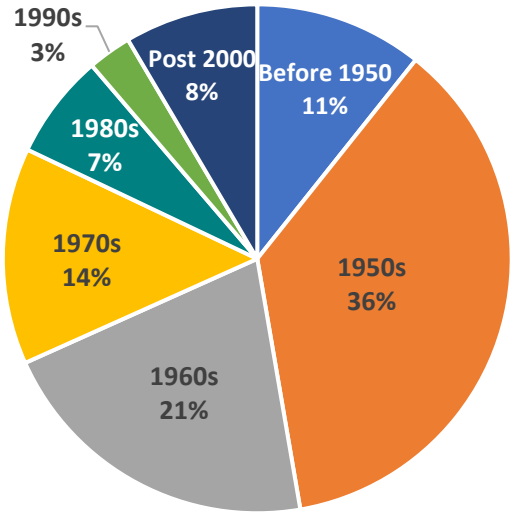
While the increase in units has been nominal, additional residential development has been occurring through the replacement and expansion of existing single family homes. Much of Rolling Hills was developed in the 1950s and was typified by 2,000 to 4,000 square-foot ranch style homes. As in many desirable older communities, the original housing stock is gradually being replaced with much larger units. These units average 6,000 to 9,000 square feet in size, according to City building permit records. This trend of residential recycling can be expected to continue and potentially increase as less vacant land is available for development.

Chart 3.5: Total Number of Housing Units in Rolling Hills, 1990-2020



Source: Census 1990, 2000, 2010, 2020

Chart 3.6: Year of Construction for Rolling Hills Homes



Source: American Community Survey 2021

3.5.2 Age and Condition of Housing Stock

Chart 3.6 shows the age of the housing stock in Rolling Hills. About half of the housing stock in the community is more than 60 years old. About 35 percent was built in the 1960s and 70s and the remainder has been built in the last 40 years. About 8 percent of the city's housing stock is less than 20 years old—however, most of these homes are "replacements" and were built on previously developed lots.

The older housing stock in the city is in excellent condition. Census data indicates there are no units in the city without plumbing or kitchen facilities. The City strongly encourages reinvestment in the existing housing stock, and homeowners take pride in their homes and properties. Common repairs include new roofs, new siding, plaster and stucco repair, upgraded electrical systems, and plumbing improvements. Home additions, kitchen and bathroom upgrades, and solar energy installations are also common.

No significant code enforcement or housing problems have been observed in the city. The city has a Code Enforcement Officer who makes complaint-based site visits. In the event a violation is identified, the City works with the property owner to resolve the issue.

The City estimates that five units, or 0.8 percent of its housing stock, is in need of rehabilitation or replacement. These properties include:[7]

- A home that has been red tagged and in need of foundation repair
- A home in a landslide area with a stop work order due to work being done without permits

[7] *Addresses can be provided to HCD upon request but are not disclosed here.*

- An older home where the owner is seeking approval to demolish and rebuild
- A home with an approved application to demolish and rebuild
- A home with an approval for a major remodel and addition

In any given year, the City also receives "tear down and rebuild" applications for one to two older homes as well as dozens of applications to modernize, expand and update older homes. In almost all cases, these homes are habitable, but they are outdated and do not provide the amenities expected in high-end construction.

3.5.3 Housing Type

Rolling Hills is comprised entirely of single family homes. The 2021 ACS indicates there are no multi-family units in the city. ACS data further indicates seven units that are "single family attached" which presumably are accessory dwelling units (ADUs) or other separate living quarters that are ancillary to a primary residence.

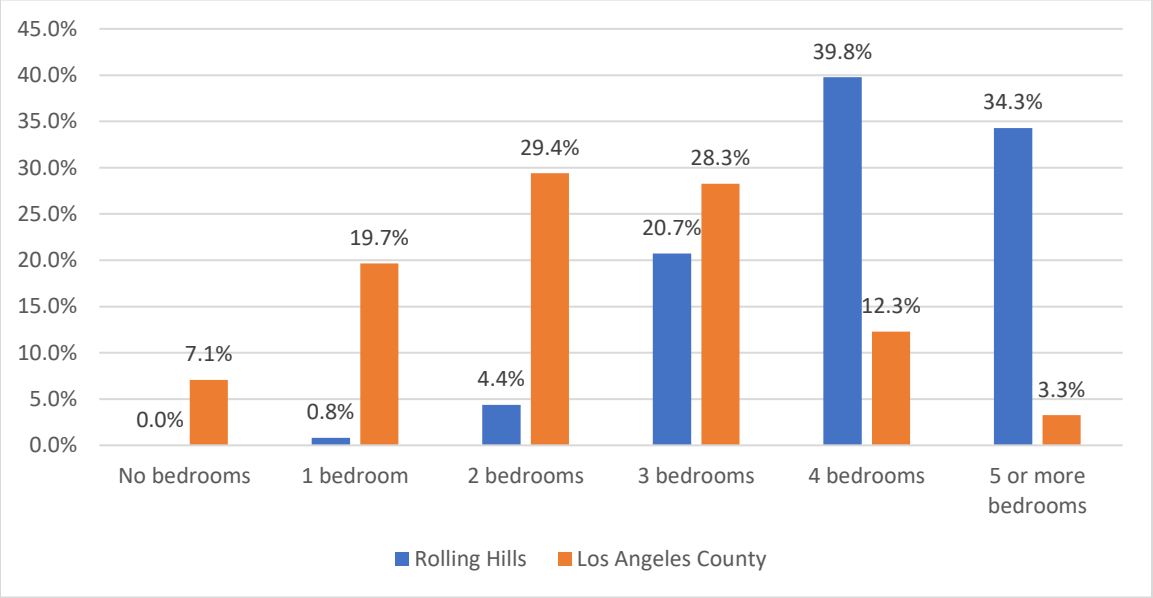
Census data does not typically classify "guest houses" as dwelling units unless they have been legally permitted as separate residences. Rolling Hills classifies guest houses differently than ADUs; the latter are permitted by right to be independent dwellings provided they meet certain adopted zoning standards. By contrast, occupancy of guest houses is limited to persons employed on the premises, the family of the occupants of the main residence, or the temporary guests of the occupants of the main residence. Guest houses may not be used as rental housing, but an owner may apply for a permit to convert a guest house to an ADU, which can then be rented.

3.5.4 House Size

Homes in Rolling Hills are large. Chart 3.7 below shows the distribution by number of bedrooms. About 74 percent of the homes in the city have four or more bedrooms. Another 21 percent have three bedrooms and only five percent have two bedrooms or fewer. By contrast, among homes in Los Angeles County as a whole, 16 percent of all housing units have four or more bedrooms and 56 percent have two bedrooms or fewer.

Data for total house size shows a similar difference between Rolling Hills and the County as a whole. Countywide, the median number of rooms per home is 4.5. It Rolling Hills, it is 8.3. Only 4.7 percent of the homes in Los Angeles County have nine or more rooms. In Rolling Hills, 46 percent of the homes have nine or more rooms.

Chart 3.7: Percent of Housing Units by Number of Bedrooms, Rolling Hills and Los Angeles County



Source: American Community Survey 2021 (for 2015-2019)

3.5.5 Vacancy Characteristics

The August 12, 2021 data release from the US Census indicates that 63 of the city's 702 homes were vacant at the time of the 2020 Census. This is a nine percent vacancy rate. By contrast, 2020 Census data indicates that the vacancy rate for the Palos Verdes Peninsula as a whole was about five percent. Countywide, ACS data indicates that six percent of the housing stock in Los Angeles County is vacant.

ACS data provides an indication of the characteristics of vacant units in Rolling Hills. The ACS reports that 30 percent of the vacant units in the city were for sale, 26 percent were used seasonally (and were not occupied at the time of the census), and five percent were for rent. The remainder were classified as "other." ACS data further indicates that the vacancy rate among for-rent units was three times higher than the vacancy rate among for-sale units, although the sample size is very small.

In 2010, the Census reported that 5 percent of the homes in the city were vacant, indicating a significant increase between 2010 and 2020. The higher vacancy may be a result of changes in the housing market, including significantly higher home prices, and an increase in the number of homes that are used seasonally. The city's housing market serves a unique market niche.

3.5.6 Home Values and Prices

A variety of sources were used to analyze housing market prices and trends in Rolling Hills, including on-line real estate data vendors, current real estate listings, and the US Census.

According to on-line real estate service Zillow.com, the median value of a home in Rolling Hills is $3,733,468. Rolling Hills home values have gone up 19.7% over the past year. Chart 3.8 compares the local median home value with values in the three other Palos Verdes Peninsula cities and with Los Angeles County as a whole. Homes in Rolling Hills are valued at 50 percent higher than those in Palos Verdes Estates ($2.45 M), 126 percent higher than those in Rancho Palos Verdes ($1.65M), and over four times higher than the countywide median ($790,000).

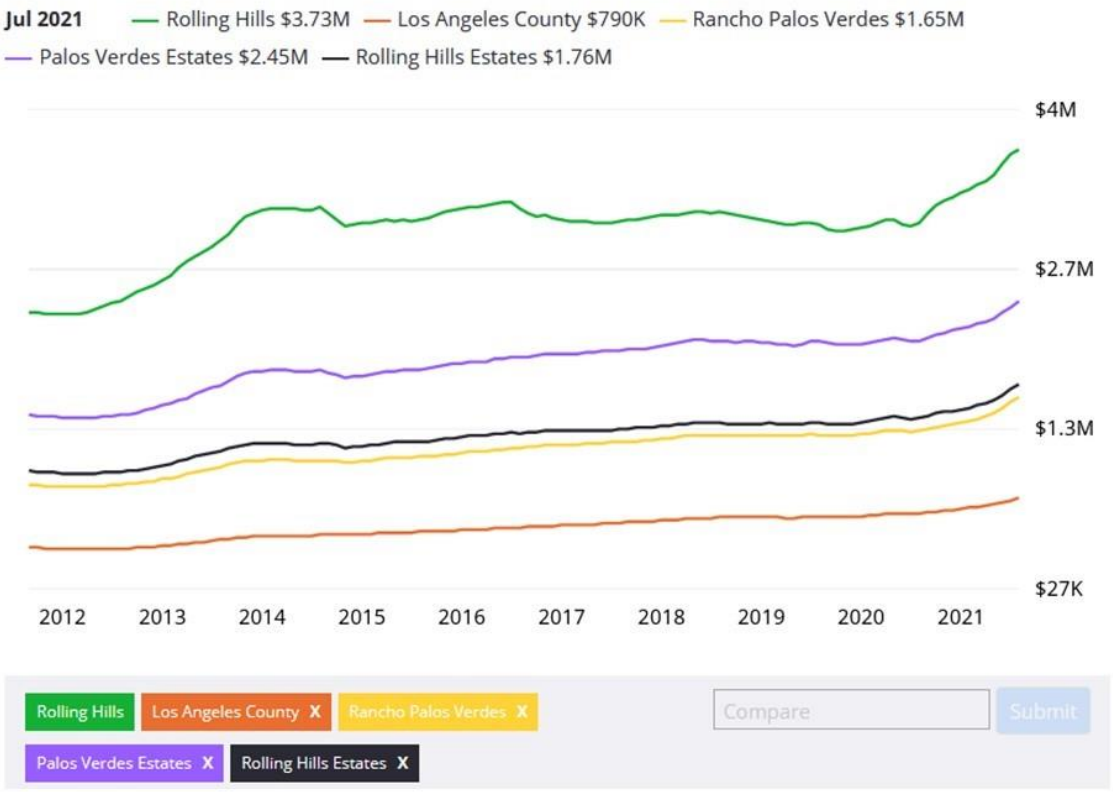
The ACS 2021 data indicates that 95 percent of all homes in Rolling Hills have a value of over $1,000,000. The Census-reported median is over $2 million, which is the highest interval on the Census scale. The ACS shows the median in Los Angeles County at $583,200. This is substantially lower than the Zillow data, which is only based on homes recently sold.

The website realtor.com indicates that the average time on the market for a home in Rolling Hills in July 2021 was 120 days. However, the sample size is small, and similar data for earlier in the year indicates a median sale time of 45 days (December 2020 and January 2021). Realtor.com indicates that homes in the city sold for 4.98 percent below asking price in July 2021. This figure is highly variable depending on market listings at any given time.

In July 2021, there were 14 homes for sale in Rolling Hills (including properties with pending offers). These ranged in size from a 1,467 square foot home to a 13,000 square foot home. Prices ranged from $2,499,000 to $15,975,000. The median price was $5.02 million and the mean was $6.15 million. This is substantially higher than the average for surrounding cities on the Palos Verdes Peninsula and in Los Angeles County. The higher priced homes were typically new construction, while the two lowest priced homes were built in 1954 and 1957.

Data on rentals in the city is more difficult to characterize because the number of available properties is so small. In July 2021, there was only one home being advertised for rent in the city. The asking monthly rent was $16,000. The property has five bedrooms, seven bathrooms, and is 5,035 square feet. Zillow also reported a 2-bedroom, 1-bath detached 1,000 square foot accessory dwelling unit for rent for $3,950. In addition, two ADUs were being advertised on Craigslist (listed as Rolling Hills but likely in Rolling Hills Estates or Rancho Palos Verdes). One was a 500 square foot studio for $1,250 and the other was a 400 square foot guest house for $1,800. The Census indicates that seven of the renter households in the City pay less than $1,500 a month in rent, and the remainder pay more than $3,000 a month.

Chart 3.8: Home Prices in Rolling Hills, Peninsula Cities, and Los Angeles County, 2012-2021



Source: Zillow.com, 2021

Table 3.154: Homes for Sale in Rolling Hills, July 2021

Asking Price	Square Footage	Cost per Square Foot	Year Constructed
$15,975,000	7,136	$ 2,239	2016
$11,100,000	13,000	$ 854	2007
$8,765,000	5,100	$ 1,719	1951
$7,750,000	4,000	$ 1,938	1968
$7,499,000	8,000	$ 937	2002
$5,800,000	4,453	$ 1,302	1986
$5,795,000	5,884	$ 985	1956
$4,250,000	4,101	$ 1,036	1941
$4,200,000	3,527	$ 1,191	1940
$3,950,000	5,560	$ 710	1989
$3,495,000	3,414	$ 1,024	1947
$2,630,000	3,444	$ 764	1974
$2,500,000	1,467	$ 1,704	1957
$2,499,000	1,752	$ 1,426	1954
MEAN: $6,150,000		$1,273	
MEDIAN: $5,020,000		$1,030	

Source: Realtor.com, Trulia, Zillow, 2021

Table 3.154 indicates the cost per square foot of those homes currently for sale in Rolling Hills, along with the asking price, square footage and year of construction. The median cost per square foot is $1,030, which is substantially higher than the statewide median of $438 per square foot. Cost per square foot ranged from $710 to $2,239.

3.5.7 Units at Risk of Conversion from Affordable to Market Rate

State law requires the City to identify, analyze and propose programs to preserve any deed-restricted lower-income housing that could be lost as these deed restrictions expire. However, there are presently no low-income or income-restricted units in Rolling Hills. As a result, there is no housing at risk of losing its subsidized status.

3.6 Future Housing Needs

3.6.1 2021-2029 Regional Housing Needs Allocation (RHNA)

The eight-year housing need for the six-county Southern California region is calculated by the California Department of Housing and Community Development (HCD). This need was determined to be 1,341,827 units for the 2021-2029 Sixth Cycle planning period. The total regional need represents a 225 percent increase over the need calculated for the 2013-2021 Fifth Cycle.

The total regional need is disaggregated to the six counties and 191 cities in the region by the Southern California Association of Governments (SCAG) through a process known as the Regional Housing Needs Allocation (RHNA). About 60 percent of the regional need was assigned to Los Angeles County, which had 53 percent of the region's population in 2020. Concentrating the RHNA in Los Angeles County is a response to the greater availability of transit, urban services, and housing need within the core of the region. If the 1.3 million unit need was fully constructed, it would represent a 20 percent increase in the region's housing unit count in eight years.

The City of Rolling Hills was allocated 45 units of the countywide total, or about .006 percent. Allocations for nearby cities on the Palos Verdes Peninsula were 191 for Rolling Hills Estates, 199 for Palos Verdes Estates, and 639 for Rancho Palos Verdes. As shown in Table 3.165, these allocations are significantly higher than they were in the Fifth Cycle, particularly when compared to the county and region. This represents a shift in the methodology used to allocate units, with less consideration given to growth potential as defined by local governments and more consideration given to population, proximity to job centers, and equity factors. Despite the large increases compared to the last cycle, the RHNA targets for the four Peninsula cities combined represent one-tenth of one percent of the countywide allocation. The RHNA for each of the four cities is equal to between four and six percent of each city's existing housing stock, compared to 20 percent for the region.

Table 3.165: RHNA by City and Comparison to Fifth Cycle

Jurisdiction	5th Cycle RHNA	6th Cycle RHNA	Percent Increase, 5th to 6th Cycle	Existing (2021) Housing Units	6th cycle RHNA as percentage of existing inventory
Rolling Hills	6(*)	45	650%	702	6%
Rolling Hills Estates	5	191	3720%	3,157	6%
Palos Verdes Estates	16	199	1144%	5,303	4%
Rancho Palos Verdes	31	639	1961%	16,340	4%
Los Angeles County	179,881	812,060	351%	3,614,809	22%
SCAG Region	412,137	1,341,827	226%	6,679,283	20%

Source: SCAG 2012 and 2021, plus DOF Table E-5 and US Census 2020
(*) In addition to planning for its 5th Cycle allocation, the 2015-2023 Rolling Hills Housing Element includes the 4th Cycle allocation of 22 units, which was carried over. The 45- unit assignment is a 60 percent increase over the prior 28 unit two-cycle total.

The 6th Cycle allocation by income group is shown in Table 3.167. In Rolling Hills, about 64 percent of the RHNA is for low and very low income households. The figure is comparable to the other cities on the Palos Verdes Peninsula (ranging from 62 to 65 percent). In Los Angeles County, only 42 percent of the assigned need is for low and very low income households, and regionally, it is 41 percent. The greater allocation of lower income housing to the Peninsula cities reflects the statewide and regional focus on encouraging fair housing and discouraging economic segregation.

Table 3.167: Comparison of 6th Cycle RHNA by Income Category

Jurisdiction	Very Low % of total	Low % of total	Moderate % of total	Above Moderate % of total
Rolling Hills	44%	20%	24%	11%
Rolling Hills Estates	43%	22%	20%	15%
Palos Verdes Estates	41%	22%	24%	13%
Rancho Palos Verdes	40%	22%	20%	19%
Los Angeles County	27%	15%	16%	42%
SCAG Region	26%	15%	17%	42%

Source: SCAG, 2020

The City's "very low" income housing allocation for 2021-2029 is 20 units. The State Government Code requires that this total be further allocated between "extremely low" income households (earning less than 30% of areawide median income) and other "very low" income households (earning 30-50% of areawide median income). This distribution may be based on Census income data showing the current percentages of households in these two categories. According to the most recent HUD Comprehensive Housing Affordability Strategy data, there are 65 very low income households in Rolling Hills. CHAS indicates 25 are extremely low income and 40 are very low income. Applied to the 20 unit RHNA, these proportions equal roughly 7 extremely low income units and 13 other very low income units.

3.6.2 Growth Forecasts

As the regional planning agency for the Los Angeles region, SCAG is responsible for preparing jurisdiction-level forecasts for each city and county in the region. The latest forecasts were adopted in September 2020 and describe conditions in a base year (2016) and forecast year (2045). The six-county region as a whole is expected to grow from 6.012 million households (2016) to 7.633 million households (2045), an increase of over 1.3 million households in the 29-year period. Average household size is projected to decline from 3.1 to 2.9 during this period.

SCAG forecasts indicate that Rolling Hills growth will be flat during through 2045. The latest published forecasts (Connect SoCal Demographics and Growth Forecast, September 2020) show 700 households in 2016 and 700 households in 2045. However, the numbers are rounded to the nearest hundred and it is likely that some marginal change will occur. Population over the equivalent period is shown as increasing from 1,900 to 2,000, a growth rate of about 5 percent

over 29 years. As noted on page 3.1, the 2020 Census indicates the City lost over 100 residents between 2010 and 2020, so the SCAG forecasts will need to be adjusted in the future. An increase of 100 residents would bring the City closer to its 2010 total of 1,860 residents.

3.6.3 Locally Identified Needs

While Rolling Hills is obligated by the Government Code to identify capacity for 29 low and very low income units and to develop programs to meet this need, the City also has an opportunity to tailor its housing programs to meet local needs. Based on the Assessment in this chapter, some of the key findings regarding local needs are:

- The City has a large and growing population of seniors. Some of these residents are on fixed or limited incomes and face relative high housing costs, including home maintenance, property taxes, HOA dues, utilities, etc. These residents could benefit from more senior housing options, ranging from fully independent to assisted living.

- Although there are very few people who list Rolling Hills as their permanent place of employment, the City supports a relatively large population of service workers, including caregivers, domestic employees, child care workers and au pairs, landscapers and gardeners, and others in construction and home maintenance. In addition, there are public sector workers, firefighters, and teachers/counselors (at Rancho Del Mar) employed within the city, with incomes that are far below what would be required to buy a home in Rolling Hills. A limited number of affordable rental units serving these workers could reduce commute lengths and vehicle miles traveled.

- Adult children of Rolling Hills residents (particularly those in the 18-30 age range) have limited housing options in the city, other than remaining at home. ADUs could provide additional options.

- The City's housing stock is well suited to ADUs and home sharing. More than two-thirds of the non-vacant housing units in the city have only one or two occupants, despite homes that are substantially larger than the regional average. There are also 300 fewer residents in Rolling Hills today than there were 50 years ago, despite larger homes and more square feet of living space. Additional residents would have a lower impact on infrastructure, services, and the environment if accommodated in the footprint of existing homes as opposed to new construction.

- Creating an ADU or deciding to share one's home is a personal choice and is entirely at the discretion of the homeowner. However, the City can create incentives that make it easier and more affordable for homeowners to consider this option.

4.0 Housing Opportunities and Resources

4.1 Introduction

This section of the Housing Element evaluates potential opportunities to meet the City's Regional Housing Needs Allocation (RHNA). It includes an inventory of potential housing sites in the city and an evaluation of Accessory Dwelling Unit (ADU) and Junior ADU potential. The analysis in this section demonstrates that Rolling Hills has the capacity to accommodate its RHNA assignment of 45 additional housing units, including 29 units that are affordable to low and very income households.

Two other topic areas are covered in this chapter. As required by State law, this chapter discusses opportunities for energy conservation in the city. Reducing energy costs can reduce overall housing costs, contributing to affordability. This chapter also identifies potential financial resources to support the provision of affordable housing and the maintenance of existing housing in the city.

4.2 Approved or Pending Development

There are 12 housing units in the city that are approved or pending and not yet constructed. All of these units are expected to become available for occupancy during the 2021-2029 period and therefore count toward meeting the RHNA. These units include three market-rate single family homes and nine ADUs. These units are listed in Table 4.1 below, including an assignment of each unit by income category.

Table 4.1: Committed Development for the 2021-2029 RHNA period

ID	Assessor's Parcel Number (APN)	Address	Description	Income Category
A	7567-011-020	23 Crest Road E	New SF home on vacant lot	Above Moderate
B	7567-001-018	1 Poppy Trail	New SF home on vacant lot	Above Moderate
C	7569-020-004	8 Middleridge Ln S.	New SF home on vacant lot	Above Moderate
D	7567-011-020	23 Crest Road E	ADU (1000 SF)	Above Moderate
E	7569-001-031	2950 Palos Verdes N	ADU (1000 SF)	Above Moderate
F	7569-026-008	13 Buggy Whip Dr.	ADU (997 SF)	Above Moderate
G	7569-023-006	33 Crest Road W	ADU (946 SF)	Above Moderate
H	7569-026-012	27 Buggy Whip Dr.	ADU (800 SF)	Moderate
I	7567-006-036	23 Chuckwagon	ADU (800 SF)	Moderate
J	7567-005-028	79 Eastfield Dr.	ADU (799 SF)	Moderate
K	7567-014-022	23 Georgeff Road	ADU (620 SF)	Low
L	7567-008-009	63 Crest Rd E	ADU (580 SF)	Low

Sources: US Decennial Census, 1970-2010. California Dept. of Finance, 1/1/21 estimate, 2020 Census (8/12/21 release)

The assignment of the ADUs by income category is based on the size of the unit. Units larger than 800 SF are presumed to be "above moderate"; units 650-800 SF are presumed to be "moderate"; units 500-650 SF are presumed to be "low"; and units smaller than 500 SF are presumed to be "very low." This is based on local rental data for comparably sized ADUs (see Section 4.6 and the footnote below).[1]

4.3 Vacant Sites

Table 4.2 identifies vacant residentially zoned sites in Rolling Hills. These sites are shown graphically on Figure 4.1. For each site, the table indicates the theoretical number of units permitted by zoning (based on acreage and minimum lot size requirements) and the "realistic" number of units based on lot configuration, access, and terrain.[2] Some of the vacant parcels are characterized by physical constraints that preclude their development, including steep or unstable slopes or landslide hazards. A few are landlocked and have no access. The acreage data for each site is based on assessor parcel maps and subtracts out unbuildable easements such as flood hazard areas and roads.

There are 34 parcels identified totaling, 124.8 acres. All of these parcels are in private ownership. Twenty are estimated to be developable and 14 are severely constrained and presumed undevelopable for the 2021-2029 planning period. The constrained parcels include five lots that are landlocked with no street frontage and nine that are in the Flying Triangle Landslide Hazard Overlay area. Several of the lots in the landslide area had homes that were destroyed by earth movement in the 1980s and early 1990s.

For the 20 remaining vacant lots, Table 4.2 indicates the "realistic" potential for 20 single family homes. This excludes accessory dwelling units, which are addressed later in this chapter.

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[1] *~~In this case, the assignment of two smaller units as "low" income is further supported by the fact that they are both conversions of existing structures rather than new construction. This facilitates greater affordability.~~The City is presuming that the two smallest ADUs listed in Table 4-1 will be affordable "by design" to lower income households. ADU permits were issued for these two units on October 27, 2020 and May 20, 2021 respectively. Both of these projects involve converting existing two-story stables (located on two separate parcels about a mile apart) into ADUs of approximately 600 square feet each. Neither of these units has a finaled building permit yet. Given the eight year timeframe of the Housing Element, both units are expected to be completed before 2029.*

These are market rate units. The assumption that they will be affordable to low-income households is based on the size of the units and the fact that they are being created by repurposing existing space rather than building new space, which presumably would cost more. Current HCD income limits for Los Angeles County indicate that the upper end of the low-income range for a two-person household is $75,700. At 30 percent of household income, monthly housing costs would need to be $1,892 to be considered affordable. The City's survey of comparable properties in 2021 found that ADUs of 400 to 600 square feet in the Palos Verdes Peninsula sub-market were renting for $1,800 per month or less. The two new ADUs are presumed to rent at comparable rates. Moreover, SCAG's ADU survey for Los Angeles County found that 60% of all ADUs in the region could be presumed affordable to lower income households. As these two ADUs are the smallest of the nine that are listed in the Housing Element (see Table 4-1), it is reasonable to presume they would fall in this range.

[2] *Excludes additional units that could be permitted under SB 9.*

Table 4.2: Vacant Residentially Zoned Sites (sorted by APN) (see note at end of table)

Site	APN	Address or Location	Zoning	General Plan	Acres (*)	Theoretical Unit Yield	Realistic Yield, excl. ADUs	Comments
1	7567-006-001	15 Chuckwagon Road	RAS-1	LDR	2.27	2	1	
2	7567-006-014	Behind 6 Chesterfield	RAS-1	LDR	1.22	1	0	Landlocked (no road access)
3	7567-009-007	5 Southfield Drive	RAS-1	LDR	1.61	1	1	
4	7567-010-013	East of 3 Packsaddle Rd W	RAS-1	LDR	1.24	1	1	
5	7567-010-015	North of 3 Packsaddle Rd W	RAS-1	LDR	1.49	1	0	Landlocked (no road access)
6	7567-011-017	54 Portuguese Bend Road	RAS-2	VLDR	2.67	1	0	Severely constrained - slide hazards
7	7567-012-019	SW of 56 Portuguese Bend	RAS-2	VLDR	0.96	1	0	In landslide hazard area
8	7567-012-020	53 Portuguese Bend Road	RAS-2	VLDR	1.46	1	0	In landslide hazard area
9	7567-012-026	4 Wrangler Road	RAS-2	VLDR	1.82	1	0	Severely constrained - slide hazards
10	7567-012-035	66 Portuguese Bend Road	RAS-2	VLDR	1.64	1	0	Severely constrained - slide hazards
11	7567-012-036	64 Portuguese Bend Road	RAS-2	VLDR	1.71	1	0	Severely constrained - slide hazards
12	7567-012-038	62 Portuguese Bend Road	RAS-2	VLDR	1.84	1	0	Severely constrained - slide hazards
13	7567-013-005	End of Portuguese Bend Rd	RAS-2	VLDR	19.81	1	0	Flying Triangle Landslide
14	7567-013-007	2 Running Brand	RAS-2	VLDR	7.09	1	0	Severely constrained - slide hazards
15	7567-014-005	West of 5 El Concho Ln	RAS-1	LDR	2.12	2	0	Landlocked (no road access)/ canyon
16	7567-014-011	West of 24 Georgeff Rd	RAS-1	LDR	1.66	1	0	Landlocked (no road access)/ canyon
17	7567-014-013	North of 27 Georgeff Rd	RAS-2	VLDR	3.79	1	0	Landlocked (no road access)/ canyon
18	7567-014-031	Access b/w 1 and 3 Poppy Tr.	RAS-2	VLDR	6.85	3	1	Rear of 8 Reata Lane
19	7567-015-036	North of 1 Georgeff	RAS-2	VLDR	4.56	2	1	
20	7567-017-017	Between 4 and 5 Ranchero	RAS-2	VLDR	3.52	2	1	Access at end of Ranchero cul-de-sac

Table 4.2, continued

Site	APN	Address or Location	Zoning	General Plan	Acres (*)	Theoretical Unit Yield	Realistic Yield, excl. ADUs	Comments
21	7567-017-045	17 Cinchring Rd	RAS-1	VLDR	1.52	1	1	Driveway access b/w 15 and 20 Cinchring
22	7569-001-020	B/w 2954 and 2958 PV Dr N	RAS-1	LDR	1.03	1	1	
23	7569-001-036	B/w 6 and 14 Roadrunner	RAS-1	LDR	1.00	1	1	
24	7569-004-026	B/w 35 and 45 Saddleback	RAS-1	LDR	3.39	3	1	
25	7569-005-008	80 Saddleback	RAS-1	LDR	6.52	6	1	This parcel is currently for sale
26	7569-012-022	W of 25 Portuguese Bend	RAS-2	VLDR	2.30	1	1	
27	7569-012-025	N of 25 Portuguese Bend	RAS-2	VLDR	3.51	1	1	
28	7569-013-017	North of 10 Pine Tree Lane	RAS-2	VLDR	2.41	1	1	One of three adj. vacant lots
29	7569-013-018	South of 18 Pine Tree Lane	RAS-2	VLDR	2.20	1	1	One of three adj. vacant lots
30	7569-013-020	18 Pine Tree Lane	RAS-2	VLDR	2.13	1	1	One of three adj. vacant lots
31	7570-024-019	Storm Hill Lane, Parcel 1	RAS-2	VLDR	6.04	3	1	7.6 ac parcel with 1.6 acres of easements
32	7570-024-020	Storm Hill Lane, Parcel 2	RAS-2	VLDR	11.64	5	1	34.7 ac parcel with 23 acres of easements
33	7570-024-021	Storm Hill Lane, Parcel 3	RAS-2	VLDR	10.10	5	1	17.3 ac parcel with 7.2 acres of easements
34	7570-025-022	N/ end of Johns Canyon Road	RAS-2	VLDR	1.68	1	1	
TOTAL					124.8	57	20	

Sources: Barry Miller Consulting, 2021; LA County GIS Portal, 2021
(*) Acreages generally exclude unbuildable easements

Note: This is a roster of existing vacant residentially zoned land in Rolling Hills. No changes to the zoning of these parcels is proposed, and no specific projects are proposed on these sites. Future development applications on these properties would be subject to environmental review or applicable exemptions, consistent with the requirements of California Environmental Quality Act.

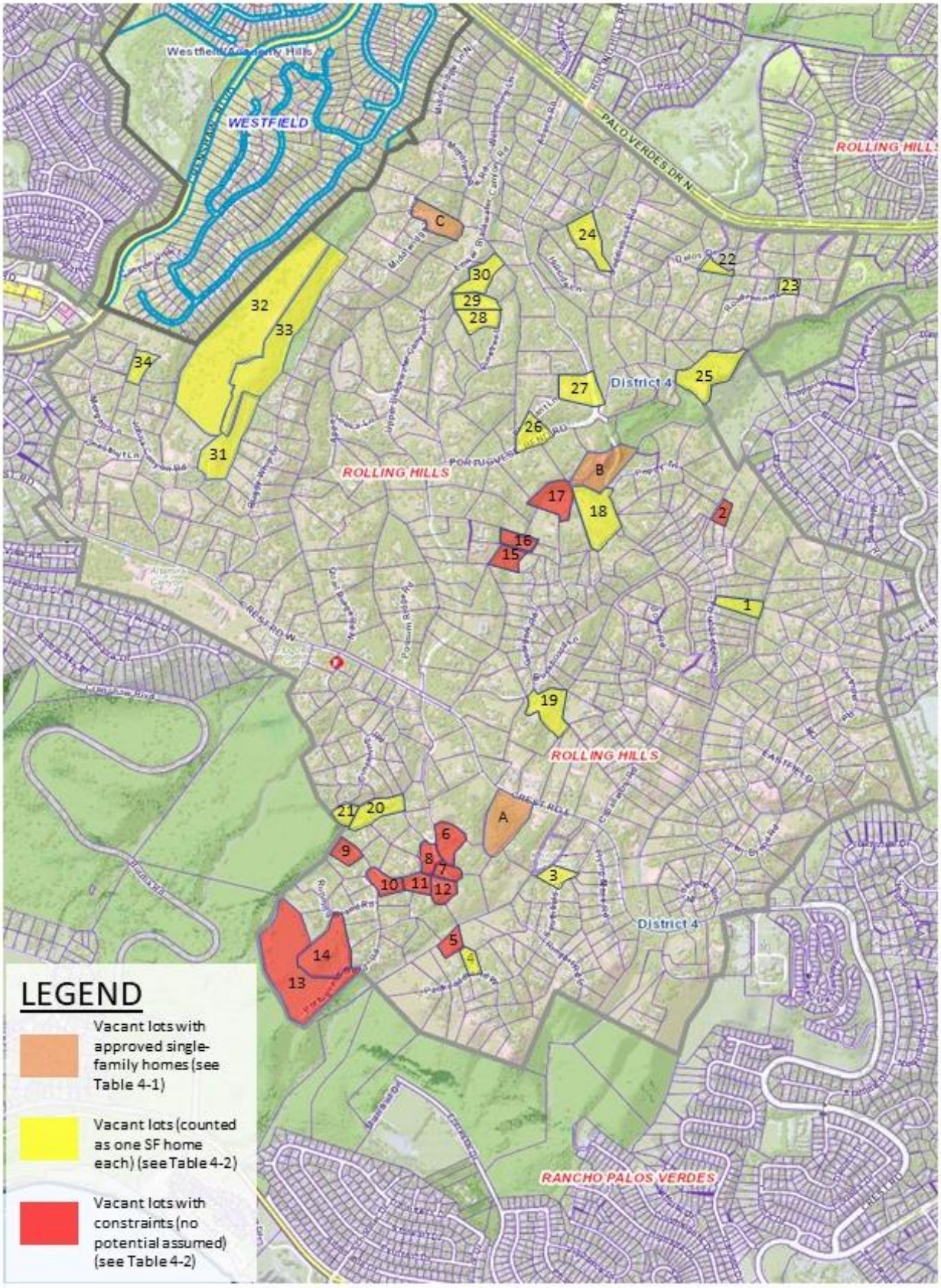


Figure 4.1: Vacant Residentially Zoned Sites

Several of the sites, such as those on Storm Hill Lane, are quite large and could potentially be subdivided. However, the "realistic" estimates are intended to be conservative and do not presume subdivision of any of the sites. These estimates also reflect the absence of sewer services on these sites, their very steep topography, and the severe risk of wildfire.

The vacant lots have the potential to completely meet the regional need for above moderate income units assigned to Rolling Hills. As noted, this need is five units for the 6th Cycle. Since three new single family homes are already in the pipeline (see Sec 4.2), the remaining need is two units. Several of the vacant sites are currently for sale, making it likely that the City will exceed its above moderate income allocation for 2021-2029.

Table 4.2 indicates the General Plan and zoning designations for each vacant site. Of the developable parcels, eight are in the RAS-1 zone (one acre minimum) and 12 are in the RAS-2 zone (two-acre minimum). No zoning changes are proposed or required to meet the above moderate income or moderate income allocations.

4.4 Lot Splits

There are a number of parcels in Rolling Hills with lot sizes that are more than double the minimum acreage required by zoning. Some of these parcels could theoretically be subdivided into two or more lots. Moreover, SB 9 (effective January 1, 2022) includes provisions to allow single family lots to be divided to allow new homes.

The potential for lot splits in Rolling Hills is very limited due to the configuration of the lots as well as environmental hazards, evacuation constraints, and the lack of a sewer system. Many of the city's larger lots have limited street frontage and irregular dimensions that would make it difficult to divide them. Moreover, the platting pattern responds to topography, and the larger lots are often steep and geologically constrained, making them difficult to subdivide. Their division could result in lots with no buildable area, street frontage, or access.

Although a limited number of new homes could conceivably occur as a result of future lot splits, a capacity estimate has not been made due to the constraints inherent in the community's topography and hazards. In addition, the reliance on septic tanks makes subdivision infeasible from a public health perspective, even on many larger lots. The supply of vacant lots is sufficient to meet the above moderate income RHNA without relying on lot splits.

4.5 Non-Vacant Sites

While Rolling Hills' above moderate income (or "market rate") RHNA can be met on vacant residentially-zoned land, the City's moderate, low, and very low income RHNA will need to be accommodated through a combination of development on non-vacant sites and accessory dwelling units (ADUs). The text below addresses non-vacant sites. ADUs and Junior ADUs (JADUs) are discussed in Section 4.6.

The sites described below provide the potential for 16 units of low- and very low-income housing. This potential is associated with the 31-acre Palos Verdes Peninsula Unified School

District (PVPUSD) site, where an overlay zone was created in 2021 to facilitate affordable housing. Other non-vacant properties addressed here are the City Hall complex, the Tennis Court Facilities, the Los Angeles County Fire Station, and the Daughters of Mary and Joseph Retreat Center parking lot. These properties have been determined to not be viable as potential housing sites. Non-vacant housing sites are shown in Figure 4.2.

4.5.1 PVPUSD Site/ Rancho Del Mar Overlay Zone (APN 7569-022-900)

In March 2021, the City of Rolling Hills adopted the Rancho Del Mar Overlay Zone on the 31-acre Palos Verdes Peninsula Unified School District (PVPUSD) property located at 38 Crest Road. Although the site is technically non-vacant, roughly three-quarters of the property (23 acres) is open space. The remaining areas are underutilized and could be repurposed.

Appendix B of this Housing Element provides a detailed evaluation of the site, demonstrating that it is the most suitable location for multi-family housing in Rolling Hills. The site also provides the City's best opportunity to meet its requirements for low- and very low-income units. It is located outside the jurisdiction of the Rolling Hills Community Association, outside the Rolling Hills security gates, and is one of the largest properties in the city. It includes multiple areas that are vacant and underutilized, relatively flat, and well buffered from adjacent uses. The site is also one of the only properties in Rolling Hills that is served by a public sewer system. This substantially reduces multi-family development costs and addresses an infrastructure constraint that makes affordable housing cost-prohibitive in almost all of the city. The site is also ½ mile from the corner of Crenshaw and Crest Roads in Palos Verdes Estates, which is served by four bus lines.

Existing uses on the PVPUSD site include Rancho Del Mar Continuation High School and a maintenance facility leased to the Palos Verdes Peninsula Transit Authority (PVPTA). Each of these activities is discussed below.

Rancho Del Mar School was initially developed as an elementary school in 1960. The school closed in 1980 and was repurposed as a continuation school in 1986. The continuation school was initially intended as a temporary use but has been in place for 35 years. The possibility of residential development on the site has been considered in the past. Enrollment at Rancho Del Mar has been steadily declining and was just 32 students in the 2020-2021 school year (California Department of Education, DataQuest). Enrollment has declined every year since 2014 and is now less than half of what it was just five years ago.[3]

The Beach Cities Learning (BCL) Center uses four classrooms in the school building. BCL serves students aged 11-22 with emotional, behavioral, and learning disabilities that cannot be addressed in public school settings. Students participate in individual and group counseling run by licensed therapists on-site. Total enrollment in 2019-20 was 17 students, with two teachers on-site (School Accountability Report Card, 2021).

[3] *California Department of Education indicates the following enrollment figures: 2020-21 (32 students); 2019-20 (46 students); 2018-19 (47 students); 2017-18 (58 students); 2016-17 (69 students); 2015-16 (72 students); 2014-15 (79 students)*

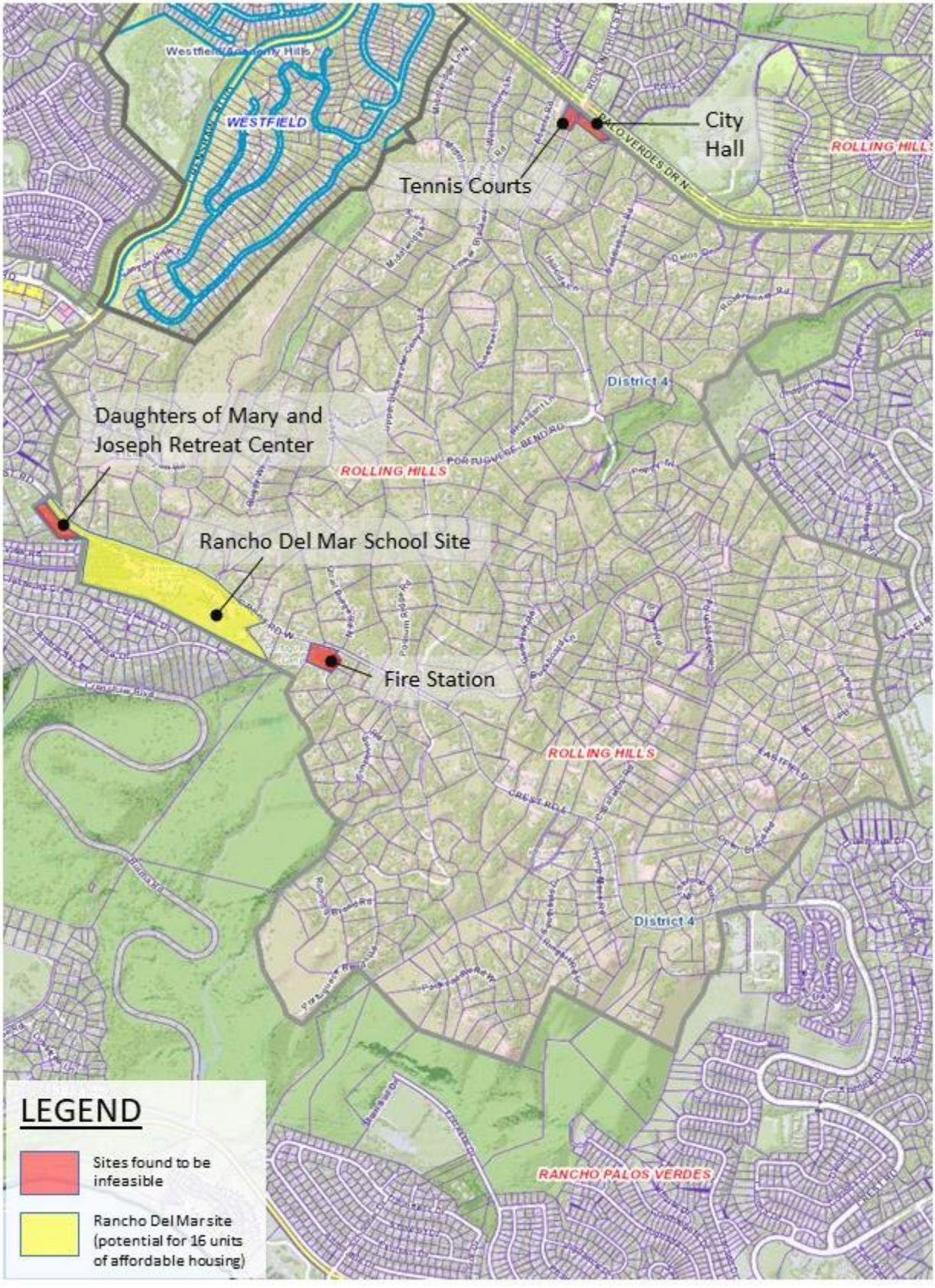


Figure 4.2: Non-Vacant Sites Evaluated

The school building is adjoined by a lawn, playing fields, and school parking lot. The complex serves only a fraction of the number of students for which it was designed. Moreover it occupies just 1.9 percent of the 31-acre site. Sale of the school property could generate significant revenue for the School District.

The only other active use on the property is the PVPTA maintenance facility, which occupies 4.5 acres. The PVPTA facilities include maintenance buildings and administrative offices and are self-contained in the west central part of the site. While PVPTA has no immediate plans to relocate, the site could be sold in the future or repurposed by the School District. In any event, the facilities occupy only 15 percent of the 31-acre site and have co-existed with the nearby school and adjacent residential uses for many years.

Roughly 75 percent of the PVUSD site is vacant, and at least five developable areas have been identified on the campus. These include the school itself (in the event it is closed), the ballfield east of the school, the large lawn adjacent to the school, a vacant area between the school and the PVPTA facility, and the undeveloped area west of the PVPTA facility. Each of these areas is at least one acre in size. The area west of the PVTPA facility is the largest of the five areas and the one deemed most viable as a multi-family housing site. It is the closest location to Crest Road and could easily be developed without affecting activities at either the school or the transit facility. Accordingly, the Rancho Del Mar Overlay Zone identifies this area as the location for future affordable housing.

The entire Rancho Del Mar site has a General Plan designation of Very Low Density Residential and an underlying zoning designation of RAS-2. The designation permits 16 units on the site, based on the site area of 31 acres and the density of one unit per two acres (31/2 = 15.5, rounded up to 16). However, the General Plan (as amended in 2021) requires that the allowable density for this site be transferred to a single location on the property where a density standard of 20-24 units per acre applies. This is reinforced and codified by the Rancho Del Mar Overlay Zone (RDMO). The RDMO effectively takes the 16 units of housing and transfers it to a single location on the west side of the parcel. The RDMO further mandates that any housing built on the site be 100% affordable to very low and/or low income households. Such development is permitted by right, provided that the development complies with the objective development and design standards contained in the RDMO.

The RDMO also provides opportunities for emergency shelter and single room occupancy (SRO) hotels. Emergency shelter is permitted by right, subject to objective development standards that have been adopted by the City. SROs require a conditional use permit and are also subject to objective design standards. These provisions create opportunities for extremely low income households as well as low and very low income households.

Creation of the RDMO occurred collaboratively with the School District. District staff confirmed that there are no prohibitions on the application of this zoning overlay or the use of the property for affordable housing. Moreover, the District has expressed interest in developing housing for teachers in the past; such units would likely meet income criteria for lower income housing. Programs in this Housing Element support active communication with the School District regarding the disposition of the area west of the PVPTA for affordable housing.

The PVUSD site also meets the "carry-over" criteria established by the State for sites that were counted in the prior cycle Element. It is zoned with a minimum density of 20 units per acre and permits "by right" development of affordable housing, subject to objective design and development standards. The current zoning was put in place just six months before the end of the Fifth Cycle planning period and was principally intended to provide a housing opportunity for the Sixth Cycle.

For the 2021-2029 Housing Element, the capacity figure of 16 lower income units is being used for the site. Under State Density Bonus law, a 100% affordable project would be eligible for an 80 percent density bonus. This could potentially result in 29 units of lower income housing, which is equal to the total number of units assigned to the City under the Sixth Cycle RHNA. However, State law precludes the City from counting potential density bonus units when determining its RHNA capacity. As explained in Section 4.6, the remaining 13 units will be met through Accessory Dwelling Units.

As indicated in Appendix B, the PVUSD site is large enough to accommodate multi-family housing, emergency shelter, and an SRO on the same property, either in the same sub-area or independently in different parts of the site. Neither the shelter beds nor the SRO rooms would be counted as independent "dwelling units" so they could be accommodated under existing General Plan densities. Moreover, all three of these uses are permitted by right, provided they meet the Municipal Code objective standards (which were previously reviewed by HCD in 2020). As noted above, the preferred location for the multi-family housing is in the western part of the property, near the access drive and closest to public transit and other urban services (see Figure 4 on Page B-8 in the Housing Element Appendix—this is labeled Area 5). This area is four acres. Only about one acre would be required for multi-family housing, leaving three vacant acres for the SRO and/or emergency shelter if all three uses are located in this area.

An SRO or emergency shelter could also locate in areas 1, 2, 3, or 4, as shown in Figure 4 in Appendix B, page B-8. As the map and text indicate, Area 1 is a 1.6-acre site that is flat and vacant. Area 2 is a 1.0-acre site that is flat and vacant. Area 3 is a 1.75-acre former school building that is mostly vacant and underutilized. Portions of this building could be easily be converted to group residential uses. Area 4 includes a ballfield and parking lot which collectively occupy 2.5 acres. There are no limitations in the housing overlay ordinance that limit where shelters or SROs can locate within the 31 acres. Areas 1, 2, 3, 4, or 5 all have adequate space for these uses.

4.5.2 Rolling Hills City Hall (APN 7569-003-904)

This site is located at the southeast corner of Palos Verdes Drive North and Portuguese Bend Road. Palos Verdes Drive North is a major thoroughfare and provides access from Rolling Hills to surrounding communities and the regional roadway network. Portuguese Bend Drive is a local street but the primary north-south route through the city, connecting to Crest Drive. This is one of the only sites in Rolling Hills that is located outside the security gates, and adjacent to a transit line. An elementary school and park are nearby in the City of Rolling Hills Estates.

The property is 1.22 acres and is roughly rectangular in shape. It has a General Plan designation of Civic Center and a zoning designation of Public Facilities (PF). Neither of these

designations permits housing, so a General Plan amendment would be required to enable its development. The site is owned by the City of Rolling Hills.

The parcel currently contains three structures: City Hall, the Rolling Hills Community Association Administration Building, and an accessory structure that houses an emergency generator. The site is relatively flat, although it is adjoined by a steep canyon to the east. There is a single family residence located to the south. To the west, there is a guardhouse in the median of Portuguese Bend Road, and a public tennis court on the west side of the road. Site ingress and egress is from Portuguese Bend Road. Direct access to Palos Verdes Drive North is not feasible due to high speeds and volumes and the existing traffic signal at the corner of Portuguese Bend.

Given the existing uses on the site and its function as the only civic building in Rolling Hills, the site is not a practical location for multi-family housing. Its rezoning is not recommended at this time.

4.5.3 Rolling Hills Tennis Court Facility (APN 7569-015-900)

This site is located immediately west of City Hall on the southwest corner of Palos Verdes Drive North and Portuguese Bend Road. It is adjoined by a residence and horse stables on the west and south and by street frontage on the north and east. The site is 0.86 acres and is one of the few properties located outside the City security gates. It is currently in use as a community tennis facility, with three tennis courts in total.

Like City Hall, the property has a General Plan designation of Civic Center and a zoning designation of Public Facilities (PF). Neither of these designations permits housing, so a General Plan amendment would be required to facilitate residential development. The site is owned by the City of Rolling Hills. Parking for the tennis courts is provided on the City Hall property to the east.

The site could potentially be converted to housing. At a density of 20 units per acre, it would yield 17 units. However, the community would lose parkland, which is already in short supply, as well as a well-used recreational amenity and gathering place. As a result, no rezoning is recommended.

4.5.4 Los Angeles County Fire Station (APN 7567-017-900)

This is a 2.2-acre site owned by the County of Los Angeles located at 12 Crest Road East. It is currently developed with Battalion 14 Fire Station 56, which provides fire and rescue services for Rolling Hills and nearby communities on the Palos Verdes Peninsula. While much of the parcel is open space, it occupies a steep downslope and would require costly grading and construction. Moreover, the Fire Station is an essential community asset and long-term use. This site is also located in an area that is far from services and amenities, not served by transit, and under the oversight of the Rolling Hills Community Association. Rezoning to allow housing is not recommended.

4.5.5 Daughters of Mary and Joseph Retreat Center (APN 7569-022-006)

The parcel is located on the western edge of the City, immediately west of the Rancho Del Mar (PVPUSD) site. It is outside the western City gatehouse at 5300 Crest Road and forms part of the 8-acre Daughters of Mary and Joseph Retreat Center, which straddles the border between Rolling Hills and Rancho Palos Verdes. The Retreat Center consists of two parcels—a 5.95-acre parcel located entirely in Rancho Palos Verdes that contains the buildings, gardens, and a portion of the parking lot, and a 1.96-acre parcel located entirely in Rolling Hills that contains parking, landscaping, and unimproved property.

The parcel has a General Plan designation of Very Low Density Residential and is zoned RAS-2. These designations would allow a single dwelling unit on the site. A General Plan Amendment and rezoning could be considered to allow multi-family housing on the property, or on a portion of the property. The unimproved portion of the site is about 0.67 acres, which could hypothetically support 13 units if developed at a density of 20 units per acre. This area has a 15-30 percent slope and would require grading to support multi-family construction. The flatter portion of the site (i.e., the parking lot) is larger and would be easier to develop but is currently in active use.

The City has had prior conversations with the Retreat owners regarding the possibility of housing on this site. While there are no plans to redevelop the property, it remains a potential long-term opportunity.

4.5.6 Conclusions

Based on the analysis above, only the Rancho Del Mar site is considered a viable housing site at this time. Consistent with the General Plan and Zoning amendments completed in 2021, the site is viable for 16 units of low/very income housing.

4.6 Accessory Dwellings

The City of Rolling Hills has estimated the potential for 40 ADUs and JADUs over the eight-year planning period, or approximately five (5) ADUs per year. This projection is based on the permitting of nine ADUs in 2021 alone, and the implementation of Housing Element program that encourage ADUs in the coming years. It is further based on a citywide survey conducted in October 2020 (with a 30 percent response rate) indicating that:

- 25 percent of the survey respondents indicated they had a secondary building on their property with a kitchen, bath, and sleeping area. Another 25 percent indicated their home had two kitchens or an area that could be “easily converted” into an ADU.
- 24 percent of the survey respondents indicated they would consider developing an ADU on their property now, with another 15 percent indicating they would consider this at some point in the future.
- 8 percent of the survey respondents indicated they would rent their ADU to a tenant while 24 percent said they would use it for a caregiver or employee and 31 percent said they would use it for a family member.

Extrapolating these results to the citywide total of 639 households, the results suggest that:[4]

- An estimated 153 households might be interested in developing an ADU on their properties, with another 95 potentially interested at some future date.
- An estimated 51 households would rent their ADU to a tenant, 153 would be interested in using their ADUs for a caregiver or domestic employee, and 198 would consider using an ADU for a family member.

The survey, combined with physical characteristics of the City's large lots and building stock, indicate significant potential for ADU development. ADUs could be created through new construction, conversion of existing guest houses and barns, and reconfiguration of interior spaces in primary residences. The latter category includes Junior ADUs (JADUs), which are often affordable to very low income tenants "by design" given their small size.

A majority of the 2020 survey respondents indicated they would use their ADU for a family member, caregiver, or other domestic employee. A substantial number of these households would likely pay reduced rent, or no rent at all. Some would likely meet HCD criteria for extremely low income households.

In order to demonstrate the suitability of ADUs and JADUs to satisfy the RHNA, the City must estimate the affordability of ADUs by income category. This requires data on occupancy and rents. The 2020 ADU survey conducted by the City identified 12 ADU tenants, including two extremely low income, two very low income, one low income, and seven who were moderate or above moderate income (see Appendix C). This is based on data provided by survey respondents and the HUD income categories by household size for Los Angeles County. The City's 2020 ADU survey produced only two data points for rents—one unit renting for $950 and another for $1,500. Both of these were market-rate units with no deed restrictions.

In addition, weekly scans of Craigslist ads in 2021 identified two ADUs in Rolling Hills and two in Rolling Hills Estates, with rents of $895 for a "basement apartment", $1,200 (for a JADU at an unidentified address), $1,800 (for a one-bedroom one bath "guest house"), and $3,950 for a two-bedroom one bath, 1,000 square foot guest house. Assuming a household size of two, the rents for these six units correspond to two very low-income units, three low income units, and one above moderate income unit. This is a limited sample size, however, and it excludes units that may be occupied "rent free" or without advertising.

In 2020, the Southern California Association of Governments conducted a survey of ADU rents in multiple jurisdictions across the region. The stated purpose of the survey was to "provide local governments with assumptions for ADU affordability that can be used to assign ADUs to income categories for the purpose of Sixth Cycle Housing Elements."[5] The SCAG study was organized by geographic sub-area, including one sub-area corresponding to Coastal Los Angeles County. The survey included an estimate of the percentage of ADUs that would be affordable to "Extremely Low Income" households, which included units that were available for

[4] The numbers in the three bullets below this sentence have been developed by applying the percentages from the survey to the total citywide housing stock. This assumes that the 192 households who responded are representative of the 639 households that live in Rolling Hills.

[5] SCAG Regional Accessory Dwelling Unit Affordability Analysis, published by SCAG in 2020

little or no rent and were not advertised (for instance, a detached in-law unit occupied by the elder parents of the homeowner).

The distribution identified in the SCAG survey (for Coastal LA County) was as follows:

Extremely Low:	15%
Very Low:	2%
Low:	43%
Moderate:	6%
Above Moderate:	34%

This distribution is roughly consistent with the sample taken by the City of Rolling Hills and the survey data collected in 2020. Applied to the City's projection of 40 units, the allocation using SCAG's methodology would be:

Extremely Low:	6 units
Very Low:	1 unit
Low:	17 units
Moderate:	2 units
Above Moderate:	14 units

This is equivalent to 24 lower income units and 16 moderate and above moderate units.
All of the ADUs permitted to date have been "full" ADUs, meaning they are at least 500 square feet in size. Among the City's Housing Element programs is an initiative to create at least five JADUs. Given the small size of these units and the fact that they are created by repurposing existing space, they are more likely to be affordable to very low income households, thus shifting the distribution shown above so that more "very low" income units are produced.

In addition, based on actual production of ADUs in 2021, the City anticipates a smaller share of "Low" income units and a larger share of "Moderate" income units. Moderate income units represented one-third of the production in 2021, which suggests something closer to the following distribution for 2022-2029:

Extremely Low:	7 units (occupied rent-free or at minimal charge)
Very Low:	5 units
Low:	6 units
Moderate:	8 units
Above Moderate:	14 units

Housing Element programs have been developed to ensure that the City reaches its very low/ extremely low income ADU targets.

4.7 Summary of Ability to Meet RHNA

As shown in Table 4.3 below, the combination of recently approved housing units (expected to be occupied in 2022), future affordable units on the Rancho Del Mar site, and new ADUs can accommodate the RHNA allocation in all income categories. The table illustrates a surplus capacity of seven lower income units based on projected ADU production over the planning period.

Table 4.3: Summary of Housing Opportunities, 2021-2029

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

Source: Barry Miller Consulting, 2021
(*) includes 3 new homes and 4 large ADUs, see Table 4.1.

4.8 Opportunities for Energy Conservation

Home energy costs, including electric and natural gas utility bills, are considered part of monthly housing expenses. The large floor area of many Rolling Hills homes suggests that this may be an important consideration in the city. Home energy bills can be substantial, particularly for senior households on fixed incomes. Government Code Section 65583(a)(7) requires the Housing Element to include an analysis of opportunities for residential energy conservation and reduced energy costs.

The US Department of Health and Human Services provides funding for a program known as the Low-Income Home Energy Assistance Program (LIHEAP). In California, the program is administered by the Department of Community Services and Development. LIHEAP is aimed at assisting low-income households that pay a high portion of their incomes to meet their energy needs. This is achieved through one-time financial assistance grants covering the utility bills of eligible households, an energy crisis intervention program to help low-income households in danger of having their utilities turned off, free weatherization and energy efficiency upgrades to qualifying households, and energy education and budget counseling. Low income customers are also eligible for reduced rates through the California Alternative Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) programs.

Southern California Edison (SCE) and the Southern California Gas Company offer energy conservation and assistance programs. These include home energy audits, rebates on energy-efficient appliances, and weatherization assistance to qualified low-income companies. SCE has an energy management assistance program for qualifying households.

While the measures above are aimed at meeting day to day utility bills, there are also more systemic long-term ways to reduce home energy costs. Nearly half of the homes in Rolling Hills were built before 1960, many without consideration given to the cost and availability of energy. Weatherization and insulation can provide significant reductions in home energy use and reduce monthly utility bills. Replacement of older appliances can likewise provide significant long-term savings. A variety of rebates and other financial incentives are available for homeowners.

In addition, all new construction in California is subject to State building code and energy standards, including Title 24. These requirements apply to most remodeling projects, creating opportunities to retrofit older homes. The standards are periodically updated to reflect new technology and targets for reducing greenhouse gas emissions. The latest standards incorporate the California Green Building Code, including energy-saving design standards for walls, ceilings, and floor installations, as well as heating and cooling equipment and systems, gas cooling devices, window glazing, and the use of renewable energy sources such as solar energy. These standards are incorporated in Title 15 of the Rolling Hills Municipal Code (the Building Code).

The City also encourages the use of solar panels to maximize energy efficiency, as well as the application of passive solar design principles that reduce heating and cooling costs. These measures include home orientation and siting, landscaping to reduce direct sunlight, placement of windows to support home heating and cooling, the use of skylights, and incorporation of overhangs and shade structures. In addition, home energy costs can be reduced by incorporating some or all of the measures listed below:

- Solar heating for swimming pools
- Flow restrictors on hot water faucets and showerheads (to reduce natural gas use)
- Tankless water heaters
- Attic ventilation systems that reduce attic temperatures during summer months.
- Insulation, caulking, and weatherstripping to guard against heat gain in the summer and prevent heat loss in the winter. These measures can reduce energy use for air-conditioning up to 55 percent and for heating as much as 40 percent.
- Proper maintenance and use of stoves, ovens, clothes dryers, washing machines, dishwashers, and refrigerators.
- Purchase of air-conditioning units and refrigerators on the basis of efficiency ratings (the State prepares a list of air-conditioning and refrigerator models that detail the energy efficiency ratings of the product)

Indoor and outdoor lighting also impacts home energy costs. The City has adopted standards for outdoor lighting through its Municipal Code (Section 17.16.190(E)). Energy efficient lighting is required in most cases, and outdoor lighting is prohibited in many instances to retain dark skies and the community's rural character. For interior spaces, the costs of lighting can be reduced through purchase of light bulbs which produce the most lumens per watt, avoidance of multi-bulb mixtures, and use of long-life bulbs and clock timers.

As a member of SCAG, the City also participates in the Regional Comprehensive Plan to achieve a sustainable future. The City also has joined ICLEI, which is a membership association of local governments committed to advancing climate protection and sustainable development. Rolling Hills also is a participant in the South Bay Cities Council of Governments Environmental Services Center. The Center serves as a clearinghouse for information on energy efficiency, renewable energy, and sustainability. It assists residents, businesses, and public agencies with incorporating energy-saving practices in their daily lives and operations.

Water conservation provides another opportunity to reduce home utility costs. The City has adopted a Water Efficient Landscape Ordinance (Chapter 13.18 of the Municipal Code), and encourages the use of low-flow plumbing fixtures and products to reduce water use.

4.9 Financial Resources

This section of the Housing Element summarizes financial resources for affordable housing in Rolling Hills. An overview of federal and State programs, as well as tax credit programs, is provided below.

4.9.1 Federal Programs

A major source of housing assistance in many communities is the Community Development Block Grant (CBDG) program (including the Los Angeles County Urban County CDBG program, which provides federal funds to about 50 participating small cities). Rolling Hills no longer participates in this program, as the cost of its administration made it infeasible. When the City did participate, it received approximately $6,000 per year. The City transferred these funds to Rancho Palos Verdes, an adjacent city which has a population roughly 25 times larger than Rolling Hills.

Opportunities for funding through other federal programs is limited. For example, the federal Home Investment Partnership (HOME) program is designed to increase home ownership and affordable housing opportunities for low and very low-income Americans. The funds are distributed to jurisdictions based on need. They support programs such as loans to assist low-income families with down payments to purchase homes, tenant-based rental assistance, rehabilitation of affordable housing, and relocation assistance for low-income tenants. The high cost of land and construction, limited opportunities for home ownership, absence of a sewer system, and very high incomes in Rolling Hills, make the City non-competitive for these applications.

Likewise, HUD's Section 202 program provides funding for construction, rehabilitation, and acquisition of structures for supportive housing for very low-income seniors. It offers interest-free capital advances, as well as rental assistance funds. The funds are provided to private and non-profit organizations and consumer cooperatives and are highly competitive. Use of these funds in Rolling Hills is constrained by the community's natural hazards, lack of infrastructure, and high land costs. The use of project-based federal Section 8 funding for new affordable housing and substantial rehabilitation of existing housing is infeasible in Rolling Hills for these same reasons.

The federal government also operates the Section 8 Housing Choice Voucher Program. This program assists very low-income families, the elderly, and the disabled in securing housing in the private market. Participants may choose any housing that meet the requirements of the program. A housing subsidy is paid directly to the property owner, and the tenant pays the difference between the actual rent charged and the amount subsidized by the program. Housing choice vouchers could potentially be used on ADUs, but this is rarely done in practice.

HUD also operates the Section 203(k) program, which facilitates the rehabilitation and repair of single-family residential properties by insuring homeowner loans for purchase or refinancing. It can enable homebuyers to purchase homes that need significant repairs and can also be used for a variety of other improvements. These funds can also be used to enhance accessibility for people with disabilities, and to eliminate health and safety hazards. Eligibility for this program in Rolling Hills is limited due to the factors cited earlier.

Other HUD programs include Section 811 Supportive Housing for Persons with Disabilities (interest-free capital advances, operating subsidies, and/or project rental assistance for eligible projects developing affordable housing for persons with disabilities) and the Federal Housing Finance Agency's Affordable Housing Program (AHP). These programs are most viable in areas with lower land and development costs, as well as available infrastructure and services.

4.9.2 State Programs

The State of California provides resources for affordable housing construction, rehabilitation, and assistance. Many of these programs are oriented toward populations in need of assistance or housing stock requiring repair or rehabilitation. The absence of these populations, coupled with the cost of land and construction in Rolling Hills and the excellent quality of the City's housing stock, render the City ineligible for many types of assistance. The only site where State financial resources could likely be feasible is the PVUSD site, given that it is publicly owned and has infrastructure and public street access.

In 2017, the State approved SB 2, which established a $75 recording fee on real estate documents to increase the supply of affordable homes in California. The State subsequently established the Local Early Action Planning (LEAP) grant program which provides funding for local planning activities aimed at supporting housing production. In 2020, the City of Rolling Hills received a $65,000 LEAP grant, which was used to fund preparation of the Housing Element. The City may be eligible for future planning grants and other SB 2 funds that facilitate housing affordability and promote projects and programs to implement the Housing Element.

The California Housing Finance Agency (CHFA) provides loans for construction of affordable housing projects and could be a source of revenue for future affordable housing development in the Rancho Del Mar Overlay Zone. The State provides a pre-development loan program for low-income housing projects, and low-interest long-term deferred payment loans through the Multi-Family Housing Program. These sources could potentially be used on the PVPUSD site. CHFA also provides financing for rehabilitation of housing by low- and moderate-income households, which would generally not be viable in Rolling Hills due to housing conditions, costs, and local income levels.

The State Department of Housing and Community Development provides funding for a variety of programs to prevent homelessness and assist those who are unhoused. These programs can fund construction of shelters and provide direct subsidies to individuals. HCD programs also help support supportive and transitional housing.

4.9.3 Resources for the Private and Non-Profit Sectors

The primary affordable housing financing resources for the private and non-profit sectors are tax credits and mortgage revenue bonds. Developers can also take advantage of various state regulatory tools, such as density bonuses and reduced parking requirements for projects incorporating affordable units.

The federal Low Income Housing Tax Credit (LIHTC) Program was created by the Tax Reform Act of 1986 to provide an alternate method of funding affordable housing. Each state receives

a tax credit based on its population—that credit is then used to leverage private capital into new construction or acquisition and rehabilitation projects. The California Tax Credit Allocation Committee (TCAC) competitively administers credits to projects based on priorities they set each year. Once constructed, a specific percentage of the units must remain rent-restricted, and occupancy of those units is limited to people meeting specific income criteria.

The California Public Finance Agency administers an Affordable Housing Bond program, which provides developers with access to tax-exempt bonds to finance lower-income multi-family and senior projects. A qualified developer can finance a project at a lower interest rate because the interest paid to bond holders is exempt from federal income tax. This program is often done in tandem with tax credits.

Individual home buyers may also be eligible for Mortgage Credit Certificates (MCC), working through a lender and the Los Angeles County Development Authority. This program provides a federal tax credit for income-qualified homebuyers equivalent to 15 percent of annual mortgage interest. Generally, the tax savings are calculated as income to help buyers qualify to purchase a home. Buyers in Rolling Hills would generally be ineligible due to the very high income required to purchase a home in the city.

4.9.4 Summary of Prospective Financing Sources

Due to the City's small population, low density, very high fire hazards, and lack of infrastructure, government resources for housing are extremely limited. The City's residents are generally ineligible for State and federal housing assistance based on income and home ownership status. The City does not have a housing department, and has no regular local, state, or federal revenue source for housing. The use of traditional approaches to financing affordable housing are also limited by the relatively small number of units that would be contained in an individual development project in the city.

Despite these constraints, the City is amenable to exploring future funding sources and supporting applications that would facilitate housing rehabilitation and development. Given the absence of a sewer system in the city, one of the most important financial resources potentially available to the City is State and federal funding for sanitary sewer and storm drainage improvements. The City is continuing to pursue grants to extend sewer service and improve water quality; this could potentially create future housing opportunities on sites that are not viable today.

Low-income housing tax credits could be considered to facilitate housing on the PVPUSD site. Eligible projects on this site could also use State density bonus provisions, thereby increasing the potential number of units. Other programs that could be considered include those that assist lower income seniors with energy conservation, septic system improvements, and minor home repair.

5.0 Constraints to Housing Production

5.1 Introduction

Government Code Sections 65583(a)(5) and (6) require the Housing Element to contain an analysis of governmental and non-governmental constraints on the maintenance, improvement, and development of housing for all income levels. Governmental constraints include land use controls, building codes and code enforcement practices, site improvement requirements, fees and other exactions required of developers, local processing and permit procedures, and any locally adopted ordinances that directly impact the cost and supply of residential development. Non-governmental constraints include the availability of financing, the price of land, the cost of construction, requests to develop at densities below what is allowed by zoning, community opposition, and similar factors.

In each case, the Housing Element is required to demonstrate local efforts to remove constraints that are identified, thus improving the City's ability to meet its Regional Housing Needs Allocation. The extent to which these constraints are affecting the supply and affordability of housing in Rolling Hills is discussed below, along with past (or proposed future) efforts to eliminate those constraints.

5.2 Governmental Constraints

Governmental constraints include activities imposed by local government on the development of housing. These activities may impact the price and availability of housing, the ability to build particular types of housing, and the time it takes to get housing approved and constructed. While these requirements are intended to improve housing quality and protect public safety, they may have unintended consequences.

5.2.1 Rolling Hills General Plan

Every city and county in California is required to adopt a General Plan for its long-term development. This Housing Element is actually part of the General Plan but it stands on its own as a separate document since it is updated on a schedule set by the State of California. The other elements of the General Plan are updated as needed. Most cities update their plans every 15 to 20 years.

Most of the Rolling Hills General Plan was drafted in 1990. In addition to the Housing Element, the Plan includes a Land Use Element, a Circulation Element, an Open Space/ Conservation Element, a Safety Element, and a Noise Element. An update to the Safety Element was prepared concurrently with the Housing Element, in response to recent State requirements.

The Rolling Hills Land Use Element includes a Land Use Policy Map illustrating the types of uses permitted throughout the city. When the Map was adopted in 1990, it reinforced existing parcel patterns and responded to the infrastructure, geologic, wildfire, and environmental constraints in

the city. Four categories are shown: Very Low Density Residential (2 acres per unit), Low Density Residential (1 acre per unit), Civic Center, and Publicly-owned Open Space. Prior to 2020, the City did not allow development at densities greater than one unit per acre and had no General Plan provisions for multi-family housing. As part of 5th Cycle Housing Element implementation, the City amended its Land Use Element to add the Rancho Del Mar Housing Opportunity Overlay designation to the Map (corresponding to the 31-acre Rancho Del Mar school site). At the same time, the City adopted new Land Use Element standards and policies allowing multi-family housing in the Overlay area, along with policies allowing a diverse mix of housing units, as required by state law.

The Land Use Element recognizes Rolling Hills' heritage as an equestrian community comprised of large lots on steep terrain. Its policies call for buffering between uses, preservation of views, and minimizing exposure to landslides, wildfires, and other hazards. These policies remain appropriate given the safety hazards in the community. The Element specifically discusses the 150-acre Flying Triangle landslide hazard area, noting that the area is subject to a moratorium due to unstable geologic conditions. It also notes that many existing parcels are constrained by steep slopes and have only small areas that are suitable for building pads and construction.

Recent amendments to the Safety Element further emphasize environmental hazards in the city, as well as constraints associated with evacuation, water supply, and emergency vehicle access. These constraints make most of Rolling Hills poorly suited for additional development or zoning changes that would result in increased density and population.

As it currently stands, the General Plan is not a development constraint.

5.2.2 Zoning Standards

The Rolling Hills Zoning Ordinance (Chapter 17 of the Municipal Code) implements the General Plan and provides objective development standards for all parcels in the City. There are three zoning districts in the City:

- Residential Agricultural Suburban 1 (RAS-1), which has a one-acre minimum lot size
- Residential Agricultural Suburban 2 (RAS-2), which has a two-acre minimum lot size
- Public Facilities (PF)

The RAS-1 zone roughly corresponds to the "Low Density Residential" General Plan designation The RAS-2 zone roughly corresponds to the "Very Low Density Residential" General Plan designation.[1] The PF zone corresponds to the "Civic Center" General Plan designation. Parcels with a General Plan designation of "Publicly-owned Open Space" are zoned RAS-1 or RAS-2, whichever is prevalent on private parcels in the vicinity.

There are also two overlay districts. Overlays are mapped "on top" of one of the three base zones listed above and apply additional regulations specific to subareas of the city. The first overlay district (OZD-1) provides more lenient setback standards in an area of the city characterized by smaller lots. Roughly 70 lots along Middleridge Lane, Williamsburg Lane, Chesterfield Road and Chuckwagon Road, are covered. The second overlay district (RDMO) is

[1] *Parcels along Spur Lane and Cinchring Road have a General Plan designation of Very Low Density Residential but a zoning designation of RAS-1.*

the Rancho Del Mar Overlay, which is mapped on the Rancho Del Mar School site in the RAS-2 district. The RDMO requires the transfer of General Plan density for the property as a whole (which yields 16 units) to a single location in order to facilitate the production of multi-family housing. This overlay also includes objective standards for multi-family housing and emergency shelter, which are permitted by right.

The zoning ordinance includes definitions of terms (Chapter 17.12). At this time there are no definitions of transitional and supportive housing, both of which must be permitted in every residential district under state law. An action program in this Element has been included to make that Code amendment. The definitions expressly acknowledge manufactured and mobile homes as being the same as detached single family dwellings, provided they are located on a foundation.

The zoning regulations indicate permitted and prohibited uses in each zoning district. Single family residences and accessory dwelling units are permitted "by right" in RAS-1 and RAS-2. The only expressly prohibited uses are short-term rentals (less than 30 days), commercial cannabis activities and cannabis dispensaries. Numerous types of accessory structures are permitted by right, including stables, pools, sheds, and small (under 200 SF) cabanas, guest houses, pool houses, garages, greenhouses, and similar structures. Such structures generally require conditional use permits when they exceed 200 SF (accessory dwelling units are excluded from this requirement). Other conditional uses include schools, fire stations, and similar public buildings and utilities. Site plans are required when development is proposed.

Table 5.1 summarizes the development standards in the RAS-1 and RAS-2 zones, starting with the minimum lot size requirements of one acre and two acres. The Code states that existing parcels of record that are smaller than the minimum lot size requirements are considered to be conforming. Minimum dimensional standards are established for new lots, including the ratio of width to depth and a requirement for a minimum width of 150 feet. There are also standards for minimum street frontage, keeping in mind that most streets are private and contained within easements. These standards are more flexible on cul-de-sacs, depending on turning radius.

As indicated in Table 5.1, building coverage is limited to 20 percent of the net lot area in both the RAS-1 and RAS-2 zones. Total impervious surface coverage (structures and hardscape) is limited to 35 percent of the net lot area; maximum disturbed area is limited to 40 percent of the net lot area; and building height is restricted to one story. The code identifies 2:1 (50%) as the maximum buildable slope. A minimum dwelling size of 1,300 square feet is established for the primary unit on the site. The Code includes setback standards of 50' for front and rear yards, and 20' for side yards in RAS-1 and 35' for side yards in RAS-2. Lower standards apply in the OZD-1 overlay zone and exceptions are provided for lots along street easements.[2]

The zoning code affirms the one-story construction requirement established by the Rolling Hills Community Association (the RDM Overlay area is subject to a two-story requirement). The finished floor of structures must be no more than five feet above grade. Basements are permitted and storage areas may be located above or below a story. The code also provides standards for graded building pads and requirements for stables and corral sites.

[2] *The City is currently developing standards to implement SB 9, which allows the division of existing lots into two parcels and the construction of two dwellings on each parcel, subject to specific objective standards and other considerations.*

Table 5.1: Summary of Rolling Hills Zoning Standards[1]

		RAS-1	RAS-2	OZD overlay
Minimum Lot Size		1 acre	2 acres	N/A
Setbacks				
	Front	50' from front easement line [2]		30 feet from front roadway easement
	Side	35 feet [3]	20 feet [3]	20 feet, reduced to 10' for street side yards
	Rear	50 feet		
Structure Coverage [4]		20%		
Impervious Surface Coverage		35%		
Building Pad Coverage		30%		
Maximum Disturbed Area		40% of net lot area (excl. easements)		
Maximum Height		One-story		

(1) Standards for the RDM Overlay Zone and standards for ADUs are addressed in Section 5.3.2 of the Housing Element.
(2) Most property is Rolling Hills is subject to easements varying in width around each property boundary and road easements, granted by the property owner to the RHCA, a private corporation, or another person or entity for the purpose of construction and/or maintenance and use of streets, driveways, trails, utility lines, drainage facilities, open space, and/or a combination of these uses. The RHCA requires that all easements must be kept free of buildings, fences, plantings or other obstructions.
(3) Reduced to 20' in RAS-2 and 10' in RAS-1 and OZD if there is a private street along the side property line.
(4) The percentage figures in Table 5.1 apply to the "net lot area" on each parcel, which excludes these easements.

Additional standards in the Zoning Code prohibit reflective outdoor siding, limit outdoor lighting (to maintain dark skies), and require Class "A" roofing. Conditions are established for specific accessory uses, such as greenhouses, pools, and playgrounds. This includes a requirement that guest houses (which are different from ADUs) may not exceed 800 square feet. Whereas guest houses may not be rented and typically require a conditional use permit, ADUs are permitted by right and subject to different standards (see P. 5-5).

A minimum of two garage parking spaces are required for each single family dwelling unit. An additional space is required for homes with guest houses (as noted above, guest houses are treated differently than ADUs). Homes are also required to have driveways, which are generally limited to 20 feet in width and one per lot, though exceptions apply. The parking requirement is not a development constraint and is appropriate given the size of parcels, the high number of automobiles per household[3], and the fact that the streets lack sidewalks and are too narrow to permit on-street parking. There is also no public transit service in the city.

[3] The 2015-2019 US Census American Community Survey indicates that 63% of all households in Rolling Hills own three or more vehicles.

The development standards in Table 5.1 do not present constraints to the construction of single family homes. Even a "small" substandard lot of 200' x 200' (40,000) square feet would be allowed 16,000 square feet of buildable area after required setbacks are subtracted. The allowable structure coverage on such a lot would be 8,000 square feet, providing more than enough space for a residence and detached accessory structures. The requirement for single-story construction has not constrained single family construction, given the ample building footprint accommodated on each site. In fact, single-story construction has enabled many older adults in Rolling Hills to age in place.

State law also requires the Housing Element to include an analysis of requests to develop housing at densities below those anticipated in the sites inventory. No such requests have been received in Rolling Hills, as development typically occurs on existing lots rather than through subdivision or multi-unit construction.

5.2.3 Standards for Different Housing Types

Section 65583 and 65583.2 of the Government Code require cities to plan for a "variety of types of housing, including multi-family rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single room occupancy units, emergency shelters, and transitional housing." Accordingly, the Rolling Hills Housing Element includes provisions for each of these housing types in the city, with the exception of housing explicitly reserved for agricultural employees, since this was not identified as being a need in the city.

Accessory Dwelling Units

An Accessory Dwelling Unit—or ADU—is an attached or detached dwelling unit that provides complete independent living facilities for one or more persons and is located on a lot with a proposed or existing primary residence. ADUs are commonly known as in-law units, second units, or granny flats. A "Junior" Accessory Dwelling Unit (or JADU) is an ADU that it is no more than 500 square feet in size, contained entirely within the footprint of an existing or proposed single family dwelling, and has an efficiency kitchen. JADUs often have their own bathrooms but they may also share bathrooms with the primary residence. State law now requires that all cities and counties permit ADUs and JADUs meeting certain standards "by right"—in other words, without a public hearing or discretionary approval.

Prior to 2018, ADUs and JADUs were not permitted in Rolling Hills. However, the zoning regulations allowed the construction of non-rentable guest houses for family members, visitors, and domestic employees on all residential properties. The large size and high value of properties in Rolling Hills has supported the development of guest houses in the past, resulting in a large inventory of structures that could potentially be converted from guest houses to ADUs in the future. The city also has a large number of accessory structures such as barns, pool cabanas, studios and workshops that could be converted to ADUs. Because of the single story construction requirement, there are also a substantial number of homes with floor plans conducive to Junior ADUs, as many homes have wings, additions, or rooms that could easily be partitioned as independent living units.

In January 2018, the City Amended Chapter 17.28 of the Municipal Code to allow for the construction of Accessory Dwelling Units and Junior Accessory Dwelling Units (ADUs and

JADUs). Consistent with State law (Government Code 65852.2 and 65852.22), the City allows ADUs and JADUs ministerially (e.g., without a discretionary public hearing) provided the units meet specific standards and design criteria established in the zoning code. The City has also created a discretionary review path for projects that do not meet these standards.

Chapter 17.28 establishes that an ADU and JADU may be allowed with a simple building permit if it is within the space of an existing single family dwelling or accessory structure, including an allowance for up to 150 additional square feet for ingress and egress. The unit must also have exterior access independent of the single family dwelling and side and rear setbacks that meet building and fire codes. In addition, detached ADUs are permitted with a building permit (and no additional permit) if they are 800 square feet or less, no more than 16 feet tall, and have side and rear setbacks of at least four feet.

A second permitting path has been created for units that are between 800 and 1,000 square feet. Such units require an ADU Permit, which like the building permit is issued ministerially, with no discretionary review. These units are subject to a size limit of 850 square feet for a studio or one bedroom and 1,000 square feet for a two-bedroom unit. If attached to the primary dwelling, the unit is subject to a requirement that it may not exceed 50 percent of the floor area of the existing primary dwelling. The ADU may not cause the lot coverage on the property to exceed 50 percent or cause the FAR to exceed 0.45. Setback standards also apply.

The City's ADU ordinance incorporates State standards for parking, which waive parking requirements for JADUs and units created by converting habitable accessory structures. Parking is also waived for units near public transit stops or car-share vehicles. This is generally not applicable in Rolling Hills, since the community is not served by transit or car-share services. Per State law, the Code allows for carports and garages to be converted to ADUs without replacement parking. Where this situation does not apply, one space is required for each ADU, and tandem parking is permitted.

ADUs are subject to general requirements, such as fire sprinklers (if the unit is in the primary residence) and a prohibition on short-term rentals (less than 30 days). They are also subject to permit streamlining requirements, including a requirement to act on the application within 60 days after it is deemed complete. This time period may be extended at the applicant's request, or if the ADU is located within a new single family dwelling on the lot. The City allows both the ADU and the primary residence to be rented, although there are limitations on renting JADUs if the primary residence is not owner occupied.[4] The City's Ordinance also prohibits the sale of an ADU separately from the lot and primary dwelling.

ADUs are also subject to basic architectural standards, including compatibility with the design of the primary dwelling. This is objectively quantified, for instance by specifying that the roof pitch must match the primary dwelling, and that the entry be on the side or rear elevation. The ADU is also subject to a minimum length and width standard of 10 feet, and a minimum ceiling height of seven feet. Landscape screening requirements apply to units that are near adjacent parcels. If the ADU changes the building exterior or involves a new structure, it is subject to design review by the Rolling Hills Community Association Architectural Committee (see next section for further discussion).

[4] *JADUs (units created within the floorplan of an existing home) are subject to an owner-occupancy requirement unless the property is owned by a government agency, land trust, or housing organization.*

ADUs smaller than 750 square feet are exempt from all impact fees. Units larger than 750 square feet may only be charged impact fees that are proportionally related to the square footage of the unit. The Code also includes waivers for utility connection fees for most ADUs, thereby reducing construction and operating costs. Moreover, the Code provides the option for a conditional use permit for ADUs that do not conform to the basic development standards of Chapter 17.28.

Overall, these requirements do not constrain or inhibit ADU or JADU construction. The regulations reflect State regulations and create ample opportunities for homeowners to earn extra income while providing a new dwelling unit for a tenant, employee, caregiver or family member. Given the large lot sizes in the city, the setback standards, FAR standards, and lot coverage limits still allow for generous ADU footprints. Likewise, the single story requirement is consistent with the requirement for single family homes. The "bonus" 150 square feet for JADU ingress/egress creates an incentive for such units. The requirement to provide a parking space is consistent with State law, since there is no transit in Rolling Hills—and is not a constraint given the large lot sizes and substantial driveway space available on most lots.

While no constraints have been identified, there are opportunities to provide incentives for ADUs that have yet to be realized. Because of recent changes to State law, there are opportunities for ADUs to be conveyed separately or operated by non-profits and/or affordable housing providers. As noted in Chapter 6, the City will pursue future programs to encourage ADU construction, including ADUs for very low and low income households. This includes creating a roster of ADUs and an inventory of units that meet "extremely low income" needs by providing housing for family members, domestic employees, or other long-term occupants.

Additionally, State law for ADUs was amended in 2020 and 2021. Several provisions in the City's regulations must be updated for consistency. This includes eliminating the prohibition on ADUs with more than two bedrooms, and adding a provision that completed applications be deemed approved if they are not acted upon within 60 days. The City will work with the State Housing and Community Development Department to determine if there are other provisions of the ordinance that require updating. Program 6.10 in Chapter 6 identifies this as a high priority action, to be completed by October 15, 2022.

Multi-Family Housing

In February 2021, the City amended its General Plan and zoning regulations to allow multi-family housing within the City limits. This was a key implementation measure in the Fifth Cycle Housing Element. New policies in the General Plan Land Use Element expressly support a range of housing types in the city, including multi-family housing. Chapter 17.19 of the Municipal Code creates the Rancho Del Mar Overlay (RDMO) Opportunity Overlay Zone, which has the following objectives:

- Create "by right" opportunities for multi-family housing
- Implement state laws that require cities to demonstrate available land capacity and zoning to accommodate the City's current and projected need for housing
- Facilitate well-designed development projects

- Encourage development that provides attractive features that integrate the public realm with development on adjacent private property.

The zone is mapped on the 31-acre Rancho Del Mar school site, which as noted in Chapter 4 and Appendix B, is the most viable location for multi-family housing in Rolling Hills. The zone allows 16 units of multi-family housing on the site (excluding potential density bonus units), with a requirement that this housing be constructed at a density of 20 to 24 units per acre. The 20 unit per acre minimum density requirement corresponds to the "default density" under AB 2348, while the 16-unit requirement is based on the number of units permitted by the underlying General Plan and RAS-2 zoning designations. It is also a threshold used by HCD to identify viable housing sites.

Affordable multi-family housing is permitted **by right** in this zone, provided it is affordable to low and very low-income households and meets objective design standards that are included in the zoning code. These include minimum dwelling unit sizes of 250 square feet for a studio, 400 square feet for a one-bedroom, 650 square feet for a two-bedroom, and 900 square feet for a three-bedroom. Higher minimums had been proposed initially but were lowered to the adopted standards based on direction from HCD that the above figures would not constrain development.

As noted above, the allowable density range for the Zone is 20-24 units per acre. Numerous projects—both market-rate and affordable—have been developed in this density range in Los Angeles County in recent years. The range can accommodate apartments, condominiums, townhomes, row houses, clustered units, manufactured homes, and small detached cottages. All of these housing types would be permitted under the regulations prescribed by the Overlay Zone.

Development standards for multi-family housing within the Overlay Zone are conducive to higher density construction. These standards require 5-foot front and side setbacks and a 10-foot rear setback. Encroachments such as decks, balconies, awnings, porches, and stairways may extend into the setback areas, and architectural features such as eaves and cornices are also permitted in the setbacks. There are no lot coverage standards or Floor Area Ratio limits. A 28' height applies, allowing two-story construction. This is the only place in Rolling Hills where two-story construction is permitted.

Development is subject to a requirement that 100 square feet of common open space be provided for each dwelling unit. Thus a 16-unit project would be required to set aside 1,600 square feet of shared open space, which is equivalent to about 5 percent of the development site (assuming a density of 20 units per acre). When drafting the Ordinance, the City initially proposed a common open space standard of 150 square feet per unit, but this was reduced to 100 square feet during HCD's review of the draft to eliminate the potential for a constraint.

One parking space per unit is required, plus one guest parking space for every 10 units. For senior housing, one space per unit is required for the first 10 units, and 0.5 spaces per unit are required for any additional units. The RDMO zone allows surface parking, with no requirements for garages or carports. At 180 square feet per parking space, the total area dedicated to parking in a 20 unit per acre project would be 3,240 square feet, or about nine percent of the site. Even with driveway lanes, the total area of the site required for parking would be small.

Moreover, the ordinance includes provisions for reduced parking where certain conditions exist (shared parking agreements with nearby uses, available street parking, etc.).

No parking is permitted in the 20' front setback area (at the driveway location). This would not be a constraint given the large size of any parcel that would be created in the future to accommodate multi-family development. Moreover, the front yard setback for structures is only five feet, which creates more space for the building envelope and encourages parking to be placed to the rear or side of the parcel, potentially within the setback.

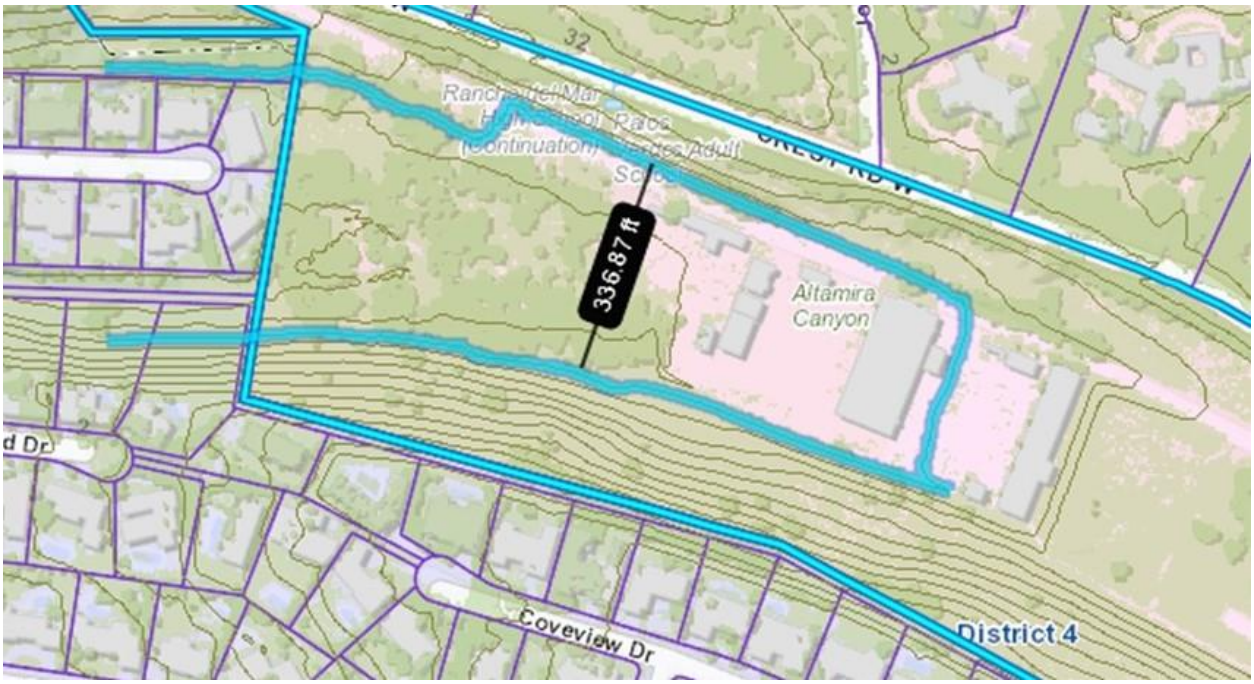


Figure 5.1: Slope Setbacks on PVUSD Site

The development standards require that multi-family housing be located at least 50 feet from the toe of the slope associated with a hillside area within the Overlay District. Figure 5.1 shows the sloped area and indicates that the linear distance between the toe of the slope and the access road serving the multi-family development site is 337 feet. Thus the area where structures are acceptable extends 287 linear feet back from the access road (minus a 5-foot front setback). While the rear 50 feet may not include structures, it could include open space and other amenities, including parking and driveways. The 50' setback does not affect parcel width (i.e., the east-west dimension), and still leaves room for a substantial development site on the property.

Because affordable multi-family housing is permitted by right in the Overlay Zone, the City has adopted objective design standards to ensure that new development is compatible with adjacent uses. These address residential frontages (facades, etc.), usable open space standards, public space amenity requirements, and operational standards. Such standards have the potential to create a development constraint if they are too onerous or add to the cost of housing.

The residential frontage standards require that the ground floor be no more than five feet above the ground surface. This is easily attained, since the site is relatively flat. The standards establish a 10' floor to floor height, which is consistent with the overall 28' height limit as well as typical residential construction standards and interior ceiling heights. Entrances and windows are required along the front façade, and entrances to individual units may either be direct to the exterior, or to an interior hallway. Stoops and porches may be located on the exterior, and projecting elements (bay windows, eaves, balconies) may extend into setback areas. Street tree, landscaping, and lighting requirements apply, but these do not constrain development.

The usable open space standards likewise do not represent a constraint. These requirements call for an amenity such as a children's playground or clubhouse in multi-family projects. The amenity may be indoors or outdoors and may not include parking areas, streets, or driveways. Projects are also expected to include amenities such as pedestrian walkways, landscaping, bike storage racks, and screened trash enclosures, and would need to comply with building code standards for interior noise. These are common requirements in California communities and do not represent a constraint.

Mobile and Manufactured Homes

As required by State law, the City Zoning Ordinance allows for manufactured housing units to reduce residential construction costs. Section 17.12.130 of the Rolling Hills Municipal Code defines manufactured homes and mobile homes as "single family dwellings"; as such, they are subject to the same standards as wood-frame construction.

Emergency Shelters

Every city in California is required to identify a zone where at least one year-round emergency shelter is permitted without a conditional use permit or other discretionary permit (Govt Code Section 65583(a)(4)(A)). The Government Code further requires that emergency shelters be subject to the same standards that apply to residential and commercial development in that zone, except that certain objective standards prescribed by the State may apply.

In February 2021, the City of Rolling Hills amended its zoning regulations to permit emergency shelters "by right" in the Rancho Del Mar Overlay (RDMO) Zone. Rolling Hills has adopted standards for shelters that meet the requirements of the Government Code and facilitate emergency shelter construction or conversion. The RDMO Zone encompasses over 31 acres of public property, most of which is underutilized. There are opportunities to create shelters by converting existing buildings, constructing new buildings, or using temporary facilities such as portables or tiny homes. This use is permitted by right, with no discretionary permit required by the City. There are no limitations on where shelters may locate within the boundary of the RDMO Zone. Since shelter beds do not constitute "dwelling units", an emergency shelter would not be considered part of the 16 dwelling units permitted by the Overlay Zone and would not affect the number of allowable multi-family units in the Zone.

The City submitted preliminary standards to HCD for review in December 2020 and subsequently revised those standards to ensure that they are compliant with the Government Code and do not present a constraint to emergency shelter development. The adopted standards include:

- ~~Shelters must be at least 300 feet apart, as allowed by the Government Code~~ Shelters may be 300 feet apart, consistent with Government Code 65583(a)(4)(A)(v)
- One parking space for each staff person must be provided. There are no supplemental parking requirements based on the number of beds. The requirements are consistent with Government Code 65583(a)(4)(V)(A)(ii) and are no greater than those that apply to other land uses and activities in the RDMO zoning district.
- A maximum of 12 beds applies. This is comparable to the maximums that apply in nearby cities, including those with unsheltered populations.
- 50 square feet of personal living space is required for each occupant, excluding common areas.
- The standards allow, *but do not require*, shelters to include a dining room, commercial kitchen, laundry room, recreation room, child care facilities, and support services (the Code indicates these may be provided, but they are not mandatory)
- At least five percent of the shelter area must be dedicated for on-site waiting and intake, and an equivalent (or larger) area is required for exterior waiting
- Shelters must comply with building code, plumbing code, and trash enclosure requirements—the same standards that apply to other uses in the Overlay Zone and in the underlying base RAS-2 Zone.

Consistent with the Government Code, an application to operate an emergency shelter requires submittal of a management and operations plan that addresses hours of operation, staffing levels, maximum length of stay, and security procedures. The application would require approval by the City Administrator, based on satisfaction of the conditions listed above and review for compliance with Building, Fire, and other applicable regulations.

The regulations do not constrain emergency shelter development and are compliant with Government Code requirements. As they were just put into effect in 2021, the City will monitor their effectiveness over the 2021-2029 planning period to determine if changes are needed.

Single Room Occupancy (SRO) Hotels

In February 2021, the City of Rolling Hills amended its zoning regulations to allow Single Room Occupancy (SRO) housing in the RDMO Zone. These are facilities with individual rooms or small efficiency apartments designed for very low-income persons. There are no limitations on where SROs may locate within the boundary of the RDMO Zone. A Conditional Use Permit is required.

In December 2020, the City submitted preliminary standards to HCD for review and subsequently revised those standards to ensure that they do not present a constraint to SRO development. The adopted standards include:

- A minimum of six units and a maximum of eight units
- Maximum occupancy of two persons per unit
- Floor area of 250-350 square feet per unit
- Each room must include a water closet (Toilet plus sink)
- Each room must include a kitchen sink with a disposal (but not necessarily a full kitchen)
- Each unit must have a closet

- Full kitchens (i.e., with range, refrigerator, dishwasher, etc.) and full bathrooms (with shower/bath) *may* be provided in each unit but are not required. If these facilities are not included in each unit, then shared facilities are required on each floor.
- 0.5 parking spaces are required per unit, plus one space for each employee on duty
- Occupancy is for 30 days or more

The City initially proposed including a requirement for 24-hour on-site management, and a requirement for elevators in the event the building was two stories. Both of these requirements were removed following HCD's feedback that they were potential constraints. Requiring 24-hour management requirement could be a constraint for a 6-8 unit facility. As a result, on-site management is not required on a 24-hour basis. Given that the building would only be two stories, the requirement for elevators was removed. Since SRO rooms would not be classified as independent "dwelling units", they would not be considered part of the 16 units permitted by the Overlay Zone and would not reduce the number of allowable multi-family units in the Zone.

Supportive, Transitional, and Employee Housing

Supportive housing is a type of rental housing that includes on-site services such as medical assistance or treatment of chronic health conditions or disabilities. Transitional housing is a type of supportive housing but is specifically intended for unsheltered residents who are transitioning to permanent housing. Supportive and transitional housing is not associated with a specific structure type—single family homes can be used in this manner, and so can multi-family buildings.

Government Code Section 65583(a)(5) requires cities to treat transitional and supportive housing as residential uses that are only subject to those restrictions that apply to other residential uses of the same type in the same zone. In other words, a City cannot hold a single family home used as supportive housing to a different standard for parking, setbacks, floor area, etc. than a single family home occupied by a family or other type of household.

Public Health and Safety Code Section 17021.5 requires the City to treat employee housing for six or fewer people the same as other single family housing in each zoning district. For example, if a corporation in another city purchased a home in Rolling Hills and allowed its employees to live there, the use would be treated like any other single family home.

Rolling Hills presently has no Code language that limits transitional, supportive, or employee housing or imposes any special restrictions on such housing. However, these housing types are not expressly acknowledged in the Municipal Code. The 2021-2029 Housing Element includes an action item to add definitions of transitional, supportive, and employee housing to the Municipal Code within six months of Housing Element adoption, acknowledging that such housing is permitted or conditionally permitted in the same manner as other residential dwellings of the same type in the same zone, as required by State law.

Housing Constraints for Persons with Disabilities

Government Code Sections 65583(a)(4) requires the Housing Element to include "an analysis of potential and actual governmental constraints upon the maintenance, improvement of development of housing…for persons with disabilities. AB 686 also requires the City to

affirmatively further fair housing, which includes housing that meets the needs of persons with disabilities.

In November 2020, the City Council approved reasonable accommodation procedures, including application requirements, review procedures, findings, and provisions for noticing and advertising the opportunity. These procedures establish a process through which persons with disabilities can request reasonable accommodations (or modifications) to the City's codes, rules, policies, practices or services so that they have an equal opportunity to enjoy or use a dwelling. The City has also adopted a resolution recognizing the Americans with Disabilities Act, including a commitment to assist disabled residents.

A request for reasonable accommodation may be made by any individual with a disability, his or her representative, or a developer or provider of housing for individuals with disabilities, when the application of a land use, zoning, or building regulation, policy, practice, or procedure acts as a barrier to fair housing opportunities. The City has posted notices at City Hall informing the public of its right to make such a request, including application forms for those making a request. Requests are generally made to the City Manager.

Once a completed application is received, the City Manager has 45 days to make a written determination. Additional information may be requested of the applicant in order to make an informed determination. An alternative solution to the one proposed by the applicant may be considered if it would reduce impacts and still achieve the intent of the request.

The request is granted, with or without conditions, if the City Manager finds that the housing will be occupied by an eligible individual, the requested accommodation is necessary to provide the individual with equal opportunity to use and enjoy a dwelling, the requested accommodation would not impose an undue financial or administrative burden on the City, or fundamentally alter the City's zoning or building laws or undermine the General Plan, and there are no other reasonable accommodation methods that would allow the applicant to enjoy the dwelling that would be less impactful on the surrounding area.

Conditions of approval may be replaced on the application. These may include periodic inspection to verify compliance, recordation of a deed restriction requiring removal of the improvements when it is no longer needed, time limits, measures to reduce off-site impacts, and measures that respond to the unique physical attributes of the property. Decisions may be appealed.

Rolling Hills has adopted the Los Angeles County Building Code. As long as construction is consistent with the Building Code, residents are permitted to provide any disabled access or amenity improvements necessary to reduce barriers. Access to homes via ramps is permitted. One-story construction throughout the community removes a major barrier for persons with disabilities and facilitates access for persons with mobility limitations. Accessibility improvements, universal design changes, and other accommodations for persons with disabilities are processed administratively in conjunction with the building permit process and are permitted in both of the City's residential zones.

No constraints to housing for persons with disabilities were identified in this analysis. As noted in Chapter 3, the city's large population of older adults requires ongoing efforts to facilitate retrofitting of existing homes for residents with physical limitations, and their caregivers.

Residential Care Facilities and Definition of "Family"

The Lanterman Developmental Disabilities Services Act requires that small licensed residential care facilities for six of fewer clients be treated as regular residential uses and permitted by right in all residential districts. Care facilities with seven or more clients (e.g., "large" residential care facilities) may be subject to additional requirements but must be treated the same as other residential uses in that zoning district. Cities that require conditional use permits for large residential care facilities are required to mitigate this constraint in their housing elements. ~~Rolling Hills complies with this requirement in practice and has no minimum distance (separation) or siting requirements for residential care facilities. However,~~

At this point in time, the Rolling Hills Zoning Code does not expressly mention or define ~~small~~ residential care facilities, nor does it distinguish between "large" and "small" facilities. ~~It~~ The Code should be amended to expressly indicate that this use is permitted by right in all zones where housing is allowed, and is subject to the same standards, fees, and procedures as other residential uses in those zones. This is required by State law. ~~.~~ As required by California Health and Safety Code Section 1566.2, the City does not collect business taxes, registration fees, or other fees for small residential care facilities.

The Rolling Hills Municipal Code includes a definition of "family" in its zoning regulations. Overly restrictive definitions may pose a housing constraint, but in this instance the definition is broad and inclusive. According to the Rolling Hills Municipal Code, "family" means:

> "one or more persons living as a single housekeeping unit, as distinguished from a group occupying a boarding, rooming or lodging house, hotel or club. Family may include domestic servants."

5.2.4 Cumulative Impacts of Land Use Controls

State law requires the City to consider not only the impact of individual development standards, but also the cumulative effects of these standards on the cost and supply of housing. For example, it is possible that a particular setback requirement may appear reasonable on its own but may limit development opportunities when combined with height and lot coverage limits. Sometimes, the combined effect of different development controls can require more expensive construction or result in frequent zoning variances.

Because of the very large lot sizes in Rolling Hills, the zoning standards do not create an adverse cumulative impact on development costs or the housing supply. As previously noted (pages 5-2 and 5-4), a special zoning overlay (OZD-1) was created in 2012 to recognize that some parts of the city have prevailing lot sizes that are smaller than the one-acre minimum required by the RAS-1 district. Roughly 10 percent of the City's parcels are covered by this zone, which allows reduced setbacks in order to avoid the need for zoning variances.

As noted earlier, the combination of front, rear, and side yard setbacks on a rectangular one-acre lot would still allow for a buildable area of over 16,000 square feet. Most parcels are considerably larger than one acre and have buildable areas that exceed 20,000 square feet. FAR and lot coverage limits likewise allow ample structure coverage, and homes larger than 10,000 square feet can be built without Variances on most lots. The one-story height limit tends to produce building footprints that are quite large—but still within the 20% structure coverage requirement. Each residence is required to have two covered parking spaces (three, if an ADU or guest quarters are on-site). This requirement is modest given the typically large home size and does not constrain building construction.

The land use controls also do not present a cumulative constraint to ADU construction. Almost every parcel in the City has the land area or existing built floor area to support an ADU, and many homes already have spaces that could be easily converted to ADUs. The ADU and JADU regulations adopted in 2018 and revised in 2020 were drafted to work in tandem with the controls for the RAS-1 and RAS-2 districts and have laid the foundation for substantial ADU production.

There are no cumulative land use constraints to multi-family development. The Rancho Del Mar Overlay (RDMO) Zone standards have been tested to ensure they are internally consistent and can support housing in the 20-24 unit/acre range. The RDMO Zone allows multi-family housing to be either owner or renter occupied. New housing units in this zone must be affordable. The affordability requirement is not a constraint to development, as the site is publicly owned and represents a unique opportunity for reduced land and construction costs. There are no comparable opportunities in the city, as this is the only property in Rolling Hills that is flat, vacant, served by public sewer, and walking distance from public transit.

One notable omission from the City's zoning regulations a provision for density bonuses. State law requires that the City offer a density bonus for projects that set aside various percentages of units for affordable housing, senior housing, and other types of special needs housing. The number of bonus units is based on a sliding scale and can be up to 50 percent above the base density permitted by zoning. For projects where all units are affordable to low and very low

income households, the density bonus rises to 80 percent. A density bonus could be requested for the Rancho Del Mar site, since the overlay requires that any multi-family housing is 100 percent affordable. This would allow 28 units on the site instead of the 16 allowed by the General Plan and zoning.

The Housing Element includes a program recommendation that the City amend the Municipal Code to adopt density bonus provisions or adopt the State provisions by reference.

5.2.5 Building Code Standards

The City of Rolling Hills adopted the Building Code for Los Angeles County in effect on January 1, 2020 as its Building Code. A number of local amendments to the Code were made. This includes an allowance for the City Council to hold a public hearing to review decisions of the County Board of Appeals, Code Enforcement Appeals Board, or Building Rehabilitation Appeals Board. Other local amendments include a modified definition of "basement" (to avoid the appearance of multi-story buildings), adjusted provisions for grading and cut slopes, limits on driveway slope, and limits on developing slopes over 50 percent. The City has also adopted the Los Angeles County Plumbing Code, Mechanical Code, Electrical Code, Residential Code, Fire Code, and Green Building Code.

Effective July 1, 2008, all land in the City of Rolling Hills was deemed to be a "Very High Fire Hazard Severity Zone" (VHFHSZ). As a result, several more restrictive fire safety standards have been adopted. The City also has adopted standards for hours of construction, and requirements for geological surveys and investigations.

5.2.6 Permit Processing Times and Approval Procedures

Processing and permit procedures can be a constraint to the production and improvement of housing due to the time they add the development process. Unclear permitting procedures, layered reviews, multiple discretionary review requirements, and costly conditions of approval can increase the cost of housing, create uncertainty in the development process, and increase the financial risk assumed by the developer.

In Rolling Hills, the time required to process a project varies depending on the size and complexity of the proposal, and the volume of projects being reviewed. Not every project must complete every possible step in the process. In addition, certain review and approval procedures may run concurrently.

For smaller projects, permit processing times tend to be faster than in most cities. Administrative review applications (i.e., those that do not require public hearings) typically take only a few days to process. However, the City's capacity is limited, requiring that some permit processing functions are contracted out. Even smaller projects that are approved ministerially typically require review by the Rolling Hills Community Association and the Los Angeles County Building and Safety Department, in its role as the contracted building authority of the City.

The City collects no fees for over the counter review—such fees are assessed when the project is submitted to the Department of Building and Safety. Administrative review processes have been created for residential additions less than 1,000 square feet, accessory dwelling units and

junior accessory dwelling units, remodels, foundation repair, and re-roofing. Such projects are required to submit two sets of plans, various checklists, and calculations of existing and proposed square footage, lot coverage, and impervious surface coverage. The City's website provides comprehensive information for applicants seeking permits, including on-line portals for applications, payment, and checking progress on permit status.

Larger projects such as new homes take longer, but they are less common. New homes in Rolling Hills are multi-million dollar projects that often require demolition, site preparation and grading, and new driveways before construction may begin. Larger projects may also require review by the LA County Health Department for the adequacy of the septic system, and the Fire Department for fuel modification.

Unless specifically exempted by State law, large projects such as new homes and residential additions of 1,000 square feet or larger are subject to Site Plan Review. An initial consultation with staff is strongly encouraged at the start of the process. Once an application is received, it is reviewed for completeness, including required calculations, elevations, and site plans. When the application is deemed complete, it is forwarded to the Planning Commission for a hearing, including a recommendation from staff. ~~The Planning Commission conducts an initial project review meeting, a field trip, and a meeting to forward the application to the City Council. Likewise, the Council conducts an initial meeting, a field trip, and a meeting to forward the plans to the Rolling Hills Community Association (RHCA).~~

The Site Plan review process typically takes three to six months from start to finish, including a field trip by Planning Commissioners to the project site at the start of the process. The process may be completed in a single hearing but on occasion may take two to three hearings so that issues raised by the Commission and public can be addressed. Additionally, project applicants may modify their site plans after approval and return to the Commission for approval of major revisions.

The Planning Commission has the authority to approve Site Plan Review applications. The decision of the Commission is considered final unless an appeal is filed with the City Council or the City Council decides to take the application under its jurisdiction. The decision becomes effective 30 days after the adoption of the resolution.

Approval of a Site Plan Review application requires findings related to compliance with the General Plan and adopted lot coverage standards, preservation of topography and vegetation, grading that follows natural contours or does not adversely modify natural drainage channels, the use of drought-tolerant landscaping, impacts to pedestrian movement, and compliance with CEQA.

The Planning Commission does not expressly perform design review as part of this process, as its findings are principally related to address public health, safety, and welfare. Design review occurs privately, through the Rolling Hills Community Association (RHCA). The RHCA has an Architectural Committee that reviews plans for new homes and large additions to ensure that easements are kept free and clear of structures, including fences and other obstructions.[5]

[5] *School District and City-owned property is exempt from this requirement. Thus, any development in the RDMO Housing Opportunity Zone would not be subject to RHCA review.*

Projects are submitted to LA County Building and Safety following RHCA review. RHCA maintains its own design guidelines, covering such topics as roofs, walls, windows, doors, and lighting. Because RCHA is a non-governmental agency, these guidelines are described later in this report under non-governmental constraints (see discussion of CC&Rs on page 5-22).

Projects that require Variances to development standards or Conditional Use Permits (CUPs) also require Planning Commission hearings. CUPs are required for large horse stables and corrals, detached garages, tennis courts, and a number of other large-footprint site features. From start to finish, the process from submittal of plans to approval of permits may take six months or longer for a brand new home. Applications for ADUs, major remodels, residential additions, and accessory structures are more common, and are processed more rapidly. ADUs, JADUs, and other ministerially approved projects take approximately two to four weeks to process.

The City regularly seeks ways to expedite processing and improve the timeliness of its services. At the present time, permitting and processing time is not considered a constraint and the City complies with the time limit requirements established by Sections 65943 and 65950 of the Government Code. The Site Plan Review requirements and other permitting requirements are not a constraint to the development of multi-family or affordable housing as they would not apply to projects on the Rancho Del Mar site nor would they apply to ADUs that meet the City's adopted standards. As such, they have no impact on the cost, supply, timing, or approval certainty of these projects. For new single family homes, the review requirements result in processing times that may take several months. However, they do not affect the supply approval certainty. In a review of applications over the past eight years, only one application was denied (requesting a height modification to approved addition in 2017) and another application had a partial denial (for stairs and walls, in 2014).

5.2.7 Site Improvement Requirements

The principal site improvements required upon development of a vacant property are the undergrounding of electrical lines to the structure, installation of a septic system, and conformance to the City's outdoor lighting standards. Road and emergency access (fire safety) improvements may be required for properties that do not have street frontage or have other access constraints. New development in Rolling Hills consists almost entirely of custom homes on existing vacant or previously developed lots, rather than subdivision of "raw land," which tends to reduce overall improvement requirements. At the Rancho Del Mar affordable housing site, installation of curb and gutter improvements would be required prior to development, but the site already has road access, storm drainage, and water and sewer facilities in place. There would be no special or unique site improvement requirements imposed on development of this site.

Projects requiring the subdivision of land would be subject to the standards set forth by the City's subdivision regulations, which are specified in Title 16 of the Municipal Code. These standards establish a 24-foot road width for streets. A 32-foot turning radius is required on dead-end streets, and grades may not exceed six percent. The standards recognize that all streets in Rolling Hills are private. The City Council has the discretion to require additional site improvements adjacent to sites where land is being subdivided, including widening existing roads to meet neighborhood traffic and drainage needs. The subdivider may also be required to

provide drainage improvements, in accordance with standards set by the City Engineer and with the city's MS4 permit (see P 5-26). The subdivision ordinance further specifies that water mains and fire hydrants may be required when new lots are created, and that easements for gas and electric services may be required.

The cost of installing a new septic system is generally not a constraint for brand new homes but can be an impediment for ADUs and smaller additions, particularly for homeowners with limited incomes. At minimum, the County Health Department requires a feasibility study for any project that could result in septic tank capacity being exceeded. Older homes may face costly septic installation requirements that could render a home addition or ADU infeasible. Programs to assist lower income or senior homeowners with septic tank replacement could be considered, particularly where an ADU is being added.

5.2.8 Development and Permitting Fees

Fees are charged by the City and other agencies to cover the costs of processing permits and providing services and facilities, such as utilities, schools, and infrastructure. Most of these fees are assessed through a pro rata system based on the square footage or value of the project, the staff time required for processing, and the magnitude of the project's impact. If fees become excessive, they can become a constraint on development and make it more difficult to build housing affordably. They can also place a burden on lower income homeowners seeking to modify their homes or add an Accessory Dwelling Unit.

A summary of residential development fees charged by the City of Rolling Hills is presented in Table 5.2. Most projects do not require payment of these fees, as they would not typically require use permits, Variances, Zoning changes, General Plan amendments, CEQA review, lot line adjustments, and so on. However, Site Plan Review is commonly required for all new homes and major additions, and ADU permits are required for larger ADUs. For projects complying with City standards and requirements, the fees are not a development constraint.

Table 5.2: City of Rolling Hills Major Development Fees[1]

Fee Type	Fee Amount	Notes
Site Plan Review	$1,500	
Conditional Use Permit	$1,500	
Variance	$1,250	
Minor Variance	$750	Encroachments from main structure that do not extend more than 5' into required setbacks
Zoning Change or Code Amendment	$2,000	
General Plan Amendment	$2,000	
Accessory Dwelling Unit application	$375	
Major Remodel Review	$375	

View Impairment Review	$2,000	Processing fee for Committee review of impacts on trees and views
Water Efficient Landscape Review	$1,500	Unused balance refunded
Traffic Commission Review	$300	Required for new driveways
Lot Line Adjustment	$1,500	Plus County fee
Tentative Parcel Map	$1,500	Plus County fee
Final Parcel Map	--	County fee only
Environmental Review Determination	$200	Plus Fish and Game Fee
Environmental Impact Reports	Consultant fee plus 10%	Only required as needed
Appeal Fee	2/3 of original application fee	Only required as needed

Source: City of Rolling Hills, 2021. Barry Miller Consulting, 2021
[1] This is not a comprehensive list of all fees but covers the major development-related categories in the City's fee schedule. The fee schedule also covers records searches, inspections, and review of grading plans.

Rolling Hills is one of 13 cities that contracts with the Los Angeles County Department of Building and Safety (LACDBS) for plan checking, building permits, and building inspection. The County issues building, plumbing, mechanical, and electrical permits on the City's behalf. The cost schedules for the incorporated cities served by LACDBS are higher than the schedules for the unincorporated area but are comparable to nearby cities with full-service building departments. A residential project with an assessed valuation of $100,000 would be subject to a plan check fee of $3,413 and a permit fee of $4,029. This includes required energy and disabled access checking costs. As the value of a project increases, the fees decline as a percentage of total project costs. They represent 7 percent of a $100,000 project but less than 5 percent of a $500,000 project.

The fee schedules for other permits varies by type. Electrical permits are subject to a base fee of $74.70, plus a cost per square foot ($0.20/SF for multi-family and $0.50/SF for single family and duplexes). Separate fees are collected for swimming pools, branch circuits, lighting fixtures, appliances, and electrical plan checking. Mechanical permits are collected for HVAC systems, compression units, boilers, refrigeration systems, etc. Plumbing permits are based on the number of fixtures and also cover projects requiring connection to septic tanks and work such as solar water heaters, sprinkler systems, and backflow protection devices. Relative to the other 12 cities that contract with Los Angeles County, the fee schedule in Rolling Hills is slightly higher. However, the fees are lower in Rolling Hills than in nearby Rolling Hills Estates.

The County also collects fees for projects requiring geotechnical review. This would apply to most new housing units in Rolling Hills. The fee ranges from $2,752 to $17,746, with the actual amount based on 0.50% of the value of the proposed structure. Additional fees are charged for geotechnical site inspections and geotechnical review of grading plans.

Los Angeles County typically updates its fees annually based on the consumer price index and other factors. The increase in 2021 was 2.2 percent for all cities served by the County. Rolling Hills updates its fee schedule less frequently, although fees are considered as part of the annual budgeting process. Some of the City's fees—such as the fees for parcel maps and lot line adjustments—have not been updated in many years.

There are no local surcharges or special fees associated with multi-family housing. On a per unit basis, permitting costs would be substantially lower for multi-family units than for new single family units. This is due to the smaller size of multi-family units and to multi-family housing being permitted "by right" within the Rancho Del Mar Overlay Zone, with no applicable administrative fees. The City's fee structure has not historically distinguished between single and multi-family construction, as multi-family housing only recently became a permitted use.

A number of other fees apply in Rolling Hills; these are typically associated with new residences and are intended to offset the additional cost of providing services. These include:

- A Park and Recreation Fund Fee, which is equivalent to 2% of the first $100,000 in building evaluation, plus an additional 0.5% of the remaining balance. The fee for a $1 million construction project would be $6,000. This fee is only charged for new primary homes---ADUs are exempt.
- A School Impact Fee, which is paid to the Palos Verdes Unified School District. In 2020, the fee was $3.79 per square foot for new residential construction.
- A fee collected by the Rolling Hills Community Association (RHCA), equivalent to $0.20 per $100 of assessed valuation (i.e., $2,000 for a project with a construction value of $1,000,000)
- Additional architectural review fees collected by the RHCA, including a $165 flat fee plus $1 per square foot for new construction, additions and major remodels. In addition, RHCA collects fees ranging from $25 to $500 for individual features such as swimming pools, tennis courts, gazebos, and new roofs.

There are no sewer connection fees in the city, since there are no sewers. There is no water connection fee; water service charges are determined by the size of the meter and the number of fixtures, plus the amount of water used. The City likewise has no impact fees for housing, transportation, public art, or other services. Projects in the RDMO Zone would be exempt from the RHCA fee, since they are outside the HOA boundary.

In total, fees for a typical new home are roughly equivalent to 7-8 percent of total construction costs. This is comparable to other cities on the Palos Verdes Peninsula, though somewhat higher than in other urbanized parts of Los Angeles County. The higher fees are associated in part with the terrain and hazards in Rolling Hills and the size and complexity of applications for new homes, many of which require extensive grading and multiple inspections. Fees do not constrain development in Rolling Hills, but they do add to the cost of housing, which is already expensive in the City. Programs to reduce processing and permitting fees for ADUs could be considered, as they could incentivize ADU production.

5.2.9 Other Local Ordinances and Disclosure Requirements

No other local ordinances were identified that could present potential constraints to housing needs. The City does not have an inclusionary zoning requirement, growth control ordinance or limits on the number of units that may be constructed in a given year, or other locally-imposed requirement impacting the cost of residential development. The City prohibits the rental of rooms and houses for periods of less than 30 days, effectively disallowing short-term rentals. This supports the City's goal of using Accessory Dwelling Units as rental housing, rather than for transient occupancy.

The City also complies with AB 1483 (2019), which requires that agencies publish specific information on their websites starting January 1, 2021. This information includes:

- All current fees and exactions applicable to housing
- All zoning ordinances, design and development standards
- Current and five previous annual financial reports
- An archive of nexus studies for impact fees conducted after January 1, 2018

The City of Rolling Hills maintains a Planning and Community Services landing page on its website that contains all of this information. This landing page includes a link to all planning and development fees, the Zoning Map, the Municipal Code (which includes the zoning ordinance and all applicable development standards), the General Plan, the Local Hazard Mitigation Plan, Landscape Design Standards, the Water Efficient Landscape Ordinance, Planning and Development forms and application materials, the Planning Commission calendar, technical information for developers (related to stormwater management), permitting requirements, guidelines for equestrian facilities, information on solar panels and rainwater harvesting, and guidance on septic system installation. The City is also updating its environmental programs page. An action program in the Housing Element calls for this information to be reorganized and updated, with new information added on Accessory Dwelling Units and links to the RHCA Design Guidelines.

Every annual budget and audited financial report for the City since 2010 is available on the City's website. There have been no nexus studies for impact fees since 2018, but such studies would be posted if conducted in the future.

Disclosure requirements related to SB 35 also apply to Rolling Hills. In 2018, California adopted SB 35, which establishes streamlining provisions for multi-family projects meeting certain criteria related to affordability and payment of prevailing wages to construction workers. As of 2021, projects in Rolling Hills in which 10% of more of the units are affordable are eligible for SB 35. Article III Section 300 (b) of HCD's Guidelines for SB 35 requires that cities in this situation must provide "information, in a manner readily accessible to the general public, about the locality's process for applying and receiving ministerial approval, materials required for an application as defined in Section 102(b), and relevant objective standards to be used to evaluate the application." An action program in this Housing Element recommends creating an SB 35 information sheet and application and including it on the Planning and Community Services Website.

5.3 Non-Governmental Constraints

Non-governmental constraints significantly affect the affordability of housing in Rolling Hills. Specifically, the high cost of real estate in the city, its heritage as a rural, gated equestrian community, and its limited infrastructure and severe environmental constraints, make it extremely challenging to build traditional affordable housing units. The city is one of the most expensive and highly constrained communities in California. To be economically viable, affordable housing must be tailored to community context—for example, through accessory dwelling units.

5.3.1 Land Costs

Land in Rolling Hills is expensive. The city features dramatic topography, with sweeping views of the Pacific Ocean and Los Angeles basin. Property in the city is marketed as a location for prestigious estates. The supply of acre-plus homesites on the Palos Verdes Peninsula is limited, making demand for such properties very strong. A scan of Zillow.com in Fall 2021 shows two vacant lots for sale in the city—one for $7.5 million and another with geologic constraints for $1 million. Data on recent sales shows a vacant single family parcel that sold for $6.85 million in November 2020 and another that sold for $1.84 million in 2019. These properties have been marketed and sold as sites for large single family homes.

The economic viability of affordable housing on these sites is further challenged by the cost of the site improvements that would be required to facilitate safe development. The vacant parcels described above lack public sewer; are accessed by narrow, winding, private roads traversing an area with very high wildfire severity; and have slopes that exceed 50 percent in some cases. The cost of road widening, grading and earth movement, and installation of community-wide sewer and storm drainage construction make most types of multi-family housing economically infeasible. There is no public revenue source to make these improvements. The absence of commercial land uses in the city limits the City's ability to sponsor programs that would reduce or underwrite land or site improvement costs.

5.3.2 Construction Costs

The cost of construction, including labor and materials, is a significant constraint to housing development in Rolling Hills. While high costs have impacted the entire state, Rolling Hills is particularly impacted by the high cost of mitigating environmental constraints, including fire and geologic hazards. New home construction requires grading and earth movement, often with costly retaining walls and engineered drainage systems. Many homes in the city feature high-end finishes, as well as amenities that result in higher costs. The city is also vulnerable to elevated or inflated costs that reflect its reputation as a high-end, high-income market.

In 2014, the Rolling Hills Housing Element estimated that construction costs were approximately $330 to $500 per square foot. Based on recent projects in the city, costs have doubled since then. The National Association of Homebuilders estimated that costs increased 26 percent between June 2020 and June 2021 alone. There have been rapid increases in the price of lumber, copper, steel, aluminum, concrete, and other building materials, resulting in some

projects being placed on hold and others being cancelled altogether. Construction costs for home additions now regularly exceed $800 per square foot.

Construction of septic tanks represents a unique expense in Rolling Hills that is not common in surrounding cities. Anecdotally, homeowners in the city report costs of well over $25,000 to install new septic systems, which in some cases can be an impediment to adding an accessory dwelling unit or expanding an older home.

5.3.3 Financing

Financing is not a constraint to housing development in Rolling Hills, but the high cost of housing makes it infeasible for most households to buy a home in the community. Home mortgage interest rates were ~~remain relatively~~ low at the time the Housing Element was drafted, with rates at around 3.0 percent for a 30-year mortgage in Fall 2021. Income and down payment requirements have become more stringent than they were following the mortgage crisis of a decade ago, and there are fewer flexible loan programs to bridge the gap between the amount of a required down payment and a potential homeowner's available funds.

Given the very high cost of housing in Rolling Hills, significant capital is required to purchase a home. A 20 percent down-payment on the median priced home in the City would be nearly $750,000, with monthly mortgage payments of nearly $19,000. A very high income would be required to qualify. First time buyers face particular challenges in the city, given the lack of equity from prior home ownership.

5.3.4 Delays Between Approval and Construction

Given the high cost of construction and rising interest rates, there may be delays between the time a project is entitled and when it is actually constructed. Applicants may postpone their projects due to high material costs, supply shortages and shipping delays, and a lack of skilled construction workers and contractors. Rising interest rates can also add to the cost of a project, leading to postponement. The economic uncertainty and upheaval of the COVID-19 pandemic has also caused some projects to stall over the last two years. In some cases, projects may be cancelled altogether, or the property may be sold to a new owner who may modify or abandon previously approved plans.

These factors are out of the City's control but can have a real impact on housing supply and construction. The City is particularly interested in the completion of permitted ADUs, as these units are critical to achieving affordable housing goals. As noted in Chapter 6, Rolling Hills intends to establish a monitoring program for permitted ADUs to facilitate their construction. This would include reaching out to those who receive ADU permits and monitoring construction progress on those units. The monitoring program includes follow-up conversations with any applicants who do not complete their projects to understand the factors leading to that decision, and any steps the City can take to improve completion rates.

5.3.45 Conditions, Covenants, and Restrictions (CC&Rs)

Development in Rolling Hills is controlled through both municipal zoning and privately enforced CC&Rs. The CC&Rs are considered a non-governmental constraint because they are enforced by the Rolling Hills Community Association (RHCA), a private entity. The CC&Rs were established by the Palos Verdes Corporation in 1936 upon the initial development of the community. They apply to all property in the city except the City Hall Campus, Tennis Court Facilities, PVP Unified School District site (Rancho Del Mar), and Daughters of Mary and Joseph Retreat Center. The RHCA does not have design review or building permit review authority on these sites.

Elsewhere in Rolling Hills, the CC&Rs restrict the development and use of property to single family homes and limited public uses. They do not allow multi-family housing, commercial, office or industrial activity. One of the stated purposes of the CC&Rs is to preserve and maintain the rural character of the community, including regulating the architectural design of structures. The CC&Rs authorize the RHCA Board to appoint and maintain a five-member Architectural Review Committee to carry out this objective. The Committee is comprised of three Association members and two licensed architects.

The RHCA Board has adopted a Building Regulations manual that is used by homeowners and their architects/ contractors, and by the Committee to evaluate projects. Committee review is required for all new residences and accessory structures, and for all projects that modify the exterior of existing structures. Committee meetings occur twice monthly, on the first and third Tuesdays. The meetings are not considered "public hearings" since RHCA is not a public agency, but they are open to all members of the Association and are subject to Association bylaws.

RHCA's Building Regulations require that all homes under RHCA's jurisdiction be one-story, ranch-style construction. The Regulations identify three permissible style types: traditional ranch, contemporary ranch, and early California Rancho. Specific standards are provided for each style, including allowable exterior siding materials, roof materials (and colors), roof pitch, building height (25 feet), and floor to ceiling plate heights (8'6" maximum in at least 50 percent of the structure). Regardless of style, all buildings must be painted white, conform to the natural grade, and have consistently designed doors and windows. A minimum floor area of 1,300 square feet, plus a two-car garage, is required for all residences.

The regulations align with the City of Rolling Hills zoning regulations—in fact, the CC&Rs expressly state that the Architectural Committee must comply with applicable provisions of the Rolling Hills Municipal Code. This includes allowing Accessory Dwelling Units (ADU), which are not mentioned in the Association's Building Regulations. Under AB 670 and AB 68 (effective January 2020), CC&Rs may not be used to deny ADU applications, and prohibitions on ADUs by homeowner associations are not enforceable.

State law does allow homeowner associations to review the design of ADUs, provided their process is fair, reasonable, and expeditious. This has been occurring in Rolling Hills for the last three years with no adverse effects on ADU construction.

As noted earlier in this chapter, the City has developed a ministerial process for ADU approval as required by state law. Projects meeting the dimensional requirements in the Municipal Code (which are consistent with State standards) are approved without a public hearing or discretionary review by the City. If an ADU does not affect the exterior of a home (for instance, a Junior ADU entirely within the footprint of an existing home, or the conversion of a detached guest house to an ADU), then no RHCA review is required. The Architectural Committee does review ADUs that modify the exterior, add square footage to a structure, or result in a new accessory structure. The purpose of this review is to verify that the structure meets the objective design requirements in the RHCA Building Regulations rather than to evaluate the merits of the project or its off-site impacts. According to the Committee's own guidelines, it "will not require modifications to working drawings that materially change the massing of the project."

City staff has worked closely with RHCA staff to ensure that their design review process is coordinated with City permitting, streamlined, and does not impose unreasonable restrictions on applicants. The RHCA office is adjacent to City Hall and there is ongoing coordination between the two entities. When an application for an ADU is submitted to the City, the City advises the applicant to proceed to RHCA immediately afterwards to initiate project review. Projects are typically forwarded to the RHCA Architectural Committee within two weeks and are typically approved at the initial meeting; if modifications are required, the plans are typically approved at the second meeting two weeks later. The review occurs concurrently with the City permitting process, avoiding potential delays.

In practice, every ADU application approved by City staff has subsequently been approved by the RHCA Architectural Committee. Nonetheless, an action program in this Element recommends that the City work with RHCA to update the 2017 Building Guidelines to acknowledge ADUs and provide guidance for homeowners seeking to add an ADU.

5.3.~~5~~6 Infrastructure

Another factor adding to the cost of new construction is the limited availability of infrastructure, specifically streets, sewer, storm water and water facilities.

Streets

Rolling Hills has no public roads or streets. Since the 1930s, the community's internal street network has been designed to establish a rural, equestrian character. This historic aspect of the city's infrastructure is one of Rolling Hills' defining features. The road network is typified by winding roads with a 15- to 25-foot paved cross-section and no curbs, gutters, sidewalks, or streetlights. Narrow road width, coupled with steep grades and very low densities, effectively precludes public transit within the city. Access is also gate-controlled at three entry points.

The city's circulation infrastructure is not conducive to uses generating high trip volumes, such as higher-density housing. Given the entire city's designation as a very high wildfire hazard severity area, the capacity to evacuate the population is also a limiting factor. Most streets in the community are "dead ends" without emergency vehicle access alternatives in the event that ingress and egress is blocked.

A number of properties—including City Hall, the Retreat Center, and the PVUSD site, are accessed from roads outside the City gates. These parcels are less constrained by street access but could require ingress and egress improvements (resurfacing, driveways, etc.) in the event a change of use was proposed. Such improvements are typical for any development and would not adversely affect expected construction costs.

Wastewater Disposal

With the exception of the school site and thirteen residences that have individually or collectively (through the creation of a small sewer district) connected to an adjacent jurisdiction's sewer systems, there is no sanitary sewer system in Rolling Hills. Residences are served by individual septic tanks and seepage pits. These systems are designed to serve single family residences and are not conducive to multi-family housing. This is particularly true given the geologic, slope, and soil constraints in Rolling Hills. To meet water quality and runoff requirements, high-density housing typically requires a viable sewer connection.

Over the past 35 years, the City has conducted multiple sewer system feasibility studies. In 2019, the City received approval from the Los Angeles County Public Works and Sanitation District to discharge effluent from up to 235 existing homes in Rolling Hills. The City is in the process of completing design drawings for Phase One, which is a 1,585-foot long 8-inch diameter sewer line along Rolling Hills Road/Portuguese Bend Road. This will provide service to City Hall, the RHCA offices, and the Tennis Courts. Future phases of the project could provide service to residences but would require significant grant funding and potentially special assessments.

In 2021, the City surveyed all households to determine the level of support for developing a sewer system. Roughly 16 percent of the City's households participated. The survey found that about three-quarters of the residents' septic tanks were more than 20 years old. More than 80 percent supported construction of a sewer system, though many responses were contingent on the cost. Past engineering studies have concluded that the terrain and unstable geological conditions in the city make a conventional gravity sewer system infeasible in the city, meaning the cost to property owners could be significant.

The Palos Verdes Unified School District site is an exception. It is connected to a wastewater treatment line that was installed when the school was initially constructed. Collection lines were sized to accommodate a school campus with several hundred students, and associated maintenance facilities—a higher level of demand than is associated with current uses on the site. Given the availability of sewer service to this site and the high cost of extending sewer services elsewhere, it is the most suitable property for multi-family housing in the City.

In some instances, septic systems may present a constraint to ADU development. This is generally not an issue for JADUs or smaller ADUs that repurpose existing habitable space, but a new detached ADU that adds floor space may require increasing the capacity of a septic system. As noted earlier in this chapter, a program in this Housing Element proposes further evaluation of this constraint, and possible ways to assist homeowners in addressing it.

Storm Water Run-off

As a rural community without public streets, Rolling Hills does not have a municipal storm sewer system or continuous network of storm drains. Drainage follows topography, with stormwater flowing into steep ravines through the community. Water percolates into the ground along canyon bottoms, with runoff flowing to the ocean, or to larger streams and detention basins downstream, depending on location.

To comply with federal National Pollutant Discharge Elimination System (NPDES) requirements and maintain its Municipal Separate Storm Sewer System (MS4) permit, the City is required to screen and monitor its runoff to avoid compromising downstream water quality standards. It also required to implement a number of programs, such as an Illicit Discharge Elimination Program. The City also requires Best Management Practices (BMP) for construction in order to avoid erosion, pollution, sedimentation, and runoff that would degrade water quality. These requirements are not a development constraint but may add to the cost of construction. Moreover, the lack of a municipal storm drainage system represents another constraint to higher density housing in most of the city.

The Rancho Del Mar site is outside the area covered by the MS4 monitoring program and drains west toward Rancho Palos Verdes. Unlike the rest of Rolling Hills, it is served by an improved storm drainage system. A 2017 facility evaluation reported the storm drains and inlets on the site as being in good condition.

Water

Water infrastructure in Rolling Hills is owned, maintained, and operated by California Water Service (CalWater). The city is within CalWater's Palos Verdes District, which also serves the other cities on the Palos Verdes Peninsula. Facility planning is governed by an Urban Water Management Plan (UWMP), which evaluates anticipated demand and the water resources available to meet that demand.

Projections of future water use are based in part on expected population growth, which is derived from SCAG forecasts and local general plans. Water demand is projected to increase by 6 percent by 2045, reflecting very slow population and housing growth in the Peninsula cities. Development beyond that anticipated by SCAG forecasts could reduce water pressure, compromise firefighting capabilities, and curtail domestic water availability. This is a problem throughout California, made worse by persistent drought conditions. The UWMP provides water shortage contingency plans, including measures to reduce demand and procure emergency supplies.

Water storage facilities and pipelines in Rolling Hills are generally adequate to meet local needs. However, many of the city's water facilities are aging and the system as a whole is vulnerable to damage during earthquakes and landslides. Storage and distribution facilities reflect the rural density of the city and are not sized to accommodate significant growth. The Palos Verdes Unified School District site provides a unique opportunity in this regard, as its water system was designed for a public school campus with several hundred students.

The introduction of ADUs in Rolling Hills could potentially impact water demand in the City. The California Water Company has no plans to upgrade the aging water system. As ADUs are created, it will be important to consider potential impacts on water distribution lines and fire fighting capacity. Several factors work to mitigate the impacts of ADUs on the water system. First, the population of Rolling Hills has declined by roughly 300 since 1980. Thus, the addition of 40 or so ADUs over eight years may not increase the total number of residents in the City. Second, water conservation measures have been implemented—and continue to be implemented—to reduce water flows and water demand. These measures include water-efficient landscaping requirements, as well as requirements for more efficient plumbing fixtures.

Dry Utilities

Rolling Hills residences are also served by dry utilities. Electric services are generally provided by Southern California Edison while natural gas is provided by Southern California Gas Company. A range of private vendors provide phone, internet, and cable services. Capacity is available to serve new development, and all of the vacant and underutilized sites identified in Chapter 4 would have access to these services if they were developed. The Rancho Del Mar site currently has access to these services as it is a former school.

5.3.76 Environmental Constraints

Rolling Hills has severe environmental constraints to development. Slopes exceeding 25 percent are present on almost every remaining undeveloped parcel in the city. Geotechnical studies are required when new homes are constructed, and mitigation is often required to reduce the potential for future damage. The City's Site Plan Review Process and grading requirements are intended to strictly limit recontouring of existing terrain. Most grading occurs through "cut and fill" procedures that retain materials on site. This adds to local housing costs and limits the viability of multi-family housing on most properties in the city.

Landslide Hazards

Figure 5.2 shows landslide zones in Rolling Hills, as mapped by the California Geological Survey (CGS). Large portions of the city are considered hazardous and major slides have occurred in the past. This includes the Flying Triangle Landslide, which has impacted roads, homes, and properties in the southern part of the city for the last 50 years. These areas are poorly suited for development and are susceptible to slope failure. Human modifications to slopes (through development) can exacerbate the problem and the risk.

Building at the head of a landslide can decrease the bedrock strength along an existing or potential rupture surface and "drive" the landslide down slope. Improper grading practices can also trigger existing landslides. Because of these geologic hazards, the City limits land disturbance and other actions that would exacerbate soil instability. Ground instability would contribute to potential risks to human life as well as to physical structures. The Safety Element of the General Plan sets forth policies to restrict new development and expansion of existing development in areas susceptible to landslides.

Earthquake Hazards

Like most of Southern California, Rolling Hills is vulnerable to earthquakes. Large earthquakes can cause building damage and collapse, as well as damage to roads and utilities. The City of Rolling Hills is crossed by the Cabrillo Fault, which is part of the Palos Verdes Fault Zone. It is also vulnerable to earthquakes on the Whittier Fault, the Newport-Inglewood Fault, the Malibu Fault, the Santa Monica Fault, the Redondo Canyon Fault. The location of these faults is shown on Figure 5.3.

The Whittier and Newport-Inglewood Faults are considered capable of generating earthquakes with magnitudes greater than 7.0 and have the potential to cause catastrophic damage. In the event of a major earthquake on either fault, the city of Rolling Hills would be vulnerable to ground shaking. Secondary hazards include liquefaction, earthquake-induced landslides and differential settlement. Fault rupture is not a significant hazard in the city, and there are no Alquist Priolo "special studies" zones within the city limits.

Wildfire

As shown on Figure 5.4, the entire city of Rolling Hills has been designated a "Very High Wildfire Hazard Severity Zone" by CalFire. The city's terrain creates challenges for vegetation management and presents conditions where a fire can travel quickly up and down canyon slopes. Despite defensible space requirements, the city's rural nature and equestrian heritage means that extensive areas are covered by dense scrub and brush. The Palos Verdes Peninsula has a history of destructive wildfire, including fires that destroyed homes in 1973, 1993, 2009, and 2018.

The City has taken measures to reduce fire hazards, including preparing a Community Wildfire Protection Plan in 2020. The Plan outlines measures to harden infrastructure, improve vegetation management, underground electric power lines, and improve inspections and enforcement. It also includes provisions for evacuation. Additionally, the City (and Los Angeles County) require special building safety measures, including standards for roofing, eaves, exterior finishes, and buffer zones that respond to the higher fire hazard levels.

Despite these measures, the risks of wildfire cannot be eliminated entirely. Moreover, the city continues to face evacuation constraints resulting from its narrow roads, limited ingress and egress points, and the presence of livestock on many properties.

Biological Resources

Rolling Hills supports a variety of plant and wildlife species, including some that are listed or under consideration for listing by the U.S. Department of Fish and Wildlife and/or the California Department of Fish and Wildlife. These species include the Palos Verdes Blue butterfly, the California Gnatcatcher, the Pacific Pocket Mouse, the San Diego Horned Lizard, and Brackishwater snail. Development that could adversely impact the habitat of these species must undergo review and approval by the overseeing federal and state agencies. Typical mitigation measures include preservation of habitat, further restricting the potential land available for development. This constraint is likely to continue throughout the planning period.

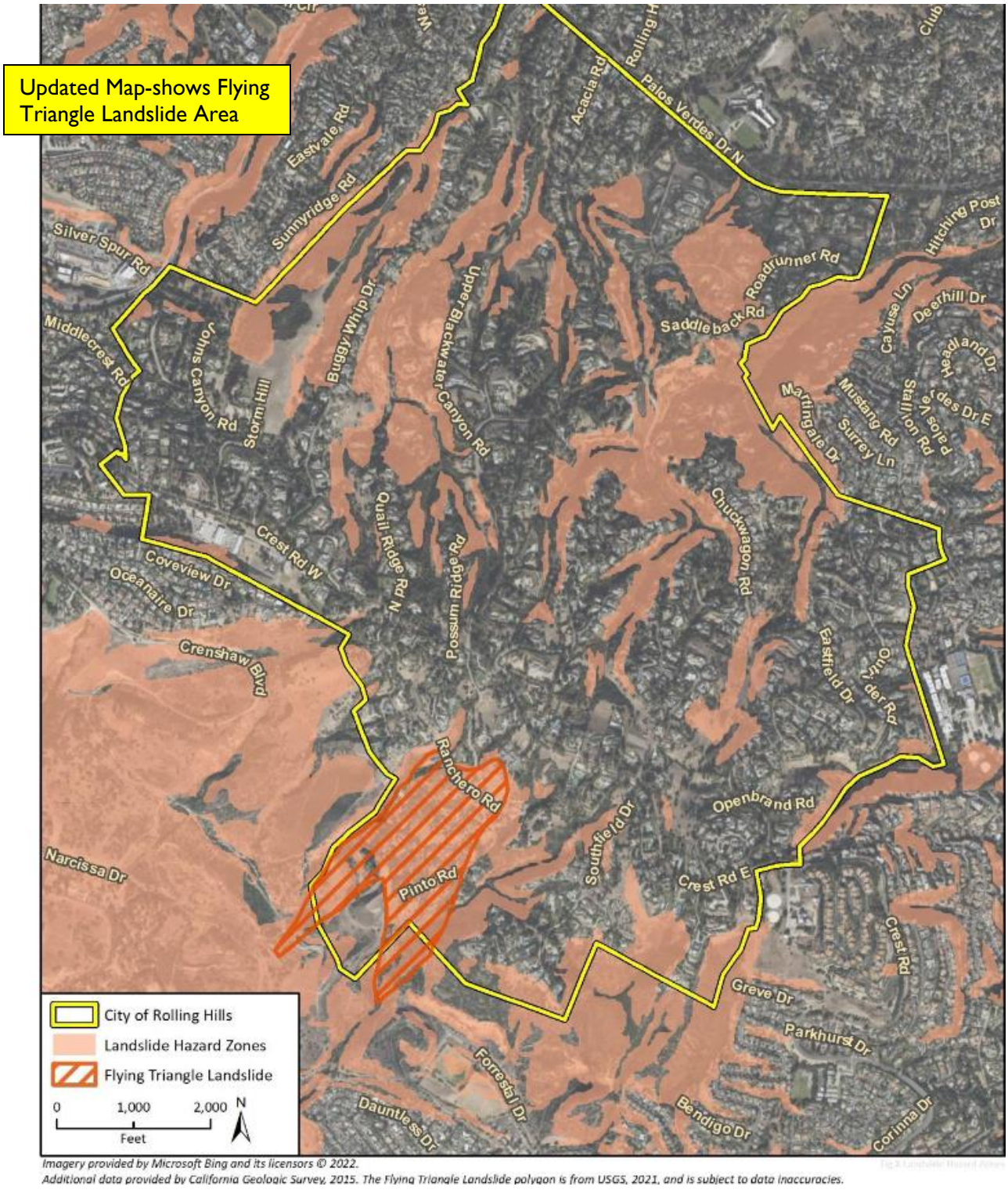


Figure 5.2: Landslide Hazard Areas in Rolling *Source: Draft Rolling Hills Amended Safety Element, 2021*



Imagery provided by ESRI, Microsoft Bing and its licensors © 2020. Additional data provided by California Department of Conservation, California Geological Survey, 2016.

Source: Draft Rolling Hills Amended Safety Element, 2021

Figure 5.3: Earthquake Faults in the Rolling Hills Vicinity



Imagery provided by Microsoft Bing and its licensors © 2020.
Additional data provided by CalFire, 2020.

Source: Draft Rolling Hills Amended Safety Element, 2021

Figure 5.4: CalFire "Very High" Fire Hazard Severity Zones

6. Housing Goals, Policies, Objectives, and Programs

Chapter 6 provides the City's housing plan for the next eight years. The plan has three components:

- A statement of the City's goals and policies for housing. The goals and policies balance State mandates and Government Code requirements with local needs and priorities.
- An action program. The action program identifies the specific, measurable steps the City will take during 2021-2029 to implement the policies.
- Measurable objectives for housing production. These objectives correspond to the City's Regional Housing Needs Allocation (RHNA) and also include numeric targets for housing rehabilitation and conservation.

6.1 Goals and Policies

The following goals and policies reflect the City's continued commitment to actively support residential development and plan for the City's fair share of regional housing needs:

GOAL 1: Provide housing opportunities which meet the needs of existing and future Rolling Hills' residents.

Policy 1.1: Accommodate Rolling Hills' share of the region's housing needs in a way that protects public safety, responds to infrastructure constraints and natural hazards, recognizes market conditions, and respects the historic context and land use pattern in the city.

Policy 1.2: Allow the development of a variety of housing types in the city, including multi-family housing. While Rolling Hills will remain a rural equestrian community, housing opportunities will be provided for all income groups as required by State law.

Policy 1.3: Facilitate development on the remaining vacant buildable lots in the city in a manner consistent with adopted zoning standards.

Policy 1.4: Allow Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) in all residential zones. Maintain objective standards to ensure that ADUs and JADUs are compatible with the community; minimize visual, parking, traffic, and other impacts; and respect neighborhood context.

Policy 1.5: Explore incentives to create and maintain Accessory Dwelling Units that are affordable to low and very low income households.

Policy 1.6: Encourage the conversion of existing guest houses and other habitable accessory buildings into legal ADUs.

Policy 1.7: Work with other governmental entities and the non-profit community to support the development of affordable or senior housing on the Palos Verdes Peninsula and in nearby South Bay cities.

Policy 1.8: Maintain planning and building procedures that maximize efficiency and reduce permit processing times and high fees. Encourage public understanding of the planning and building processes to reduce project costs and delays.

GOAL 2: Maintain and enhance the quality of residential neighborhoods in Rolling Hills.

Policy 2.1: Encourage and facilitate the maintenance and improvement of existing homes.

Policy 2.2: Ensure that new housing and home improvements comply with building code and fire safety requirements.

Policy 2.3: Maintain a code enforcement program, including procedures to remediate violations.

Policy 2.4: Require the design of home improvements, additions, ADUs, and infill housing to minimize impacts on existing residences. Include objective standards in the zoning ordinance that protect visual quality, privacy, and community character.

Policy 2.5: Mitigate hazards that could potentially cause a loss of housing units in the city, including wildfires, landslides, and earthquakes. Encourage home hardening and defensible space to minimize the potential for housing loss during a natural disaster.

Policy 2.6 Prohibit the use of ADUs as short-term rentals in order to maintain their viability as permanent housing units.

Policy 2.7: Encourage weatherization, energy conservation, and renewable energy to increase energy efficiency and reduce home energy costs.

GOAL 3: Address the housing needs of older adults and others in the community with special housing needs.

Policy 3.1: Provide reference and referral services for seniors, such as in-home care and counseling for housing-related issues.

Policy 3.2: Support shared housing programs and room rentals as options for seniors to remain in the community without financial hardship.

Policy 3.3: Encourage housing opportunities for live-in care givers, domestic employees, and family members who may assist elderly or mobility-impaired residents who wish to age in place.

Policy 3.4: Consider participation in state and federal programs that assist lower income and senior households in home repair and maintenance.

Policy 3.5: Strive to meet the needs of extremely low-income Rolling Hills residents, including seniors on fixed incomes.

Policy 3.6: Encourage the retrofitting of existing Rolling Hills homes so they are accessible to the disabled, including persons with developmental disabilities. Provide reasonable accommodations in rules, policies, practices, and procedures for disabled persons to ensure equal access to housing.

Policy 3.7: Participate in countywide programs to meet the needs of unsheltered residents and others who may need emergency housing assistance.

GOAL 4: Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, disability status, or national origin.

Policy 4.1: Affirmatively further fair housing by ensuring that housing opportunities for persons of all income levels, races and ethnicities, and physical abilities are available in Rolling Hills.

Policy 4.2: Enforce all applicable laws and policies pertaining to equal housing opportunity and discrimination. Maintain third party agreements to follow-up on and correct alleged violations.

Policy 4.3 Make information on fair housing laws available to residents and realtors in the City by providing information on the City's website and print media at the City Hall public counter.

Policy 4.4: Ensure effective and informed community participation in local housing decisions. This should include special efforts to include traditionally underrepresented groups, including persons working or providing services in Rolling Hills.

Policy 4.5: Distribute affordable housing opportunities around the city by focusing on ADUs as a housing strategy.

Policy 4.6: Participate in regional forums and initiatives to promote fair housing.

6.2 Housing Implementation Plan, 2021-2029

The goals and policies set forth in the Housing Element will be implemented through a series of housing programs. Some of these programs are already underway and others will be implemented over the next eight years. This section of the Housing Element provides a brief description of each program, including measurable objectives, responsible entities, and implementation timeframes. Each of these programs has been developed consistent with HCD guidelines and State Government Code requirements.

Program 1: Annual Progress Report

As required by State law, the City will prepare and file an annual report on the progress made toward implementing its Housing Element using forms and definitions adopted by the California Department of Housing and Community Development (HCD). Guidance on the content of the report is provided by the State Office of Planning and Research. It documents the City's progress toward meeting its share of regional housing needs and efforts to remove government constraints to housing production. The report must be presented to the City Council prior to its submittal (it may be approved as a consent item).

Quantified Objective:	Provide one report per year
Funding Source:	City General Fund
Responsible Agency:	Planning and Community Services Department
Implementation Time Frame:	File by April 1 of each year

Program 2: Rancho Del Mar Opportunity Site Monitoring

In February 2021, the City adopted the Rancho Del Mar Overlay Zone on the 31-acre Rancho Del Mar (RDM) campus owned by the Palos Verdes Unified School District. As documented in Chapter 4 and Appendix B of this Housing Element, large parts of the RDM site are unimproved and vacant. The new zoning permits 16 affordable multi-family units on the site, which may be developed "by right" at a minimum density of 20 units per acre.

The City Manager will meet at least once annually with the School Superintendent to discuss the future of the site, including future development opportunities. Next steps to be pursued on the site include:

- ~~Exploring the feasibility of s~~Subdividing the site to create a separate parcel west of the PVPTA transit facility. This site could potentially be more easily marketed as a development opportunity than the 31-acre site as a whole.[1]
- Preparation of a "fact sheet" for the site, for review by the School Superintendent and School Board, highlighting the potential for multi-family housing
- Further discussions with the School Board regarding opportunities for teacher housing and/or senior housing on the site.

[1] *Subdivision is not required to develop the site—it can also be developed "as is" in 2022. However, subdivision could provide an incentive for future development during the planning period.*

- In collaboration with the School District, make information on the site (e.g., the "Fact Sheet") available to affordable housing developers.
- Further discussions with non-profit developers regarding the opportunity to construct housing on the site, including technical assistance to developers where requested.
- Consideration of permit streamlining, CEQA clearance, and fee reductions for future affordable housing development on the site. Multi-family housing is already permitted "by right" subject to objective design standards adopted in February 2021, but further steps could be taken to reduce future development costs.

Quantified Objectives:	(1) 16 units of affordable housing on the RDM site (2) Annual meeting between the City Manager and School Superintendent
Funding Source:	City General Fund
Responsible Agency:	City Manager
Implementation Time Frame:	~~Once annually, beginning in 2021~~ (1) Meeting with School Superintendent by end of 2022 and once annually thereafter (2) Preparation of site "fact sheet" for review by School District and School Board by June 2023 (3) Subdivision creating "western" parcel by end of 2023, subject to School Superintendent and Board approval

Program 3: No Net Loss Monitoring and Other Multi-Family Housing Opportunities

The City has identified adequate capacity to accommodate 45 units of housing, as required by the Regional Housing Needs Allocation. Sixteen of these units are on the Rancho Del Mar Site. Five are new single family homes on vacant lots (three of which are already approved). The remainder are Accessory Dwelling Units. Rolling Hills will continue to maintain General Plan and zoning designations that facilitate development of the required number of units and will continue to comply with the Housing Accountability Act in the event projects are proposed.

SB 166 (2017) requires that every city maintain "adequate sites" to accommodate its RHNA by income category at all times during the eight-year Housing Element period. If a designated housing opportunity site becomes unavailable, the city must demonstrate that it still has adequate capacity on its remaining sites (e.g., "no net loss"). In the event the Rancho Del Mar site becomes unavailable to produce the housing units envisioned by the overlay zone, the City would need another suitable site to accommodate those units.

Cities generally meet the no net loss mandate by providing one or more "buffer" sites in addition to their primary sites. These sites must meet HCD criteria, including the ability to accommodate 16 units at a density of at least 20 units per acre. As demonstrated in Chapter 4, due to the lack of sewer and the community's natural hazards, Rolling Hills does not have a buffer site available. The City will continue to explore potential housing sites that could supplement the RDM site, particularly where sanitary sewer service could be made available in the future. The City will continue to rely on accessory dwelling units to meet the balance of its lower-income housing assignment, regardless.

Quantified Objectives:	No net loss of housing capacity to meet RHNA at all times
Funding Source:	City General Fund/ Permitting Fees
Responsible Agency:	Planning and Community Services Department
Implementation Time Frame:	Continuous through 2029

Program 4: Add Definitions of Transitional and Supportive Housing, Residential Care Facilities, and Employee Housing, to Municipal Code

To comply with Government Code Section 65583(c)(3), the City of Rolling Hills must clarify that residential care facilities, transitional housing, and supportive housing are considered residential uses and are subject to the same restrictions that apply to the other residential uses that are allowed in a given zoning district. In other words, a single family home used as a group home for persons with disabilities is subject to the same planning and zoning requirements that apply to a single family home used by a traditional family. Most local governments have addressed this requirement by adding definitions to their zoning codes for transitional and supportive housing, as well as large and small residential care facilities.

The purpose of this program is to add those definitions to the Rolling Hills Municipal Code (Chapter 17). The definitions would acknowledge that such housing is permitted ~~or conditionally permitted~~ in the same manner as other residential dwellings of the same type in the same zone as required by State law. The Code amendments will ensure that no special requirements are placed on residential care facilities with seven or more occupants, as required by State law. Definitions of ~~small licensed residential care facilities (for six of fewer residents) and~~ low barrier navigation centers also will be added to the Code and referenced in other zoning regulations, as required by State law.

This program also includes a Municipal Code Amendment to add a definition for employee housing in accordance with the California Health and Safety Code (HSC). HSC Section 17021.5 states that employee housing providing accommodations for six or fewer people shall be deemed a single family structure with a residential land use designation. It further states that employee housing may not be considered a boarding house, rooming house, hotel, dormitory, or similar term that implies that such housing is a business run for profit or differs in any other way from a single family dwelling. State law precludes a city from requiring a conditional use permit, zoning variance or other zoning variance for such housing, and stipulates that the use of a single family dwelling for six of fewer employees does not constitute a change of occupancy for building code purposes.

Quantified Objectives:	Council Action Adopting Definitions
Funding Source:	City General Fund
Responsible Agency:	Planning and Community Services Department/ City Attorney
Implementation Time Frame:	Complete by December 2022

Program 5: Density Bonus Ordinance

Section 65915 of the California Government Code establishes mandatory statewide provisions for density bonuses for affordable and senior housing projects. Rolling Hills does not currently have density bonus provisions in its Municipal Code. Historically, the City has not had multi-family housing, nor any site where multi-family housing could be constructed. With the creation of the Rancho Del Mar Overlay Zone, a developer could request a density bonus and related concessions from a developer. State standards would apply in this instance. The City should adopt provisions in its Municipal Code acknowledging the applicability of State density bonus laws in the event a request is received.

Quantified Objectives:	Municipal Code amendment related to Density Bonuses
Funding Source:	General Fund
Responsible Agency:	Planning and Community Services Department
Implementation Time Frame:	Complete by December 2022

Program 6: Accessory Dwelling Unit (ADU) Production, Monitoring, and Incentives

As noted in Chapter 4, the City intends to meet its Regional Housing Needs Allocation of 29 lower income units through a combination of affordable housing on the Rancho Del Mar site (16 units) and privately constructed and rented ADUs on scattered sites throughout the city. At least 13 ADUs should meet affordability thresholds for low and very low income households.[2] Creating opportunities for lower income households on scattered sites supports one of the main objectives of the State's Affirmatively Further Fair Housing (AFFH) requirements, which is to avoid the concentration of lower income housing in a single location. An ADU-centered strategy also responds to the lack of sanitary sewer, storm drainage, and public streets in Rolling Hills and the community's rural densities and absence of supportive services.

As stated in Chapter 4, the City approved nine ADUs in 2021 alone, including two that are projected to be affordable to lower income households based on their small size. Thus, creating another 11 ADUs affordable to lower income households over the next eight years is an attainable goal. The Annual Housing Progress Report should address the City's progress toward meeting this goal; if the City is falling short after two years, the strategy should be revisited and additional incentives should be developed.

Program 6 includes a number of specific elements, which are listed below:

6.1 Develop Citywide Roster of ADUs. The City developed an ADU roster in October 2021 and will expand the roster as new units are created. Currently, the roster (or data base) contains fields such as Address, Owner, month approved, square footage, and a description of each unit. This should be expanded to include information on whether the unit is occupied, the number of occupants, and the rent charged—this information would be requested from homeowners on a voluntary basis. Tracking occupancy and affordability is intended to determine how many units are serving very low- and low-income households, and to demonstrate that the City is meeting its RHNA.

[2] *Two ADUs meeting affordability criteria for low/very low are already under construction (see Table 4.1), leaving a balance of 11 needed.*

6.2 Annual ADU Survey and Monitoring. The City will send an annual letter to households on the ADU roster requesting information on the status of the unit. The information will be used to prepare a summary that can be referenced as part of the City's Annual Progress Report. As part of this task, the City will also identify instances where very low or extremely low income households (including family members, domestic employees, caregivers, etc.) are residing on Rolling Hills properties and paying below market rent (or no rent). To the extent these households are occupying independent living quarters, this data provides evidence that the City is accommodating its RHNA target for very low income households.

As part of this effort, the City will also implement an annual monitoring program to ensure that the Housing Element targets for ADUs are being achieved. A determination of the City's progress toward meeting its RHNA target of 40 units over 2021-2029 shall be made once per year. In the event the City is not on track to meet its target, it will consider alternative means of meeting its RHNA goals within six months of this determination. These could include additional ADU incentives, modifications to the affordable housing overlay zone, and other actions that would facilitate production of additional affordable units.

6.3 Develop Inventory of Potential ADUs. Over time, the City will develop a parcel data base of potential (or "unintended") ADUs, which are existing habitable spaces that could potentially be converted into independent dwelling units. This would include guest houses, pool houses, and similar accessory structures that are used by the primary residence. As the inventory is completed, owners would be advised of the opportunity to convert the space into a legal ADU.

6.4 Incentives for ADU Construction. The City will develop incentives for ADU construction. Different incentives may be developed for those building new homes (i.e., reduced fees for including an ADU in a new residence), those adding a new ADU on their property, and those converting existing habitable floor space into an ADU. In accordance with California Health and Safety Code (HSC), Section 65583(c)(7) (effective January 1, 2021), the City will explore the use of State CalHome, LEAP, REAP, and SB 2 funding to help local homeowners build or finance ADUs on their properties. Access to these funds typically requires rents that are affordable to low and very low-income households.

6.5 Pre-Approved ADU Plans. The City will determine its eligibility for State grant funding to develop "pre-approved" plans for ADUs that can be used by Rolling Hills residents. These architect-developed plans would be specifically tailored to meet the RHCA design guidelines and would respond to the topography and access constraints found on most Rolling Hills lots. Enabling homeowners to use pre-approved plans may reduce architectural design costs, and potentially reduce construction costs. This can make ADUs more feasible and allow them to be rented more affordably.

6.6 Coordination with RHCA. The City will coordinate with the Rolling Hills Community Association to ensure that RHCA's design review practices and procedures do not constrain ADU construction or add to their costs. City staff will meet with RHCA staff and the RHCA Architectural Committee regularly to coordinate review, advise RHCA of State laws relating to ADUs, and address any issues that may arise in the future. The City will also work with the Rolling Hills Community Association to explore reduction of annual HOA fees for

property owners agreeing to limit rents on their ADUs.

6.7 Septic Tank Replacement Grants or Financial Assistance. The City will pursue funding for a grant which can be used to assist homeowners with septic tank replacement when paired with the addition of an ADU. The grants would be targeted to lower income seniors who may seek to add an ADU but lack the financial resources to replace their septic tanks.

6.8 Non-Profit Construction of ADUs. The City will explore the possibility of engaging a non-profit housing developer in a program to develop ADUs in partnership with interested Rolling Hills property owners. Participation could be limited to qualifying lower income residents, or to homeowners who agree to limit rents to levels that are affordable to lower income households. Such a program was successfully implemented by the City of Santa Cruz, in collaboration with Habitat for Humanity, and could be considered locally.

6.9 Monitor Best Practices in ADUs. The City will continue to track statewide and national trends in ADU management, incentives, and regulations. The focus will be on cities in California that are comparable to Rolling Hills in density, character, and constraints, with an eye toward cities that are relying on ADUs to meet a substantial share of their RHNA for lower income households. Programs that are potentially transferable to Rolling Hills will be considered for local implementation.

6.10 Update Municipal Code Provisions for ADUs. By October 15, 2022, the City will update its ADU ordinance to reflect changes to State law made since the last revision to the ordinance in February 2020. This includes eliminating references to a maximum bedroom count in an ADU and including provisions for complete applications to be deemed approved if they are not acted upon within 60 days.

6.11 Outreach to ADU Permit Recipients. The City will monitor ADU approvals, including six-month "check-ins" with all applicants receiving ADU permits until the units are completed. These check-ins will include status updates on the projects, including whether a building permit has been issued and what progress is being made. In the event an applicant chooses not to follow through on an approved ADU, staff will make an effort to document the reasons and evaluate any changes that might be made to the City's ADU program to improve completion rates. This information should be part of the City's annual housing progress report.

In addition to the specific measures listed above, City staff will continue to assist homeowners who are interested in adding an ADU, and will work with applicants to facilitate ADU review, permitting, and approval.

Quantified Objectives:
(1) Citywide ADU roster of 40 ADUs by 2029, including at least 13 ADUs rented at levels meeting affordability criteria for lower income households
(2) ADU Survey, administered once a year
(3) Inventory of potential ADUs
(4) ADU Incentives
(5) Two to four pre-approved ADU architectural plans
(6) Municipal Code Revisions (see 6.10 above)

(7) 100% completion of ADUs receiving permits

Funding Source: City General Fund/ State grants

Responsible Agency: Planning and Community Services Department/ City Attorney

Implementation Time Frame: (1) Rosters and Surveys prepared by 2022 and updated annually
(2) ADU incentives by 2023
(3) Approved architectural plans by 2024, or as funding allows
(4) Amend Municipal Code Chapter 17.28 (Accessory Dwelling Units) for consistency with State law by October 15, 2022
(5) Establish protocol for 6-month check-ins with ADU permit recipients by January 1, 2023
(6) Annual monitoring report on ADU production

Program 7: Accessory Dwelling Unit (ADU) Outreach, Education, and Information

Program 7 addresses public outreach, education, and information on ADUs. Like Program 6, it has multiple elements.

7.1 Biennial Mailing. The City will send a mailing to all households in Rolling Hills at least once every two years advising them of the opportunity to create an ADU, the potential benefits of having an ADU, and potential incentives in the event the ADU will be occupied by a household worker, caregiver, family member, or other household meeting the definition of a low or very low income household. The mailing may consist of an article in the City's monthly newsletter.

7.2 Website. The City will develop a landing page on its website with information on ADU opportunities ("Thinking about building an ADU?"). The website landing page will include information on the types of ADUs an owner may consider (detached, attached, junior, etc.), the typical cost and cost considerations, financing options, tax implications, development standards, tenant selection, and so on. The information should also be provided in printed form for interested homeowners.

7.3 RHCA Design Guidelines Update. The City will work with the Rolling Hills Community Association to facilitate an update of the RHCA Design Guidelines so that they address ADUs. Currently, the Guidelines do not acknowledge ADUs at all. The Update would provide objective design standards for ADUs that are consistent with Rolling Hills zoning standards as well as the design guidelines that currently apply.

Quantified Objectives: (1) Mailings to all Rolling Hills households (at least once every 2 years)
(2) Updated City website
(3) Updated Design Guidelines document

Funding Source: City General Fund, State grants

Responsible Agency: Planning and Community Services Department

Implementation Time Frame: (1) First mailing by December 2022
(2) Website update by June 2023
(3) Update of design guidelines by 2024

Program 8: Assist Senior and Disabled Households

The City will continue to address the housing needs of seniors and persons with disabilities by connecting those in need with social service agencies, non-profits, volunteer organizations, and other service providers, and by coordinating with the RHCA in the services and programs it provides. As noted in the Needs Assessment, more than one-third of the city's residents are over 65 and about 10 percent have one or more disabilities. The City will work with seniors, especially those on fixed incomes, to evaluate housing needs and resources. Within 18 months of Housing Element adoption, the City Council will convene a study session jointly with the RHCA Needs of Seniors Committee and at least one local non-profit serving seniors (such as Peninsula Seniors) to discuss the needs of Rolling Hills seniors and potential programs to address these needs.

Several of the programs listed elsewhere in this Element (shared housing, assistance with home maintenance, reduced utility rates, etc.) are primarily intended to benefit lower income seniors. The City also will support expanded opportunities for persons with disabilities, including the use of universal design principles and accessibility standards in new construction and ADUs. As part of this program, Rolling Hills will also work with the Harbor Regional Center to implement outreach services to Rolling Hills families on services available to persons with developmental disabilities. The City's website will be updated to include links to housing and supportive services for seniors and disabled persons.

Quantified Objectives:	Website landing page with senior housing resources Facilitate age-in-place retrofits for 10 senior households City Council study session on needs of seniors and potential actions to assist Rolling Hills seniors
Funding Source:	City General Fund
Responsible Agency:	Planning and Community Services Department/ City Manager
Implementation Time Frame:	June 2023 (for website) Council Study Session before December 2023

Program 9: Assist Extremely Low-Income Households

Extremely Low Income (ELI) households have incomes that 30 percent or less of the County median. In 2021, the income thresholds for ELI were $24,850 for a household of one; $28,400 for a household of two; $31,950 for a household of three; and $34,450 for a household of four.

Based on CHAS data, there are 25 ELI households in Rolling Hills, representing about 3.5 percent of the city's households. The CHAS data indicated that all 25 of these households were homeowners, suggesting they are primarily seniors on fixed incomes. The City will explore ways to assist elder Rolling Hills homeowners on fixed incomes with home maintenance, repair, and retrofit activities. It will also direct these households to appropriate resources, such as shared housing services and programs to reduce utility costs.

There are additional ELI households in Rolling Hills that may not be counted in the Census data, including extended family members living in independent quarters on a property, or domestic employees (housekeepers, au pairs, personal assistants, etc.) living in guest houses, accessory buildings, or in separate quarters within the primary residence. The City will address the needs

of these households by prioritizing applications for ADUs and encouraging homeowners to create opportunities for domestic employees and family members to live "on site."

A study sponsored by SCAG in 2020 determined that 15 percent of the ADUs in the coastal Los Angeles area were likely to be available at rents affordable to Extremely Low Income Households.[3] A 2018 study further found that 17% of the ADUs in Portland, Seattle, and Vancouver were occupied by a friend or family member for free.[4] A 2014 study found that 18% of the ADUs in Portland were occupied for free or extremely low cost.[5] A 2012 UC Berkeley publication indicates that up to half of all ADUs are occupied at no cost.[6]

Based on these analyses, the City is estimating that seven "rent free" or extremely low income rentals will be added to the Rolling Hills housing stock by 2029. It will seek to document and measure progress toward this objective by soliciting voluntary reporting of such units by individual homeowners. As noted in Program 6.2, an annual survey is proposed to be administered to all registered ADU owners in the city. This would enable tracking of rent-free or reduced rent ADUs.

Quantified Objectives:	Provide seven housing units affordable to Extremely Low Income
Funding Source:	City General Fund/ Permitting Fees
Responsible Agency:	Planning and Community Services Department
Implementation Time Frame:	Prepare inventory of Extremely Low Income (ELI) units by 2024, update annually Facilitate housing assistance to at least three ELI senior homeowners by 2025

Program 10: Support Regional Efforts to End Homelessness

Extremely low-income persons also include those who are homeless or may be at risk of becoming homeless. Although the point-in-time surveys for the last five years have not counted any homeless residents in Rolling Hills, the City recognizes that homelessness is a regional problem that requires regional solutions. Rolling Hills will continue to allow emergency shelters and single room occupancy hotels in the Rancho Del Mar Overlay Zone and will monitor the effectiveness of its regulations in its Annual Housing Progress Report.

The City will continue to work with adjacent communities on emergency shelter referrals. As a member of SCAG and the South Bay Cities COG, staff and elected officials participate in forums and discussions of homelessness, and potential programs and resources to end homelessness and increase the supply of shelter, transitional, and supportive housing in Greater Los Angeles.

Quantified Objectives:	Participation in point in time surveys; participation in at least one regional meeting annually on strategies to end homelessness
Funding Source:	City General Fund/ Permitting Fees
Responsible Agency:	Planning and Community Services Department/ City Manager
Implementation Time Frame:	Ongoing, 2021 through 2029

[3] *SCAG Regional Accessory Dwelling Unit Affordability Analysis, 2020*
[4] *Jumpstarting the Market for ADUs. Terner Center (for ULI), San Francisco, 2018*
[5] *ADUs in Portland OR. Environmental Solutions Management, 2014*
[6] *Scaling Up Secondary Unit Production in the East Bay. Berkeley Institute of Regional Development, 2012*

Program 11: Permit Streamlining

The City will continue its efforts to expedite permit processing, ensure efficiency, and reduce administrative and processing costs for new development. This could include provisions for reduced fees for ADUs that are rented at below market levels, or occupied by qualifying lower income households. As part of the annual budgeting process, the City will ensure that fees are appropriate for the services provided, and will consider ways to improve the permitting and entitlement processes.

Quantified Objectives:	Compliance with all provisions of the Permit Streamlining Act
Funding Source:	City General Fund/ Permitting Fees
Responsible Agency:	City Manager/ Finance Director/ Planning and Community Services Department/ LA County Building and Safety
Implementation Time Frame:	Ongoing, 2021 through 2029

Program 12: Facilitate Communication with Affordable Housing Service Providers, Developers, and Advocates

The City of Rolling Hills periodically receives requests from housing advocates, non-profit developers, and service providers to disseminate information on affordable housing needs and opportunities and work collaboratively to address housing issues. City planning staff regularly field requests from for-profit and non-profit developers, participate in regional housing meetings and discussions, and work with other cities to explore creative, effective ways to meet housing needs. In the event a non-profit agency or developer wishes to submit a grant application that will increase housing affordability for senior or low income Rolling Hills residents, staff will provide administrative support wherever possible.

Quantified Objective:	Hold at least one meeting a year with one or more non-profit housing sponsors to discuss housing opportunities and needs in Rolling Hills
Funding Source:	General Fund
Responsible Agency:	Planning and Community Services Department
Implementation Time Frame:	Convene one meeting before December 2022. Convene additional meetings at least once a year from 2023 to 2029.

Program 13: Shared Housing

Shared housing enables homeowners to offset their housing costs by receiving rent, or get additional help in managing housing duties. It also creates a resource for lower income households in the community, including college-aged students and young adults, caregivers, domestic workers, landscapers and building industry workers, child care workers, teachers, and other public service employees. It can also be a resource for seniors, some of whom may no longer wish to live alone or lack the financial resources to live alone.

Residents in Rolling Hills have access to two nearby shared housing programs: Focal Point at the South Bay Senior Services Center in Torrance and the Anderson Senior Center in San Pedro. Both these centers offer resources to assist seniors locate roommates interested in sharing housing. These programs make roommate matches between seniors based on telephone requests.

Numerous other home sharing services have emerged over the last decade. These include SHARE! Collaborative Housing, a public-private partnership supporting shared single family housing for persons with disabilities in Los Angeles County; Affordable Living for the Aging, which matches younger single tenants with seniors in Los Angeles County; and Los Angeles County HomeShare, which serves residents of all ages throughout the County. There are also private services such as Silverleaf (Long Beach) that facilitate home sharing for a fee.

The City will continue to apprise residents about shared housing programs by providing information at the public counter and online.

Quantified Objectives:	Continue to provide informational brochures advertising shared housing programs at City Hall and on the City's website
Funding Source:	City General Fund
Responsible Agency:	Planning and Community Services Department
Implementation Time Frame:	Establish website links by December 2022

Program 14: Sewer Feasibility Studies and Phase One Construction

As indicated in Section 5.3.5 of this Housing Element, Rolling Hills does not have a sanitary sewer system. With a few exceptions, the entire city is served by private septic systems. Septic system installation is costly and requires customized design to reflect steep terrain. The cost of installing sanitary sewers and storm drains would be even more costly, as it would likely require easements, force mains, and lift stations.

The City recently completed design drawings for a sanitary sewer extension through adjacent Rolling Hills Estates that will bring service to Rolling Hills City Hall and the Tennis Courts. A future phase of this project could continue southward along Portuguese Bend Road, allowing some Rolling Hills homes and a number of vacant properties to be served by sewer. A survey done by the City in 2021 indicated there was strong support for a sewer extension project, contingent on the cost to each homeowner. There is currently no funding source for such an extension. Grant funding would be required, as it would reduce the cost burden on homeowners and make the project more feasible.

The City will continue to work toward addressing this constraint during the 2021-29 planning period. This includes:

- Developing the initial phase of the project, serving City Hall and the Tennis Courts
- Conducting feasibility and cost studies for a future phase to serve privately owned homes and parcels in the northern part of Rolling Hills
- Pursuing funding for future phases
- Continuing to poll Rolling Hills residents on their level of support for the project

In addition, the City continues to monitor water quality issues related to its MS 4 permit for stormwater discharge. Efforts to address runoff quality and implement best management practices to reduce pollution are ongoing and will continue.

Quantified Objective:	(1) Complete 1,585-foot sanitary sewer extension to City Hall/ Tennis Courts (Phase I) (2) Complete feasibility / cost study of sanitary sewer extension (3) Obtain grants for Phase I project construction
Funding Source:	General Fund/ State grants
Responsible Agency:	City Manager
Implementation Time Frame:	Complete Phase I by 2024 Determine viability of future phases and available grants by 2023

Program 15: Consider Participation in CDBG Urban County Program

At least once every two years, the City should re-evaluate the feasibility of joining the Los Angeles Urban County CDBG program in order to create a funding source for home improvements for qualifying lower income Rolling Hills residents. The decision should consider the potential amount of funding that could be received by the city, and potential uses for that funding, as well as the administrative costs, reporting requirements, and staff resources required to carry out the program. In the event the City receives CDBG grants, it could consider using the funding to assist qualifying lower income households with energy efficiency improvements, housing rehabilitation and improvements, or septic tank replacement.

Quantified Objectives:	Prepare staff report to City Council regarding participation in Urban County CDBG program
Funding Source:	City General Fund
Responsible Agency:	City Manager/ Finance Director
Implementation Time Frame:	By 2023, and every two years thereafter

Program 16: Code Enforcement

The City will continue code enforcement and nuisance abatement activities to ensure the safety and habitability of housing in Rolling Hills. While property maintenance in Rolling Hills is excellent, there is a need for ongoing enforcement of planning and building codes. The City has a "Code Enforcement" webpage with online forms for reporting suspected violations, including those relating to vegetation management and outdoor lighting as well as unpermitted construction or nuisances. Periodic information on code enforcement resources and requirements is also provided to residents through the City's monthly newsletter.

Quantified Objective:	Respond to 100 percent of resident Code Enforcement inquiries
Funding Source:	General Fund
Responsible Agency:	Planning and Community Services Department
Implementation Time Frame:	Ongoing, 2021-2029

Program 17: Reduce Home Energy Costs

Energy bills can be a significant cost burden, particularly for households on fixed incomes with large homes to heat and cool. The City has adopted the Green Building Code and enforces Title 24 energy efficiency requirements through its contract with the Los Angeles County Department of Building and Safety. New residential projects, including new homes, ADUs, renovations, and additions, will continue to be required to meet Title 24 standards. These requirements result in energy savings which reduce gas and electric consumption and home utility bills.

Rolling Hills also works with Southern California Edison to distribute information to residents on energy conservation and weatherization, including information on financial assistance and lower utility rates for low-income customers. The City will provide links on its website to assist lower income residents in accessing information on reduced utility rates. Rolling Hills is also a member of the South Bay Environmental Services Center, which provides information on energy incentives, audits and rebates. These programs will continue in the future.

The City will also support resident installation of solar energy systems. A growing number of Rolling Hills homeowners have installed photovoltaic panels, increasing energy independence and resilience while reducing home energy costs.

Quantified Objective:	(1) Provide links on City website related to energy conservation, weatherization, and financial assistance (2) Adopt updated Building Code standards for energy efficiency
Funding Source:	General Fund, LIHEAP
Responsible Agency:	Planning and Community Services Department
Implementation Time Frame:	Website Update, with links: Complete by January 2023

Program 18: Facilitate New Construction and Home Improvements

The City will continue to work with property owners, architects, and builders to enable new housing to be built in the City. Continued cooperation and communication between City staff, applicants, and neighbors will facilitate the construction of new housing. The City is committed to efficient planning, building, and inspection procedures, and regularly seeks ways to improve the process and reduce delays.

With few vacant lots remaining, most construction projects in Rolling Hills consist of home additions, repairs and modernization, or replacement of existing dwellings. Continued investment in Rolling Hills housing stock is strongly encouraged and will continue to be supported in the future. Although the City does not provide direct financial assistance to lower income homeowners, it assists owners in keeping costs down through permit streamlining and fees that are generally below average compared to other cities in Los Angeles County.

Quantified Objective:	5 new single family homes (above moderate income)
Funding Source:	Private Funds (Permitting Fees)
Responsible Agency:	Planning and Community Services Department, LA County Building and Safety
Implementation Time Frame:	Objective covers the period from 2021 through 2029

Program 19: Remediate Geologic Hazards

The City will continue to explore solutions to ground stability and landslide problems. Grading, new structures and additions typically require a soils and geology report along with grading and building permits. The City has developed strict grading practices that limit grading to no more than 40 percent of the lot and require maintenance of natural slopes. These practices are necessary to safeguard the public against ground instability.

The City will support repair work on landslide-damaged homes and hillsides that have been damaged or compromised by past landslides. The City will strive to avoid further loss of its housing stock as a result of natural disasters, including landslides and wildfires.

Quantified Objective:	Geologic studies for new development and major grading permits
Funding Source:	City General Fund
Responsible Agency:	Planning and Community Services Department/ City Manager
Implementation Time Frame:	On-going, 2021 to 2029

Program 20: Fair Housing Services Program Administration

The City will complete a Fair Housing Outreach and Enforcement Options Memorandum to determine options for ensuring that existing and prospective residents have access to fair housing services, and that property owners are apprised of Fair Housing laws and practices. This could include an agreement ~~contract~~ with a third party fair housing services provider to promote and affirmatively further fair housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, disability, or other characteristics protected by state and federal fair housing law. Other alternatives for outreach, education, and enforcement may be considered. Based on the findings of the Memorandum, the City will implement Fair Housing measures, including Programs 21 and 22 described below. ~~City will also contact the fair housing service provider annually to obtain information on cases and referrals originating in Rolling Hills.~~

Quantified Objective:	Fair Housing Outreach and Enforcement Memorandum ~~Active contract with a fair housing services provider~~
Funding Source:	General Fund
Responsible Agency:	City Manager
Implementation Time Frame:	Complete memorandum ~~B~~by December 2022~~; renew Agreement as needed~~

Program 21: Fair Housing Outreach

The City will provide information on fair housing resources on its website, including ~~a~~ links to ~~the~~ fair housing service~~s provider~~. Other outreach measures to be implemented include posting regulations regarding housing discrimination, as well as phone contacts, at City Hall and periodically providing this information in the City's newsletter.

The City will also provide a referral process for any person who believes they have been denied access to housing because of their race, sex, marital status, ancestry, national origin, color, familial status or disability. In the event a complaint is received, the City will refer the party to a fair ~~the City's~~ housing service provider for follow up and work with the complainant to resolve the issue.

Quantified Objective: Active contract with fair housing services provider
Funding Source: General Fund
Responsible Agency: City Manager
Implementation Time Frame: Ongoing, 2021-2029. Website update by December 2022.

Program 22: Fair Housing Training for Staff

At least one City staff member will attend an on-line fair housing certification training class on an annual basis. These classes are typically three-hour sessions in which participants are informed and educated about federal and California fair housing laws, compliance, and illegal housing practices. The trainings cover prohibited and best practices, including language guidance for advertising housing for sale or for rent, and protected classes under federal and California law.

In addition, the City will regularly evaluate the need for multi-lingual services, including translation of material on its website into other languages. It will also continue to implement its reasonable accommodations ordinance and monitor data on persons with disabilities in the city to ensure that barriers to mobility are eliminated to the greatest extent possible.

Quantified Objective: Annual staff training
Funding Source: General Fund
Responsible Agency: City Manager
Implementation Time Frame: Initiate in 2022 and continue annually through 2029

Program 23: Written Procedures for SB 35 Projects

As required by State law, the City will prepare written procedures and application materials for projects seeking to use SB 35. Affordable multi-family housing development on the Rancho Del Mar site would be potentially eligible. The procedures would follow the provisions established by the Affordable Housing Overlay Zone, and include the objective standards and application procedures identified when that zone was adopted. Once completed, the information will be included as a PDF link on the Planning and Community Services Department website for easy access.

Quantified Objective:	Posted information on SB 35, including application form
Funding Source:	General Fund
Responsible Agency:	Planning and Community Services Department
Implementation Time Frame:	Complete by December 31, 2022

Program 24: Updating of Linked Files on Planning and Community Services Department Landing Page

AB 1483 requires that every city post current information on fees, zoning standards, design guidelines, processes and procedures, nexus studies and other pertinent information on its website. Although Rolling Hills complies with this requirement today, reorganization of the material could provide greater clarity and easier access to this information. For example, the website could include a link to the RHCA design guidelines, as well as updated flow charts and graphics showing approval processes. As noted under Program 7.2, the website also should include dedicated information about Accessory Dwelling Units (ADUs) and the steps residents can take to add an ADU on their property.

Quantified Objective:	Reorganized and updated Planning and Community Services Department website
Funding Source:	General Fund
Responsible Agency:	Planning and Community Services Department
Implementation Time Frame:	Complete by December 31, 2023

6.3 Summary of 2021-2029 Quantified Objectives

Table 6.1 provides quantified objectives for housing construction, rehabilitation, and conservation by income group. The new construction objectives align with the RHNA numbers that appear earlier in the Housing Element. The rehabilitation objective aims to assist 10 very low-income senior households over the eight year period. The conservation and preservation objectives correspond to the approximate number of households in Rolling Hills by income group based on Census data. The objectives aim to preserve housing for 100 percent of these households. There are no housing units in Rolling Hills that are at risk of conversion from affordable to market-rate.

Table 6.1: Quantified Objectives by Income Group for Rolling Hills (2021-2029)

Income Category	New Construction	Rehabilitation	Conservation/ Preservation
Extremely Low [1]	7	5	25
Very Low	13	5	45
Low	9		45
Moderate	11		25
Above Moderate	5		500
Total Housing Units	**45**	**10**	**640**

Source: SCAG Adopted Regional Housing Needs Determinations (November 2012)

[1] City's RHNA for "Very Low" income is 20 units. This has been allocated proportionally to "Extremely Low" and "Very Low" based on Table 3.8, which indicates the current proportion of "Very Low" income households in these two groups. Extremely low income households represent 35% of the "very low" total.

Table 6.2 summarizes the 2422 Housing Element programs listed in this chapter. It includes a quantified objective and timeframe for each program, as presented above.

Table 6.2: Housing Element Action Plan Summary

#	Program	Timing	Quantified Objective
1	Prepare Annual Progress Report on Housing Element implementation	Annually, by April 1	One Report per year
2	Facilitate affordable housing on Rancho Del Mar Housing Opportunity site	Annual meeting with School Superintendent Subdivision by 2024	16 lower-income units by 2029
3	No net loss monitoring/ other housing opportunities	Continuous, through 2029. Address in Annual Report.	No net loss of housing capacity for duration of planning period
4	Add definitions of transitional, supportive, employee housing and residential care facilities to Municipal Code	December 2022	Council action adopting definitions and identification of permitted uses
5	Adopt density bonus provisions in Municipal Code	December 2022	Council action adopting density bonus provisions
6	Accessory Dwelling Unit production, monitoring, and production	• Updated ADU ordinance by 10/15/22 • ADU Roster in 2021 • Annual ADU survey, starting in 2022 • Pre-approved plans in 2024 • ADU incentives in 2023 • Annual monitoring program (2023)	40 ADUs by 2029, including at least 13 ADUs affordable to lower income households
7	Accessory Dwelling Unit Outreach, Education, and Information	• First biennial mailing by end of 2022 • Website update by 6/23 • Update of design guidelines by 2024	• Outreach mailer to 639 households • ADU website landing page • ADU section added to RHCA Guidelines
8	Assist senior and disabled households	• Website update by 6/23 • Housing assistance during 2021-2029	Assist 10 lower income senior households with age in place retrofits
9	Assist extremely low income households	• Prepare inventory of ELI units by 2024	7 ADUs affordable to ELI households
10	Support regional efforts to end homelessness	Ongoing	• Participate in point-in-time surveys • Attend one mtg a year
11	Permit streamlining	Ongoing	Compliance with Permit Streamlining Act

#	Program	Timing	Quantified Objective
12	Facilitate communication with affordable housing service providers, developers, and advocates	By December 2022	• Convene at least one meeting a year
13	Shared housing	By December 2022	• Provide information on website, plus print media resources
14	Sewer feasibility studies and Phase I construction	Phase I construction (serving City Hall) by 2024	• Sewer extension to City Hall/ Tennis Courts • Feasibility study for sewer extension
15	Consider participation in Urban County CBDG Program	By 2023	Staff report and Council discussion
16	Code enforcement	Ongoing	100% follow up
17	Reduce home energy costs	By 2023	Website update
18	Facilitate new construction and home improvements	Ongoing	5 market-rate single family homes (including 3 already approved)
19	Remediate geologic hazards	Ongoing	Geologic studies for new development
20	Fair housing ~~services contract and~~ program administration	Develop fair housing compliance program by December 2022 ~~Develop agreement in 2022; renew annually or as needed~~	~~Contract with fair housing service provider~~ Fair Housing Planning Memo
21	Fair housing outreach	Website update by December 2022	• Contract with fair housing service provider • Website links or landing page
22	Fair housing training for City staff	Initiate in 2022	Annual training for at least one staff member
23	Prepare written instructions for SB 35 applications	Complete by December 31, 2022	Guidance memo and application form
24	Update Planning and Community Services website	Complete by December 31, 2023	Updated website

APPENDICES

Appendix A:
Affirmatively Furthering Fair Housing (AFFH) Evaluation

Overview

In 2018, the Governor signed Assembly Bill 686, adding a requirement that local housing elements address each community's obligation to "affirmatively further fair housing." AB 686 defined this is as:

> *"taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities that restrict access to opportunity based on protected characteristics. Specifically affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws."*

In April 2021, the California Department of Housing and Community Development issued its formal guidance memo on how local governments should address this new requirement in their housing elements. The guidance memo indicates the ways in which the AFFH mandate affects outreach and community engagement, data collection and analysis, the site inventory, identification and prioritization of "contributing factors," and the goals, policies, and programs of the housing element. It also includes data sources and other resources for local governments.

Chart A-1 summarizes the AFFH mandate; the requirements are extensive. As a result, the City of Rolling Hills has provided this appendix to address the mandatory components rather than including this information in the body of the Housing Element. The findings of this assessment have informed the policies and programs in the Housing Element.

There are limitations to the analysis presented here. Rolling Hills is a small community, comprised of a single Census Tract Block Group. It is affluent and homogenous and does not have pockets of poverty or notable disparities between its neighborhoods. Many of the AFFH maps developed by HCD simply affirm this, rather than revealing spatial patterns within the city limits. The underlying goal, which is to reduce impediments to fair housing in the city and improve housing opportunities for lower-income households, remains relevant.

In addition, Rolling Hills does not participate in the federal CBDG program as a member of the Los Angeles County Urban County designation. As such, it is not directly covered by the Analysis of Impediments to Fair Housing Choices prepared by the County Community Development Commission and Housing Authority. Some of the findings of the County Analysis are cited here, as they apply more broadly to the Palos Verdes Peninsula (Rolling Hills Estates and Rancho Palos Verdes are both members).

Chart A-1: Summary of AB 686 Requirements



Source: HCD, April 2021

The remainder of this report provides the data that is generally referred to as the AFFH analysis. This includes trends and patterns related to segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity (including persons with disabilities), and disproportionate housing needs. Unless otherwise indicated, all maps in this chapter were prepared using the AFFH data viewer from the California Department of Housing and Community Development.

Duty of All Public Agencies to Affirmatively Further Fair Housing

Federal law already requires that federal agencies administer programs in a way that affirmatively furthers fair housing. This also extends to all local governments receiving funds from the federal government. AB 686 further extended the obligation to all public agencies in the State of California. This mandate applies to administration of all programs and activities relating to housing and community development. The statute requires an examination of policies, programs, rules, practices, and activities, and where necessary, changes to promote more inclusive communities.

Outreach

The City of Rolling Hills has worked to engage all economic segments of the community in the Housing Element Update process. This included conducting more than 11 housing-focused public meetings on Zoom in 2020 and 2021, delivering newsletters with information on the Housing Element to every household in the city, and providing housing-related surveys (both paper and electronic) to every housing unit in Rolling Hills. By reaching out to every household in the city, Rolling Hills has engaged its lower income residents in the process.

Meetings have been held in the evenings to facilitate participation. The public was invited to participate in each meeting as "panelists" rather than "attendees," giving them equal footing to staff and Councilmembers/ Commissioners rather than the more limited opportunities offered by webinars. Drafts of the Housing Element were made available at City offices and on-line, with at least 30 days provided between the release of the Draft and action by the City Council.

Site Inventory

AB 686 requires that a jurisdiction identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The sites identified by the City must work to replace segregated living patterns with integrated living patterns. Rolling Hills has done this by focusing on Accessory Dwelling Units (ADUs) to meet its housing needs, rather than by zoning scattered sites throughout the city for multi-family housing. By definition, ADUs provide an effective way to achieve economic integration as they enable low and very low income households to live throughout the community rather than in segregated living patterns.

As noted throughout the Housing Element, the City currently has no multi-family housing units—thus, the designation of the Rancho Del Mar property as an affordable housing opportunity zone would not constitute a "concentration" of poverty. As the only site in the city that has sewer and storm drainage, flat buildable land, road and transit access, and relatively few natural hazards, it is the only suitable site in the city for multi-family housing (see Chapter 4). Placing multi-family

housing elsewhere in Rolling Hills---on hazardous sites prone to landslides and wildfires, without public street access or sewer facilities—would be inconsistent with the objectives of AB 686.

Fair Housing Enforcement

Fair housing enforcement is presently handled on a case-by-case basis. The State of California has an Office of Fair Housing and Equal Opportunity (FEHO) that enforces the Fair Housing Act and other civil rights authorities that prohibit discrimination. In the event a fair housing complaint is received by the City, the involved party would be referred to FEHO for investigation.

There are no pending lawsuits, enforcement actions, judgements, settlements, or findings related to fair housing and civil rights in Rolling Hills. There are currently no local fair housing laws in the City, but Rolling Hills complies with all applicable state and federal laws. These include:

- ~~The City is committed to complying with t~~The federal Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq., which the City complies with by ensuring that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status, or sex.
- The federal Americans with Disabilities Act (ADA), which the City complies with through its building code, permit review procedures, and reasonable accommodation procedures
- The California Fair Employment and Housing Act, which the City complies with through its protocols for hiring, decision-making, staff training, advertising, and legal counsel
- Government Code Section 65008 and 11135, which guide the City's procurement protocols, provide preferential treatment for affordable housing, provide equal access to housing assistance, and ensure that multi-family housing is treated fairly relative to single family housing
- Government Code Section 8899.50, which specifies AFFH requirements
- Government Code Section 65913.2, which precludes excessive subdivision standards
- Government Code Section 65302.8, which precludes certain types of municipal growth control laws (the City has none)
- Government Code Section 65583, which includes the requirement to have a housing element
- Housing Accountability Act, which is implemented through the City's development review and zoning procedures

~~An action program in the 2021-2029 Housing Element recommends that the City contract with a third party non-profit to promote the enforcement of fair housing laws, respond to complaints, and resolve complaints through conciliation, mediation, referrals, and litigation where necessary. Most cities in the region have agreements with third party non-profits that provide this service. These entities also provide on-line workshops for city staff and landlords, and offer phone and on-line counseling.~~

HCD's AFFH data viewer reports that there were zero (0) fair housing enforcement and outreach inquiries in Rolling Hills between 2013 and 2021. The City is unaware of any fair housing cases that may have occurred without being formally reported, and has not received complaints or inquiries from residents. The City is likewise unaware of any Section 8 housing choice vouchers

in use within Rolling Hills, or any instance of a prospective applicant being denied the opportunity to use a voucher within the city.

Due to the small size of the City's staff, there is not a formal fair housing training program and there is limited expertise on fair housing issues. An action program in this Element directs the City to provide fair housing training to staff, and to improve web-based and print media resources to inform residents of their rights and obligations under the Fair Housing Act. Fair housing information will also be included in the City's newsletter.

~~The City is committed to complying with the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq., by ensuring that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status, or sex.~~

Integration and Segregation

Race and Ethnicity

Chapter 3 of the Housing Element provides an overview of the racial composition of Rolling Hills and the surrounding region. In addition, Table A-1 below shows race and ethnicity data for Rolling Hills and the region (in this case Los Angeles County) for 2010 and 2020.

Relative to Los Angeles County and the greater Los Angeles region, Rolling Hills has a higher percentage of White and Asian residents, and a lower percentage of Black and Hispanic residents. This is also true of the other cities on the Palos Verdes Peninsula. Rolling Hills has have seen an increase in Asian and multi-racial residents over the last 20 years, but the aggregate Black and Hispanic population is 8.3~~7.3~~ percent compared to a countywide figure of 55.6~~56.3~~ percent. The percentage of residents who are two or more races more than doubled in Rolling Hills between 2010 and 2020, which is a much faster rate of increase than the county as a whole. However, given the city's small population, even a few households can cause percentages to shift noticeably. The most significant change is that the number of White, Non-Hispanic households in the city declined from 74.1 percent to 64.9 percent over the decade. Countywide, this percentage dropped from 27.8 percent to 25.6 percent, a smaller rate of decrease~~.~~.

Table A-1: Population Share by Race and Ethnicity, Rolling Hills and Los Angeles County

	Percent of Residents by Race in Rolling Hills		Percent of Residents by Race in Los Angeles County	
	2010	2020	2010	2020
White Non-Hispanic	74.1%	64.9%	27.8%	25.6%
Hispanic/Latino	5.5%	7.0%	47.7%	48.0%
Black	1.5%	1.3%	8.3%	7.6%
Native American	0.0%	0.1%	0.2%	0.2%
Asian	16.2%	20.4%	13.5%	14.7%
Native Hawaiian/ Pacific Islander	0.1%	0.1%	0.2%	0.2%
Other	0.2%	0.7%	0.3%	0.6%
Two or More Races	2.4%	5.6%	2.0%	3.1%

Sources: US Decennial Census, 2010 and 2020.

Since the City is comprised of a single Census tract block group, this data is most useful on a regional basis. Census tracts located several miles to the east and north of Rolling Hills, in Lomita, and in the San Pedro and Wilmington neighborhoods of Los Angeles, are more diverse. Some of the Census tracts on the Palos Verdes Peninsula have larger percentages of Asian residents, making them majority non-White.

Figure A-2 shows the "diversity index" for Census tract block groups in and around Rolling Hills. The index is an indicator of racial and ethnic diversity within a given geographic area. It considers both race and ethnicity (Hispanic or Non-Hispanic). The higher an area's number, the more diverse it is. The index ranges from zero (no diversity) to 100 (complete diversity). An area's diversity is 100 when the population is evenly divided into different race/ethnic groups. The Table indicates an index of 48.4 for Rolling Hills, indicating it is somewhat diverse. The rating is comparable to many other census tracts on the Palos Verdes Peninsula. Some tracts in Rolling Hills Estates and Rancho Palos Verdes are more diverse, while several tracts in Palos Verdes Estates are less diverse. The diversity index is considerably higher in the more urbanized tracts in San Pedro and the Harbor neighborhoods to the east.

Persons with Disabilities

Chapter 3 of the Housing Element provides information on the number of people with disabilities by disability type in Rolling Hills. Roughly 10.6 percent of the city's population has one or more disabilities compared to 9.9 percent in Los Angeles County as a whole. The higher local percentage is likely a result of the older population in Rolling Hills, where the median age is 55 compared to the County average of 36.5. This is further supported by the data shown in Table A-2, which indicates that the percentage of residents with a hearing disability and an ambulatory disability is higher in Rolling Hills than in the county as a whole. Conversely, a smaller percentage of Rolling Hills residents have cognitive disabilities, vision disabilities, and self-care limitations.

Table A-2: Percentage of Residents with a Disability, Rolling Hills and Los Angeles County

	Percent of Residents in Rolling Hills		Percent of Residents in Los Angeles County	
	2010	2020	2010	2020
Total with a Disability	N/A	**10.6%**	**9.3%**	**9.9%**
Hearing	N/A	3.7%	2.3%	2.5%
Vision	N/A	1.3%	1.8%	2.0%
Cognitive	N/A	2.1%	3.6%	4.1%
Ambulatory	N/A	6.9%	5.2%	5.8%
Self-Care	N/A	2.3%	2.6%	3.0%
Independent Living	N/A	5.0%	4.1%	5.6%

Sources: US Decennial Census, American Community Survey, Five Year Averages for 2010 and 2020. ACS 2010 indicates no data for Rolling Hills ("X").

Figure A-3 shows census tract maps for Rolling Hills and the surrounding area indicating the percentage of residents who are disabled. As Figure A-3 indicates, Rolling Hills appears within the 10-20 percent interval on the map, which is comparable to the percentage in Rancho Palos Verdes, Lomita, and the San Pedro and Wilmington neighborhoods in Los Angeles. Most of the other Census tracts in the vicinity, including those comprising the majority of Rolling Hills Estates, Palos Verdes Estates, and Torrance, are in the less than 10 percent interval. However, the difference is marginal, with Rolling Hills being less than one percentage point above the 10 percent threshold. Given that the population of Rolling Hills is significantly older than the county as a whole, the rate of disability in the city is relatively low. Compared to the disabled population in the region at large, the city's disabled residents have greater access to medical care and supportive services as a result of higher household incomes and the generational wealth accrued through home ownership and equity.

The special housing needs of persons with disabilities are addressed in Section 3.3.2 of the Housing Element.

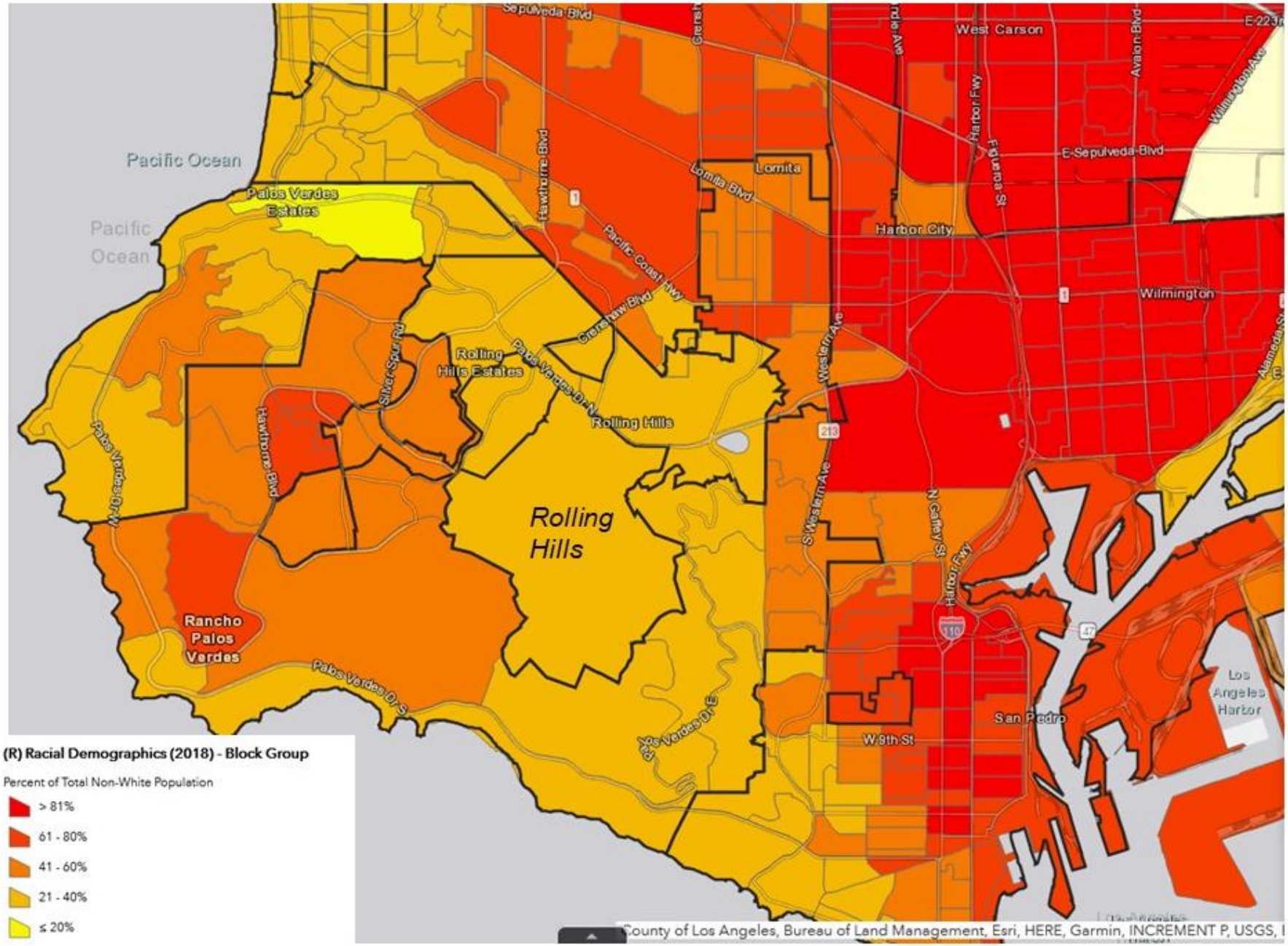


Figure A-1: AFFH Percentage of Residents who are non-White

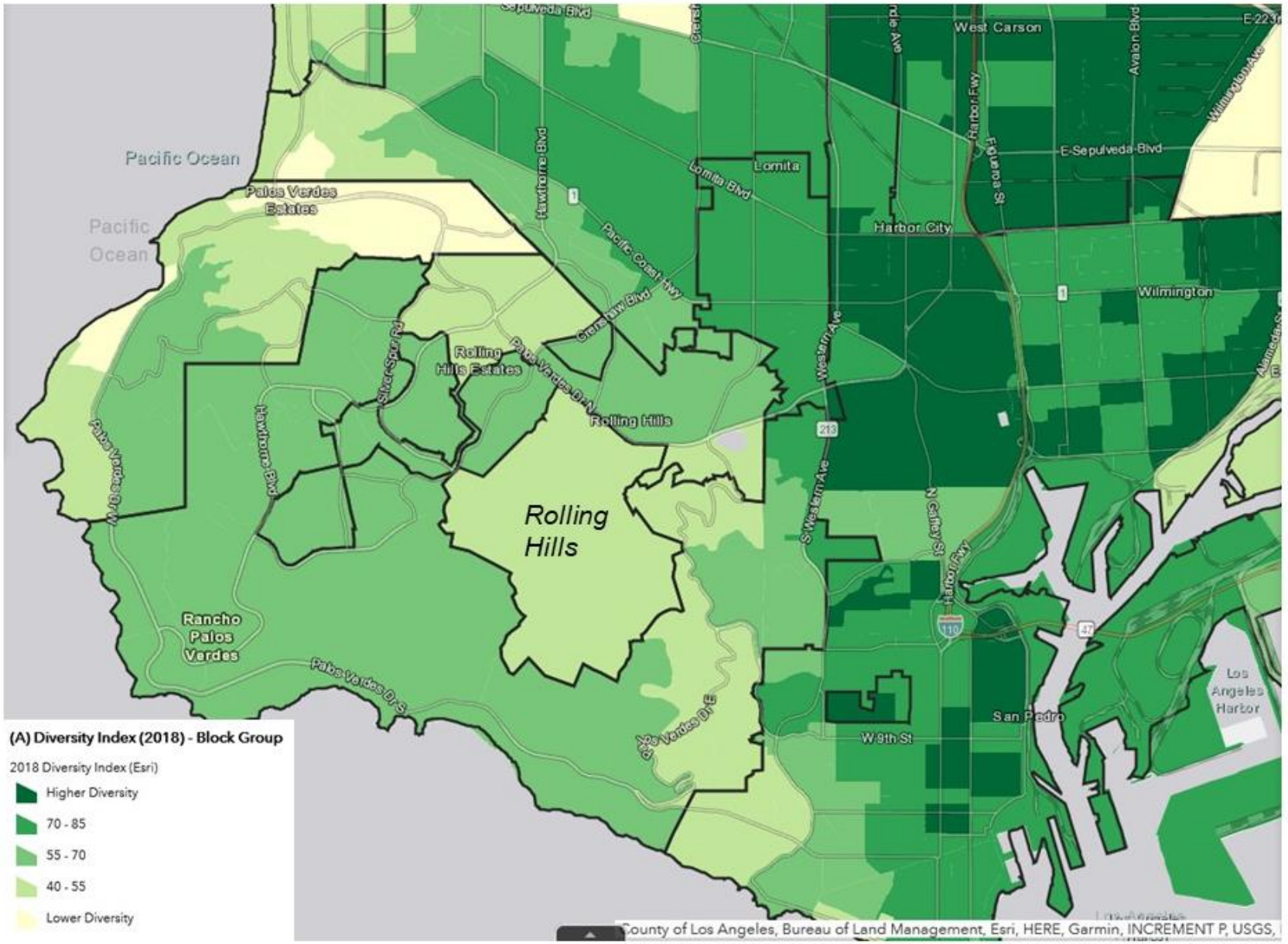


Figure A-2: AFFH Diversity Index

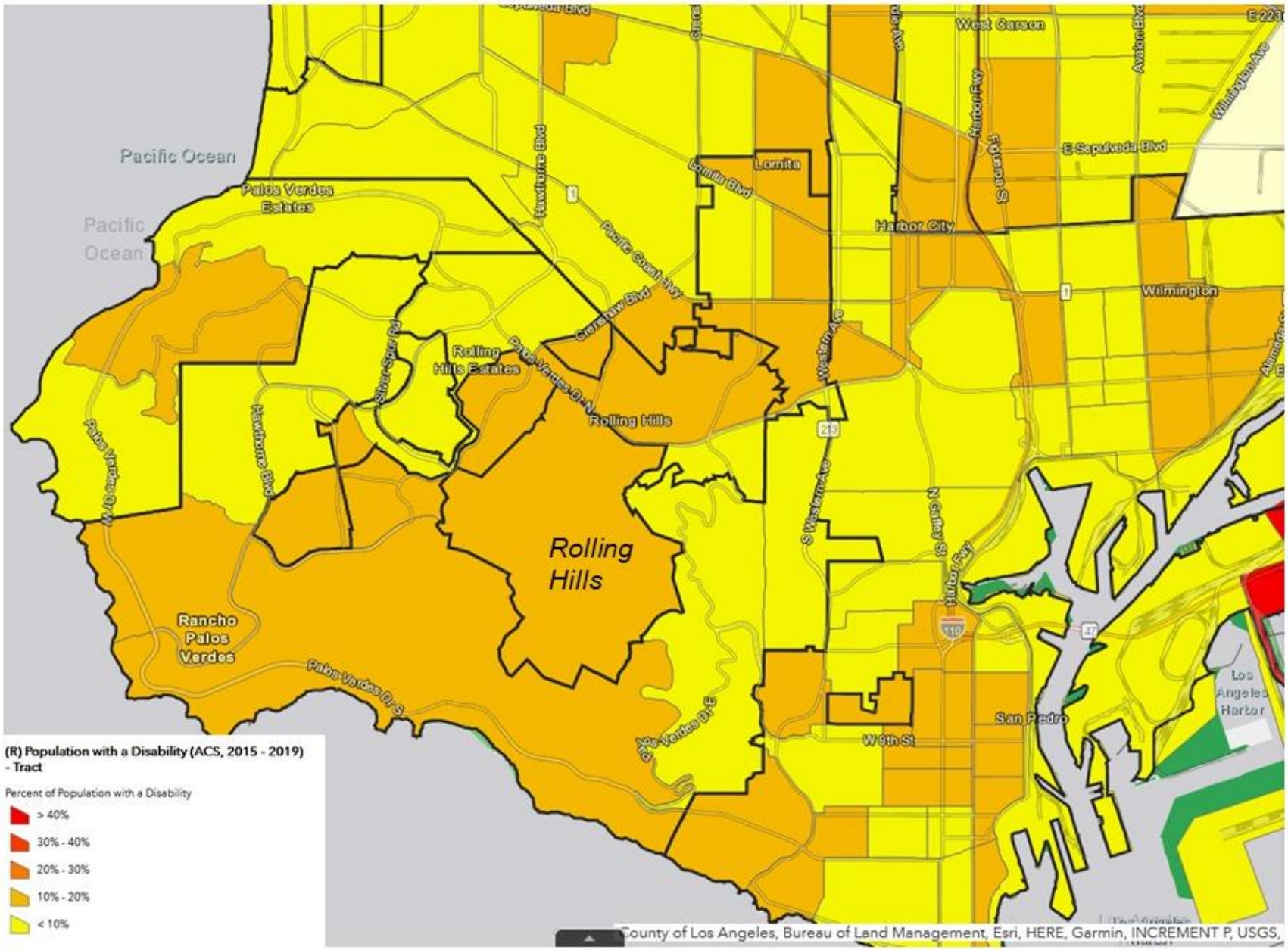


Figure A-3: AFFH Percentage of Residents with a Disability

Familial Status

The federal Fair Housing Act prohibits discrimination on the basis of familial status. This refers to the presence of children in a household, regardless of the relationship of the child to the adult members of the household. It also includes pregnant women and persons in the process of obtaining legal custody of a child. Housing that is exclusively reserved for seniors is exempt from these requirements.

Examples of familial status discrimination include refusing to rent to someone because they have a child or are a single parent, evicting a tenant if they have a child, or requiring families with children to live in a specific part of a multi-family building. Advertising that prohibits children also is prohibited.

Relative to Los Angeles County as a whole, Rolling Hills has about the same percentage of married couples with children but much lower percentages of single parent households. The 2015-2019 ACS indicated there are five single parent female households with children in Rolling Hills. Despite the small number, single parent households may have special needs due to having only one income, as well as greater needs for child care and other supportive services (see Housing Element Section 3.3.4). These obstacles can limit net income and prevent most single parents from being able to live in Rolling Hills.

Table A-3 shows familial status in Rolling Hills relative to Los Angeles County. The table compares the percentage of households in different categories, including families, married couples, other households, and non-families (including persons living alone).

Table A-3: Population by Familial Status, Rolling Hills and Los Angeles County

	Percent of Total in Rolling Hills		Percent of Total in Los Angeles County	
	2010	2020	2010	2020
Family Households	81.9%	78.7%	67.3%	66.4%
Married Couples	(75.2%)	(68.5%)	(44.5%)	(44.8%)
With children under 18 at home	*30.1%*	*17.8%*	*21.6%*	*18.8%*
Without children under 18 at home	*45.1%*	*50.7%*	*22.9%*	*26.0%*
Other Families	(6.7%)	(10.2%)	(22.9%)	(21.5%)
With children under 18 at home	*2.8%*	*3.1%*	*11.2%*	*8.8%*
Without children under 18 at home	*2.9%*	*7.1%*	*11.7%*	*12.7%*
Non-family Households	18.1%	21.3%	32.7%	33.6%

Sources: American Community Survey, Five Year Averages for 2010 and 2020. All percentages refer to the percentage of total households in Rolling Hills in the listed category. Because the categories are "nested", the numbers add up to more than 100 percent.

Relative to Los Angeles County as a whole, Rolling Hills has a much higher percentage of married couples. However, the percentage of married couples with children at home is about the same as the countywide average, and has declined substantially since 2010. More than half of the city's households are married couples with no children living at home, compared to 26 percent countywide. Only 10 percent of the city's households are "other" families (mostly single parent households), which is less than half the countywide average. Rolling Hills also has a far smaller percentage of non-family households than Los Angeles County, representing 21 percent of the city compared to 34 percent countywide. The city's demographics are indicative of a relatively stable, older population with smaller households than the county as a whole.

Figure A-4 shows familial status in Rolling Hills and surrounding areas. As the map indicates, the entire Palos Verdes Peninsula is in the same category as Rolling Hills, which corresponds to 80 percent or more of all children living in married couple households. The rate is considerably lower in adjacent cities in Los Angeles County but is still at least 60 percent in most of the South Bay cities. Rates below 60 percent occur in some of the census tracts in the Harbor area of Los Angeles, including San Pedro. Rates below 60 percent are also found beyond the South Bay, in locations such as Compton, Inglewood, Carson, Northern and Central Long Beach, and South Central Los Angeles. These are generally lower resource areas, with higher rates of poverty and unemployment, and lower rates of home ownership.

Income Level

Activities funded by federal community development and housing programs are typically designed to benefit low- and moderate-income (LMI) persons. For example, activities qualify for Community Development Block Grant (CDBG) funding if they benefit the residents of a primarily residential area where at least 51 percent of the residents are low- and moderate-income. Accordingly, HCD has used Census income data to map these areas by Census block group. This is shown in Figure A-~~4~~5.

The Figure illustrates that there are no LMI areas in Rolling Hills or in any of the adjacent communities on the Palos Verdes Peninsula. Fewer than 25 percent of Rolling Hills' residents are LMI. While there are a few block groups in Rancho Palos Verdes that are 25-50 percent, none exceed 51 percent. There are multiple LMI block groups in San Pedro and the Harbor neighborhoods east of the Palos Verdes Peninsula. There are also LMI areas in Lomita and Torrance to the north.

Figure A-~~5~~6 shows median income by Census block group. The Palos Verdes Peninsula is one of the most affluent parts of Los Angeles County, with Rolling Hills among the highest income census tracts in the County.

Figure A-7 shows median income for a larger geographic area, including most of the urbanized part of Los Angeles and Orange Counties. At the regional level, the Palos Verdes Peninsula stands out as an affluent area with incomes above $100,000. The Beach cities of Manhattan, Hermosa, and Redondo Beaches are also in this category, as are numerous census tracts on the west side of Los Angeles, the base of the San Gabriel Mountains, and Orange County. The lower income areas are generally located in central and south Los Angeles County, East Los Angeles, the southeast part of the San Fernando Valley, and the older suburbs in Orange

County. Many of these areas include high concentrations of persons of color who historically faced discrimination in the housing market.

Comparative income data between the city and region is shown in Table A-4. As the table indicates, Rolling Hills has a substantially higher income profile than the county, with well over half of its population earning over $200,000 a year, compared to 11 percent in the county as a whole. By contrast, only 15 percent of the city's households earn less than $50,000 a year, compared to 36 percent countywide. However, it is notable that the percentage of households in Rolling Hills earning less than $25,000 a year grew from 4.5 percent of the population in 2010 to 6.4 percent in 2020. This is likely due to the growing number of households aging in place and living on fixed incomes. Countywide, the percentage of households in this category declined over the decade, from 24 percent to 18 percent.

Table A-4: Household Share by Income, Rolling Hills and Los Angeles County

	Percent of Residents by Income in Rolling Hills		Percent of Residents by Income in Los Angeles County	
	2010	2020	2010	2020
Less than $10,000	1.5%	1.5%	6.8%	5.5%
$10,000-$14,999	0.7%	2.7%	6.1%	4.6%
$15,000-$24,999	2.3%	2.2%	11.1%	7.8%
$25,000-$34,999	4.8%	4.7%	9.7%	7.6%
$35,000-$49,999	2.5%	4.5%	13.5%	10.7%
$50,000-$74,999	4.9%	3.3%	17.4%	15.8%
$75,000-$99,999	4.9%	3.5%	11.7%	12.3%
$100,000-$149,999	14.1%	12.0%	12.8%	16.3%
$150,000-$199,999	11.0%	12.0%	5.3%	8.2%
$200,000 or More	53.3%	53.6%	5.5%	11.1%
Median Income	$219,688	$250,000+	$52,684	$71,358

Sources: American Community Survey, Five-Year Averages, 2010 and 2020

Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) and Affluence

Racially/ethnically concentrated areas of poverty –or R/ECAPs—are census tracts identified by HUD with a majority non-White population (greater than 50 percent) and poverty rates that exceed 40 percent or are three times the average tract poverty rate for the metropolitan area, whichever is lower. Figure A-~~8~~6 shows the location of R/ECAP areas in southern Los Angeles County, including the City of Los Angeles.

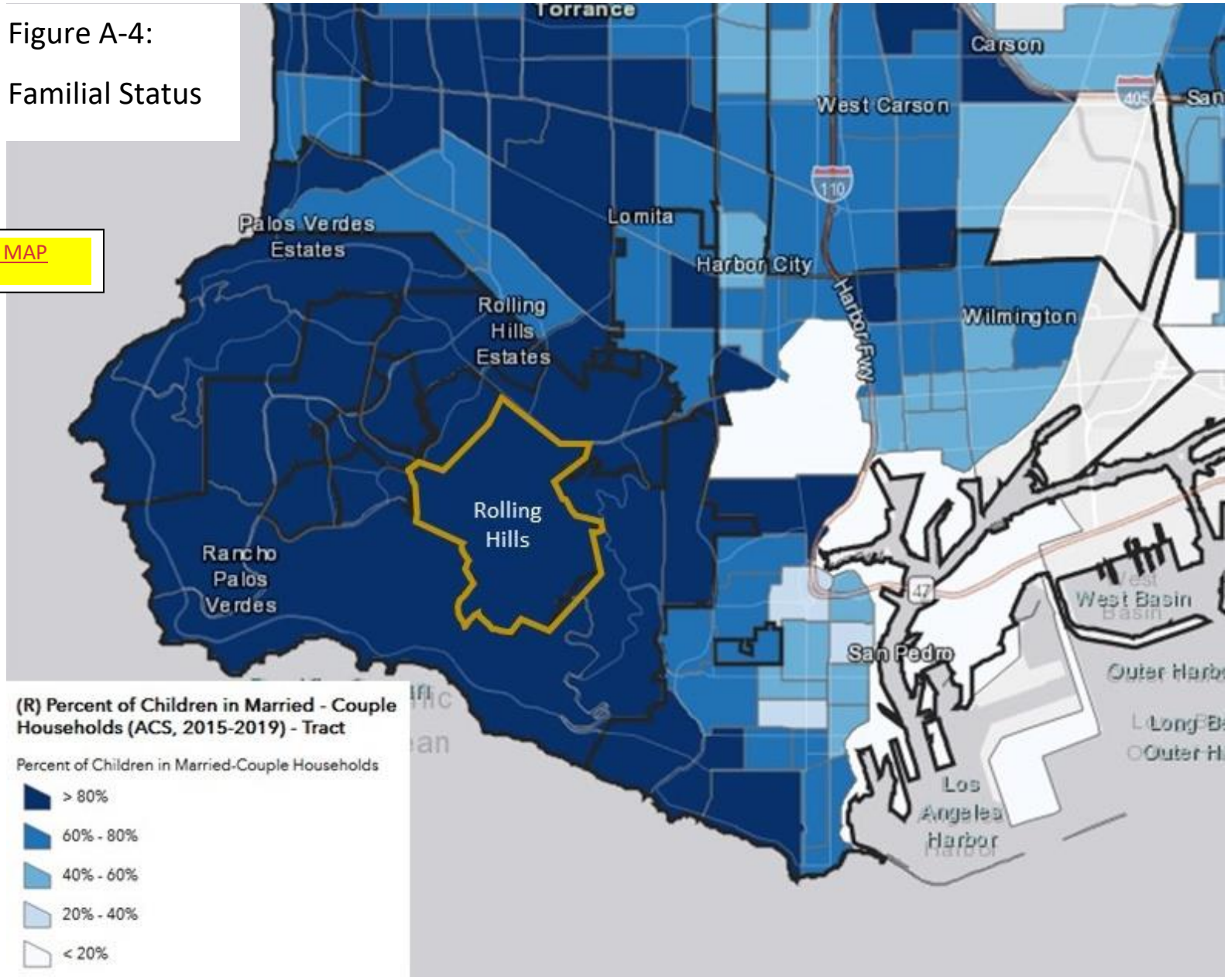
The largest concentration of R/ECAP areas in the County are in and around Downtown Los Angeles, the neighborhoods south of Downtown, and a few tracts in the Harbor area and Long Beach. There are no R/ECAP areas on the Palos Verdes Peninsula.

HCD also has identified "racially concentrated areas of affluence" (RCAAs). These are areas that exhibit both high concentrations of White residents and high concentrations of wealth. With a population that is 70 percent White, Non-Hispanic and a median income of over $250,000, all of Rolling Hills is considered an RCAA. Large areas of Rancho Palos Verdes, Rolling Hills Estates, and Rancho Palos Verdes also meet the RCAA criteria. Other parts of Los Angeles County considered to be RCAAs include Malibu, Santa Monica, Bel Air/ Brentwood, Westwood, Beverly Hills, and adjacent parts of the West Side, as well as La Canada-Flintridge and several other outlying communities.

Figure A-4:

Familial Status

NEW MAP



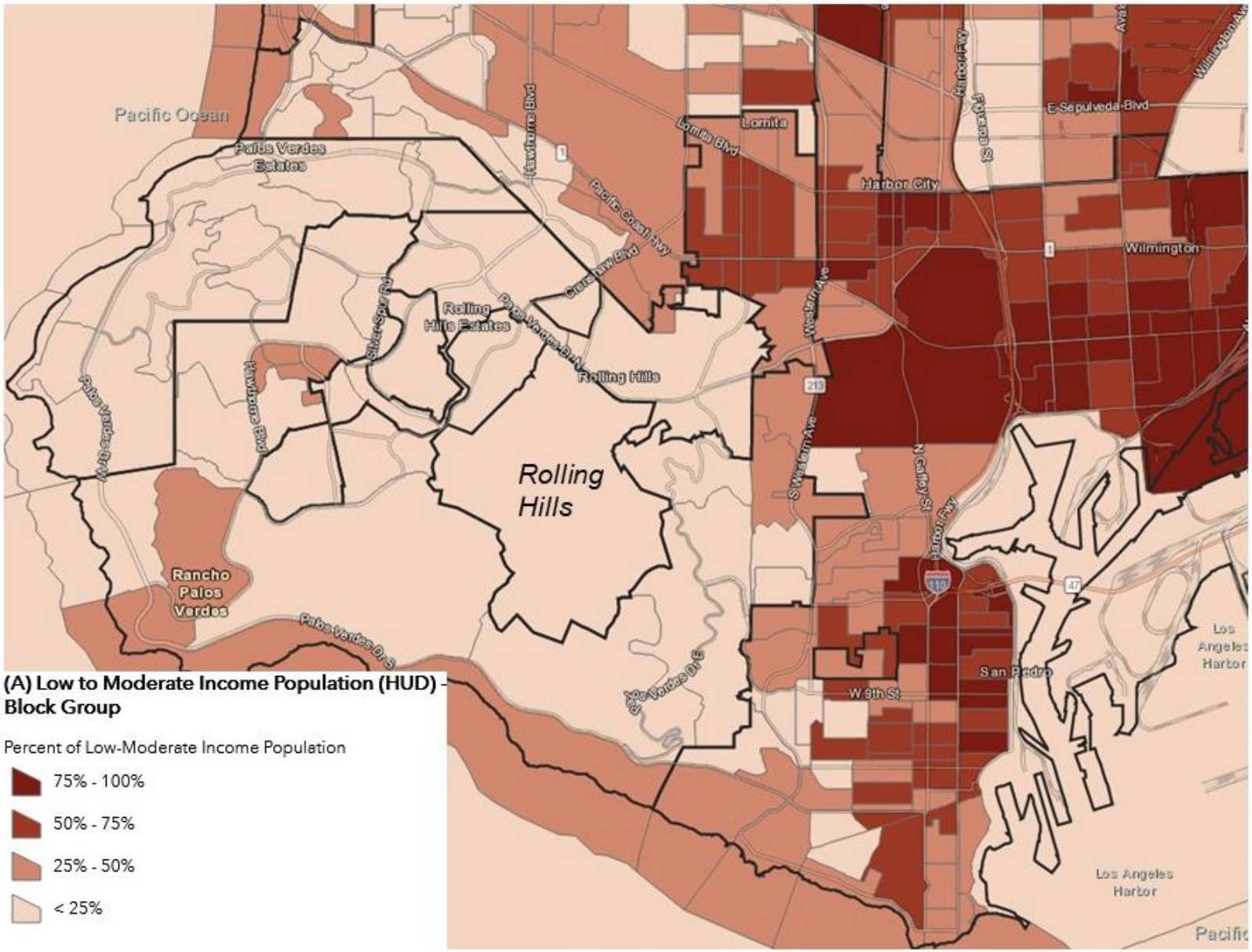


Figure A-5: Low-Moderate Income Areas (LMIs)

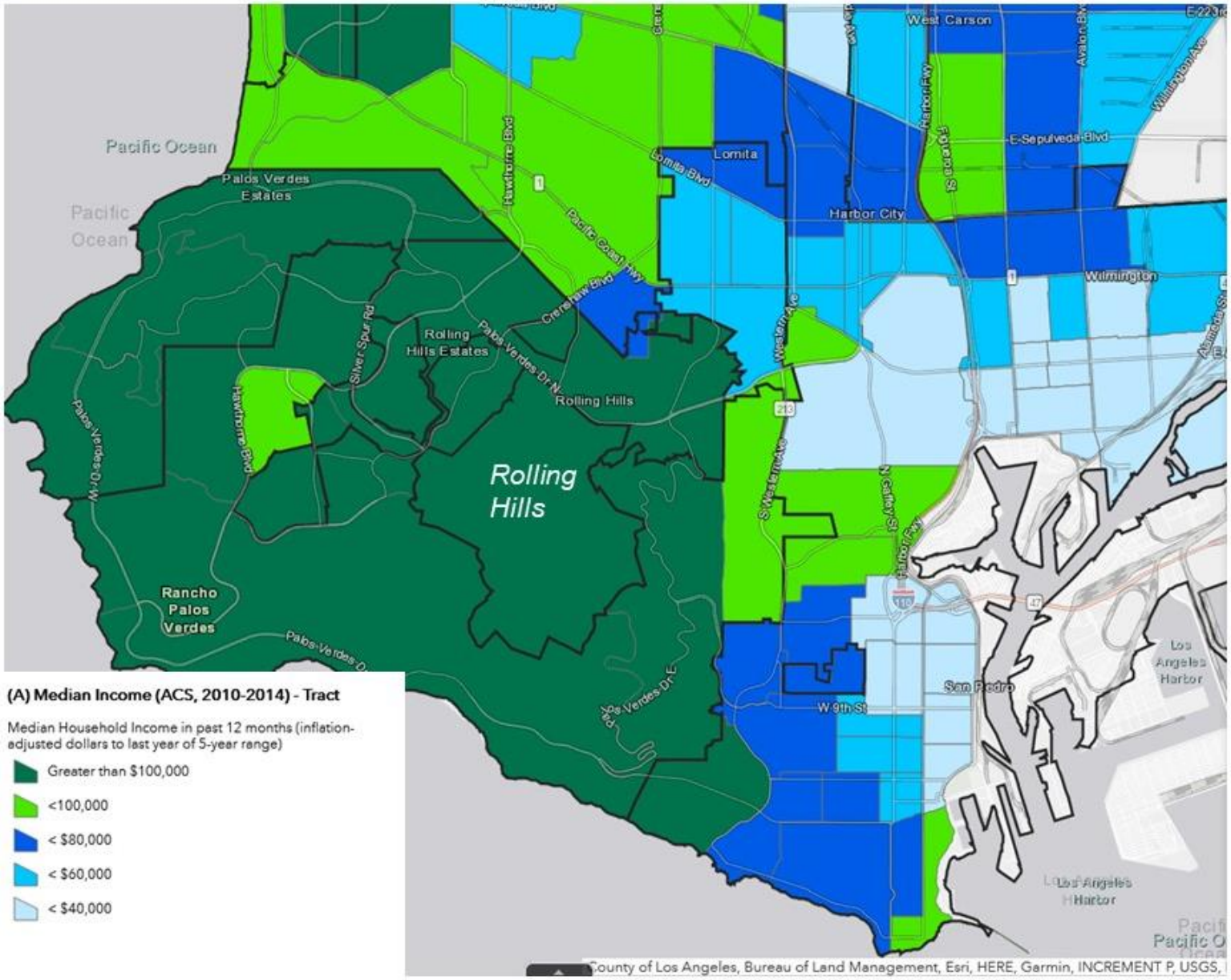


Figure A-6: Median Income by Census Tract Block Group

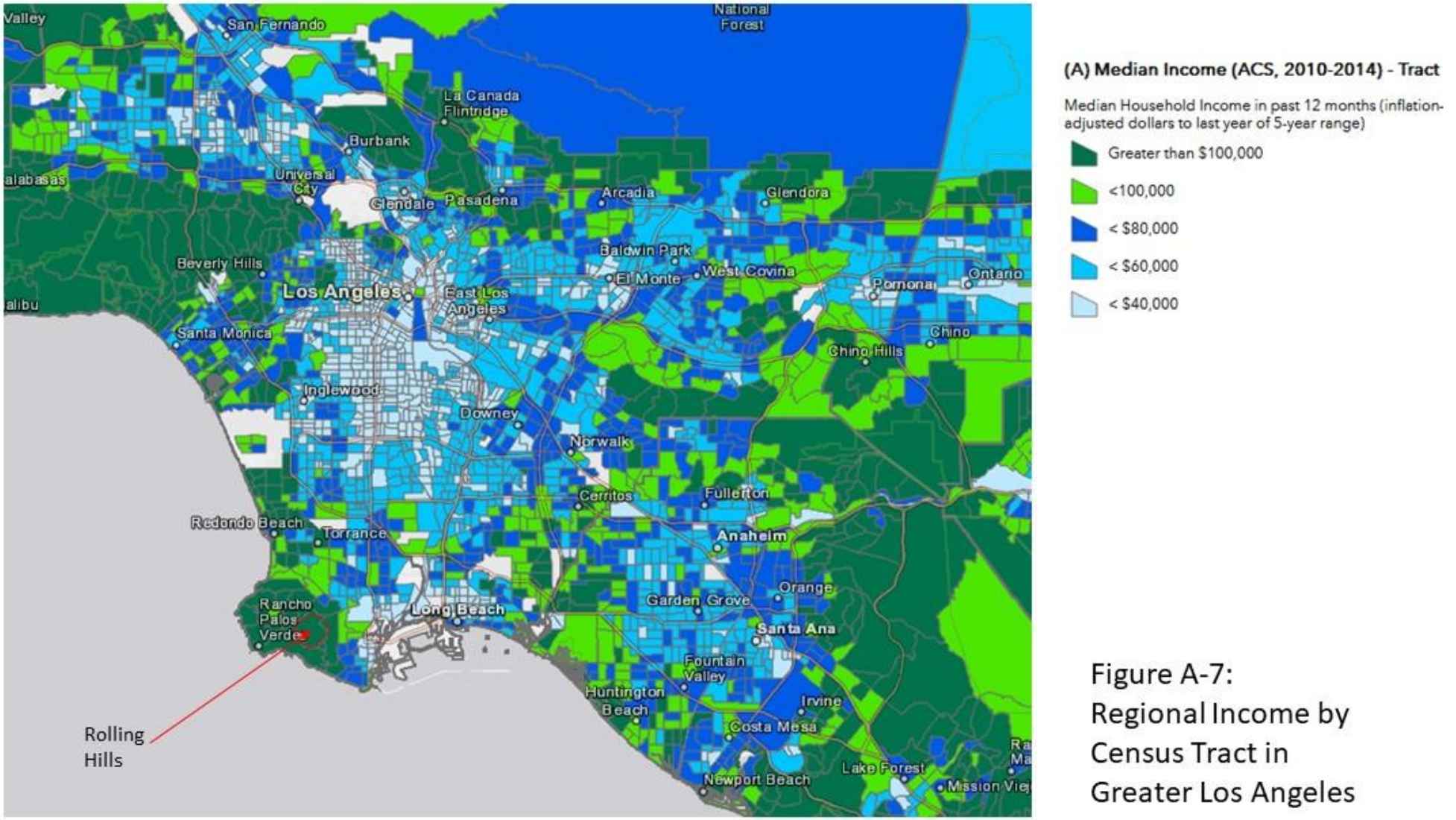


Figure A-7: Regional Income by Census Tract in Greater Los Angeles

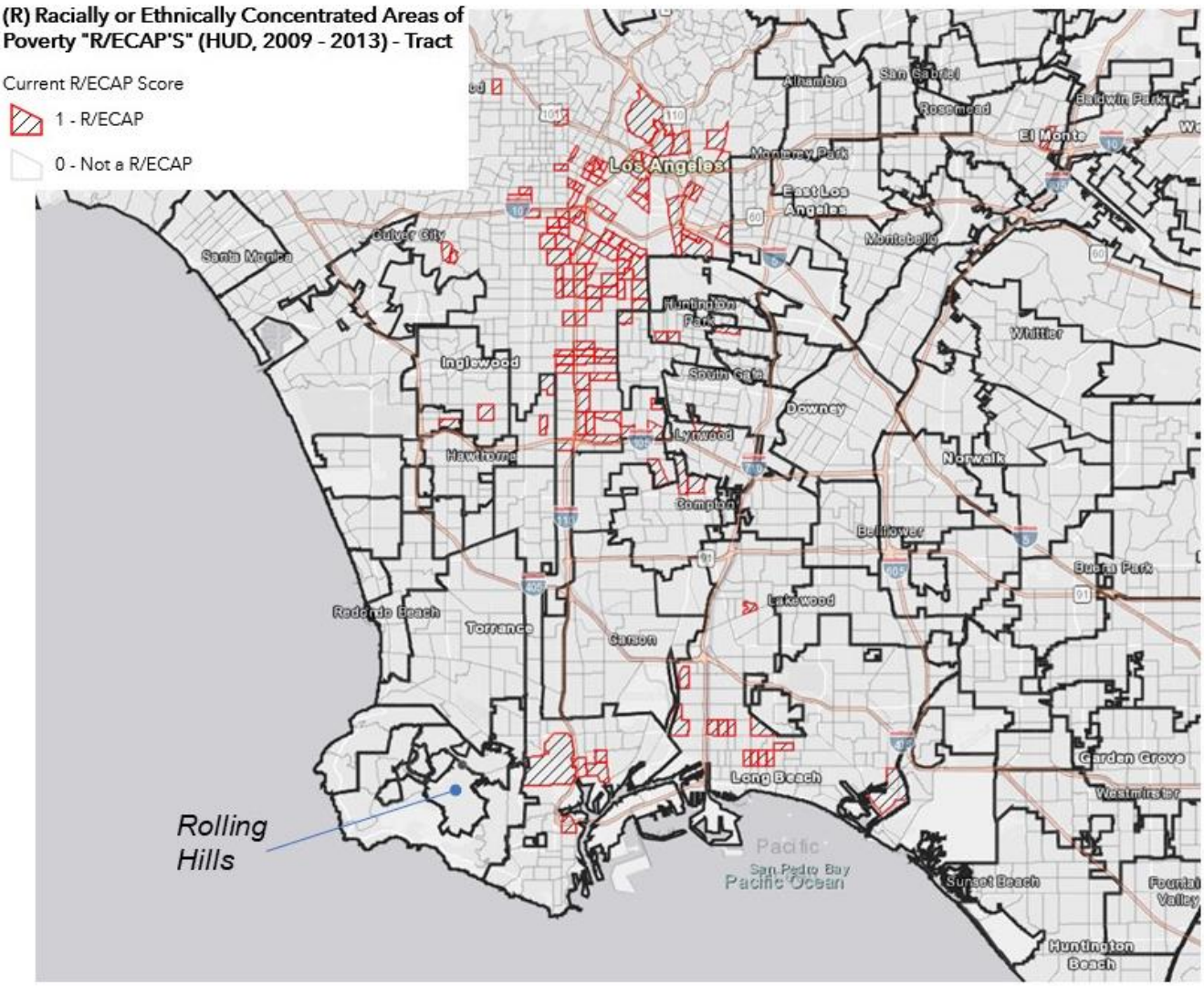


Figure A-8: Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)

Historic Context

Like many communities in Southern California, Rolling Hills reflects cultural and social norms of the era in which the city was founded and initially developed. These norms predated the Fair Housing Act and civil rights movement and included practices that excluded certain racial and ethnic groups from purchasing property.

As Table A-5 indicates, Rolling Hills is almost exclusively comprised of single family homes. Even between 2010 and 2020, the composition of the City's housing stock did not change significantly. In Los Angeles County, fewer than half of the housing units are single family detached homes and more than one-third are in multi-family buildings. The county as a whole has seen the share of multi-family units go up over time. By contrast, the California Department of Finance reports that 99.9 percent of the dwelling units in Rolling Hills are single family homes.

Table A-5: Housing Units by Type, Rolling Hills and Los Angeles County

	Number/Percent of Total in Rolling Hills		Number/Percent of Total In Los Angeles County	
	2010	2020	2010	2020
Single Family Detached	715 *99.9%*	718 *99.9%*	1,717,448 *49.9%*	1,732,045 *48.2%*
Single Family Attached	0	0	228,560 *6.6%*	234,107 *6.5%*
2-4 units	0	0	282,178 *8.2%*	295,700 *8.2%*
5+ units	1 *0.01%*	1 *0.01%*	1,156,648 *33.6%*	1,270,425 *35.4%*
Mobile Homes	0	0	58,253 *1.7%*	58,297 *1.6%*
TOTAL	**716**	**719**	**3,443,087**	**3,590,574**

Source: California Dept of Finance Table E-5, 2010 and 2020.
Note: (*) The State's data indicates that there is a building with five or more units in Rolling Hills. This is incorrect, as there are no multi-family units in Rolling Hills at this time.

The history of Rolling Hills is linked to broader early 20th Century efforts to develop the 16,000-acre Palos Verdes Peninsula as a master planned community. Prior to 1910, the entire area was farm and ranchland. Several development concepts were proposed in the 1910s and 20s, including a plan to divide the peninsula into large estates (Vanderlip, 1914) and the "Palos Verdes Project," which eventually became the City of Palos Verdes Estates. Long before Rolling Hills was subdivided, the Peninsula had gained a reputation as the "Riviera of America" and was renowned as an exclusive and beautiful place to live.[1]

A.E. Hanson became manager of the Palos Verdes Corporation in 1931. He laid out the boundaries of a development named Rolling Hills, just beyond the boundaries of the Palos Verdes Project. The community was initially marketed to residents of Los Angeles and Beverly Hills as 10 to 50 acre "dude ranches."[2] In 1936, it was reimagined as an equestrian community of one- to five-acre homesites. The initial development included 100 homesites on 600 acres. All homes were required to be one-story ranches, painted white, a requirement that remains in place today. The Covenants, Codes, and Restrictions (CC&Rs) were a strong part of the community's appeal, as they assured maintenance and uniformity throughout the years.

Rolling Hills was subdivided by a single large owner. In that respect, it is more akin to a large residential subdivision, rather than a traditional city or town with multiple land uses, developers, and housing types. Moreover, its first generation of housing consisted of modest one-story ranch-style homes, including homes smaller than 2,000 square feet. Multi-family housing was excluded from the community to retain its rural, equestrian character and to recognize what was

[1] *Morgan, Delane. The Palos Verdes Story, 1982*
[2] *Rolling Hills General Plan Land Use Element, 1990*

then a remote and rugged location with no services. As a community of small horse ranches with no sewer system, high fire danger, and private streets, construction of multi-family housing would not have made economic sense.

As the Palos Verdes Peninsula was built out at suburban densities in the 1950s and 60s, Rolling Hills retained its very low density zoning. Some of the adjacent cities on the Peninsula added multi-family housing, but the established lot pattern in Rolling Hills and its CC&Rs made this infeasible. In this respect, the CC&Rs had an exclusionary impact on the community. The City incorporated in 1957 to further protect its very low-density character. As this became a rarer commodity in southern Los Angeles County, real estate values increased substantially. Much of the original 1930s and 40s era housing stock was replaced with newer, larger housing with many more amenities. The city became a "location of choice" and became less affordable.

These changes were largely economic and driven by the dynamics of the private real estate market. They occurred after the passage of the Fair Housing Act and the era of redlining. However, the conditions were compounded by historic inequities in access to capital among racial monitories and a legacy of discriminatory lending practices in the United States. Housing opportunities for lower income households have not historically existed in the city. The city's identity and history is rooted in its low density, rural character and equestrian heritage.

Fair housing solutions that reflect the City's history and character can and should be pursued. These include creating housing opportunities on the recently rezoned Rancho Del Mar site, and encouraging greater production of accessory dwelling units in the community. They also include enforcement of fair housing laws and increased awareness of fair housing rights and practices, as well as the history of housing practices in California.

Access to Opportunity

California HCD and the California Tax Credit Allocation Committee (TCAC) convened a task force to advance fair housing through research and policy recommendations. One of the products of this effort was a series of "opportunity maps" that identify resource levels across the state. The intent of these maps is to improve the eligibility of "high resource areas" for low-income housing tax credit funding. Improving access to these funds makes it more viable to build affordable housing in these areas.

The opportunity maps depict composite data on environmental conditions (vulnerability to pollution, etc.), economic conditions (poverty, job proximity, home values), and educational conditions (graduation rates, math and reading proficiency, etc.). HCD has made these maps available through its AFFH data viewer. Conditions in Rolling Hills are depicted in Figures A-97 through A-120. On all of these maps, each census tract is assigned a value based on its level of resources. The higher the value, the more positive the outcome.

TCAC Environmental Outcomes

In this context, environmental conditions refers to environmental health and exposure to man-made hazards such as vehicle exhaust, industrial emissions, and cancer-causing chemicals. It does not refer to natural environmental hazards such as wildfire and landslides.

Figure A-97 indicates that outcomes in Rolling Hills are positive, as the community does not have industrial land uses or major pollution sources. Rolling Hills has an environmental score of 0.97, which is close to the highest possible score of 1.0. All of the Census tracts on the Palos Verdes Peninsula have scores of 0.75 or greater. Rolling Hills Estates also receives a 0.97 rating, while Rancho Palos Verdes varies from 0.82 to 0.98. Just two miles east of the city limits, near the Phillips 66 refinery, the environmental score is 0.03. Refineries and heavy industrial uses along the 110 Freeway and in the Port of Los Angeles vicinity result in low environmental rankings in a number of Census tracts around San Pedro and Wilmington. Scores are also below 0.50 around the Zamperini Airfield in Torrance, and in parts of Downtown Long Beach.

The City also is in the highest-ranking category using the Cal EnviroScreen maps and is highly ranked on the Public Health Alliance of Southern California "Healthy Places Index." Environmental outcome values are also high in the other Peninsula cities. Exposure to environmental hazards is much higher along the freeways and in the Harbor area, where industrial uses and refineries are more prevalent.

TCAC Economic Outcomes

Figure A-108 shows economic outcomes in southern Los Angeles County. This is generally a measure of wealth and access to jobs. Rolling Hills and all of the Peninsula cities are in the highest category, reflecting high rates of home ownership, high home values, and high incomes. The census tracts to the east have more diverse ratings, with low ratings in Northwest San Pedro and Wilmington.

The TCAC Opportunity Score for Rolling Hills is 0.86, which is in the highest of the four quartiles shown on the opportunity map. Neighboring census tracts in Rolling Hills Estates and Rancho

Palos Verdes have comparable scores, generally ranging from 0.75 to 0.95. Just to the east, in the Harbor neighborhoods of Los Angeles, the economic index is as low as 0.04 in some census tracts. Areas of strongly positive and much less positive economic outcomes exist in close proximity in this area, a legacy of historic land use and development patterns. To the north of Rolling Hills, the City of Torrance has economic opportunity scores that are comparable to the Palos Verdes Peninsula, despite a more moderate-income profile. Torrance is predominantly White and Asian, while the Harbor neighborhoods are primarily Latino, an indication that race and ethnicity have influenced economic opportunity in the area.

TCAC Educational Outcomes

Educational outcomes are shown in Figure A-119. Rolling Hills is in highest quartile, with positive educational outcomes. The City's score is 0.96, on a scale of zero to 1.0. This reflects the community's high wealth and access to education. Adjacent neighborhoods in Rolling Hills Estates and Rancho Palos Verdes have identical scores, while scores in the beach cities to the north are even higher. Conversely, scores step down in several bands moving to the east, with the third quartile just east of Rolling Hills, then the second quartile, and then the lowest quartile in San Pedro roughly four miles east. Low outcomes also appear in Wilmington and the ~~Less positive outcomes appear in the census tracts to the east, with the lowest outcomes in the San Pedro area and in the~~ neighborhoods around the Port of Los Angeles.

Transportation

Public transportation to and from Rolling Hills is poor and there is no transit service at all within the city limits. The Palos Verdes Peninsula Transit Authority operates buses along Palos Verdes Road North, which serve the northern edge of the city and provide service to the Peninsula's commercial centers as well as San Pedro. Connecting service is available along those routes to other transit systems (including the Metro Silver Line in San Pedro), providing connections to Los Angeles and other regional destinations. However, given the distance and travel time, these are not generally viable means of transport to workplaces. US Census data indicates that zero percent (0.0%) of the city's residents use public transit to commute to work.

Composite Opportunity Map

Figure A-120 is a composite of the TCAC analysis, taking the three above variables into consideration. The Figure affirms what is shown in Figures A-97, -108, and -119. Rolling Hills is a high-resource, high opportunity area, with positive environmental health indicators, positive economic outcomes for its residents, and access to quality education. Because of the city's small size, these opportunities are homogenously distributed across the community. The same conditions are found in the other Palos Verdes Peninsula neighborhoods, some of which have even higher composite scores than Rolling Hills.

Figure A-120 provides a more regional perspective than Figures A-97, -108, and -119. The pattern immediately evident on this map is that the coastal communities of Los Angeles County are almost all in the highest resource category. There is a swath of moderate and low resource neighborhoods extending from Downtown Los Angeles southward to the Port of Los Angeles. Areas extending from Central LA southward are highlighted on the map as having high segregation and poverty rates, corresponding with the lowest level of opportunity. Moving

further east, the pattern becomes more diffuse, with a patchwork of high, moderate, and low resource areas extending toward the San Gabriel Valley and Orange County.

The high opportunity ranking given to Rolling Hills was part of SCAG's rationale for assigning the city a large allocation in the 6th Cycle RHNA. The base number of units assigned to the city by SCAG was calibrated upward based on their "social equity adjustment," resulting in Rolling Hills' 45 units (compared to six units in 2013-2021). This reflects several mandated objectives of the RHNA methodology, including promoting socio-economic equity and balancing disproportionate household income distribution across the region.

As indicated earlier in this analysis, the Rancho Del Mar School site provides the best location to improve access to opportunity and affirmatively further fair housing within Rolling Hills. The site has the potential to improve economic outcomes for lower income households by providing affordable housing in a high-resource area.

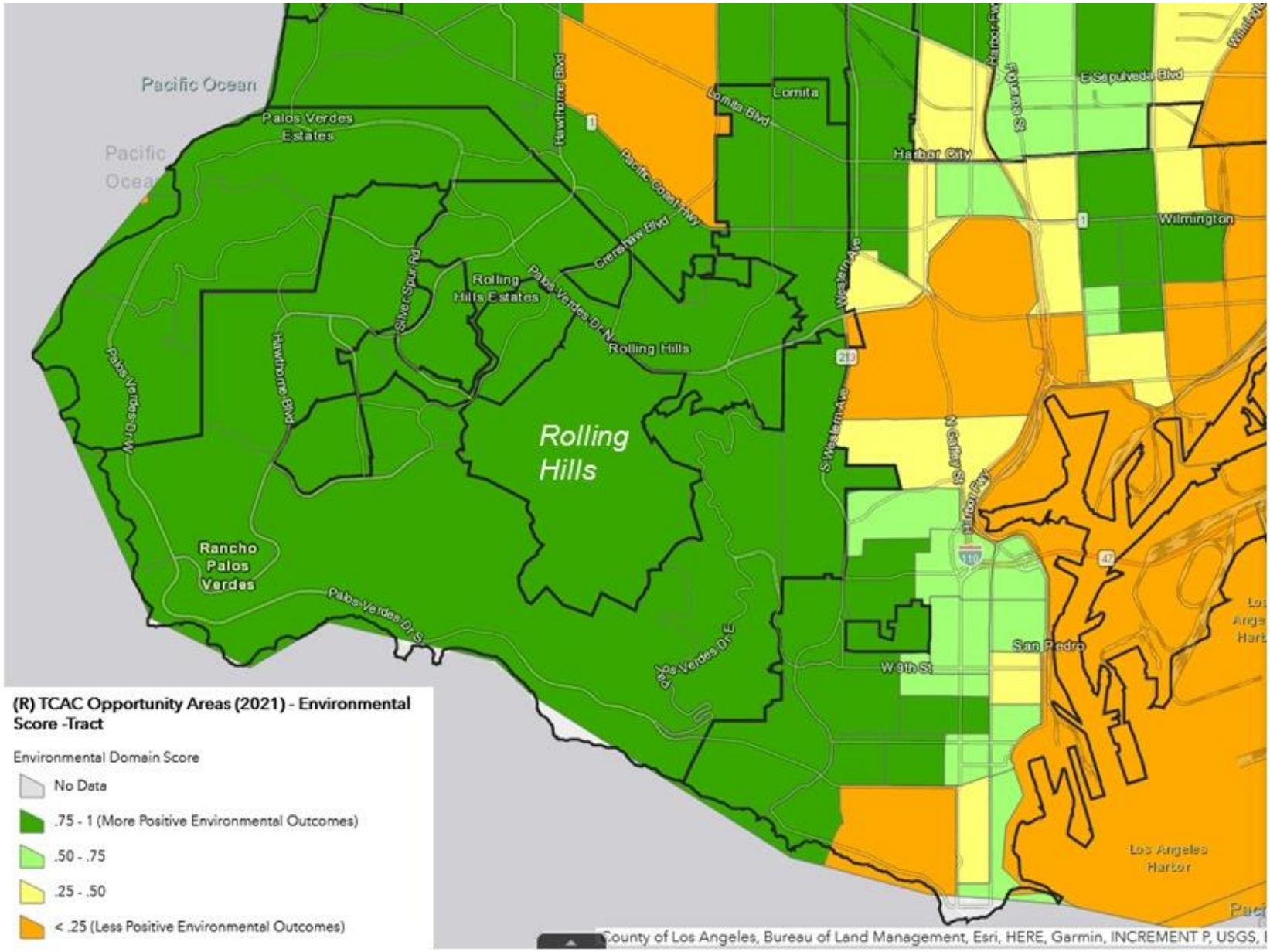


Figure A-9: Environmental Outcomes

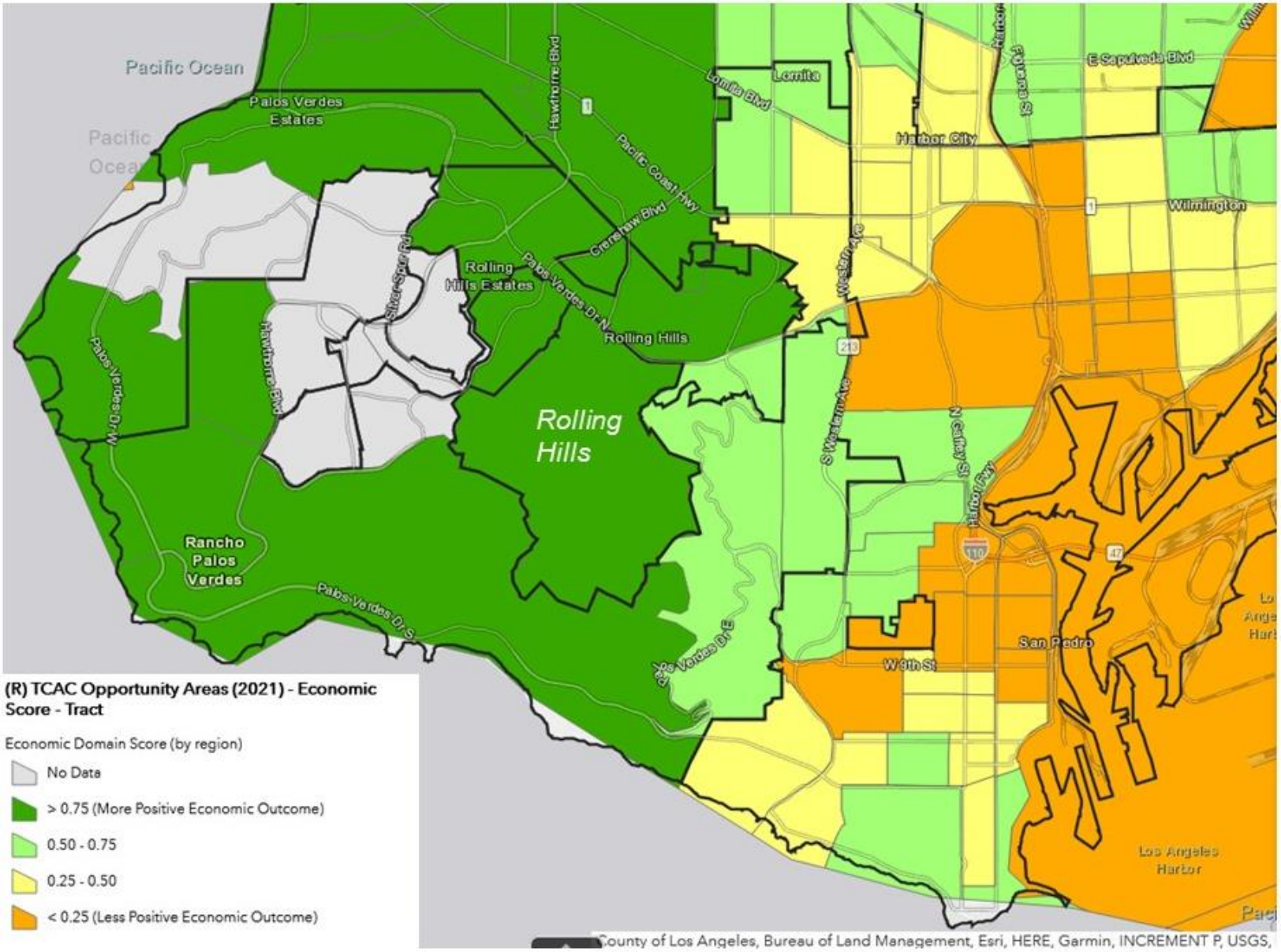


Figure A-10: Economic Outcomes

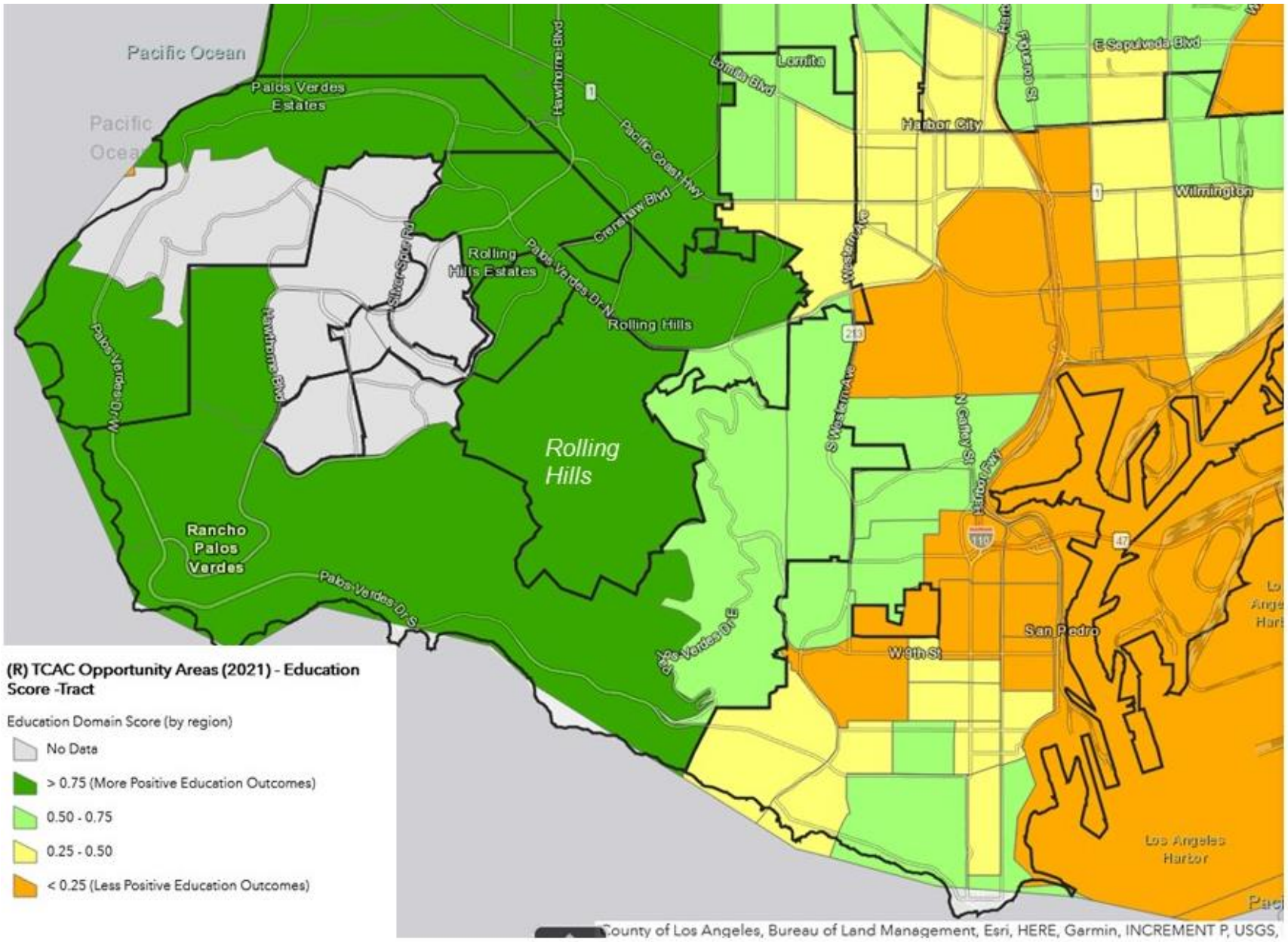
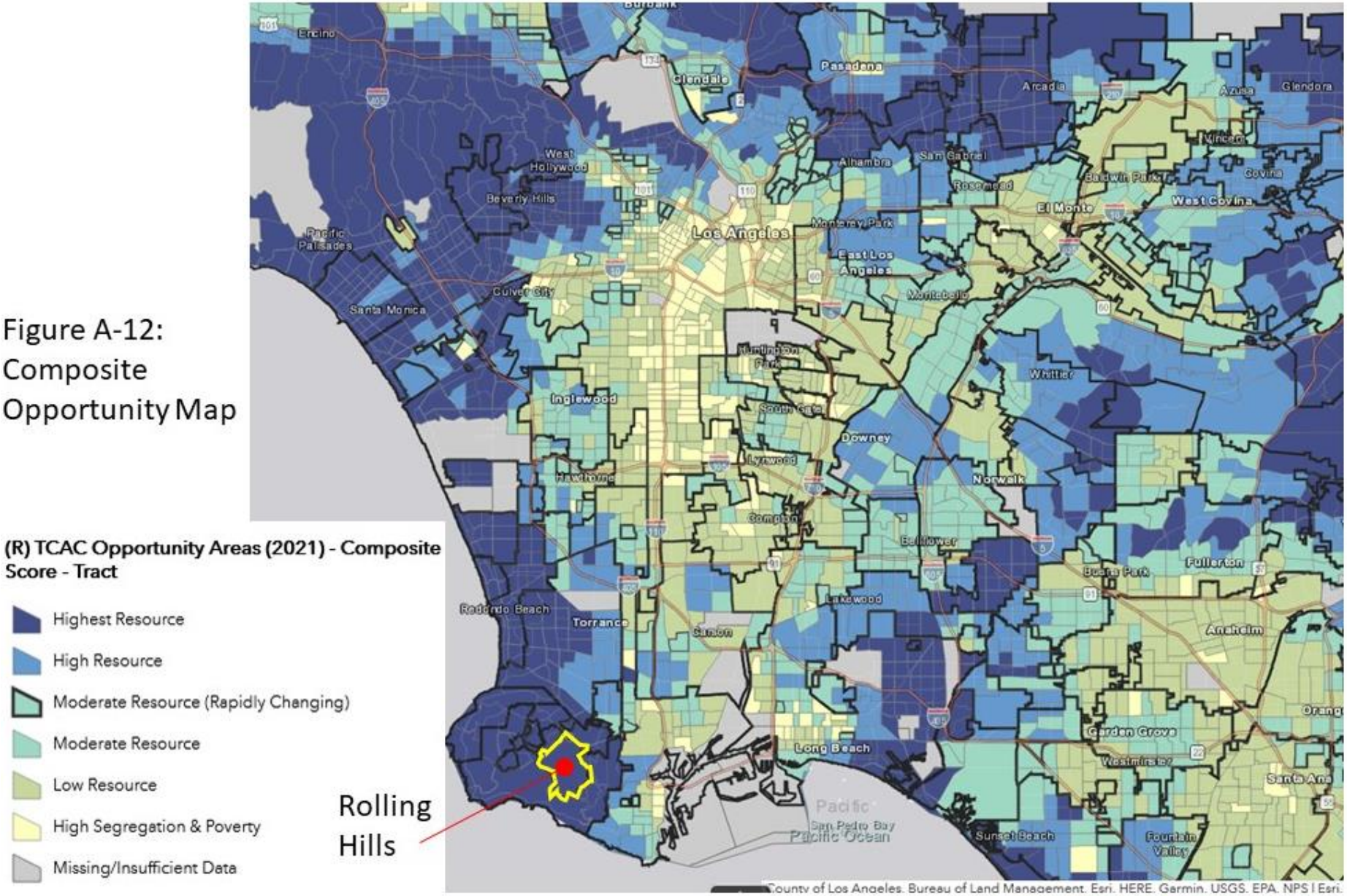


Figure A-11: Education Outcomes

Figure A-12: Composite Opportunity Map



Disproportionate Housing Needs

"Disproportionate housing needs" refer to conditions in which members of a protected class within a defined geographic area experience much higher housing needs than the population at large.[3] Following HCD guidance, the analysis to identify disproportionate needs considers cost burden, overcrowding, and substandard housing conditions. Much of this data also is contained in the Housing Element Needs Assessment (Chapter 3), but the focus here is on extremely low-income residents, tenure, and persons of color. As noted in earlier sections of this Appendix, the analysis for Rolling Hills is hampered by the small size of the community and the fact that it contains only one Census Block Group. The margin of error for American Community Survey (ACS) data for the city is high, and the number of residents in protected classes is small. Where available, maps are used to compare data for Rolling Hills with data for surrounding communities.

Tenure and Tenure by Race

Table A-6 shows tenure in Rolling Hills and Los Angeles County as a whole. Relative to the region, Rolling Hills has a much higher rate of homeownership. The rate exceeded 95 percent in 2020, compared to 46 percent regionally. As in the County, the percentage of renters increased slightly between 2010 and 2020, but the number remains very small.

Rates of home ownership often vary by race and ethnicity. Regionally and nationally, the rate of home ownership is substantially lower for Black/African-American households than it is for White households. This is not the case in Rolling Hills. The 2015-2019 ACS indicates that 100 percent of the Hispanic, Black, and multi-racial households in the city are homeowners. For White households, 95 percent are homeowners and 5 percent are renters. Among Asian households, 98 percent are homeowners and 2 percent are renters.

Table A-6: Housing Tenure in Rolling Hills and Los Angeles County

	Percent of Households in Rolling Hills		Percent of Households in Los Angeles County	
	2010	2020	2010	2020
Owners	96.9%	95.1%	46.9%	46.0%
Renters	3.1%	4.9%	53.1%	54.0%

Sources: American Community Survey Five-year averages for 2010 and 2020

[3] *The protected classes are race, color, religion, national origin, sex, familial status, and disability.*

Cost Burden

As noted in Chapter 3, a household is considered cost burdened if more than 30 percent of its income is spent on housing (including utilities). Figures A-131 and A-142 depict the incidence of cost burden for owners and renters in Rolling Hills and surrounding communities. Table 3.9 (in Chapter 3) indicates the percent of income spent on housing for homeowners with a mortgage, homeowners without a mortgage, and renters. Roughly 31 percent of the city's households are considered cost-burdened, but most have above moderate incomes.

The US Department of Housing and Urban Development publishes data on the number of households that are cost-burdened in each community using federally-defined income categories. This is referred to as the CHAS (Comprehensive Housing Affordability Strategy) data. According to the CHAS 2014-2018 data, there are 100 low- and very low-income households in Rolling Hills (i.e., earning 80 percent or less of the areawide median income [AMI]). These households include 83 who were cost-burdened, including 65 who were defined as being "severely" cost-burdened (spending more than half their incomes on housing).

CHAS data indicates that 78 of the cost-burdened lower-income households were homeowners and the remainder were renters. The relatively high number of cost-burdened low-income homeowners is likely associated with retired seniors on fixed incomes, who must still pay property taxes, utilities, insurance, HOA dues and other housing costs—even after their mortgages are paid off. These expenses may be several thousand dollars a month. In fact, the CHAS data indicates that there are 25 extremely low-income households in Rolling Hills (earning less than 30% of AMI), all of whom are homeowners. The most recent available CHAS data indicates that there are no extremely low-income renters in the city.

CHAS data identifies 10 very low-income renter households in the city (30-50% of AMI), along with 30 very low-income owners. Seventy-five percent of these households pay more than 30% of their incomes on rent.

As illustrated in Figures A-113 and A-142, the incidence of cost burden is somewhat lower in Rolling Hills than it is in adjacent communities, including those on the Palos Verdes Peninsula. Figure A-13, which is based on American Community Survey (ACS) data for 2015-2019, identifies Rolling Hills as being in the 20-40% overpayment interval for homeowners. In other words, between 20 and 40 percent of its owner-occupied households spend more than 30 percent of their incomes on housing. The city is surrounded on all sides by census tracts with rates in the 40-60% interval. This is not an indication that homes in Rolling Hills are more affordable, but rather a reflection of the length of residency and the large number of homeowners in Rolling Hills who have no mortgages. About 37 percent of the city's homeowners have lived in their homes for over 30 years. Rates of homeowner overpayment are higher in the San Pedro area of Los Angeles, several miles east of Rolling Hills and in lower income census tracts throughout Central Los Angeles County. On the other hand, the rate in Rolling Hills is comparable to many cities in the county, including Torrance, Carson, Palos Verdes Estates, and the Beach cities to the north.

Figure A-14, which is also based on ACS data for 2015-2019, identifies Rolling Hills as also being in the 20-40% overpayment interval for renters. However, this is based on a sample of a very small demographic, since there are only 27 renter households in the entire city. As Figure

A-14 indicates, the rate of overpayment is significantly higher in the portion of Rancho Palos Verdes located immediately east of the city, and in the portion of Rolling Hills Estates located immediately west of the city. There are also nearby tracts with overpayment rates that are less than 20 percent. On a regional basis, the percentage of renter overpayment in Rolling Hills is low. Most tracts in Los Angeles, Long Beach, and the larger suburban cities have rates in the 40 to 60 percent range. Rolling Hills renters tend to be more affluent, and are typically renting single family homes rather than apartments.

Cost-burden data is also shown in Table A-7 below. As the table indicates, most extremely low-income households in Rolling Hills were considered severely cost-burdened in both 2010 and 2020. Most lower income homeowners and many lower income renters (i.e., those earning 80 percent of areawide median or lower) were also cost-burdened. Rates of cost-burden were even higher in Rolling Hills than in the county as a whole. However, the data for Rolling Hills in Table A-7 is based on a very small number of households, leading to a high statistical margin of error (for instance there are only 10 lower income renter households in the city). At a countywide level, about 63 percent of all low-income homeowners and 75 percent of all low-income renters are cost-burdened.

Table A-7: Percentage of Cost-Burdened Households, Rolling Hills and Los Angeles County

	Percent of Households in Rolling Hills (*)		Percent of Households in Los Angeles County	
	2008-2012	2014-2018	2008-2012	2014-2018
Cost-burdened households earning less than 80% AMI (low income)				
Owners				
Paying > 30%	78.8%	86.7%	66.3%	63.1%
Paying > 50%	61.2%	66.7%	44.3%	40.2%
Renters				
Paying >30%	100.0%	80.0%	73.3%	75.1%
Paying > 50%	0%	40.0%	43.0%	44.5%
Cost-burdened households earning less than 30% AMI (extremely low income)				
Owners				
Paying > 30%	100.0%	76.0%	74.7%	75.4%
Paying > 50%	100.0%	60.0%	62.4%	63.0%
Renters				
Paying > 30%	100.0%	0%	82.4%	81.7%
Paying > 50%	0%	0%	70.4%	70.2%

Sources: CHAS HUD User website, data for 2008-2012 and 2014-2018. Data for Rolling Hills indicates 4 lower income renter households in 2008-2012 and 10 lower income renter households in 2014-2018

Overcrowding

As noted in Chapter 3, a household is considered overcrowded it the housing unit it occupies has more than one person per room, excluding kitchens and bathrooms. As noted on page 3-11, only one percent of the city's households meet this definition. There are no households in the city that meet the definition of "severe" overcrowding, which is more than 1.5 persons per room. Moreover, the data indicates that none of the renter-occupied households in the city were overcrowded. There were six owner-occupied units with more than one person per room.

Figure A-1~~3~~5 shows this information spatially, illustrating that units on the Palos Verdes Peninsula are generally not overcrowded. All of the tracts in all four Peninsula cities have overcrowding rates below 8.2 percent, which is the statewide average. Units in the more urbanized areas to the east, with higher percentages of renters and smaller housing units, are more likely to be overcrowded. Tracts in the Wilmington and San Pedro areas have rates exceeding 20 percent in some cases. Further north, tracts in South Central Los Angeles, Compton, Southgate, Lynwood, Compton, and other more diverse and lower income communities have higher rates of overcrowding.

Table A-8 shows household overcrowding in Rolling Hills and the region.

Table A-8: Overcrowded Households, Rolling Hills and Los Angeles County

	Percent of Households in Rolling Hills		Percent of Residents in Los Angeles County	
	2010	2020	2010	2020
Owner Households				
Less than 1.0 persons per room	99.5%	99.4%	93.9%	94.3%
1.01-1.50 persons per room	0.5%	0.6%	4.6%	4.1%
1.51-2.00 persons per room	0	0	1.1%	1.1%
2.01 or more persons per room	0	0	0.3%	0.5%
Renter Households				
Less than 1.0 persons per room	100.0%	100.0%	82.4%	84.0%
1.01-1.50 persons per room	0	0	9.8%	8.5%
1.51-2.00 persons per room	0	0	5.2%	5.3%
2.01 or more persons per room	0	0	2.6%	2.2%

Sources: American Community Survey Five-Year averages for 2010 and 2020

Table A-8 confirms that rates of overcrowding are much lower in Rolling Hills than in Los Angeles County, with no overcrowded rental units and only 0.5 percent of the owner-occupied units meeting the Census definition of overcrowding. Moreover, the data indicates almost no change between 2010 and 2020. By contrast, the countywide data shows that about 6 percent of owner-occupied units and 16 percent of rental units are considered overcrowded. In most cases, the percentages did not change significantly between 2010 and 2020.

Housing Problems

The HUD CHAS data indicates how many households in each community experience one of four specific housing problems—these problems are (a) lack of a complete kitchen; (b) lack of complete plumbing facilities; (c) overcrowding; and (d) severe cost burden (paying more than 50 percent of income on housing). According to CHAS data for 2014-2018, there are about 110 owner-occupied households in Rolling Hills and four renter households in Rolling Hills with one or more of these problems. Since all housing units in the city have kitchens and baths, and only six are overcrowded, the primary problem experienced is a severe housing cost burden. The CHAS data indicates there are 105 owner-occuped households with a severe housing cost burden. Most of these are lower-income senior households

Figure A-146 shows this data on a regional level. The rate of housing problems is higher in Rolling Hills than it is in the other Palos Verdes Peninsula cities, due to the high percentage of senior homeowners living on fixed incomes and paying substantial portions of their incomes on housing. However, the city's rate is comparable to other affluent areas on the west side of Los Angeles and is lower than in the neighborhoods and communities immediately south and immediately east of Los Angeles.

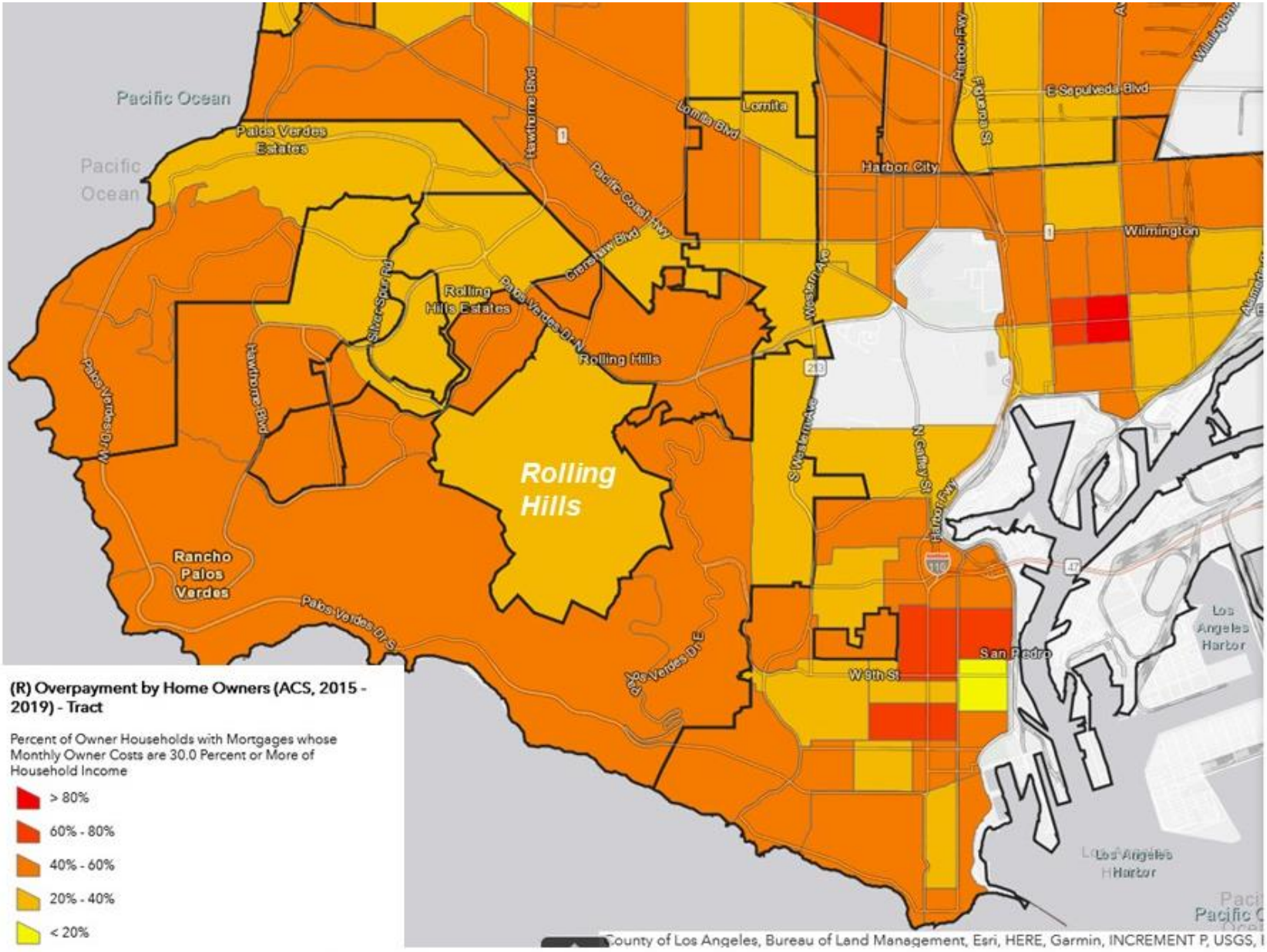


Figure A-13: Cost-Burdened Homeowners

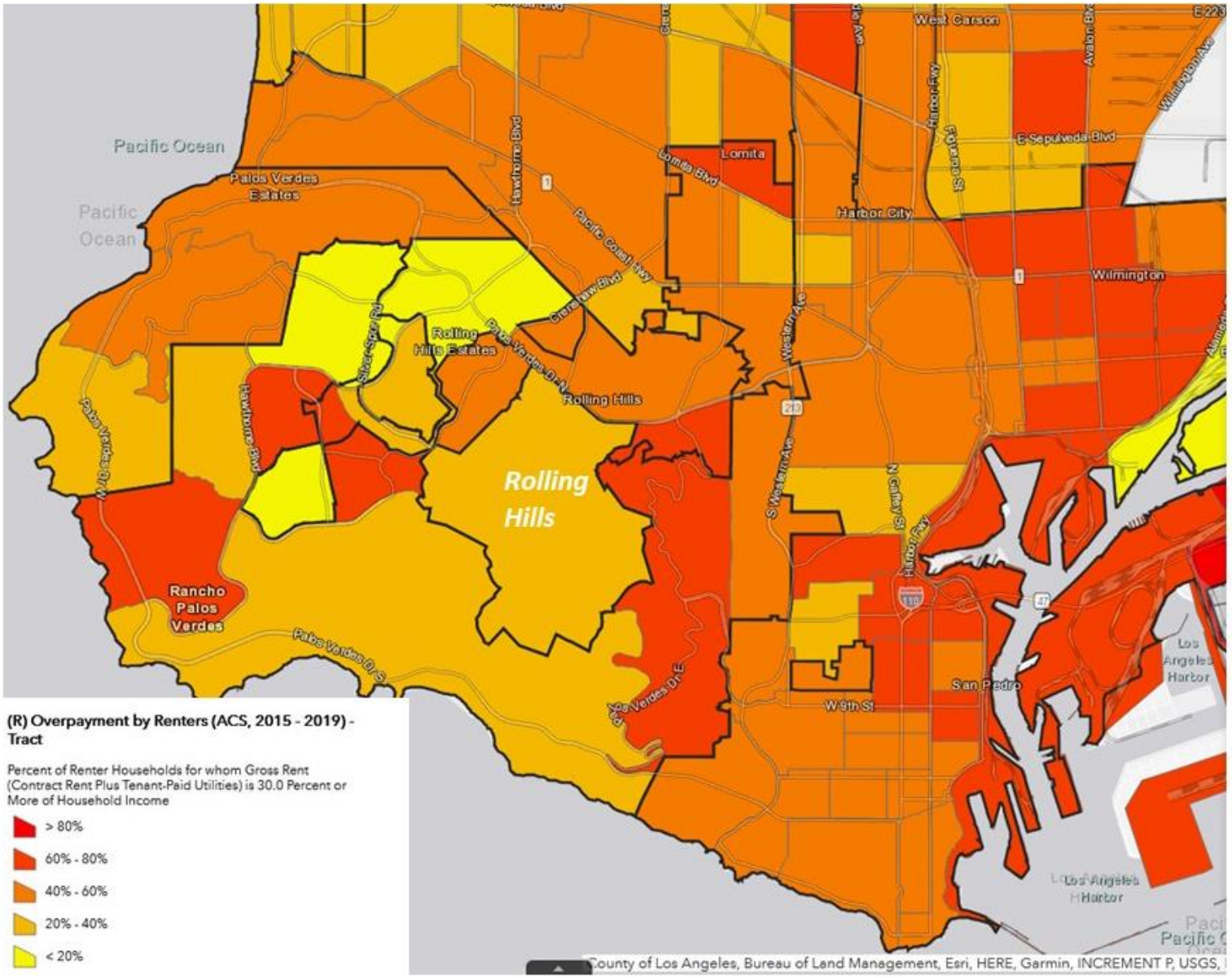


Figure A-14: Cost-Burdened Renters

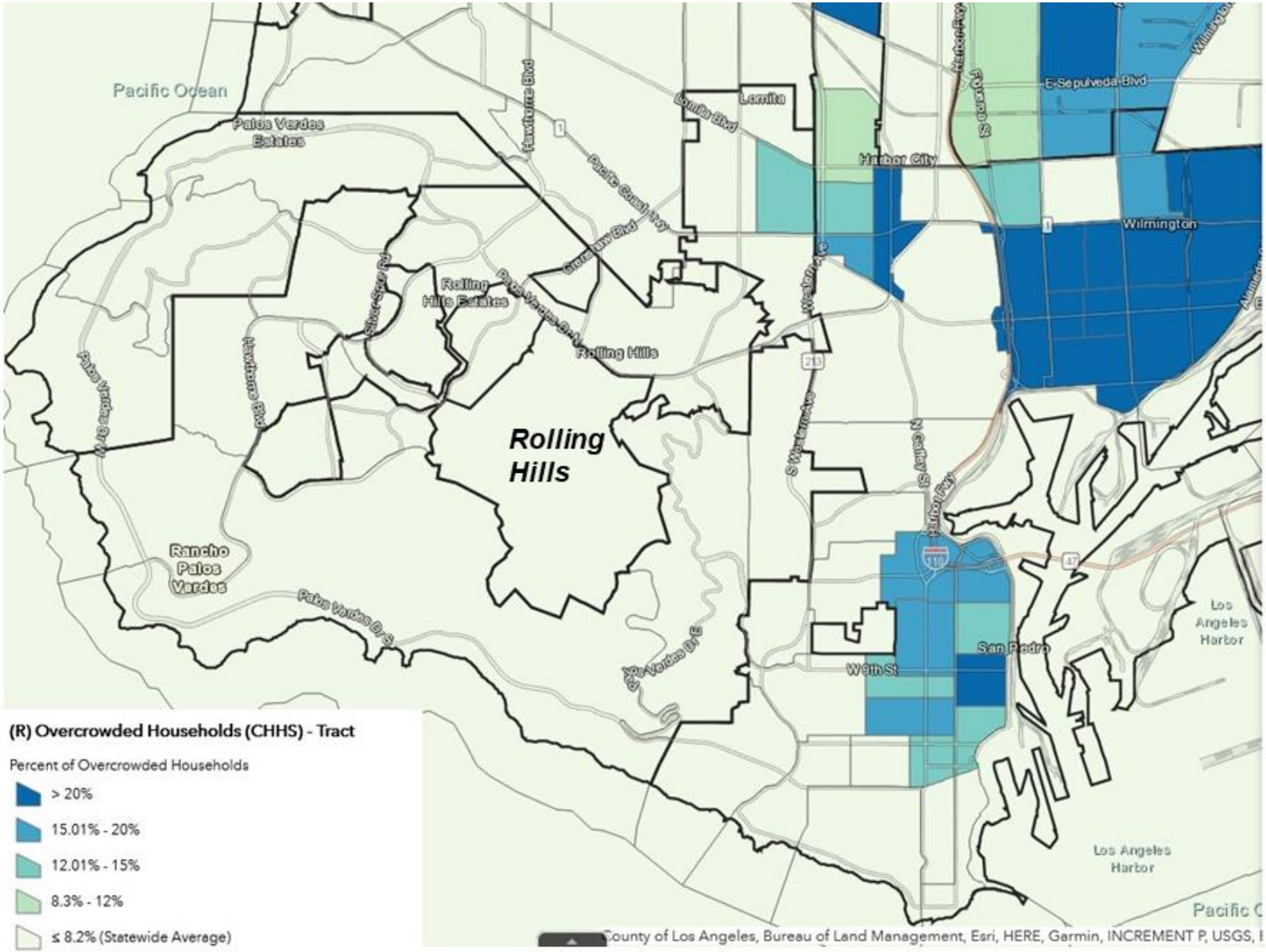
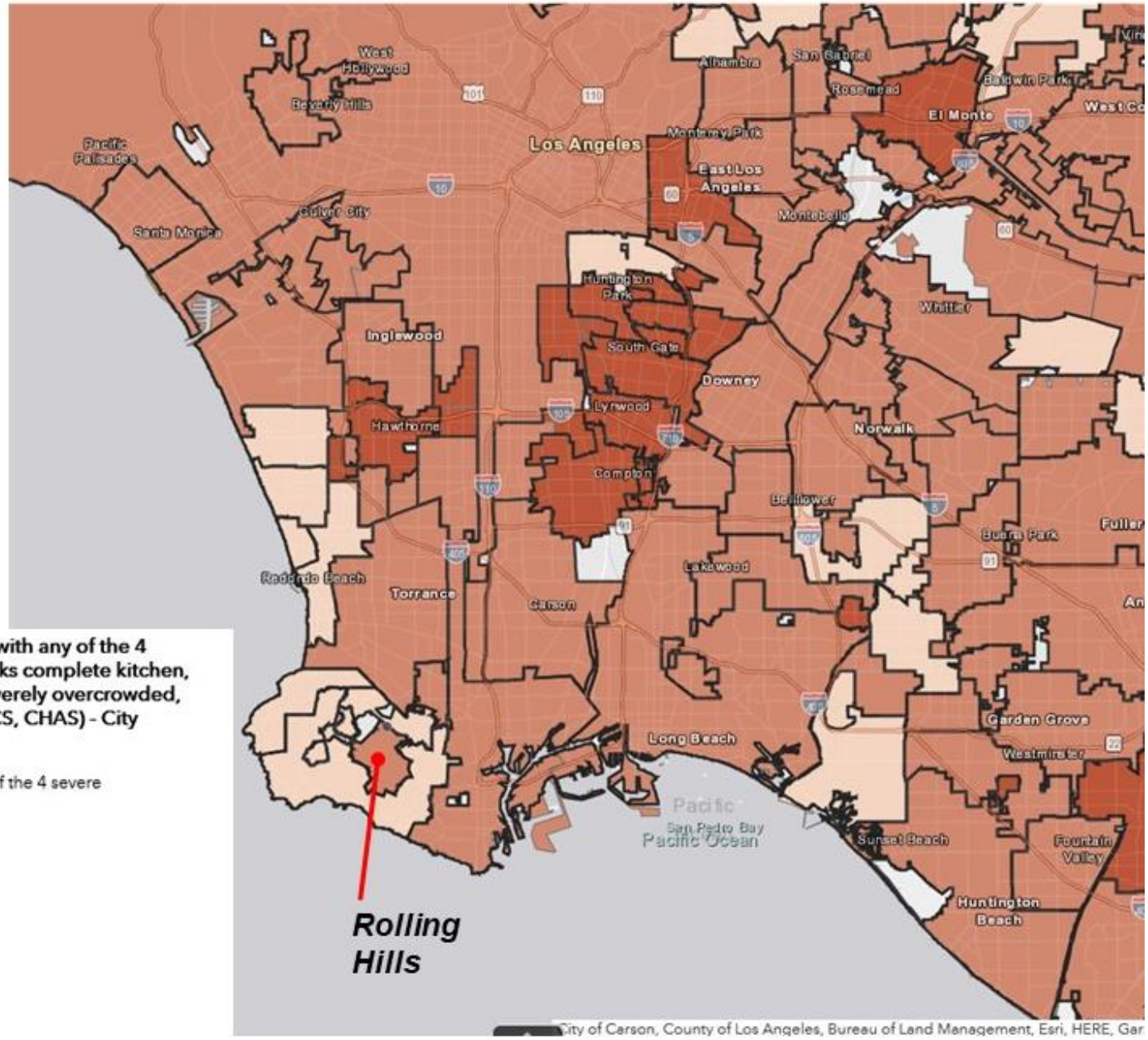


Figure A-15: Incidence of Overcrowding

Figure A-16: Percent of Households with one or more "Severe" Housing Problems



(A) Percent of all households with any of the 4 severe housing problems (lacks complete kitchen, lacks complete plumbing, severely overcrowded, severely cost-burdened) - (ACS, CHAS) - City Level

Percent of all households with any of the 4 severe housing problems

- > 80%
- 60% - 80%
- 40% - 60%
- 20% - 40%
- < 20%

Displacement Risk

Figure A-175 illustrates "sensitive communities" in the southern half of Los Angeles County. These are communities with relatively high risks of displacement due to rising rents and a lack of tenant protection. None of the Palos Verdes Peninsula cities are shown as vulnerable. On the other hand, most of the tracts in the City of Los Angeles, including the San Pedro and Wilmington communities, are shown as vulnerable. The entire South-Central area of Los Angeles is vulnerable, as are nearby communities such as Compton, Inglewood, and Hawthorne.

As depicted on Figure A-175, vulnerable communities are communities in which at least 20 percent of the population is low income and two or more of the following conditions are present:

- Renters are over 40% of all households
- People of color are 50% or more of the population
- Share of severely cost-burdened very low income renters is above county median
- Rents have been increasing at faster rate than county median
- Larger than average gap between local rents and rents in surrounding tracts

These conditions are not present in Rolling Hills.

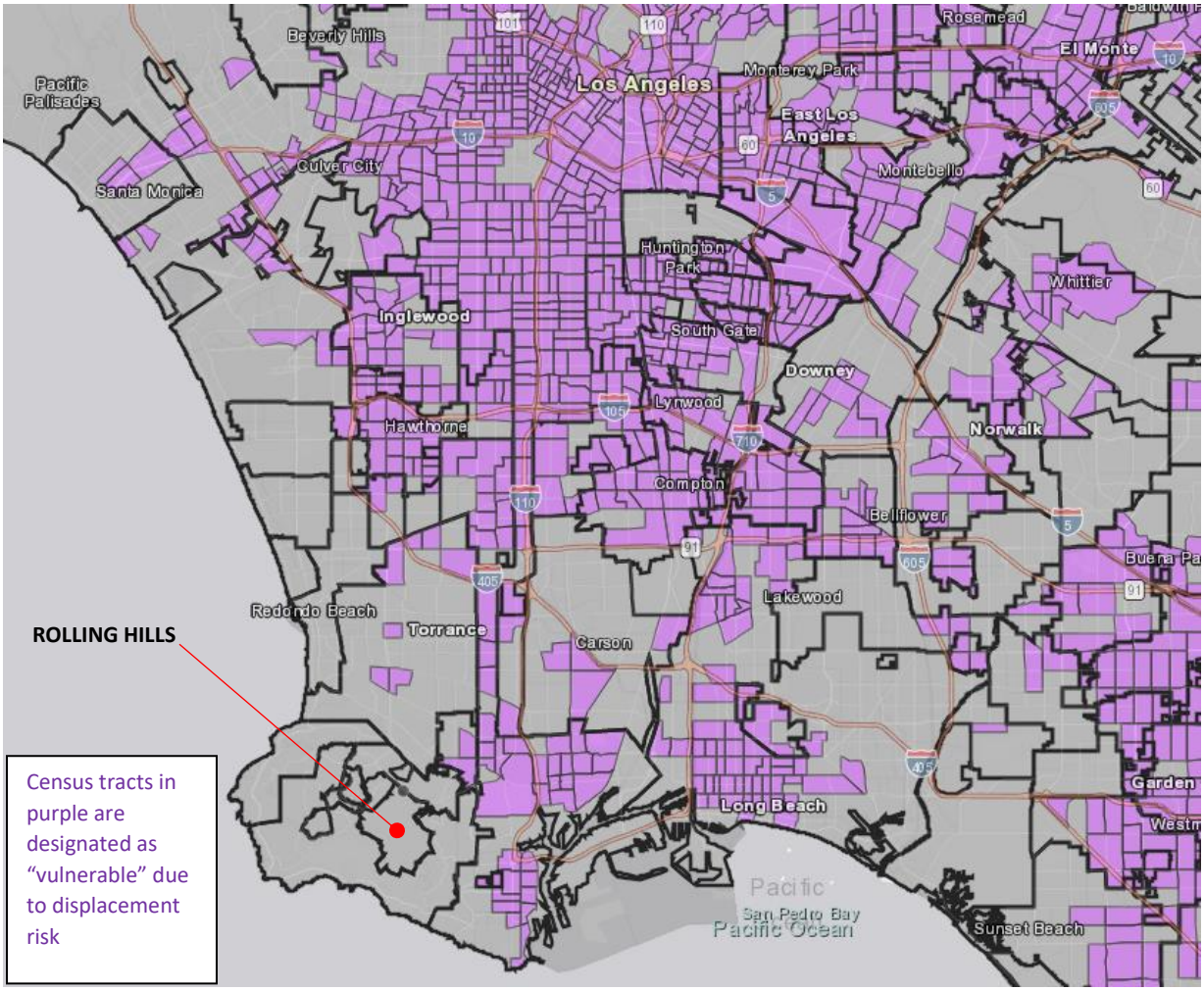


Figure A-175: Sensitive Communities

Due to the very high percentage of home ownership, Rolling Hills does not face displacement risk. Displacement may occur due to other reasons, such as an aging household unable to maintain their property or afford the modifications needed to age in place.

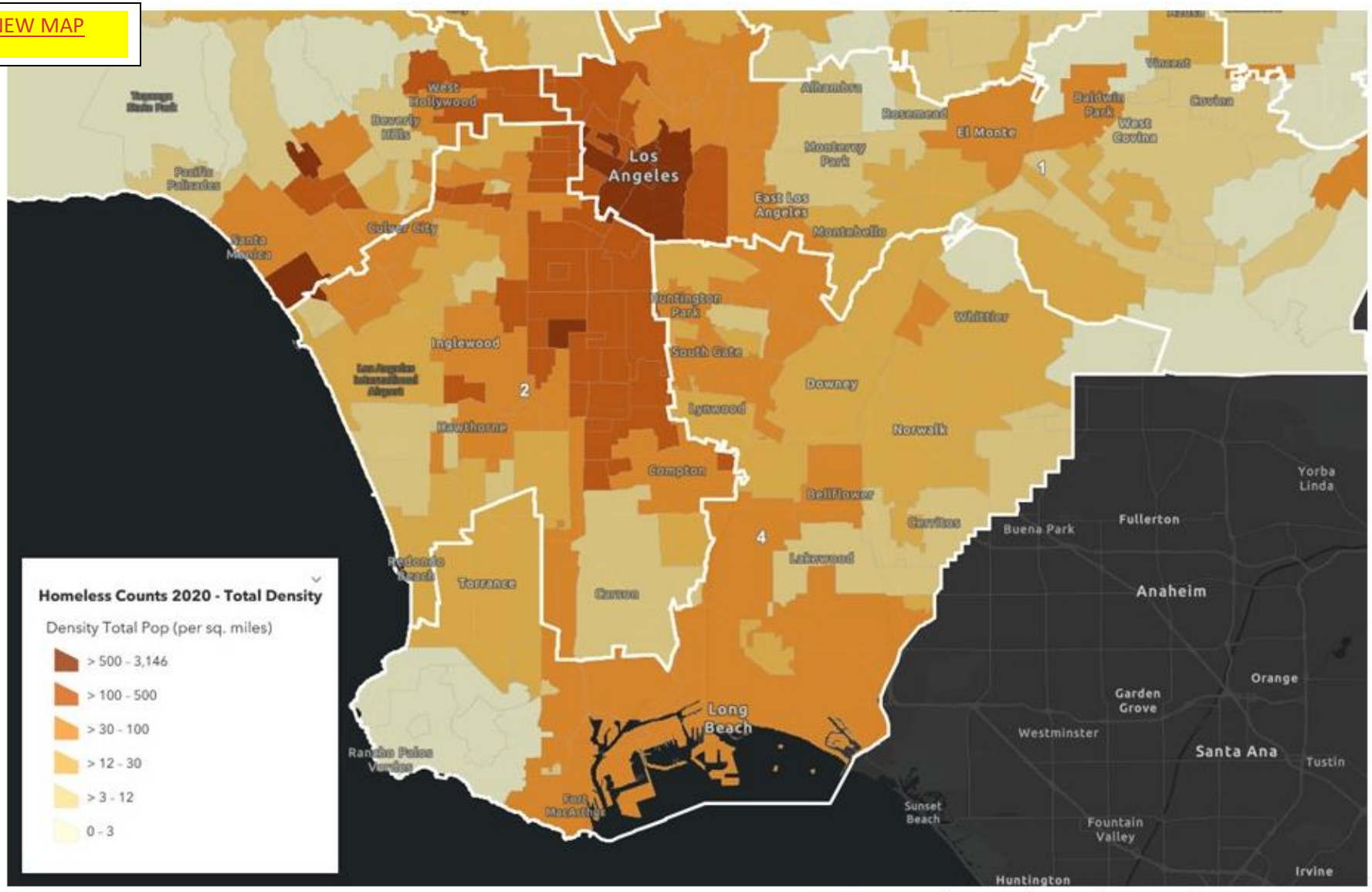
Homelessness

Homelessness in Rolling Hills is addressed in Section 3.4.8 of the Housing Element (Chapter 3). As indicated there, the annual point-in-time count for Los Angeles residents identified no unhoused residents in the city in 2016, 2017, 2018, 2019, or 2020. Figure A-18 shows the spatial extent of homelessness at a regional level based on data provided by the County of Los Angeles. The table shows that there were three unhoused residents per square mile in all four of the Palos Verdes Peninsula cities. The density is highest in Downtown Los Angeles, Venice, and various neighborhoods on LA's West Side and South Central areas. Some of these areas have more than 500 unhoused residents per square mile. The relatively low densities on the Palos Verdes Peninsula reflect the absence of shelter facilities, supportive services, non-residential land, and public lands where outdoor camping might occur.

Other Populations with Special Needs

Chapter 3 of the Housing Element identifies special needs populations in Rolling Hills. The principal special needs group is older adults, with one-third of the city's population over 65. As noted in Section 3.3.1, 56 percent of the households in Rolling Hills include at least one person who is 65 or older. Most of the persons with disabilities and *all* of the extremely low income households in the city are seniors. Rolling Hills has a very small number of single parents and large households, and it does not have ~~unhoused residents or~~ farmworkers.

NEW MAP



Source: County of Los Angeles Homelessness and Housing Map, 2022

Figure A-18: Density of Homeless Population in 2020 in Los Angeles County

Other Relevant Factors

The State's guidance for AFFH requires that other relevant factors contributing to fair housing issues be evaluated as part of this analysis. As explained in the next section, the principal contributing factor is that Rolling Hills was developed as an equestrian community in which multi-family residential uses were not permitted. The city's single family character was reinforced by minimum lot size requirements (one acre) and a (now repealed) prohibition on Accessory Dwelling Units which made it difficult for low and moderate income persons to afford housing in the community. These requirements effectively limited the rental housing supply to very expensive single family homes and resulted in a tenure pattern in which more than 97 percent of the households in the city are homeowners.

Governmental spending on affordable housing and the implementation of housing programs is severely limited by the small size of the city (fewer than 700 homes), the lack of any tax-generating land uses other than housing, the high cost of land and construction, and severe environmental hazards in the community. Historically, there have no instances of transportation or infrastructure improvements causing the displacement of lower income households. As documented in Chapter 5 of the Housing Element, there are no public streets in the city and almost no properties served by sanitary sewers. This has been an impediment to the development of multi-family housing.

The high cost of housing in Rolling Hills has historically precluded low- and moderate-income households from living in the city, unless they were home care providers, domestic employees, persons renting a room, family members, or seniors without a mortgage. Additionally, lending practices historically favored White borrowers, making the city less diverse than the county and region. This has changed in the past few decades and Rolling Hills has become more racially diverse. However, the city has not become economically diverse.

Based on Census (ACS 2015-2019) data, there are not significant differences in the rates of home ownership among different race and ethnic groups in Rolling Hills. As shown in Table A-9, the data indicates that all Black and Latino households in the city are homeowners, and that all renter households in the city are White or Asian. However, the findings are based on sample data and the sample sizes are very small. The greater takeaway is that housing in the city continues to be affordable only to very high income households.

Table A-9: Rolling Hills Home Ownership Rates by Race/Ethnicity

Race/Ethnicity	Owners	Renters	Total	% Owners
White, Non-Hispanic	360	8	368	98%
Asian, Non-Hispanic	101	16	117	86%
Black, Non-Hispanic	9	0	9	100%
Hispanic/Latino	28	0	28	100%
Two or more races	35	3	38	92%

Source: American Community Survey, 2015-2019 (2022)

Local Data and Knowledge

HCD's guidance for the AFFH analysis indicates that cities should use local data and knowledge to analyze fair housing issues, including information obtained through community participation or consultation. The regional demographic data help show spatial patterns but do not expressly explain why problems exist. An additional screen of local insights is necessary to complement federal and state data sources.

While there is no specific local data on fair housing ~~specific to Rolling Hills~~, the circumstances behind the spatial patterns shown throughout this analysis are mostly self-evident. The city was master planned more than 80 years ago as a low-density equestrian community with large parcels marketed to prospective homeowners. Rental housing was not included in these plans and CC&Rs were drafted and enforced to maintain single family character. The lack of sewers, risk of wildfire and landslides, and absence of public streets created further disincentives for multi-family housing, while also increasing construction costs. More recently, the high cost of land has made affordable housing construction economically infeasible, which will continue to be an impediment in the future.

Rolling Hills is also an entirely residential community. There are no private businesses in the city limits, except for a handful of home-based occupations. Employment is associated with the PVPTA maintenance yard, the Rancho Del Mar school building, the Fire Station, and the City Hall/ Rolling Hills Community Association buildings, which collectively employ just over 100 people. Housing demand is not generated by businesses within the city. There are no underused commercial sites to be repurposed for housing, since there have never been commercial land uses in the city.

Rolling Hills does generate demand for services that create jobs, including low-income jobs. Local homeowners provide employment for caregivers and home health care workers, au pairs and home child care providers, landscapers and domestic workers, personal assistants, and those in the construction trades. Housing for this workforce has been largely unavailable in the city, although some of these employees may live on-site and are considered part of the primary household.

Local data and knowledge supports a fair housing strategy that is heavily focused on housing this population in ADUs, potentially at reduced rents. The service industry population is generally more racially and ethnically diverse than the city at large. Providing additional ADU and JADU opportunities would help contribute to the State's integration and equity goals while improving access to housing in a high-resource area. It can also reduce commuting and associated congestion and greenhouse gas emissions.

Distribution of Proposed Housing Sites

This section of the AFFH analysis evaluates the City's site inventory to ensure that the distribution of sites does not exacerbate patterns of segregation, access to opportunity, and disproportionate housing needs. The site inventory must be consistent with each community's duty to affirmatively further fair housing.

Rolling Hills presents a unique situation in this regard, as the entire city consists of just one census block group. Data for this one tract indicates that the entire city is in the highest resource category. The land use pattern is homogenous and consistent in all parts of the city, and there are no observable disparities in housing condition, demographics, or income at the neighborhood level.

Additionally, the city's lower income RHNA is 29 units. While the State mandate calls for distributing opportunities on multiple sites in each city, the economics of affordable housing development make this impractical in Rolling Hills. The City is more likely to see affordable units developed on a single site capable of supporting a critical mass of at least 16 units than on multiple sites capable of accommodating a few units each.[4] The City will distribute affordable opportunities through a strategy that relies on its housing opportunity site and about a dozen accessory dwelling units (ADUs) on scattered sites.

The development of affordable housing on the Rancho Del Mar site furthers the goals of AB 686 by providing a viable opportunity for affordable housing in a very high resource area. This opportunity did not exist prior to 2020 when the site was rezoned. Moreover, the City has adopted provisions to allow the development "by right" creating a path to expedited approval. As documented in Chapter 4, this is the only viable site in Rolling Hills for higher density housing given the lack of sewer and a public road system. It is also one of the few sites that is accessible to transit and evacuation routes.

Meeting the remaining lower income need for affordable units through ADUs is a practical, effective way to meet the intent of AB 686 while dispersing opportunities across a large geographic area. By definition, ADUs distribute affordable housing opportunities across the community rather than concentrating them in a single location. They are also responsive to very real opportunities in Rolling Hills, resulting from large house sizes, numerous accessory buildings, a large number of one- and two-person households, and an aging population. The City's new ADU program has a demonstrated track record of success, with nine units permitted in 2021. Continued efforts to support ADUs will allow Rolling Hills to achieve AFFH goals in a way that is realistic, practical, responsive to local conditions, and produces real results.

[4] *While the base density for the Rancho Del Mar site is 16 units, the City requires that the site be developed with 100% affordable housing. Thus, it will be eligible for an 80% State density bonus which would enable 29 units in total.*

Identification and Prioritization of Contributing Factors

"Contributing factors" are the underlying forces that create, contribute to, perpetuate, or increase the severity of fair housing issues. In its AFFH Guidance Memo (2021), HCD has identified eight contributing factor topic areas, including general outreach, fair housing enforcement and outreach capacity, segregation and integration, racially and ethnically concentrated areas of poverty, disparity in access to opportunity, disparity in access for persons with disabilities, disproportionate housing needs and displacement risks, and the site inventory. Under each of these topic areas, the Guidance memo lists individual issues which can potentially be addressed by a Housing Element action. ~~According to HCD, examples of contributing factors are community opposition to affordable housing, housing discrimination, land use and zoning laws, lack of regional cooperation, lack of affordable housing, and lack of public or private investment in areas of opportunity or affordable housing choices.~~

AB 686 requires that the City strategically prioritize the contributing factors and develop programs that mitigate these ~~these~~ factors through its goals, policies, and actions. ~~The Housing Element must include programs that mitigate discrimination and improve fair housing choices and access to opportunities in high resource areas~~. HCD generally groups these actions into the following four categories:

- Housing Mobility Strategies, which consist of removing barriers to housing in areas of opportunity
- New Housing Choices and Affordability, which include strategies to promote more housing supply and choices in areas of high opportunity and outside areas of concentrated poverty
- Place-based strategies to Encourage Community Conservation and Revitalization, which include approaches to conserve and improve assets in areas with concentrated poverty and lower opportunities
- Protecting Residents from Displacement, which includes strategies to preserve housing choices and affordability for residents within low and moderate opportunity areas.

Given that Rolling Hills is a high-resource, high-opportunity area, all of the City's AFFH strategies fall in the first two of these categories.

Following is an assessment of factors that could contribute to fair housing issues in Rolling Hills, along with strategies that mitigate these factors.

Priority 1: Address Disparities in Access to Opportunity

Contributing Factors:

- Land Use and Zoning Laws
- Lack of Public Investment in Services and Amenities

The City's highest AFFH priority is to address disparities in access to opportunity. These disparities have been created primarily by land use and zoning laws, coupled with economic conditions and environmental hazards that precluded multi-family housing in Rolling Hills.

The City historically has had no rental housing and no housing opportunities for lower and moderate income households. It has begun to remove land use and zoning barriers by allowing and encouraging accessory dwelling units, promoting home sharing, rezoning land for multi-family and special needs housing, and supporting public investments in infrastructure that will facilitate future housing development. The 2021-2029 Housing Element identifies additional steps the City will take to mitigate this contributing factor.

Specific Programs (described in Chapter 6) aimed at mitigating **land use and zoning** as a contributing factor include:

- Program 2 supporting the development of **affordable multi-family housing** on the Rancho Del Mar Housing Opportunity Site
- Program 4 adding definitions of **transitional and supportive housing** to the Municipal Code, to clarify that these uses are subject to the same standards that apply to the other residential uses in each zoning district
- Program 5 adopting a **density bonus** ordinance
- Program 6 creating incentives for **ADUs**
- Program 7 promoting community education on **ADUs**
- Program 12 supporting **outreach to affordable housing service providers** and developers
- Program 13 supporting a **shared housing** program

Specific Programs (described in Chapter 6) aimed at mitigating **lack of public investment in services and amenities** as a contributing factor include:

- Program 14 calling for **sewer feasibility studies** and phase one construction of a sanitary sewer system that would serve City Hall and the community tennis courts and potential future expansions
- Program 15 calling for potential **participation in the CDBG Urban County program**, which could provide a public funding source for infrastructure and housing improvements

This contributing factor is also mitigated by the designation of the Rancho Del Mar site for multi-family housing, since this is the only site in the city that has sanitary sewers and access to a public street. As noted throughout the Housing Element, most of Rolling Hills does not sewer or public street access.

All of the above programs fall into the "New Housing Choices and Affordability" category, as they promote more housing supply and choices in areas of high opportunity.

Priority 2: Increase Fair Housing Outreach, Education and Enforcement Capacity

Contributing Factors:

- Lack of local private fair housing outreach and enforcement

The second AFFH priority area is to improve fair housing outreach, education, and enforcement capacity. While public agencies do not directly control the actions of private property owners

related to fair housing, they can influence outcomes. Rolling Hills has limited staff (6 FTEs) and a severely constrained budget, no tax-generating commercial land uses, and ~~with~~ limited revenue to fund new programs. The capacity to do pro-active outreach and enforcement of fair housing complaints is constrained. As a result, owners seeking to rent property may be unaware of fair housing laws and discriminatory practices. Likewise, tenants (or prospective tenants) may be unaware of their rights and may face discrimination without awareness of the opportunity for recourse. At present, there is not a formal private fair housing outreach and enforcement program and resources for such a program are limited.

Specific Programs (described in Chapter 6) aimed at increasing fair housing outreach, education, and enforcement include:

- Program 20 recommends that the City i**ncrease its capacity for fair housing outreach, education, and enforcement.** This would include education to those choosing to rent their homes or ADUs regarding state and federal laws on discrimination and the acceptance of housing vouchers.
- Program 21 calls for **increased information on fair housing on the City's website**, including a dedicated landing page with fair housing information and links to fair housing resources.
- Program 22 calls for **fair housing training** for City staff.

All of the applicable strategies to address this priority fall are in the "Housing Mobility" category, in that they are aimed at removing barriers in a high opportunity area.

Priority 3: Disparities in Access for Persons with Disabilities

Contributing Factors:

- Lack of assistance for housing accessibility modifications
- Lack of affordable in-home or community-based supportive services

As noted earlier in this Appendix and in Chapter 3 of the Housing Element, more than one-third of Rolling Hills residents are over 65 and most of the City's households include at least one person over 65. This demographic has the highest rate of disability in the city, primarily associated with mobility limitations. Sight and hearing impairments and cognitive impairments also may affect older adults. As a rural community with very large lots and no public transportation, persons with these limitations and impairments may face housing challenges as well as other challenges such as the ability to evacuate in an emergency.

Specific Programs (described in Chapter 6) aimed at reducing disparities in access for persons with disabilities include:

- Programs 6 and 7 supporting ADU development, including units for **live-in caregivers** and health care providers
- Program 8 to assist senior and disabled households, including **home retrofits for aging in place**. This also includes housing resources for persons with developmental disabilities.
- Program 12 supporting **home sharing**, especially for senior and disabled households

All of the above programs fall into the "New Housing Choices and Affordability" category, as they promote better choices in high opportunity areas.

Summary

Table A-10 summarizes AFFH priorities, contributing factors, fair housing issues, and applicable housing programs.

Table A-10: Fair Housing Priorities, Issues, Contributing Factors and Strategies

Priority	Fair Housing Issue	Contributing Factors	Program Category	Relevant Program (see Chapter 6)
1	Disparities to Access in Opportunity	• Land Use and Zoning Laws	New Housing Choices and Affordability	• Program 2: Affordable multi-family housing development on Rancho Del Mar site • Program 4: Definitions of transitional and supportive housing in the Municipal Code, • Program 5: Density bonus ordinance • Program 6: ADU incentives • Program 7: ADU education and outreach • Program 12: outreach to housing service providers • Program 13 supporting a shared housing program
		• Lack of Public Investment in Services and Amenities		• Program 14: sewer feasibility studies • Program 15: CDB Urban County Program
2	Fair Housing Outreach, Education, and Enforcement	• Lack of local private fair housing outreach and enforcement	Housing Mobility	• Program 20: Increase capacity for fair housing outreach, education, enforcement • Program 21: Increased fair housing information on City's website • Program 22: Fair Housing training for staff
3	Disparities in Access for Persons with Disabilities	• Lack of assistance for housing accessibility modifications • Lack of affordable in-home or community-based supportive services	New Housing Choices and Affordability	• Program 6: ADU incentives • Program 7: ADUs outreach for live-in caregivers and health care providers • Program 8: Assistance to senior and disabled households • Program 12: Home sharing

~~**Environmental Constraints**~~

The entire city is designated a Very High Wildfire Hazard Severity area. In the past, wildfires have destroyed homes in Rolling Hills and endangered life and property. Wildfires are likely to become a greater threat in the future due to global climate change and continue to limit the viability of land in Rolling Hills for higher-density construction. Much of the city is landslide prone. Landslides have destroyed Rolling Hills homes in the past and will remain an impediment to multi-family development in the future. The City has responded to this contributing factor by identifying the opportunity for multi-family housing on one of the only unconstrained sites in the city.

Economics

Economic factors will continue to present a challenge to the achievement of fair housing goals in Rolling Hills. Land and construction costs are prohibitively expensive, making it difficult to build affordable housing. To the extent that members of protected classes often have lower incomes, they will continue to be disproportionately affected by high housing costs. The City has little direct control over economic pressure, as these are driven by the regional economy and real estate market. Nonetheless, by creating the housing overlay zone on the Rancho Del Mar site, it has created an opportunity for affordable project in a location that is less impacted by these factors.

Land Use and Zoning Laws

Land use policies and zoning laws in Rolling Hills allow only very low densities on most sites, recognizing the city's identity and heritage as an equestrian community, and the infrastructure and environmental constraints cited above. The City has worked creatively to allow for ADUs and multi-family housing within the context of these constraints. Nonetheless, limited opportunities for higher density housing may cause many of the conditions identified in this analysis to continue. Various Housing Element programs are included to address this issue. This includes adding provisions for transitional and supportive housing to the zoning regulations, as well as density bonus regulations. It also includes proactive support for ADUs, including units serving lower income residents and workers.

Lack of Participation in Countywide Programs

Rolling Hills does not participate in the Countywide Urban County CDBG Program. This may limit access to some of the fair housing resources available to other cities.

Community Opposition

The 2020 Rolling Hills Housing Survey, which was focused on ADUs, indicated mixed views on affordable housing, concerns about community character, and tremendous concern about the city's ability to absorb additional housing and evacuate additional residents. The survey was anonymous and allowed for open-ended comments. While some were supportive, there were also negative views expressed about affordable housing, renters, ADUs, and the State's housing mandates. This will continue to be an issue in the future and requires an ongoing community dialogue about housing issues and the benefits of having greater housing choices.

Summary of Fair Housing Issues and Additional Fair Housing Concerns

According to the California Code of Regulations, a land use practice has a discriminatory effect where it actually or predictably results in a disparate impact on a group of individuals, or creates, increases, reinforces, or perpetuates segregated housing patterns, based on membership in a protected class. Such practices may still be lawful--however, the State has determined that they should be mitigated to the extent that they increase, reinforce, or perpetuate segregated housing patterns. In this context, the State has found that single family zoning itself has had unintended (and in some cases, intended) discriminatory effects. In response, the legislature has taken steps requiring local governments to accommodate additional housing units on single family zoned sites.

Rolling Hills has adopted regulations permitting accessory dwelling units and is currently considering legislation reflecting recently adopted SB 9. Both of these measures provide potential opportunities for rental housing, smaller units, and more affordable units that did not previously exist in the city. New ADU production and affordability programs affirmatively further fair housing and promote new housing opportunities throughout the community.

Strategies to enhance mobility (i.e., transit access to Rolling Hills), preserve existing affordable housing, and protect residents from displacement are less applicable in Rolling Hills. However, the City's policies and programs do aim to address disparities and create new affordable housing opportunities in high-resource areas. The City has required that any multi-family construction be affordable to low and very low income households, ensuring opportunities for economic diversification rather than further concentration of affluence. Allowing market-rate multi-family housing would only exacerbate existing concentrations of affluence and run counter to the purpose and intent of AB 686.

Rolling Hills also has made fair housing outreach and education a priority, not only for Rolling Hills residents but for those who may seek to move to Rolling Hills in the future. Current efforts will be expanded in the future by making more information available and strengthening communication with fair housing service providers.

APPENDIX B

Analysis of Palos Verdes Unified School District (PVUSD) Site
(APN 7569-022-900)

The intent of this Appendix is to provide supplemental analysis supporting the designation of the Palos Verdes Unified School District (PVUSD) site as an opportunity site for "by right" affordable housing in the City of Rolling Hills. This analysis was requested by the State Department of Housing and Community Development to demonstrate the site's capacity to provide 16 multi-family units at a density of 20 units per acre. Land use regulations supporting such development are required to meet the City's 6th Cycle affordable housing allocation. Based on existing land uses, access, infrastructure, topography and hazards, land ownership, and site utilization, the City has determined that this represents the most viable site in Rolling Hills for such development.

The 31-acre property is also known as the Rancho Del Mar site, as it is home to Rancho Del Mar High School, a small continuation school with an enrollment of 32 students in 2021. The Beach Cities Learning Center (17 students) also occupies a portion of the school building. Excluding the adjacent playing fields and lawn, the school campus occupies just six percent of the 31-acre site. The only other active use on the property is a Palos Verdes Peninsula Transit Authority maintenance facility. A majority of the site is vacant.

Location and Surroundings

The PVUSD site is located at 38 Crest Road. Figure B-1 provides an aerial photo of the site to provide context, orientation, and an overview of adjacent uses. Figure B-2 is an assessor parcel map. Its exact area is 31.14 acres, including a 3.56-acre street internal to the site that provides access to Crest Road, at a point outside the controlled access entryway to the Rolling Hills (but within the city limits). The net acreage of the site without the street is 27.58 acres.

The site is oblong in shape, with a panhandle area at its western edge that extends to the Crest Road access point. Excluding this panhandle area, the site extends roughly 2,600 feet from east to west and averages more than 600 feet from north to south. Within this area are numerous flat, graded surface areas with no structure coverage and minimal programmed activities.

The City of Rancho Palos Verdes lies immediately south and west of the site. The area to the south is developed with single family homes at densities of 2-3 units per acre. This area is roughly 80 to 100 feet higher in elevation than the site itself, as there is a graded downslope between the residential neighborhood and the school property (the downslope is on the school property). Residential uses also abut the west side of the site, with densities around 3-4 units per acre.

There are no road or driveway connections between the PVUSD site and the Rancho Palos Verdes neighborhoods to the south and west. A 15' riding and hiking trail easement exists along the southern and western edges of the site but it is undeveloped. The difference in topography reduces the potential for visual impacts associated with future development.

The entire northern perimeter of the site is defined by the Crest Road right-of-way. There are large lot homes on the northern side of Crest Road, set back more than 100 feet from the School District property line and more than 200 feet from the improved area of the PVUSD site. The area to the north is well buffered not only by large setbacks and Crest Road, but also by an internal street on the PVUSD property. Effectively, there are two streets between homes in Rolling Hills and the developable area—Crest Road, and the parallel internal street within the PVUSD site.

On its eastern edge, the site is abutted by large lot residences. The home closest to the site is heavily screened from the PVUSD site by vegetation, as well as a private tennis court between the residence and the property line. The residence itself is more than 200 feet from the PVUSD ballfield and more than 550 feet from the school.

The site context creates effective buffering from adjacent uses, mitigating land use compatibility concerns such as privacy, noise, and visual impacts. At the same time, the site is easily accessible from Crest Road and is outside of the gated area of the city. A fire station is located 1,000 feet to the east, and major shopping facilities and services are located just over a mile away in the City of Rancho Palos Verdes. Crest Road is one of Rolling Hills' major thoroughfares and one of the few "through-streets" that bisects Rolling Hills and connects the city to adjacent cities and regional highways.

History of the Site and Current Uses

The site was initially home to Cresta Elementary School, which was constructed in 1960. A School District warehouse and maintenance facility was part of the original campus. The school closed in the early 1980s and was repurposed as Rancho Del Mar Continuation High School, which opened in 1986. At the time, there were discussions between the City and the School District to rezone the property and sell the site for residential development. However, Rancho Del Mar has remained on the site for the last 35 years. Given the value of the land and the low-intensity and limited extent of the existing use, residential development remains viable, even if the school does not relocate.

The Rancho Del Mar Campus consists of three one-story buildings totaling 20,000 square feet of floor area. Figure B-3 shows the campus layout, as well as six photos of the school and adjacent areas. The campus consists of an L-shaped building (divided by a breezeway) with eight classrooms, a rectangular building with a classroom, multi-purpose room restroom, and custodial area, and a small building facing the parking lot with the main office. Classrooms at the school are open to the exterior and there are no interior hallways. The PVUSD shares its classroom and administrative facilities with the Beach Cities Learning Center. The Learning Center has 17 students aged 11-18 with emotional, behavioral, and learning challenges.



Source: LA County GIS, 2020. Aerial Fall 2019

Site Boundary

City Limits

Figure 1:
Location of PVUSD Housing Opportunity Site

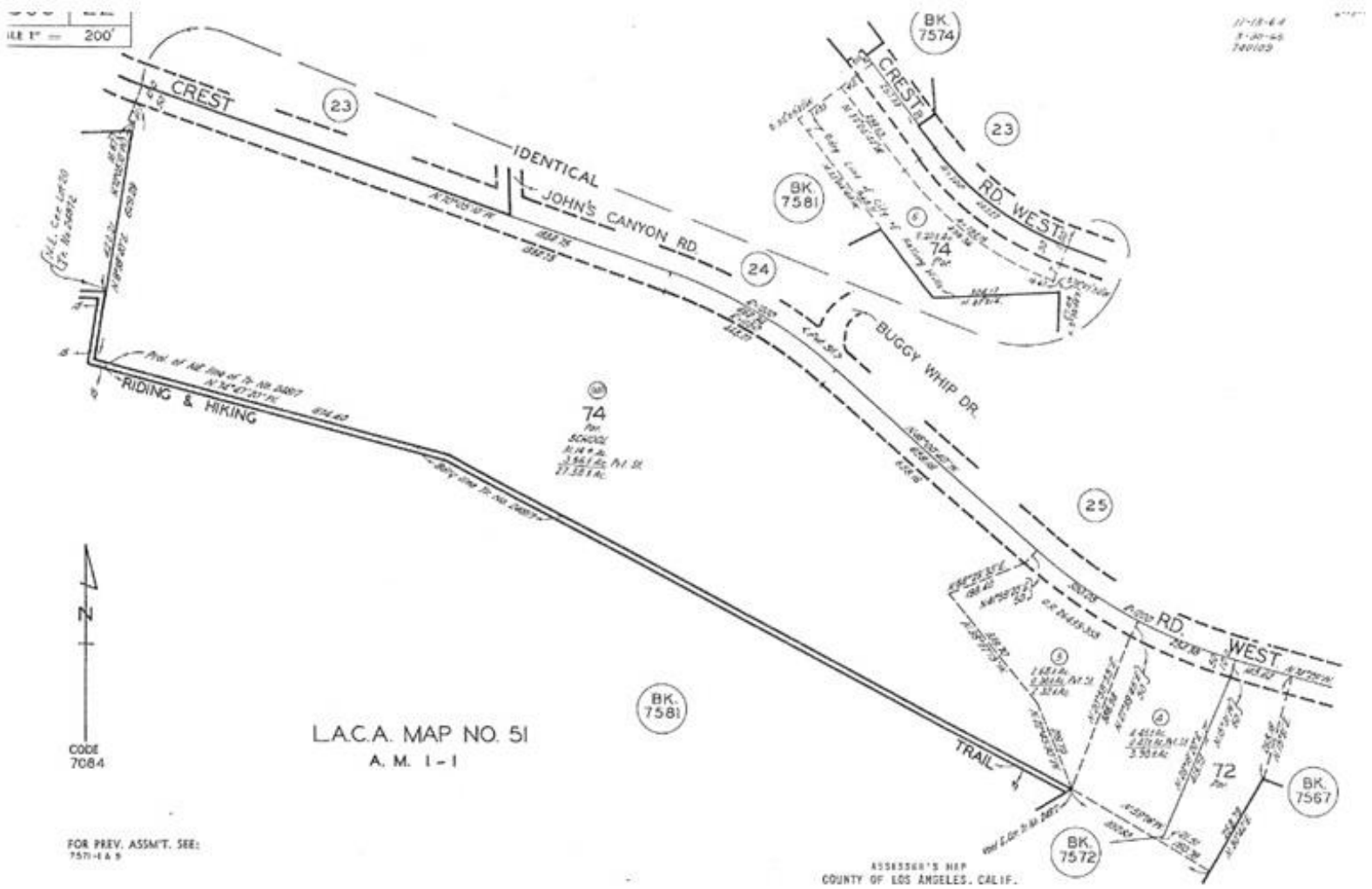


Figure 2:
Assessor Parcel Map of PVUSD Site



Figure 3:
Rancho Del Mar High School Building Plan and Photos

Rancho del Mar itself serves students ages 16-18 who were unsuccessful in a traditional high school setting. Students are referred to the school for a myriad of reasons, including poor attendance, personal crisis, behavioral issues, or other factors creating a high risk of drop-out. Enrollment at Rancho del Mar has been steadily declining and was just 32 students in the 2020-21 school year. Enrollment was 79 students in 2014-15, 72 students in 2015-16, 69 students in 2016-17, 58 students in 2017-18, 47 students in 2018-19, and 46 students in 2019-20. There are also six teachers on site and three other personnel.

Thus, the combined enrollment (Beach Cities and Rancho Del Mar) is fewer than 50 students on a 31-acre site. By contrast, Palos Verdes Peninsula High School and Palos Verdes High School enroll roughly 2,300 and 1,700 students respectively, on sites of similar size. Sale of the school property could generate significant revenue for the School District. Sale of a portion of the property also is possible, as the site is configured in such a way that easily facilitates its subdivision.

A comprehensive structural evaluation of the school was completed in 2016 as part of the PVUSD Facilities Master Plan. Beach Cities Learning Center likewise prepared a facility condition status report in 2019 as part of its annual reporting requirements. Both evaluations found the building(s) to be in good condition. The buildings were last renovated in 2008. The 2016 evaluation called for resurfacing the parking area, upgrading the HVAC system, and upgrading the electrical system. Total capital needs were estimated at $1.9 million. All utilities were found to be in good condition, and drainage issues were minimal.

The school campus is adjoined by an approximately 100-space parking lot on its north and east sides. To the west of the buildings, there is a large flat lawn area. To the east, there is an athletic field area that includes a basketball court and ballfield. The 2016 facility evaluation determined that the Floor Area Ratio of the school campus was just 0.03, as it defined the campus area as being 15.2 acres (including athletic fields, lawns, and other open areas on the perimeter of the site). The square footage of floor space per student is well below District averages.

Beyond the 15.2-acre area associated with the school, the PVUSD has leased approximately 4.5 acres of the site (roughly 15 percent of the 31 acres) to the Palos Verdes Peninsula Transit Authority. The PVPTA facilities include maintenance buildings and administrative offices and are self-contained in the west central part of the site. The Housing Element analysis presumes this part of the site will not be available for development and that the transit district will remain a long-term tenant. However, the PVPTA site could potentially be sold and redeveloped in the future, leased to a new third party, or repurposed by the School District.

Potential Development Areas

Figure B-4 shows potential development areas on the Rancho Del Mar site. These are summarized below:

- Area 1 is located between the transit facility and the school campus. It is an unimproved, almost completely flat rectangular area of 1.6 acres. Its dimensions are approximately 250 x 300, with 250 feet of frontage along the internal access street. The site is well situated for multi-family development and has no visible physical constraints.

- Area 2 is located immediately adjacent to the school and is 1.0 acre. The dimensions are approximately 200 x 200, with a "stem" area providing access to the interior street. The area is currently an unimproved lawn with a few mature trees. It is almost completely flat and has no physical development constraints. The site could easily support up to 16 to 20 multi-family units at a density of 20 units per net acre.

- Area 3 is the school itself, which occupies roughly 1.75 acres including parking, landscaped areas, courtyards, and classroom buildings. This option would be most viable if the school relocates and the site is sold, as co-location of a school and multi-family housing or emergency shelter would be unlikely. However, certain special needs housing types (such as housing for teachers) would be viable in this setting.

- Area 4 includes the area east of the school. It includes approximately three acres of level ground, with 0.5 acres of parking, a two-acre ballfield serving the school, and other paved areas used for basketball and recreation. There are several areas within the three acres where 16-20 units could be built without impacting use of the site for parking and school recreation.

- Area 5 includes approximately four acres and is located west of the PVPTA facility. It is regarded by the City as the best location on the 31-acre site for multi-family housing, as it would have the least impact on the school campus and transit facility. It is also the largest of the five areas and the most buffered from adjacent development. There are a number of extant foundations on the site from prior uses, and internal roadways that are not in use. The area has gently sloping terrain and has not been improved for school use, parking, or recreation, as the other portions of the site have.

Figures B-5 through B-7 provide a bird's eye view of each of the five areas.

Physical Constraints to Site Development

Approximately nine acres of the 31-acre site consists of a graded slope along the south side of Altamira Canyon. This area is shown in Figure B-8. The slope exceeds 30 percent, making it poorly suited for development. The sloped areas also have the potential for landslides and other seismic stability issues, which limit their suitability for further grading and construction. The sloped area is not considered suitable for multi-family development or special needs housing. It occupies roughly 29 percent of the site, all of which has been excluded from consideration in the definition of Areas 1-5 above.



Figure 4:
PVUSD Potential Housing Opportunity Areas



Figure 5:
PVUSD Opportunity Site Areas 1-4 (Looking East)



Figure 6:
PVUSD Opportunity Site Areas 1-4 (Looking West)

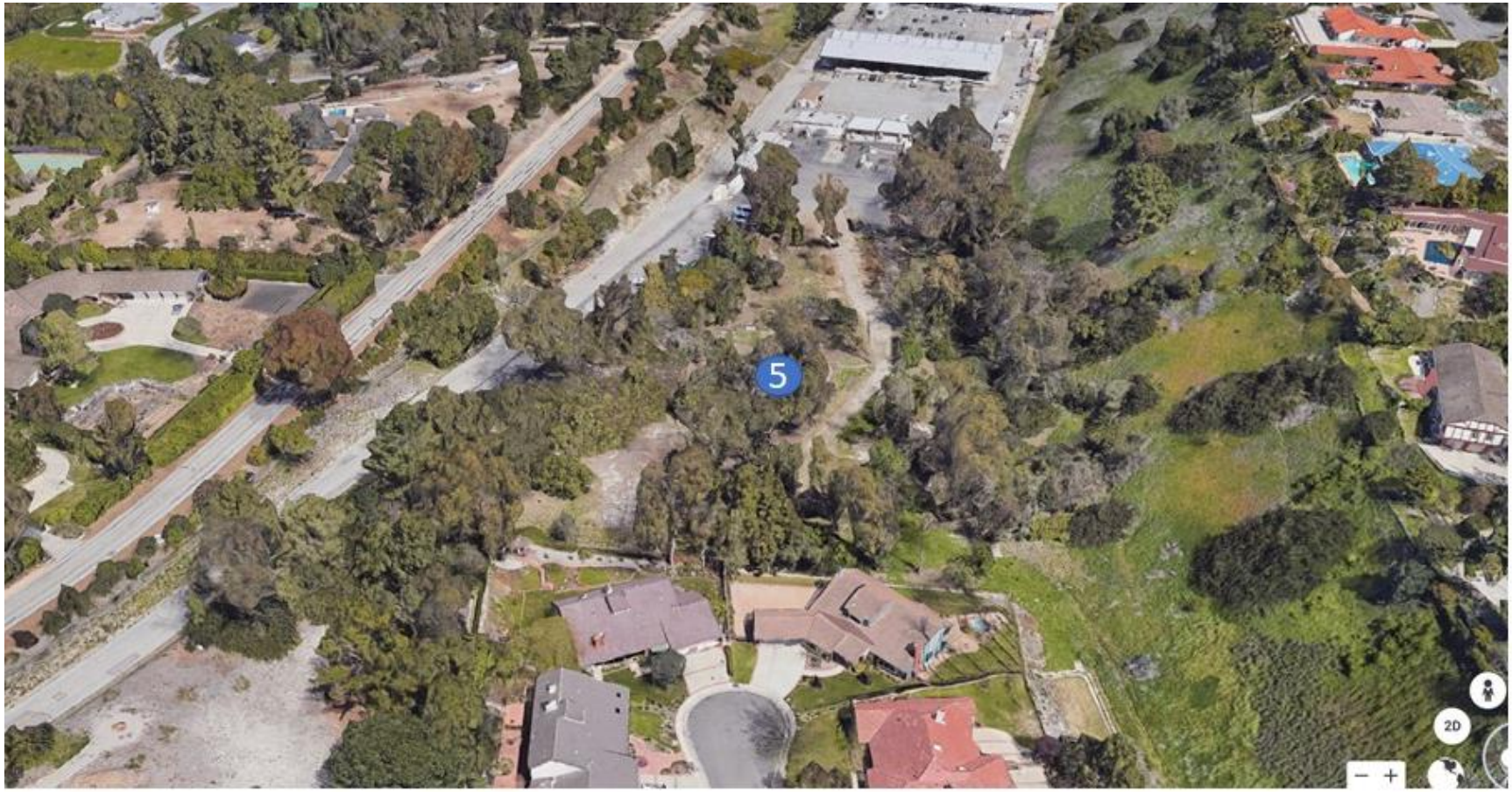


Figure 7:
PVUSD Opportunity Site Area 5 (Looking East)

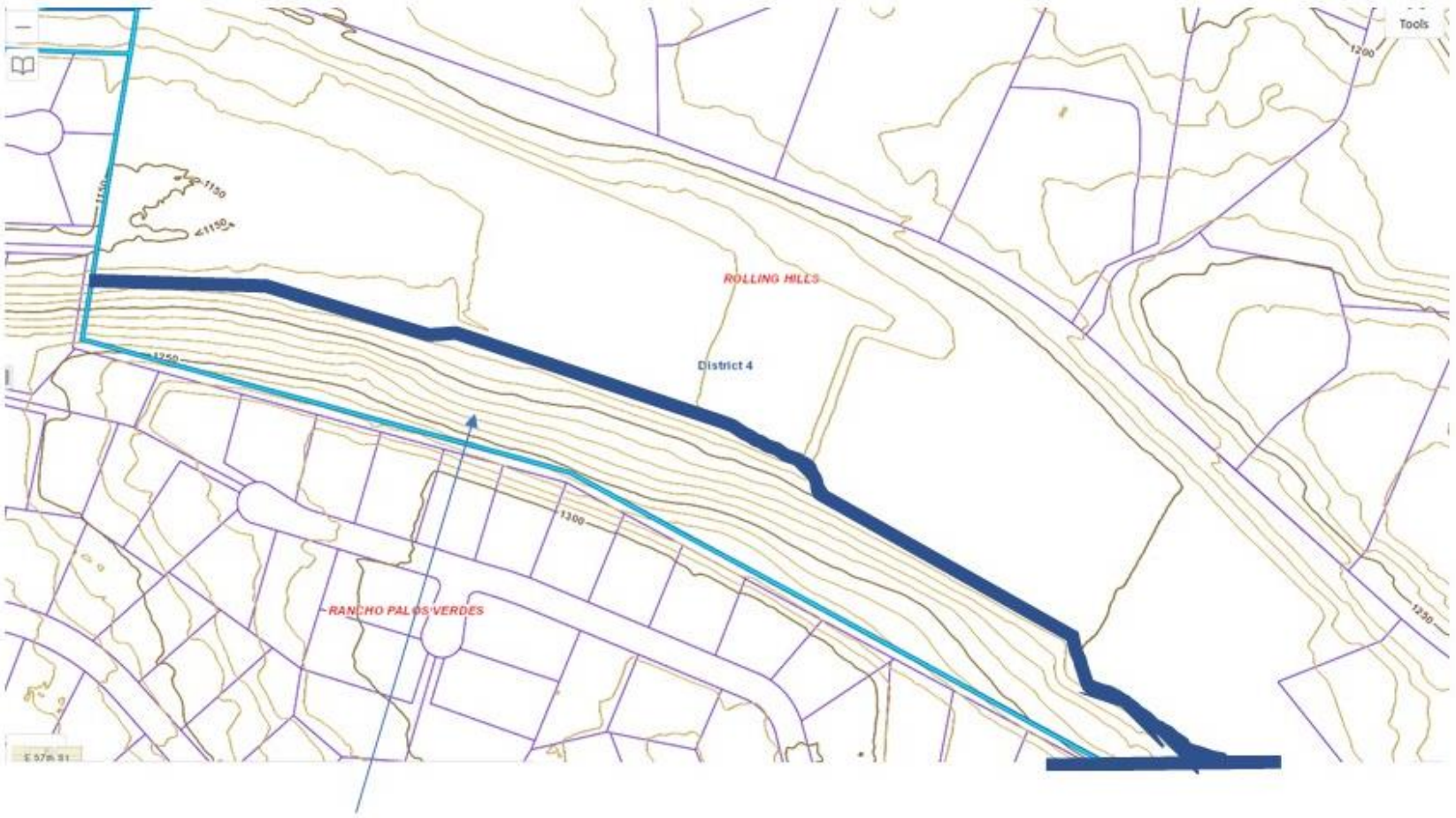


Figure 8:
PVUSD Opportunity Site Topography

The central portion of the site has historically been used for general maintenance activities, first by PVUSD and more recently by PVPTA. A search of the California State Water Resources Control Board (SWRCB) GeoTracker data base identified two leaking underground storage tanks (LUST sites) at this location. The sites were determined to contain gasoline and hydrocarbons resulting from leaking underground storage tanks. Both sites have been cleaned per SWRCB standards and are now designated by the SWCRB as "complete" and "case closed."

As noted elsewhere in the Housing Element, the City of Rolling Hills—including the PVUSD site—has been designated as a Very High Fire Hazard Severity Zone by the State of California. Rolling Hills is implementing a Community Wildfire Protection Plan to mitigate this hazard and is implementing vegetation management measures and programs to make structures more resilient. In the event of a housing proposal on this site, the need for an emergency-only access connection between the existing access road and Crest Road would be assessed.

An analysis of infrastructure and utilities on the site conducted as part of the Housing Element found no constraints associated with redeveloping this site with residential uses or special needs housing. The site is used less intensively now than when it was actively used as an elementary school and school maintenance facility. Water, drainage, and wastewater facilities are adequate to support the number of units contemplated by the Housing Element.

Importantly, this is one of the only sites in the City of Rolling Hills that has access to a public sewer system. As such, it is much more conducive to multi-family housing that sites elsewhere in the city that are served by private septic systems.

Regulatory Constraints to Site Development

Prior to December 2020, the PVUSD opportunity site was subject to a range of planning and regulatory constraints that limited the feasibility of multi-family housing. The site has historically had a General Plan designation of Very Low Density Residential and a zoning designation of RAS-2 (Residential Suburban 2-acre minimum lot size), which effectively limited uses to existing community facilities or new large-lot residential development. While Accessory Dwelling Units (ADUs) could conceivably be incorporated in new homes, the site would not have met State requirements for the Housing Element.

In February 2021, the City of Rolling Hills amended its General Plan and zoning regulations to allow multi-family housing and other special needs housing types "by right" on the PVUSD property, subject to specific development standards. As noted elsewhere in the Housing Element, the amendments included:

- Amending the Land Use Element of the General Plan to create the Rancho Del Mar Housing Opportunity Overlay. The Land Use Element now explicitly states that multi-family housing and emergency shelter are permitted by right in this area, subject to objective development standards. The number of units on the site is based on a transfer of the allowable General Plan density to a clustered area where 16 to 20 units could be added.
- Amending the Rolling Hills Municipal Code (Zoning Regulations) to create the Rancho Del Mar Housing Opportunity Overlay, and to map this Overlay on the entire PVUSD site.

The Overlay establishes a minimum density of 20 units per acre and a maximum density of 24 units per acre. Affordable housing is permitted "by right" subject to objective development standards defined in the Ordinance. The Ordinance identifies the area west of the PVPTA site as the location for future housing.

- Amending the Zoning Regulations to allow emergency shelter on the property by right, subject to specific development standards specified in the Code.

- Amending the Zoning Regulations to allow single room occupancy (SRO) units on the site, with a conditional use permit.

Other Constraints to Site Development

Development of multi-family housing, emergency shelter, or SRO uses on the PVUSD site could occur either:

- by the School District itself (on its own or through a public-private partnership)
- through a long-term lease; or
- through sale of all or part of the property

The City has met with the School District and reviewed Board Policies and Codes. Current policies accommodate all of these options—and that there are no prohibitions or limitations on multi-family and special needs housing. Moreover, the School District has expressed interest in developing housing for teachers in the past; such units would meet income criteria for low or very low income units. There are ample opportunities for such housing on the property that would not impact operations at either Rancho Del Mar School or PVPTA. Rancho Del Mar is a logical location for these activities, given the size of the site and its significant underutilization.

The District is less likely to pursue development of an emergency shelter or SRO on its own, as these are not as clearly mission-aligned. However, it could sell or lease property to a third party who could develop these uses. SROs and emergency shelters would be unlikely to co-locate in the school building or on the 1.75-acre school footprint area, given the possibility for use conflicts. However, the 31-acre PVUSD property is large enough to accommodate multiple uses. There are developable areas on the site that are 1,500 feet away from the school. The District has already set a precedent by leasing a large portion of this site to a transit agency; it could do the same for a social service agency or another agency providing a public benefit service to the community.

Like most School Districts in California, the sale or lease of PVUSD property is subject to action by the School Board. Section 3280 of the Board's Policies allows the Superintendent or designee to study the existing and projected use of facilities to ensure the efficient utilization of space. A Board Committee is typically created prior to the sale of land (although teacher housing is specifically exempted by Board policy from any Committee requirements). A Board vote is required to approve the sale or lease terms. There are also requirements for how the proceeds of a sale or lease may be used.

Once property is sold, the School District Board has no land use or decision-making authority over a site. Thus, the District could sell all or part of the PVUSD site to a non-profit housing

developer, for-profit housing developer, social service provider, or other third party who could develop housing "by right" without further oversight by the Board or City Council. Subdivision of the property would be required, creating a new legal parcel on which housing could be developed.

Given its large size, the most likely scenario is only that a portion of the site would be sold, rather than the entire site. In effect, the Housing Element is creating a unique opportunity for the District to sell a vacant or underutilized subarea on its 31-acre site to a third party, who can then produce teacher housing, senior housing, affordable family housing, or another type of housing that meet local needs.

There are a number of examples of successful small affordable housing projects in the Los Angeles region that meet the density and height criteria established for this site. For example, Habitat for Humanity is currently developing a 10-unit affordable two-story townhome project in Long Beach on a 0.5-acre site. Similar two-story projects by Habitat have been developed in Lynwood, Burbank, Bellflower, and Downey.

In the event that the Rancho Del Mar School itself is closed in the future, the building could be sold and repurposed for other uses. Once sold, the floor space could be reconfigured for alternative uses, including special needs housing. The project would be subject to the objective standards prescribed by the zoning regulations (covered elsewhere in this Housing Element), but approval of the development would be ministerial.

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APPENDIX C:
Accessory Dwelling Unit Survey Analysis

In Fall 2020, the City of Rolling Hills surveyed its residents to determine the viability of Accessory Dwelling Units (ADUs) as a future affordable housing strategy. The survey was formatted as an 11 x 17 folded sheet printed double-sided (four 8.5 x 11 pages) and was mailed via the US Postal Service to approximately 700 addresses in the city. Return postage was provided so the survey could be easily returned. Residents had roughly one month to complete and return the survey. An option was provided to reply electronically via SurveyMonkey.

Approximately 190 surveys were returned, for a response rate of 27 percent.[1] Another seven surveys were received by SurveyMonkey, bringing the total response rate to 28 percent. The survey represents the views and experiences of more than one in four Rolling Hills households. This is a high response rate and is indicative of the community's strong interest in the subject.

Demographic information about the respondents was collected as part of the survey. Respondents tended to be older than Rolling Hills residents as a whole and were mostly long-time residents. About two-thirds of the respondents were 65 or older and 25 percent were 50-64. By contrast, about 42 percent of the City's adult residents are over 65 and 36 percent are 50-64. About 42 percent of the respondents had lived in Rolling Hills for more than 30 years and only 20 percent had lived in the city for less than 10 years. By contrast, about 27 percent of all residents have lived in Rolling Hills for more than 30 years and 31 percent have lived in the city for less than 10 years.

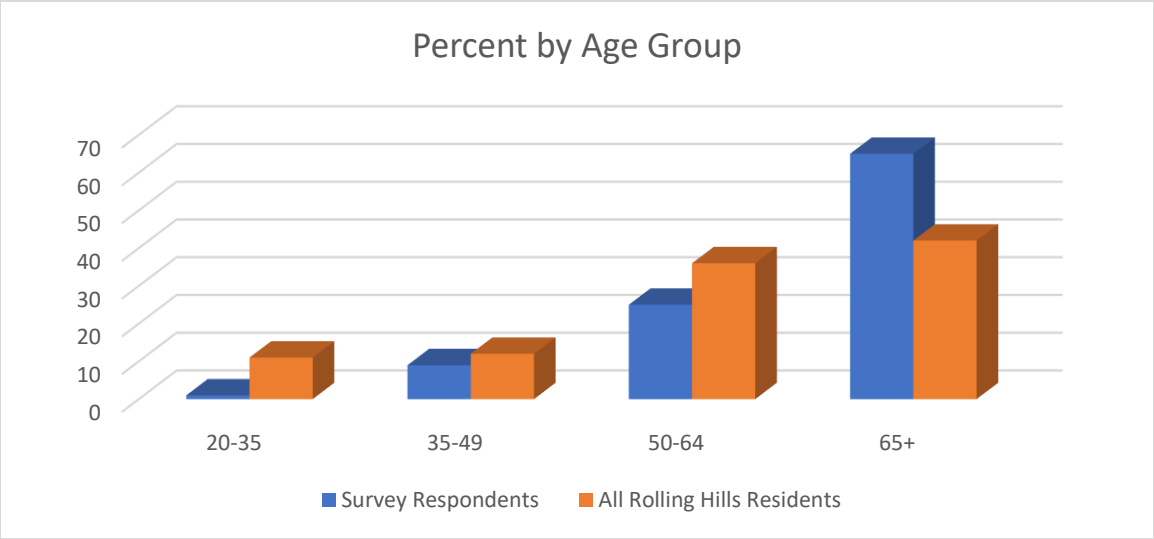
The distribution of respondents by household size was close to the citywide average. Approximately 65 percent lived in one and two person households, which is similar to the citywide average. Only seven percent lived in households with five or more residents, which is just below the citywide average. Of the 194 respondents who indicated their housing tenure, 192 were owners and two were renters. This is equivalent to one percent of the respondents, whereas renters represent about five percent of Rolling Hills households.

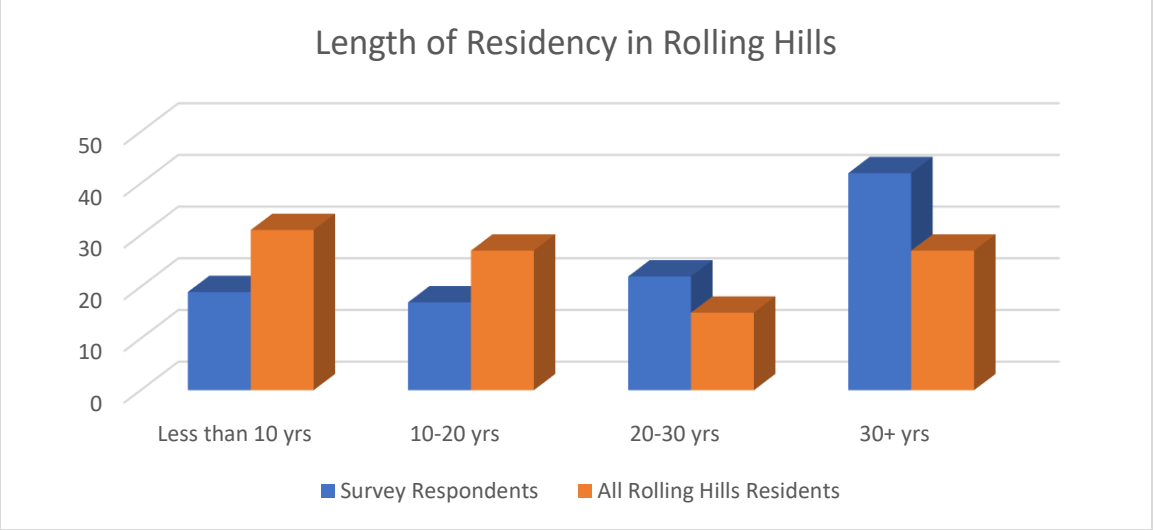
Figure C-1 compares demographics for the survey respondents and residents in the city as a whole.

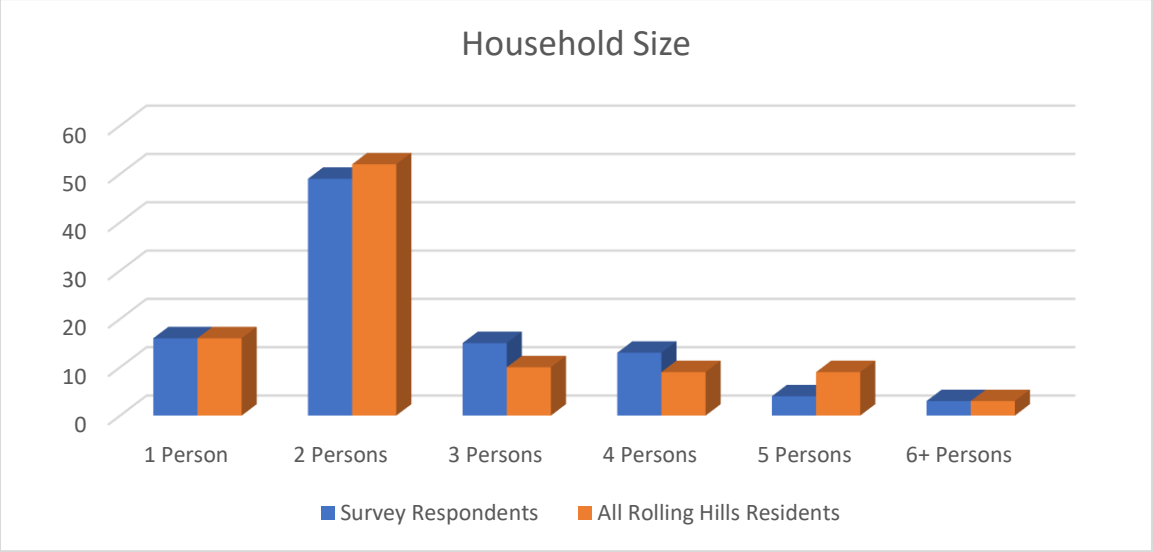
Responses to the survey was completely anonymous. Respondents were given the option of phoning the City if they had questions or wanted more information about ADUs.

[1] *This estimated return rate was based on 700 households. In August 2021, Census data indicated there were 637 households in the City, so the actual return rate was 31 percent.*

Figure C-1: Demographics of Survey Respondents Relative to All Rolling Hills Residents







Suitability of the Property for an ADU

Question 1 asked respondents to indicate if their property contained an ADU or other habitable spaces which could potentially be used as an ADU. Respondents were asked to check "all choices that apply," so the results are not additive.

Thirteen of the respondents indicated they had a legally permitted ADU on their properties with a separate kitchen, bath, and entrance. Some of these units may have been legally created in 2018-2020 after the City adopted its ADU Ordinance, but some likely already existed and are legally classified as guest quarters.

Thirty-four respondents, or roughly 25 percent of the total, indicated they had a secondary building on their properties with an indoor kitchen, bathroom, heat and plumbing. This included guest houses/ casitas, pool houses, habitable barns, and similar features that could be considered *potential* ADUs even if they are not used for habitation by another household. Ten respondents indicated they had a second kitchen in their homes. Eighteen said they had another space in their home that could "easily be converted" to a separate dwelling or junior ADU. While some respondents may have counted the same space twice, roughly half indicated they had spaces on their properties with the potential to be used as an ADU or JADU. This is further supported by the responses to Question 2 below.

Current Use of ADUs and Spaces Suitable as ADUs

Question 2 asked how the spaces described in Question 1 were being used. Only three of the respondents indicated they were renting ADUs to a paying tenant. Seven indicated that the space was used by a caregiver or domestic employee, while eleven had a family member or long-term occupant living on the property. Collectively, this represents 21 units, or just over 10 percent of the respondent households. The remainder of the respondents with potential ADU space indicated they used these spaces for house guests or their own families, or that the space was unoccupied or used as storage.

The survey findings indicate that ADUs (or "unintended" ADUs such as guest houses) already represent a component of the Rolling Hills housing supply. The survey suggests that there is potential to expand the number of permitted ADUs in the future, even without any new construction. About 15 percent of the respondents (30 in total) indicated they had potential ADU space on their properties that was vacant or used for storage.

Respondents were asked the square footage of the spaces they were describing. Figure C-2 shows the distribution. More than 100 responses were received, with a median size of about 600 square feet.

Respondents who had rented ADUs on their properties were given the option of reporting the rent that was being charged. Two of the three households who indicated they had a paying tenant replied. The monthly rents charged for these units were $950 in one case and $1,500 in another. Based on HCD income limits for Los Angeles County, the $950 unit would be considered affordable to a very low-income household of one or more persons. The $1,500 unit would be considered affordable to a low-income household of one or more persons. These

units are presumed to have been created or legalized between 2018 and 2020, following adoption of the ADU ordinance.

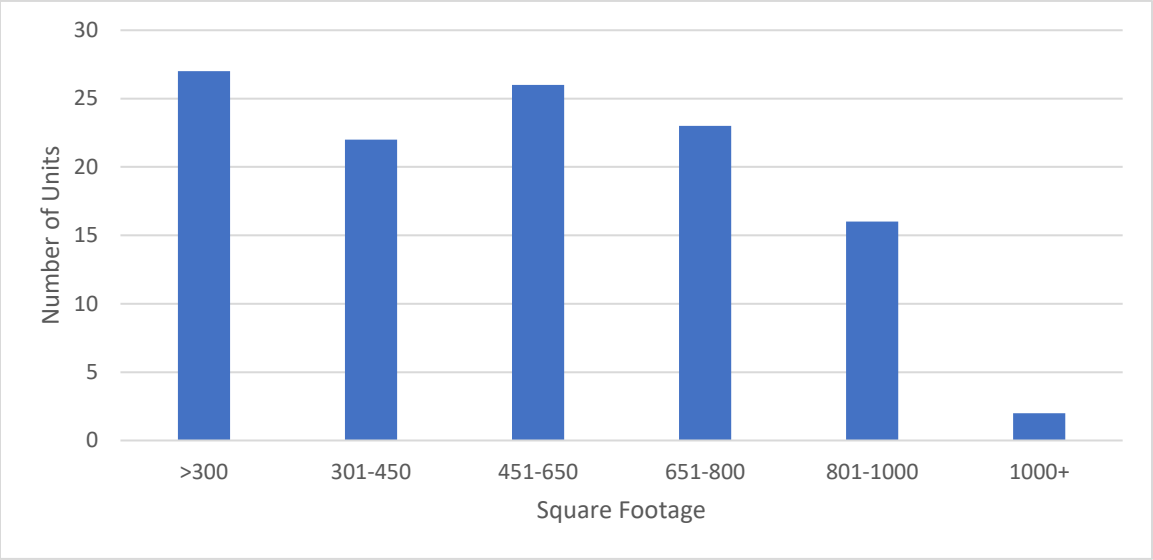


Figure C-2: Square Footage of Spaces Reported by Respondents as Potential ADUs on their Properties, Including Guest Houses

Income Characteristics of Households in Occupied Units

Those who indicated their ADU (or "unintended" ADU/ guest house/ secondary space) was occupied by someone who was not part of their household were asked to describe the number of residents and total income of the occupants. The numeric HCD 2020 income limits (dollar amounts) and number of persons in the household were used so that the occupants could be easily identified using HCD's income categories.

There were 12 responses to this question, or about six percent of all surveys returned. This presumably includes the small number of units that are rented as ADUs, plus those occupied by caretakers, domestic employees, and other long-term occupants. The distribution by HCD's income categories is shown below:

Household Size and Income of Households Occupying Formal or Unintended ADUs

Income	1 person	2 person	3 person	4 person	5 person	6+ person	TOTAL
Extremely Low	1		1				2
Very Low	2						2
Low	1						1
Moderate/ Above Mod	1	4		1		1	7
TOTAL	5	4	1	1	0	1	12

The data indicates that roughly half of the survey respondents' ADUs (including those which may be unpermitted and used "informally" on a long-term basis) provided housing for low, very low, and extremely low income households.

Interest in Developing an ADU

Question 4 asked respondents if they might be interested in developing an ADU if they didn't currently have one. There were 164 responses to this question, with 24 percent indicating "Yes" and 15 percent indicating "Maybe." Another 40 percent indicated "No" and 14 percent indicated "Probably Not." The responses are profiled in Figure C-3 below.

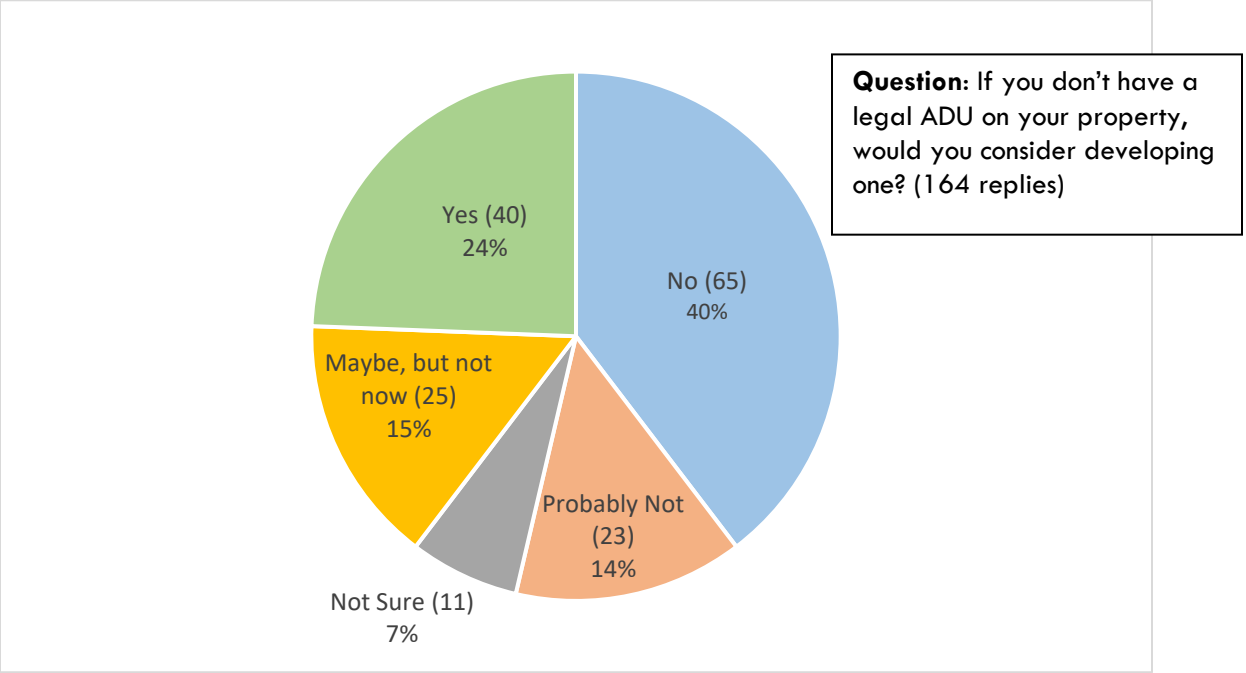


Figure C-3: Level of Interest in ADU development (N=164)

The chart above suggests that more than half of the City's residents are not interested in developing an ADU on their properties, and another quarter are undecided or not interested at this time. To flesh out possible barriers, Question 4 included a follow up asking why respondents were not interested. The responses suggest it is primarily a lifestyle choice rather than the result of regulatory or cost barriers. About one-third (51) listed the loss of privacy as a factor, and another one-third (48) indicated they didn't want to deal with tenants. The number of respondents listing the "permitting process" as a factor was relatively small (27 out of 164) and the percentage listing "cost" as a factor (24 out of 164) was even smaller. About 10 percent of the respondents cited lack of space as their reason.

Location of Possible ADUs

Those who expressed some interest in adding an ADU were asked where they might locate the ADU on their properties. The responses can potentially help inform local programs that facilitate ADUs in particular locations. There were 85 responses, representing more than 40 percent of

the total survey respondents. Conversion of an existing accessory building (such as a guest house or barn) was the most commonly selected choice (38 responses), followed by a new detached structure (21 responses) and conversion of existing space in the house (6 responses).

Only one respondent indicated they would build an addition to their home. Nineteen of the respondents were not sure where they might locate an ADU. Again, a majority (about 115) were not interested in adding an ADU.

The responses suggest stronger demand for traditional ADUs than Junior ADUs, given the large number of respondents indicating they would built or convert an accessory structure, rather than use space within their own homes.

Likely Use of Future ADUs

Respondents were asked how they would use an ADU on their property if they developed one in the future. The responses to this question are important, as the objective of the program is to create rental housing opportunities or opportunities for on-site care givers. Using the ADU as a home office or space for occasional house guests would not accomplish State-mandated housing program goals. Figure C-4 shows the responses to the question.

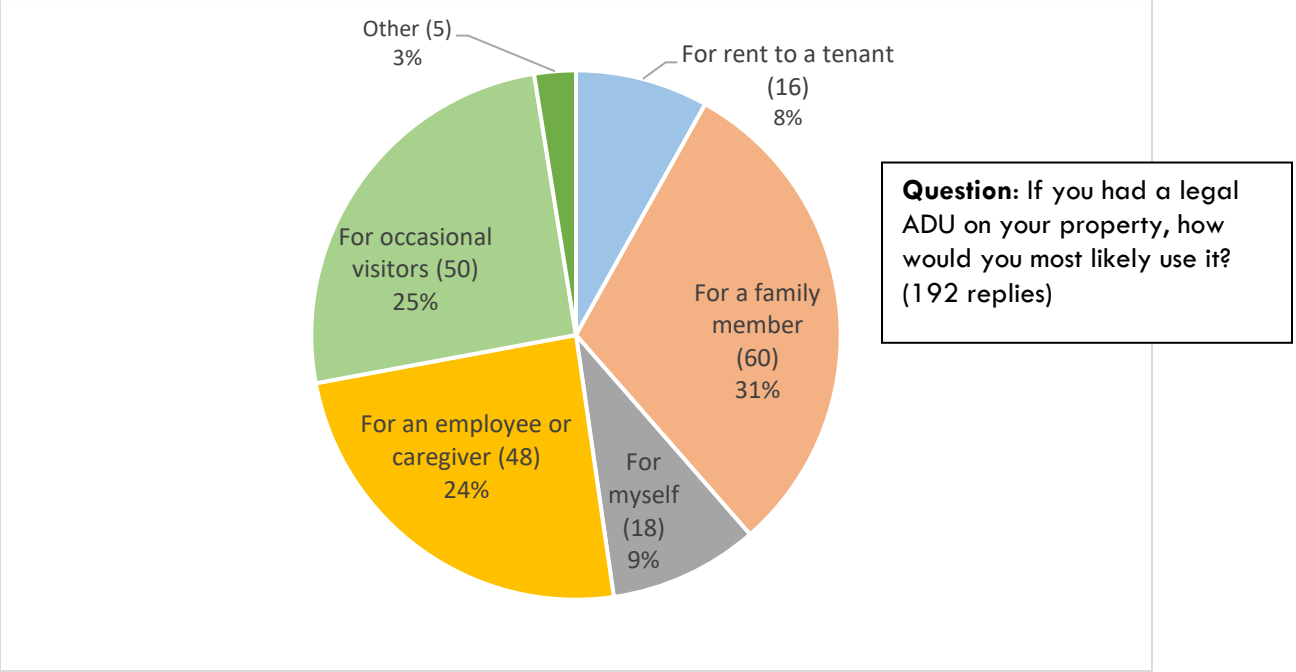


Figure C-4: Likely Use of Future ADUs (N=192)

The responses indicate that roughly one-third would use the ADU for another household, including 16 who suggested they would rent it to a tenant and 48 who suggested they would use it for a domestic employee or caregiver. The latter statistic is particularly important, as it suggests a potential resource for health care workers, elder care professionals, construction and landscape workers, and others who may work in Rolling Hills but lack the financial resources to live here. Nearly a third of the respondents indicated they would use the ADU for a family

member. The family member could be an extension of their own household or a relative or relatives living independently as a separate household. It is worth noting that only a quarter of the respondents indicated they would use the ADU for occasional visitors—historically, this has been the intended use of guest houses in the city.

Use of ADUs as Affordable Housing

Respondents were asked if they would consider limiting the rent on an ADU so that the unit was affordable to a lower income household. The question specifically asked if the respondent would consider a deed restriction that maintained the rent at a reduced rate (such as $1,200/ month for a two-person household) to help the City meet its State-mandated affordable housing requirements. Of the 194 surveys returned, 25 indicated they would consider this and another 20 indicated they might consider this ("maybe"). This represents nearly one-quarter of the total respondents. Another one-quarter indicated they would need more information before deciding. About 35 percent indicated they would not consider a lower income affordability restriction and 15 percent did not respond.

Figure C-5 shows the responses to this question. The data suggests that an "affordable" ADU program could generate sufficient participation for the City to meet its entire lower-income housing allocation through ADUs.

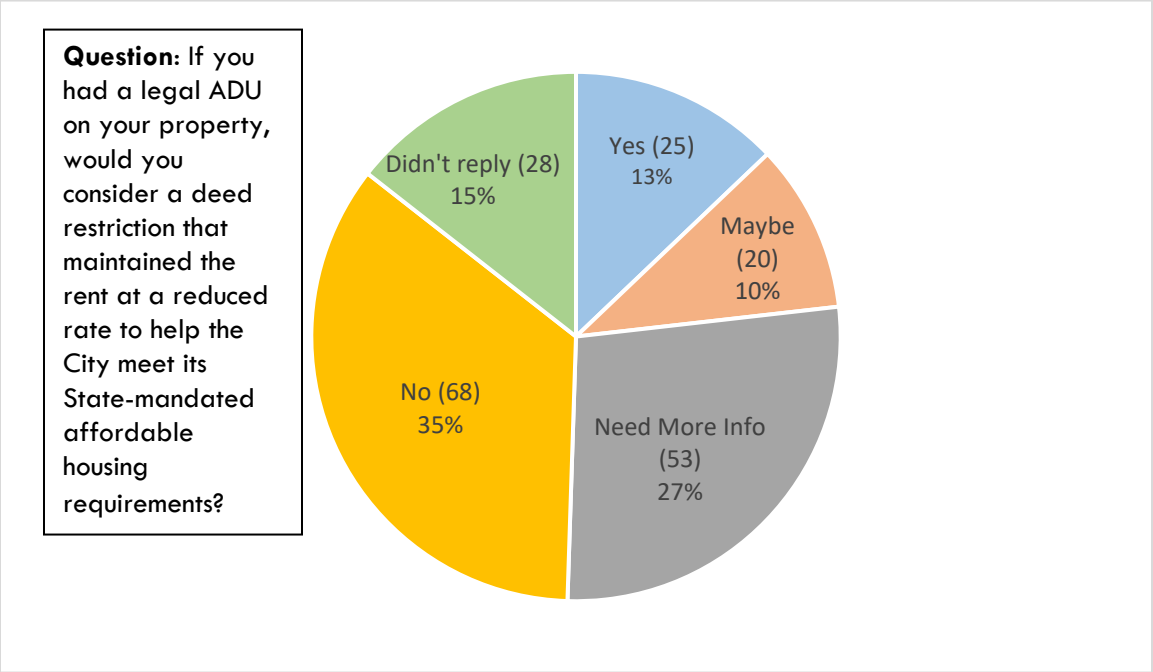


Figure C-5: Viability of ADUs to Meet Very Low Income Housing Assignment (N=194)

For the 98 respondents who answered "Yes", "Maybe," or "Need More Information", the survey asked a follow-up question, which is the maximum length of time the respondent would consider acceptable for an affordability deed restriction. Two respondents did not reply, but the other 96 provided the answers below:

- 20 would consider a 5-year term
- 2 would consider a 10-year term

- 3 would consider a 20-year term
- 17 would consider a deed restriction that ended when they sold the house
- 59 were not sure or answered "other"

The responses suggest that long-term deed restrictions (10 or 20 years) and affordability contracts that "run with the land" would have limited participation. Residents are more open to short-term arrangements such as five-year affordability terms, and flexible arrangements that would not encumber the resale of their homes. This is an important consideration in the event a program is established.

Incentives

The final question in the survey asked respondents to select from a menu of possible incentives that might make a rent-restriction on an ADU more acceptable to them. Respondents were invited to select as many of the choices as they wanted. The most frequently selected options are shown in descending order in Figure C-6 below:

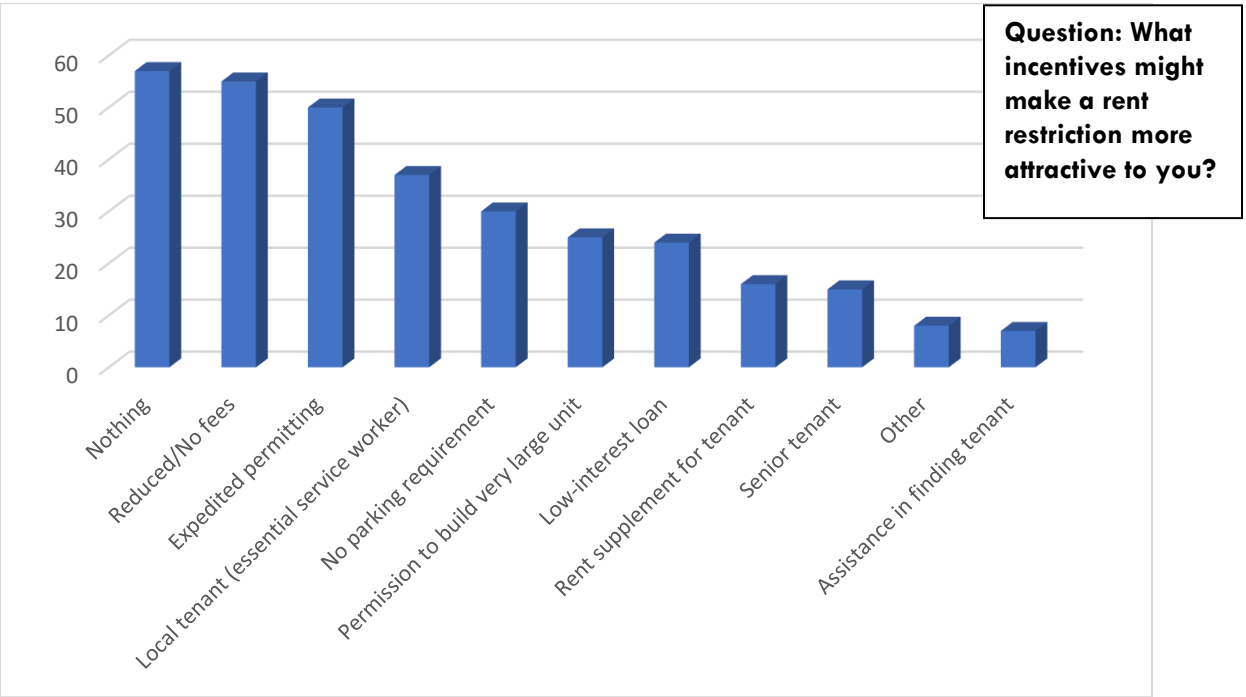


Figure C-6: Ranking of Potential Affordable ADU Incentives

The most frequently selected option was "nothing." However, 55 respondents indicated that fee waivers or reductions would be an incentive, and 50 said expedited permitting would be an incentive. Many respondents were also supportive of the idea of rent-restricted ADUs serving local essential service workers such as fire-fighters and teachers. The least popular incentive was assistance in finding a tenant.

Other Comments

The survey provided an opportunity for residents to make general open-ended comments on ADUs and housing issues in Rolling Hills, as well as the factors the City should consider as new ADU policies and regulations are developed. Feedback was provided by 52 of the respondents. This is summarized below.

Most of the open-ended comments expressed negative views about ADUs and their potential impacts on the character of Rolling Hills, as well as concerns with State housing mandates and the erosion of local land use control. Numerous concerns were raised about safety, security, and privacy. There were also concerns expressed about noise, parking, traffic, evacuation capacity, and impacts on the community's rural, equestrian feel. Some respondents expressed concerns that they would not be able to choose their own tenants if they created an ADU or would be penalized if they created an ADU but did not rent it. Questions were also raised about property tax impacts, septic system impacts, and whether tenants would pay association dues and have access to RHCA facilities.

There were also supportive comments, particularly from persons interested in creating ADUs for aging parents, or for themselves to age in place while renting out their primary home. Several respondents indicated an interest in renting space to a care giver. One respondent suggested prioritizing rentals to employees of the RHCA. Some respondents expressed their support for the idea of using the school property to meet affordable housing needs rather than relying on ADUs.

Survey

A copy of the survey mailed to residents follows this page.

City of Rolling Hills Accessory Dwelling Unit Survey

October 2020

Dear Resident:

Please take a few minutes to complete this survey about Accessory Dwelling Units (ADUs) in Rolling Hills. Your responses will help us understand community goals and concerns and will be used to develop new policies for consideration by the Rolling Hills Planning Commission and City Council.

State law requires that all cities and counties allow ADUs, provided they meet certain standards. Some of the potential benefits of ADUs include rental income for homeowners, on-site living space for caregivers or household employees, and accommodation of extended family (adult children, parents, etc.). ADUs can also help residents "age in place," particularly as homeowners need more care or assistance.

The City's objective in carrying out this survey is to determine the level of interest in ADUs among Rolling Hills residents and evaluate their potential to meet local housing needs. Like all cities in California, Rolling Hills is required by State law to provide for its "fair share" of the region's housing needs, including low- and very low-income households. ADUs provide a way to do that without significantly changing the character or appearance of the community. Some communities even provide special incentives for homeowners who rent ADUs at reduced rates to very low-income households, including household employees and local essential service employees.

The deadline for returning your survey is November 20, 2020. Please use the enclosed postage-paid envelope to return the survey to City Hall by this date. If you would prefer to complete the survey on-line, please visit www.surveymonkey.com//rollinghillsADUsurvey.

Please do not include your name or address on the survey as the intent is for all responses to be anonymous. If you have questions about the survey or about ADUs in Rolling Hills, please call Meredith Elguira at (310) 377-1521.



What are ADUs and JADUs?

Accessory Dwelling Units (ADUs) are sometimes referred to as "in-law apartments" or "second units." They are small independent dwelling units that exist on single family properties, either in a detached structure or as part of the primary structure with a separate entrance. ADUs include a bedroom or sleeping area, a bathroom, and cooking facilities.

Rolling Hills has adopted specific zoning standards for ADUs as required by state law. The maximum allowable size is 850 square feet for a studio or one-bedroom and 1,000 square feet for a two bedroom. Other standards also apply.

Junior Accessory Dwelling Units (JADUs) are a type of ADU created by converting existing living space inside a single-family home (usually a bedroom) to a separate living space. They have a maximum size of 500 square feet. JADUs may have their own kitchenette or bathroom, or they may share the facilities in the primary residence.

State law allows a property to have both an ADU and a JADU if certain requirements are met.

Thank you for taking the time to complete the survey!

Accessory Dwelling Unit Survey

1. Does your property include any of the following features? (circle all that apply)

A. A legally permitted Accessory Dwelling Unit (ADU) with kitchen, bath, and separate entrance?

B. A guest house, pool house, casita, barn or other outbuilding that has heat and plumbing?

_____ Check here if the space has a kitchen or other cooking facilities

C. A space inside your house with a separate entrance from outside and independent living quarters, including a bedroom/ sleeping area and bathroom?

_____ Check here if the space also has its own kitchen or cooking facilities

D. Another space within your house that could easily be converted into an accessory dwelling unit?

2. If you circled one of the choices above, how is the space currently used? (If you circled more than one choice, please provide a response for each applicable space on your property. Use the blank line to the right of each choice below to describe the space you're referring to).

A. It is occupied by a tenant paying rent _____

B. It is occupied by a family member or long-term visitor who is not part of my household _____

C. It is occupied by a caretaker or household employee(s) _____

D. It is used occasionally by guests or visitors _____

E. My own household uses the space _____

F. The space is currently not occupied by anyone, or is used for storage _____

G. Not applicable

2A. About how large is the space of each applicable feature from Question 1 (in square feet)?
(please skip question if not applicable)

_____ _____ _____

2B. If rent is collected for the space, what is the monthly amount? (if multiple spaces are rented, please indicate the rent for each area). (Please skip question if not applicable)

_____ _____ _____

3. **If you have space on your property occupied by a household other than your own, please circle the category in the table below that most closely matches their annual income based on the number of persons in their household, if you know that amount.** Recent data from the US Census indicates that 16 percent of Rolling Hills households have annual incomes below $50,000. ADUs (or potential ADUs) may provide a resource for these households. If Question 3 does not apply to your property, please skip to Question 4.

	Number of Persons in the Household (for other occupants only, not your own household)					
	1	2	3	4	5	6
Annual Income	$23,700 or less	$27,050 or less	$30,450 or less	$33,800 or less	$36,550 or less	$39,250 or less
	$23,700-$39,450	$27,050-$45,050	$30,450-$50,700	$33,800-$56,300	$36,550-$60,850	$39,250-$65,350
	$39,450-$63,100	$45,050-$72,100	$50,700-$81,100	$56,300-$90,100	$60,850-$97,350	$65,350-$104,550
	$63,100 or more	$72,100 or more	$81,100 or more	$90,100 or more	$97,350 or more	$104,550 or more

4. **If you don't currently have a legal ADU on your property, would you consider developing one? (circle one answer)**

No	Probably Not	Not Sure/ Neutral	Maybe, but not at this time	Yes

4A. If you answered A, B, or C, what are the reasons? (Circle All that Apply)

No Interest	Cost	Loss of Privacy	Permitting Process	Don't Want to Deal with Tenants	No Space

Other (please explain below)_____

_____

5. **If you decided to build an ADU on your property, where would it be located? (circle one)**

New detached structure on my property	Conversion of an existing accessory building on my property (e.g., guest house, barn, etc.)	An addition to my house	Conversion of space already within the footprint of my house	Not sure	I would not add an ADU on my property

6. **If you had a legally approved ADU on your property, how would you most likely use it? (circle one)**

For rent to a tenant	For a family member	For myself	For a household employee of caregiver	For occasional visitors	Other

7. If you had a legally approved ADU on your property, would you consider a deed restriction that maintained the rent at a reduced rate (for example $1,200/month, which is considered the threshold for an "affordable" housing unit for a two person very low income household) to help the City meet its State-mandated affordable housing requirements? (circle one)

A. Yes
B. Maybe
C. I would need more information first
D. No

7A. If your answer to Question 7 was A-C, what would be the maximum length of time you would consider for the rent restriction? (circle one)

A. Five years
B. 10 years
C. 20 years
D. Until I sell the house
E. Not Sure
F. Other _____

7B: What incentives might make a rent restriction more attractive to you? (circle all that apply)

A. No parking requirement
B. Reduced (or no) permit fees
C. Expedited permit processing
D. Assistance in finding a tenant
E. Rent supplement for the tenant
F. Local tenant (e.g., school teacher, fire fighter, child care worker)
G. Senior tenant
H. Low-interest financing to create the ADU
I. Permission to build a unit larger than 1,000 square feet
J. Nothing
K. Other _____

8. To ensure that we are hearing from a cross-section of the community, please tell us a little about you:

Circle one choice in each box

Age	**How Long Have You Lived in Rolling Hills?**	**How Many People Are in Your Household?**	**Are you a Homeowner or a Renter?**
Under 35	Less than 10 years	1	4	Homeowner
35-49	10-19 years	2	5	Renter
50-64	20-29 years	3	6 or more	
65+	More than 30 years		

9. Please share any concerns you may have about ADUs in Rolling Hills, or factors you'd like us to consider as new ADU policies and regulations are developed: