DESCANSO GARDENS MASTER PLAN

MITIGATED NEGATIVE DECLARATION

PREPARED FOR:

COUNTY OF LOS ANGELES DEPARTMENT OF PARKS AND RECREATION
1000 S. FREMONT AVENUE, UNIT 40
BUILDING A-9 WEST, 3RD FLOOR
ALHAMBRA, CALIFORNIA 91803

PREPARED BY:

SAPPHOS ENVIRONMENTAL, INC.
430 NORTH HALSTEAD STREET
PASADENA, CALIFORNIA 91107

JANUARY 27, 2020

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Section 1

Project Description

The County of Los Angeles (County) Department of Parks and Recreation (DPR) proposes to adopt a comprehensive 15-year Master Plan (proposed project) to guide the development of Descanso Gardens (Master Plan Area) between 2020 and 2035. The California Environmental Quality Act (CEQA), as established by statute (California Public Resources Code [PRC] §§ 21000 *et seq.*), requires that the environmental implications of an action requiring discretional approval by a local agency be estimated and evaluated before project approval. This Mitigated Negative Declaration (MND) was prepared by DPR pursuant to CEQA, as amended (Division 13, PRC) and the State CEQA Guidelines (Division 6, California Administrative Code). The proposed project would ultimately result in the construction of improvement projects on public lands, some of which may involve the expenditure of public funds, and thus constitutes a project pursuant to CEQA. Descanso Gardens is owned by Los Angeles County and jointly operated by the Descanso Gardens Guild, Inc. and DPR. The County is the Lead Agency pursuant to CEQA. This MND and supporting environmental analysis will support the decision-making process to be undertaken by the County, in their role as the Lead Agency pursuant to CEQA, in considering the Descanso Gardens Master Plan for approval.

1.1 PROJECT TITLE

Descanso Gardens Master Plan

1.2 LEAD AGENCY

County of Los Angeles

1.3 PRIMARY CONTACT PERSON

Julie Yom, Park Planner
County of Los Angeles Department of Parks and Recreation
Planning and Development Agency
1000 S. Fremont Avenue, Unit #40
Building A-9 West East, 3rd Floor
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jyom@parks.lacounty.gov

1.4 PROJECT LOCATION

The Master Plan Area is an approximately 149-acre property located in the City of La Cañada Flintridge (LCF) adjacent to the eastern City of Glendale boundary, within the Fifth Supervisorial District of Los Angeles County, approximately 11 miles north of the Los Angeles Civic Center (Figure 1.4-1, *Regional Vicinity Map)*. Descanso Gardens is sited in the Crescenta Valley, at the far western end of the San Gabriel Valley. The Master Plan Area is nestled in the San Rafael Hills to the south of the valley and across from the San Gabriel Mountains and Angeles National Forest to the east and north. The Master Plan Area is in the San Rafael and La Cañada Land Grants of the U.S. Geological Survey (USGS) 7.5-minute Pasadena topographic quadrangle in Township 1 North, Range 13 West, Section 2; and Township 2 North, Range 13 West, Section 35 (Figure 1.4-2, *Topographic Map with USGS 7.5-Minute Quadrangle Index*). The elevation ranges from 1,820 feet above mean sea level (MSL) at the southern property boundary near the Descanso Motorway trail, to 1,251 feet above MSL at the eastern property boundary near Winery Canyon Channel. In general, the Master Plan Area is concave, with topography slopes to the southeast towards Pasadena. Similarly, the property drains toward Flint Canyon Wash, which flows in an easterly direction, to its juncture with the Arroyo Seco, which in turn flows to the south and west to connect to the Los Angeles River north of downtown Los Angeles.

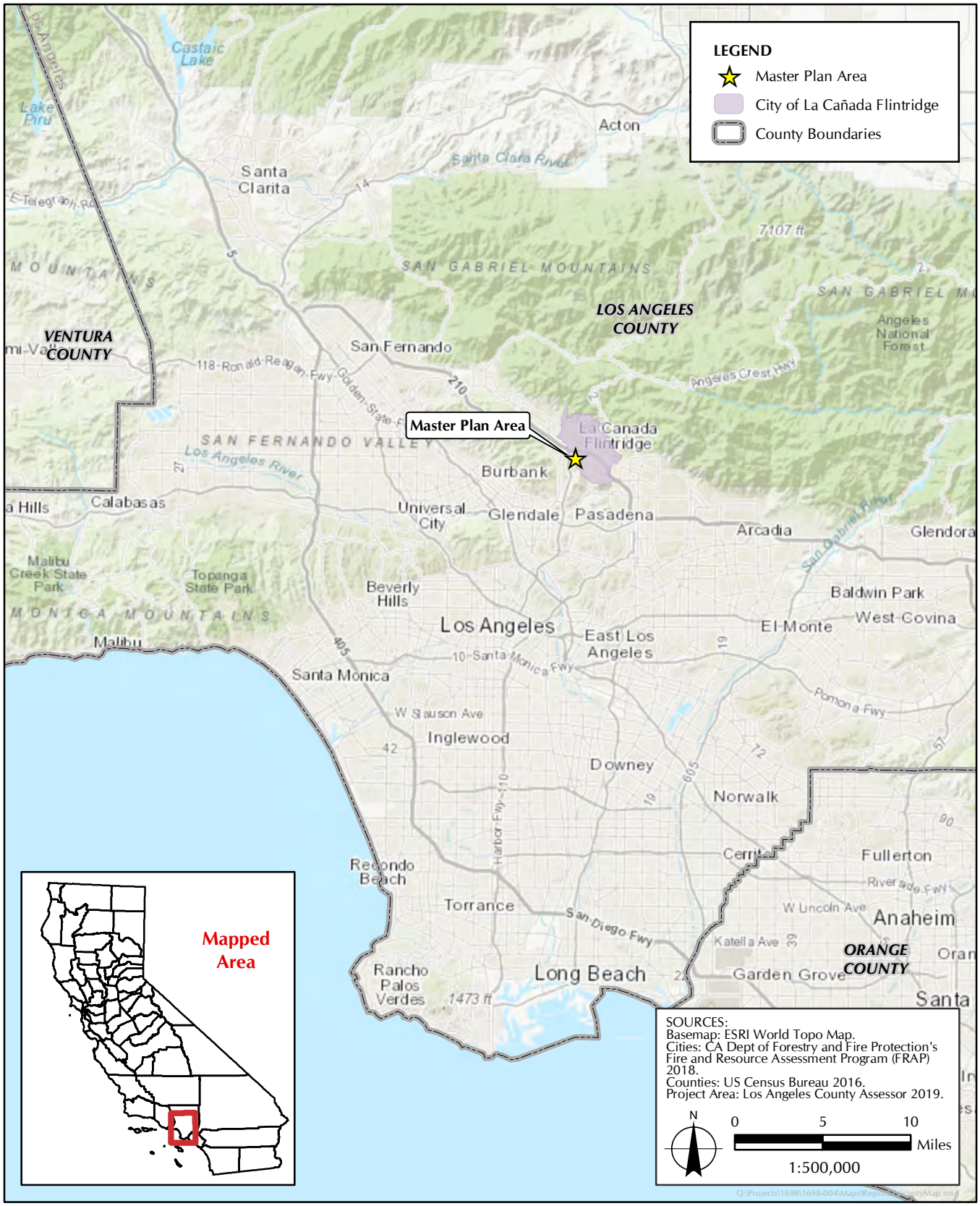

FIGURE 1.4-1

Regional Vicinity Map

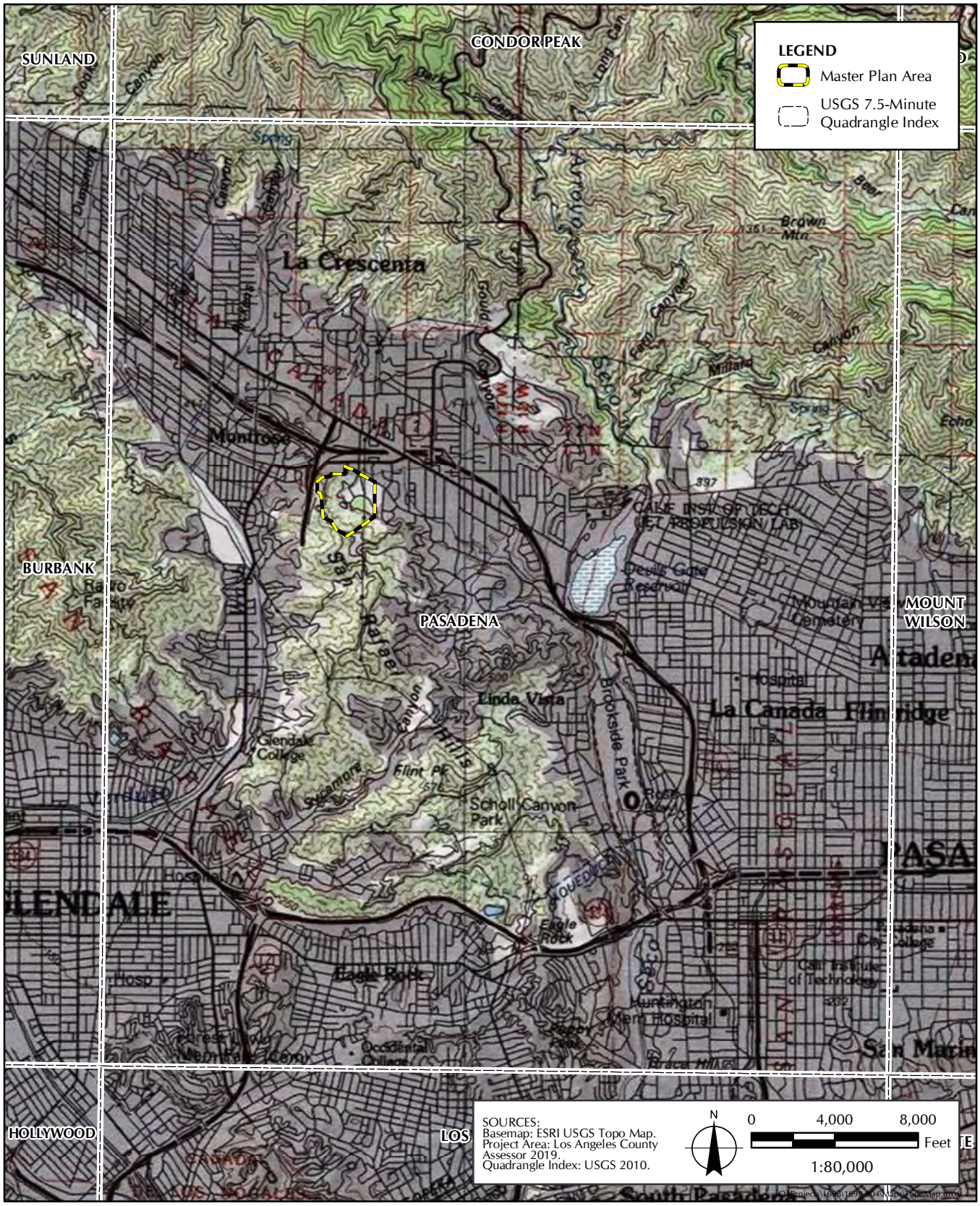

FIGURE 1.4-2

Topographic Map with USGS 7.5-Minute Quadrangle Index

Descanso Gardens is located at 1418 Descanso Drive, La Cañada Flintridge, California 91011. The Master Plan Area is bounded on the northwest by Wishing Hill Drive and single-family residences, on the northeast by Descanso Drive, on the east by single-family residences on Encinas Drive, and on the south and west by undeveloped open space including a ridgeline traversed by Descanso Motorway (designated as the Descanso Trail in the City of LCF Trails Master Plan), a segment of the 12.7 Mile City Loop Trail (Figure 1.4-3, *Local Vicinity Map*). Descanso Motorway, a two-track dirt road, is located approximately 1,000 feet south and parallel to the southern boundary and then turns and enters Descanso Gardens on the western boundary. Descanso Gardens is readily accessible from California State Route 2 (SR 2) and U.S. Interstate 210 (I-210). From SR 2, the Master Plan Area can be reached via Verdugo Boulevard and continuing south on Descanso Drive. From I-210, the Master Plan Area can be reached by exiting on La Cañada Boulevard, traveling northwest on Foothill Boulevard, continuing west on Verdugo Boulevard, and then south on Descanso Drive.

The Master Plan Area is traversed by the Winery Canyon Channel, a flood control channel managed by the Los Angeles County Department of Public Works Flood Control District (LACFCD), a City of LCF riding and hiking trail easement, and a utility corridor owned by Southern California Edison (SCE). Descanso Gardens occupies approximately 149 acres, including 138 acres owned by the County and three smaller areas totaling approximately 11 acres that are included in the Descanso Garden boundaries but owned by other parties. The 138 acres owned by the County are composed of five parcels (Assessor's identification numbers [AINs] 5813-008-909, 5813-008-910, 5813-008-902, 5813-008-903, and 5813-008-904). SCE owns approximately 9.6 acres (AINs 5813-008-803, 5813-008-804, and 5813-008-805) within the area operated as Descanso Gardens, including the picnic area and portions of the Main Lawn (Figure 1.4-4, *Parcel Map*). The County sold this land to SCE in 1984. The County now pays a modest annual "rent" to SCE for continued use of the property as part of Descanso Gardens, including appurtenant uses, such as overflow parking and picnic area use spaces. There is also 0.4 acre in the far northwest corner of the Descanso Gardens that is owned by the University of Southern California (USC). The 0.4 acre is made up of natural open spaces located at the southern boundary of the Verdugo Hills Hospital that is owned by USC. An additional 1.2 acres are within a riding and hiking easement that crosses through the northern portion of the property, west of the SCE property.

Consistent with California Public Utilities Commission regulations (General Order No. 69-C), access to SCE's right-of-way (ROW) and facilities within the SCE electrical utility corridor that extends through the Master Plan Area is maintained 24/7 to ensure SCE's access for system operations, maintenance, and emergency response.[1] Allowable uses by licensees if consistent with SCE's guidelines and approved in advance include shade structures, shadehouses/hothouses, greenhouses, irrigation systems, trailers, parking areas, and material storage.[2] The following low-intensity uses may be considered by SCE for approval as well: greenbelts, trails, horticulture and agriculture, wireless communication facilities within the footprint of the tower or removable shelters/equipment, and temporary activities such as TV filming. Prohibited uses within SCE's ROW include buildings and other permanent structures (such as pipelines, concrete slabs, foundations, vaults, decks, detention basins, pools, and anything else that is not portable and easily moveable). No plant species protected by federal or state law shall be planted within SCE's property and easements. All new trees and shrubs proposed on SCE land rights shall be slow growing and not exceed 15 feet in height. No wetlands, other sensitive natural habitat, vegetation-related natural plant areas, or environmental mitigation on SCE land will be permitted. Groundwater or storm water infiltration or recharge and water basins will not be allowed on SCE property. Flammable or combustible materials are not allowed to be used or stored on SCE's property.

[1] Public Utilities Commission of the State of California. Effective July 10, 1985. *Easements on Property of Public Utilities Resolution No. L-230.* Proposed General Order No. 69-C. Available at: http://docs.cpuc.ca.gov/published/Graphics/645.PDF

[2] Southern California Edison. n.d. *Using SCE Fee-Owned Property.* Accessed November 7, 2019. Available at: https://www.sce.com/partners/real-estate-and-locations/secondary-land-use

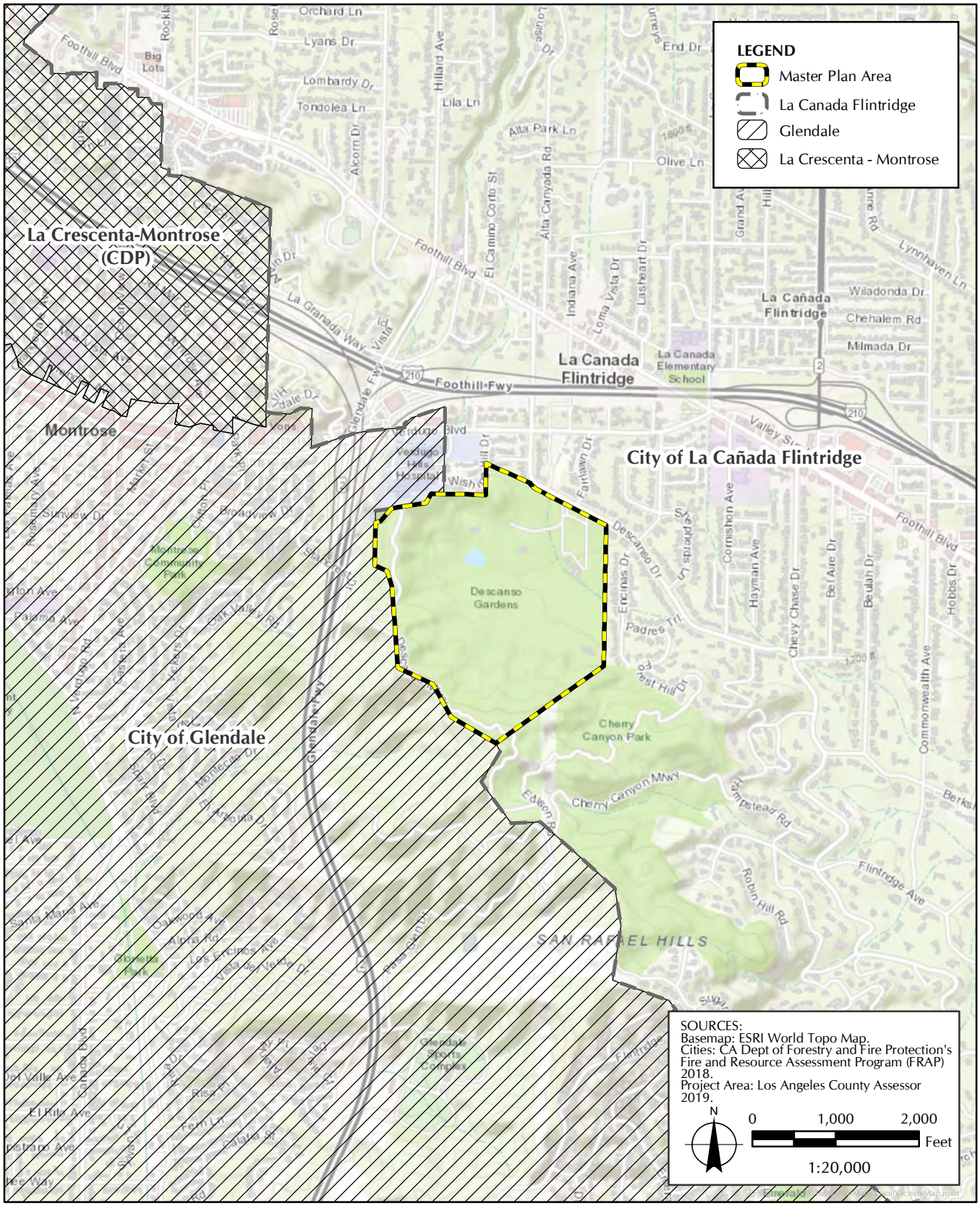
LEGEND
Master Plan Area
La Canada Flintridge
Glendale
La Crescenta - Montrose
La Crescenta-Montrose (CDP)
Montrose
La Canada Flintridge
City of La Cañada Flintridge
City of Glendale
Descanso Gardens
Cherry Canyon Park
SAN RAFAEL HILLS
Foothill Blvd
Foothill Fwy
Orchard Ln
Lyons Dr
Lombardy Dr
Tondolea Ln
Hillard Ave
Lila Ln
Alta Park Ln
Olive Ln
Alta Canyada Rd
El Camino Corto St
Indiana Ave
Loma Vista Dr
Lasheart Dr
La Granada Way
Verdugo Blvd
Fairlawn Dr
Descanso Dr
Encinas Dr
Cornishon Ave
Hayman Ave
Chevy Chase Dr
Bel Aire Dr
Beulah Dr
Hobbs Dr
Commonwealth Ave
Padres Trl
Crest Hill Dr
Cherry Canyon Mwy
Hampstead Rd
Robin Hill Rd
Flintridge Ave
Wiladonda Dr
Chehalem Rd
Milmada Dr
Lynnhaven Ln
La Canada Elementary School
Montrose Community Park
Descanso Dr
Glendale Fwy
Ocean View Blvd
Broadview Dr
Park View Dr
Rosemont Ave
Sunview Dr
Dixon St
Honolulu Ave
Pennsylvania Ave
Palomar Ave
Pinon Ave
Monterosa Dr
Mt Angelus Dr
Mt Arroyo Dr
Mt Aukum Dr
Mt Aukum Rd
Mt Carmel Ave
Mt Royal Dr
Mt Shasta Dr
Mt Whitney Dr
Oakwood Ave
Alpha Rd
Los Encinos Ave
Vista de Verde Dr
Santa Maria Ave
Zoheria Park
Glendale Sports Complex
Verdugo Hills Hospital
Big Lots
Rockhill Rd
Rosemont Ave
Alcorn Dr
Foothill Blvd
Valley St
Edison Rd
Berkshire Pl
Flintridge Ave
Fern Ln
Calada St
Sycamore Rd
El Rito Ave
Ashtano Ave
Vee Way
Sunset Blvd
Glendale Fwy
Verdugo Rd
Mt Whitney Dr
Mt Shasta Dr
Mt Royal Dr
Mt Carmel Ave
Mt Aukum Rd
Mt Aukum Dr
Mt Angelus Dr
Mt Arroyo Dr
Monterosa Dr
Honolulu Ave
Pennsylvania Ave
Palomar Ave
Pinon Ave
Dixon St
Rosemont Ave
Sunview Dr
Broadview Dr
Park View Dr
Ocean View Blvd
Descanso Dr

FIGURE 1.4-4

Parcel Map

1.5 PROJECT SPONSOR

Descanso Gardens Guild, Inc.
1418 Descanso Drive
La Cañada Flintridge, CA 91011

1.6 GENERAL PLAN LAND USE DESIGNATION

The Parks and Recreation Element of the Los Angeles County General Plan 2035 (County General Plan 2035) classifies arboreta and botanical gardens such as Descanso Gardens as Special Use Facilities that serve greater regional recreational or cultural needs and have no defined size criteria or service radius areas.[3] A Special Use Facility is generally a single-purpose facility that typically includes passive features such as wilderness parks, nature preserves, botanical gardens, and nature centers; or active uses such as performing arts, water parks, gold driving ranges, and golf courses. The Master Plan Area is located within the West San Gabriel Valley Planning Area.

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The Land Use Element of the LCF General Plan designates the Master Plan Area, as well as the properties southeast of Descanso Gardens and the SCE utility corridor that extends north into the Angeles National Forest, as an Open Space land use (Figure 1.6-1, *General Plan Land Use Designations*).[4] LCF's Open Space designation, which includes Descanso Gardens and other County land in the San Rafael Hills, allows for and encourages low-intensity public recreation uses with associated staging and parking areas. The designation applies to public and private properties in permanent open space that contribute to the preservation of natural resources, habitat protection, protection and management of natural resources, protection from and management of natural hazards, and hillside protection.

Land use designations surrounding the Master Plan Area, as established by the LCF General Plan and City of Glendale General Plan, include Low Density Residential and Open Space to the north (LCF), Very Low Density Residential to the northeast and east (LCF), Open Space to the southeast and south (LCF), Recreation/Open Space to the southwest and west (Glendale), and Public/Semi-Public to the northwest (Glendale).[5]

1.7 ZONING

A County zoning designation has not been assigned to the County-owned Master Plan Area and vicinity due to its location within an incorporated city. Although the County is not subject to city zoning, LCF's zoning information has been provided to inform the County's decision-making process. The LCF zoning designation for the Master Plan Area is PS (Public/Semi-public) for County-owned parcels and O-S (Open Space) for SCE-owned parcels (Figure 1.7-1, *Zoning Designations*).[6]

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[3] County of Los Angeles Department of Regional Planning. Adopted 6 October 2015. *Los Angeles County General Plan 2035*. Chapter 10: Parks and Recreation Element. Available at: http://planning.lacounty.gov/generalplan

[4] City of La Cañada Flintridge. Adopted January 22, 2013. *General Plan.* Chapter 2. Land Use Element. Figure LUE-1: Land Use Policy Map. Available at: http://www.lcf.ca.gov/planning/general-plan

[5] City of Glendale Community Development Department. Land Use Map last updated September 4, 2018. *City of Glendale Comprehensive General Plan Land Use Element.* Available at: https://www.glendaleca.gov/government/departments/community-development/planning-division/city-wide-plans/land-use-element

[6] City of La Cañada Flintridge Community Development Department. Updated April 2016. *Zoning Map.* Available at: http://www.lcf.ca.gov/planning

FIGURE 1.6-1

General Plan Land Use Designations

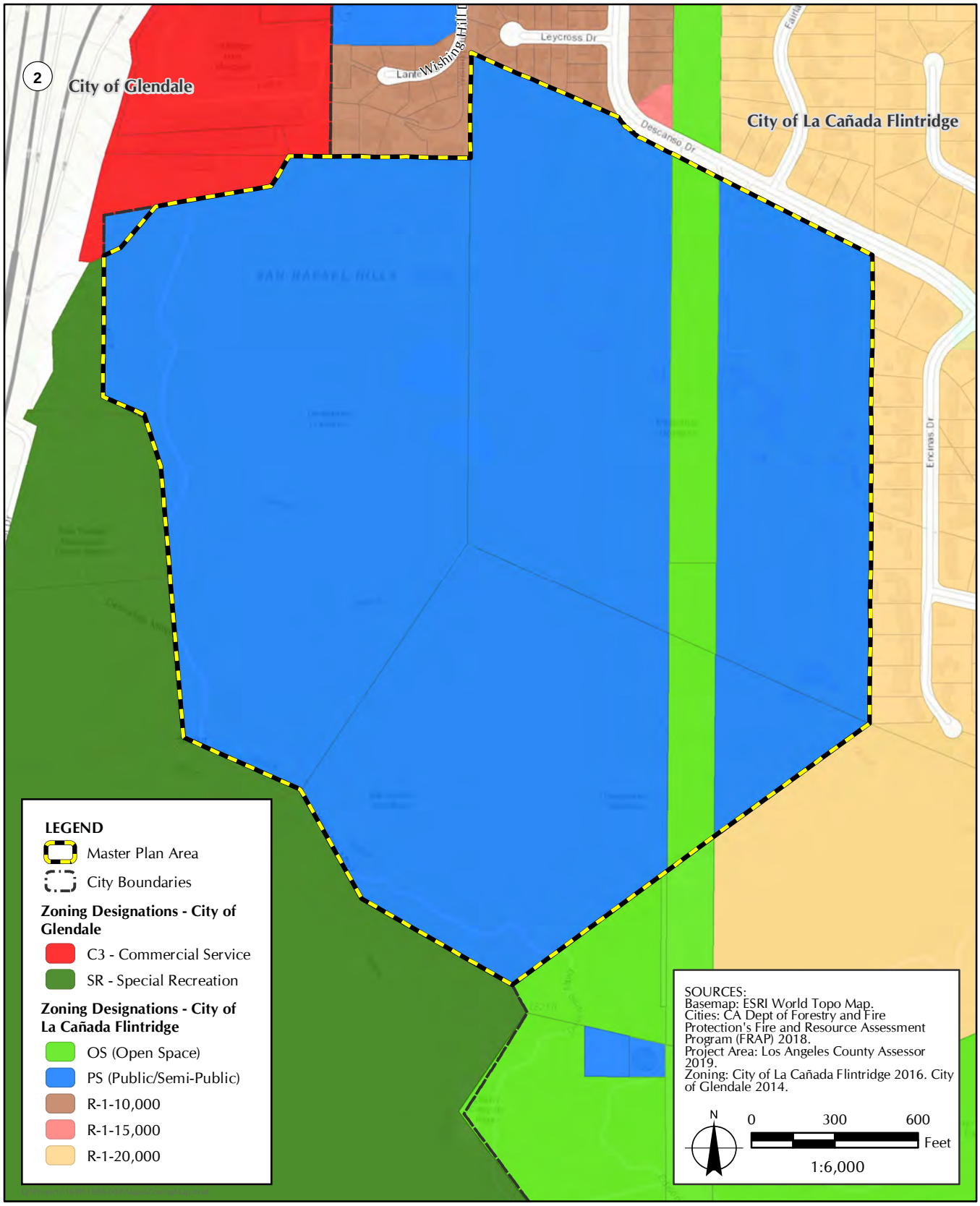

FIGURE 1.7-1

Zoning Designations

LCF's PS zoning designation permits one detached single-family dwelling unit per lot and permits arboretums and horticultural gardens if authorized by a conditional use permit.[7] The PS zone establishes minimum required setbacks of 25 feet in the front, rear, and corner side; a 15-foot setback on the interior side; a maximum height[8] of principal buildings and structures of 35 feet; a maximum height of 15 feet for accessory structures; and compliance with the R-1 building bulk limits along the common property boundary for any project abutting a single-family residential (R-1) zone. For PS zone designations, parking shall be provided in an amount that the LCF city planning commission finds adequate to prevent traffic congestion or excessive on-street parking; wherever practical, such determination shall be based upon the maximum occupancy that can reasonably be expected to occur at the site. Parking spaces within the PS zone

> "shall be not less than nine feet in width and twenty (20) feet in depth, except that parking spaces with side(s) abutting a fence, wall or other similar obstruction higher than eight inches above parking lot grade shall be a minimum of eleven (11) feet in width. Up to three feet of the required parking space length may overhang a planter or walkway, subject to design review approval. (Ord. 275 § 1, 1997)"

The intent and purpose of LCF's O-S zoning designation is to provide adequate recreational and open space opportunities for the population; to preserve and protect natural resources, including those areas necessary for the managed protection of resources; and to prevent incompatible development of areas that should be preserved or regulated for scenic, historic, conservation or public health and safety purposes.[9] LCF's O-S zoning designation permits "essentially unimproved" outdoor recreation, including but not limited to parks and other areas of active recreational usage, trails and other suitable corridors; areas for the preservation of outstanding scenic, geologic, historic, and cultural value; the preservation of natural resources including but not limited to areas required for the preservation of plant and animal life; the managed production of resources including but not limited to forest lands, range land, agricultural lands, mineral deposits, and areas of economic importance for the production of food or fiber; the regulation of areas for public health and safety including but not limited to areas that require special management or regulation because of hazardous or special conditions; and the conservation of water supply lands including, but not limited to, watershed and groundwater recharge areas (Ord. 1494 § 299.1, 1974). Additionally, accessory buildings and structures within the O-S zone such as comfort stations, maintenance buildings less than 400 square feet in size, and caretaker residences are uses subject to director's review and approval. Any additional facilities within the O-S zone (which must be secondary to and necessary for public utilization of the open space land) are subject to a permit.

City zoning designations surrounding the Master Plan Area, as established by the LCF Municipal Code and City of Glendale Municipal Code, include residential (R-1-10,000 and R-1-15,000) to the north (LCF), R-1-20,000 (residential) to the northeast and east (LCF), OS (Open Space) to the southeast (LCF), SR (Special Recreation) to the southwest and west (Glendale), and C3 (Commercial Service) to the northwest (Glendale).[10]

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[7] City of La Cañada Flintridge. Accessed July 25, 2019. *La Cañada Flintridge Municipal Code.* Chapter 11.15 Public and Semi-Public Zone. Available at: https://qcode.us/codes/lacanadaflintridge/view.php?topic=11-11_16&frames=on

[8] In all cases, height shall be measured from the lowest finished grade adjacent to or directly below the structure or building face.

[9] City of La Cañada Flintridge. Accessed July 25, 2019. *La Cañada Flintridge Municipal Code.* Chapter 11.24 Special Purpose Zones – O-S Open Space Zone. Available at: https://qcode.us/codes/lacanadaflintridge/view.php?topic=11-11_24&frames=on

[10] City of Glendale Community Development Department. September 11, 2014. *City of Glendale Zoning Map.* Available at: https://www.glendaleca.gov/home/showdocument?id=654

1.8 BACKGROUND AND EXISTING CONDITIONS

1.8.1 Background

Descanso Gardens is one of the four botanic gardens/arboreta of the County's park system. The other such gardens/arboreta include the County Arboretum and Botanic Garden, South Coast Botanic Garden, and Virginia Robinson Gardens. The Public Park Preservation Act of 1971 (PRC § 5400 et seq.) mandates the preservation of public parks and facilities such as Descanso Gardens. Descanso Gardens is a member-supported garden operated, jointly operated by the County DPR and the nonprofit 501(c)(3) Descanso Gardens Guild, Inc. (Guild), an arrangement first established in 1993, and by virtue of the most recent operating agreement extending to 2029.[11] Pursuant to Section 9.1 of the Descanso Gardens Operating Agreement - 2014, any proposed Capital Improvement[12] to be undertaken by Guild, "including but not limited to construction of utilities, landscape planting, replanting or removal, irrigation, site improvements such as paths, walkways, benches, lighting, interpretive exhibits and panels, demolition, relocation or replication of existing buildings, and construction of new buildings," shall be submitted to and have the prior written approval of the Director (of DPR).[13]

The Guild has acted as steward of Descanso Gardens since 1957, supported entirely by private philanthropy and community involvement, after Elias (E.) Manchester Boddy sold the property to the County in 1952. The property reflects many centuries of life in Southern California (please see Appendix 2, *A Brief History of Descanso Gardens*). E. Manchester Boddy purchased Rancho del Descanso, "Ranch of Tranquility," approximately 165 acres of native oak woodland and chaparral in the Crescenta Valley between San Fernando Valley and San Gabriel Valley, between 1935 and 1937. In 1936, Mr. Boddy began planting camellias (*japonica* cultivars), which were popular as corsages, in the acidic soil under the oak canopy. The Boddy House was built in 1938, and in 1941 Mr. Boddy purchased 440 acres in Hall-Beckley Canyon, including a spring-fed stream; built an underground pipeline to move water across the Crescenta Valley to Rancho del Descanso; and hired horticulturalist Howard Asper to manage the gardens. In 1948 the Old Rose Garden was created on the property by Dr. Walter Lammerts. The Boddy Lodge was constructed in 1949 near the small lake on the property that served as a reservoir for Rancho del Descanso, and Mr. Boddy renamed his property "Descanso Gardens" and opened it to the public in 1950. Mr. Boddy closed the gardens immediately in response to neighbor protest after 6,000 visitors arrived to visit Descanso Gardens, but he reopened the gardens to the public in 1951 for a $1 admission charge. Descanso Gardens and the Hall Beckley Canyon property were sold to the County as a public park in 1952. After the County negotiated with neighbors to satisfy concerns over the number of vehicles that would park in the neighborhood, Descanso Gardens was once again opened to the public.

Since Descanso Gardens opened to the public as a County facility, the property has transformed from a private estate to a member-supported garden that is nationally accredited by the American Alliance of Museums as an Arboretum/Botanical Garden/Public Garden.[14,15] The main entrance to Descanso Gardens was the Rose

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[11] Russ Guiney, Director. County of Los Angeles Department of Parks and Recreation. Adopted October 21, 2014. *Approval of an Operating Agreement Between the Descanso Gardens, Guild, Inc. and The County of Los Angeles for the Descanso Gardens (Supervisorial District 5) (3 Votes).* Available at: http://file.lacounty.gov/SDSInter/bos/supdocs/88926.pdf

[12] **2.12 Improvements:** Those things affixed to the land when attached by roots, or imbedded in it, or permanently resting upon it, or permanently attached, as by means of cement, plaster, nails, bolts, or screws.

2.13 Capital Improvement: Any project(s) which has an anticipated value to the Gardens of $50,000 or more and requires a permit(s).

[13] Russ Guiney, Director. County of Los Angeles Department of Parks and Recreation. Adopted October 21, 2014. *Approval of an Operating Agreement Between the Descanso Gardens, Guild, Inc. and The County of Los Angeles for the Descanso Gardens (Supervisorial District 5) (3 Votes).* Available at: http://file.lacounty.gov/SDSInter/bos/supdocs/88926.pdf

[14] American Alliance of Museums. Accessed July 29, 2019. *Find a Member Museum.* Available at: http://ww2.aam-us.org/about-museums/find-a-museum?_ga=2.75108567.451599468.1564419244-386242182.1564419244

[15] American Public Gardens Association. Accessed July 29, 2019. *Descanso Gardens.* Available at: https://www.publicgardens.org/about-public-gardens/gardens/descanso-gardens

Garden until the existing entrance complex near Van de Kamp Hall was constructed in 1982 (please see Appendix 2). The existing Lilac Garden was established in 1953 to display one hybrid, Lammerts' Lavender Lady. The existing California Garden was established in 1959 to showcase native plants in collaboration with native plant advocate Theodore Payne. The existing Center Circle garden, which is updated every two to three years as a rotating demonstration garden, was first planted circa 1960. The existing Japanese Garden and tea house was dedicated in 1966. The Bird Observation Station (now called the Lakeside Lookout), erected by the San Fernando Valley Audubon Society, the Guild, and the County Department of Arboreta and Botanical Gardens, was dedicated in 1968. A minka (traditional Japanese country-style farmhouse) was added to the Japanese-style garden in 1968, and the Japanese Garden was refreshed and enhanced in 1997 with new maple trees and a new bamboo water fountain. The Rose Garden was redesigned and reopened as a 5-acre International Rosarium, including a Rose Pavilion and restroom facility, in 1994.

In 2007–2008, the Boddy House reopened as an exhibit and interpretive center after a full cosmetic overhaul and restoration in collaboration with the Pasadena Showcase House for the Arts (PSHA) organization. In 2010, solar panels were installed on the roofs of the Visitor Center and Van de Kamp Complex. The Sturt Haaga Gallery was built in 2011 as an adaptive reuse of the Boddy House Garage, consistent with the Secretary of the Interior's *Guidelines for the Treatment of Historic Properties*. In 2012, an electrical vehicle (EV) charging station was installed in the Auxiliary Parking Lot. A 7.7-acre Oak Woodland garden opened near the lake and Boddy Lodge in 2014, and in 2015 the Ancient Forest Garden opened near the Japanese Garden and Lilac Garden. An improved pathway and wood platform to protect heritage oaks were installed at the Lakeside Lookout (formerly bird observation station) in 2017. In 2018, the caretaker's house (north of the Japanese Garden) was converted to usable office spaces for special events, facilities, and catering; plumbing upgrades were installed in the former caretaker's house; the Gift Shop in the entrance complex was expanded into the former Special Events Office; and the most recent redesign of the Center Circle was implemented. The County has authorized an on-site wastewater and septic improvements project in progress as of summer 2019.

In the past decade, a series of internal planning documents and conceptual plans have been prepared in support of the Guild's guiding principle that Descanso Gardens move forward as a botanical garden with a broad educational purpose in contrast to a park intended for public recreation (Appendix 3, *Internal Planning Documents, 2009–Present*, summarizes the documents and plans with their implication in development of the proposed Master Plan):

- Long Range Concept Plan (2009)
- Entry + Parking Lot Feasibility Study (2014)
- Pre-Master Plan Direction from the County (2015)
- Rose Garden Concept Plan (January 2016)
- Concept Design Report: The Lake and Water Promenade at Descanso Gardens (May 2016)
- Member Survey (2017)
- Descanso Gardens Strategic Plan (2018-2020)

Other ongoing planning and evaluation efforts at Descanso Gardens as of July 2019 include the historic evaluation of Descanso Gardens by the County, and development of a wayfinding & signage plan.

In early 2019, the County approved installation of an upgraded wastewater treatment system, including a new membrane bioreactor (MBR) and emergency electrical generator for the MBR to provide wastewater treatment on-site using the activated sludge process. The MBR is being installed near the existing septic tanks between the existing Van de Kamp Hall back-of-house area and the existing Harvest Garden and is planned to be online by the end of 2019.

1.8.2 Existing Conditions

Public Garden

Descanso Gardens is a public botanic garden serving the communities of La Cañada Flintridge, La Crescenta, Pasadena, and Glendale, and attracts visitors from throughout the country. The Master Plan Area is located within a 30-minute drive of approximately 2.9 million people[16] and currently receives approximately 550,000 visitors per year.[17] General admissions visitation is predominantly from nearby communities (with approximately 59 percent of visitors traveling from 5 miles or less), except during the winter Enchanted: Forest of Light event that draws an increase in regional visitation. Approximately 82 percent of visitors[18] are local, traveling 10 miles or less to visit Descanso Gardens, except during Enchanted, when approximately 55 percent of visitors travel over 10 miles.[19] More than 17,000 member households (approximately 33,000 individual members) demonstrate their commitment to the Gardens through paid annual membership. In the last few years, visitor attendance has increased dramatically, perhaps due to increased awareness of Descanso Gardens supported by social media. During especially popular events, visitors have parked in the neighborhood surrounding the gardens after the parking lots filled. Recently, Descanso Gardens has implemented measures to manage peak attendance periods such as creating a timed-ticket entry requirement for visitors attending events and hiring a parking attendant crew for events.

Developed Areas

Approximately 66 acres (44.3 percent) of the 149-acre Master Plan Area have been developed into gardens and supporting facilities. The southwestern 57 acres of the property are not enclosed by a fence. There are 17 existing developed gardens within the Master Plan Area (Figure 1.8.2-1, *Developed Gardens and Undeveloped Areas of the Property*; Figure 1.8.2-2, *Existing Conditions*; Table 1.8.2-1, *Existing Developed Gardens in Master Plan Area*;). There are 10 buildings, 15 other structures, 5 administrative office trailers, and over 35 storage sheds in the Master Plan Area (Table 1.8.2-2, *Existing Buildings and Structures*). With the exception of the Boddy House Complex and overlook structures in the California Garden, most of the existing buildings in the Master Plan Area are concentrated in the shallower sloped areas of the property. There are five existing restrooms available to visitors in the Master Plan Area, located in the Entrance near Van de Kamp Hall, along the Promenade, in the Rose Garden, in the Boddy House, and in the Sturt Haaga Gallery. Additional restrooms are available for bridal prep only in the Boddy House and near the Rose Garden.

Approximately 10.1 percent (15.1 acres) of the Master Plan Area has been developed with impervious surfaces, including existing building footprints (approximately 1.4 acres), paved surfaces (approximately 13.3 acres), and one concrete drainage channel (approximately 0.4 acre).

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[16] HR&A Advisors, Inc. February 21, 2019. Descanso Gardens Master Plan Needs Assessment Report. *Competitive Market Scan.*

[17] Rios Clementi Hale Studios. July 9, 2019. Descanso Gardens Master Plan: Task 4 – Draft Master Plan. Stakeholder Presentation.

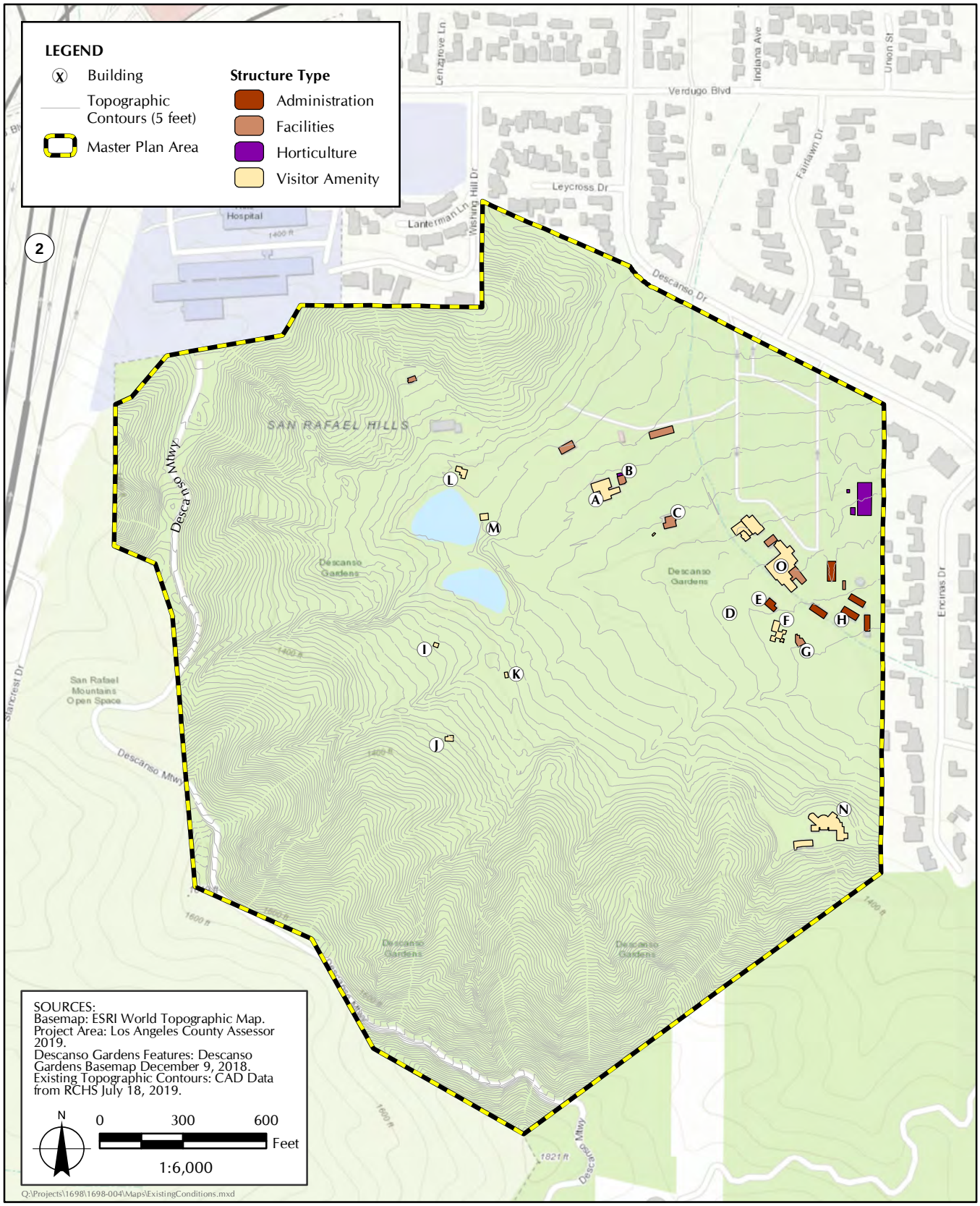
[18] Based on zip code from credit card transaction data. Does not account for visitors who paid admission in cash.

[19] HR&A Advisors, Inc. February 21, 2019. Descanso Gardens Master Plan Needs Assessment Report. *Garden Performance and Operations.*

Please refer to Table 1.8.2-2 for garden descriptions.

FIGURE 1.8.2-1

Developed Gardens and Undeveloped Areas of the Property



Please refer to Table 1.8.2-1 for building/structure descriptions.

FIGURE 1.8.2-2

Existing Conditions

TABLE 1.8.2-1
EXISTING DEVELOPED GARDENS IN MASTER PLAN AREA

Garden Location	Garden Name	Year Opened	Approx. Acres	Brief Description of Garden
1	Rose Garden	1994[1]	5.2	"International Rosarium" - the roses are showcased among a network of meandering paths, lawn, and companion plants surrounded by a grove of coast live oak and sycamore trees.
2 3 4	Promenade/ Center Circle/ Former Nature's Table	Unknown 1960 2010	2.2	The Promenade showcases seasonal plants, the Enchanted Railroad, and a restroom. The Center Circle is a display garden redesigned every 2–3 years.
5	Magnolia Lawn	1990s	0.1	Two flowering cherry trees on the lawn provide additional seasonal interest and a backdrop for wedding ceremonies.
6	Main Lawn	Unknown	1.6	This lawn area is surrounded by camellias and oak trees and features a grass-covered raised stone stage for performances near the southern portion of the lawn.
7	Japanese Garden	1966	1.0	The garden includes a stroll garden, stream-and-pond garden, tea garden, and raked-gravel garden (karesansui). Event capacity: 60
8	Lilac Garden	1953	0.4	Four hundred lilacs provide a fragrant and colorful display in March and April against a backdrop of unpaved paths and evergreen foliage surrounding the garden.
9	Ancient Forest	2015	1.7	A collection of more than 180 plants that existed in the Jurassic and Cretaceous periods, including cycads, tree ferns, ginkgo, magnolias, and redwood trees.
10	Hope's Garden	2000s	0.2	Features olive trees, rosemary, and Hope Rock as a seating area with a vista of the Crescenta Valley.
11	Camellia Forest - East	1930s	5.0	These camellias were originally planted in the acidic soil under a canopy of native Coast live oaks to provide blossoms for the cut-flower industry. Meandering unpaved paths pass through the evergreen camellia forest under a canopy of evergreen oak trees.
12	Camellia Forest - West	1930s	7.0	These camellias were planted in the acidic soil under the oaks to provide blossoms for the cut-flower industry. Meandering unpaved paths pass through the camellia forest under an oak canopy.
13	Oak Grove	N/A	2.0	A grove of native oak trees surrounded by a paved loop path and traversed by two unpaved paths and the Enchanted Railroad is sometimes used as an event venue for musical performances and wedding ceremonies.
14	California Garden	1959	8.5	Designed by native plant advocate and horticulturalist Theodore Payne, this garden showcases native plants in dry, forested, chaparral, riparian, and other microclimates of the garden.
15	Oak Woodland	2014	1.8	The Oak Woodland features naturally occurring coast live oaks, individual and grouped trees with native bunchgrass meadows, winding paths, seating areas, and a boardwalk for wildlife and riparian vegetation observation near the Lake.
16	Lake & Surroundings	1940s	4.0	The manmade Lake has served as a reservoir for the gardens from the Hall-Beckley Canyon water source since 1940s. Boddy Lodge, Lakeside Lookout, a raised platform around a Heritage Oak, two bridges, and unpaved paths surround the Lake.
17	Harvest Garden	1962	0.7	This garden features a series of raised planting beds, two group gathering areas, and a small orchard to support educational activities and therapeutic gardening. Separated from public entry.

Sources:

Descanso Gardens. 2019. *Visitor Map.* Available at: https://www.descansogardens.org/wp-content/uploads/2019/04/New-map.jpg

Descanso Gardens. Accessed July 25, 2019. *Visit: Gardens.* Available at: https://www.descansogardens.org/visit/gardens/

Descanso Gardens. Accessed July 25, 2019. *An Outdoor Classroom.* Available at: https://www.descansogardens.org/programs-events/schools-and-education/harvest-garden/

Descanso Gardens. Accessed July 29, 2019. *Special Events Brochure.* Available at: https://www.descansogardens.org/wp-content/uploads/2018/01/DG-Events-Brochure.pdf

[1] The Old Rose Garden opened in 1948.

TABLE 1.8.2-2
EXISTING BUILDINGS AND STRUCTURES

Building/ Structure Location	Building/Structure Name	Year Built	Approx. Square Feet	Primary 2019 Programming
A	Rose Garden Pavilion	1994	5,750	Daytime and evening events (including yoga, performances, weddings), filming. Capacity: seated 170, lecture 225
B	Rose Garden Comfort Station (cottage)	1994	600	Restroom, storage
C	Promenade Comfort Station	Circa 1955	812	Restroom
D	Under the Oaks Theater	Unknown	N/A	Daytime performances, wedding ceremony, school groups
E	Caretaker's Cottage	Circa 1948	1,421	Office spaces for Special Events, Facilities, and catering
F	Japanese Tea House	1966	905	Daytime to early evening events (dinners, small parties)
G	Minka	1969	818	Daytime workshops and meetings Capacity: ~25
H	Five Administrative Office Trailers	Circa 2014	7,581	Administrative offices, break room
I	Mountain View Structure	Unknown	N/A	Seating for 2; photograph location
J	Canyon View Structure[a]	Unknown	N/A	Shade structure; small day time workshops
K	El Portal Ramada	1959	N/A	Shade structure; small day time workshops
L	Boddy Lodge	1949	1,008	Pop-up bar during winter Enchanted Forest of Light event; requires electric generator
M	Lakeside Lookout[b]	1968	648	Bird watching, small day time group workshops
N	Boddy House Complex (buildings and landscape)	1938	9,877	House/patio: museum, workshops, weddings, and other day time or evening events. Capacity: 100 Sturt Haaga Gallery: seasonally rotating art exhibits
O	Entrance Complex[c] / Van De Kamp building	1982	12,163	Ticket purchase, gift shop, Maple restaurant, café, Birch meeting room, public courtyard, fitness classes/yoga, daytime and evening events, weddings (Van de Kamp Hall, workshops, meetings (area is open to the public). Birch Room Capacity: 50 Van de Kamp Hall Capacity: seated 170, lecture 225

Sources:

Sapphos Environmental, Inc. April 2019. *Historical Resources Evaluation.* Prepared for County of Los Angeles Department of Parks and Recreation.

Descanso Gardens. Accessed July 29, 2019. *Special Events Brochure.* Available at: https://www.descansogardens.org/wp-content/uploads/2018/01/DG-Events-Brochure.pdf

[a] Formerly called Redwood Rest Ramada

[b] Formerly Called Bird Observation Station

[c] During Enchanted: Forest of Light event in winter 2019–2020, a temporary pop-up food stand and bar were installed on the southern side of the courtyard (west of Van De Kamp Hall).

There are more than 1,600 roses showcased in the Rose Garden and approximately 400 lilac plants in the Lilac Garden (please see Appendix 4, *Existing Developed Gardens in Master Plan Area*).[20] The approximately 9-acre camellia forest at Descanso Gardens, with approximately 8,000 to 10,000 camellia plants, has one of the largest collections of camellias in North America, including *Camelia japonica*, *C. reticulata*, and *C. sasanqua*.[21] Approximately 2,470 of the camellias are in excellent, good, or fair condition. There are also approximately 1,200 mature native coast live oak trees in the camellia forest (Figure 1.8.2-3, *Existing Native Coast Live Oak Trees*). Five Heritage Oak trees at Descanso Gardens (circa 1717–1867), located in the Rose Garden (1), near the Lakeside Lookout (2), along the Promenade (1), and between the Japanese Garden and the Main Lawn (1), are spot lit with white lights during the annual winter Enchanted Forest of Light event. Although the camellias thrive in the shaded canopy and acidic soil under the oaks, they require moderate watering and regular summer watering, while oak trees require low watering and no summer watering to thrive. The oak trees are protected by the Los Angeles County Oak Tree Ordinance (Los Angeles County Municipal Code §§ 22.56.2050 – 22.56.2260) and Chapters 4.24 and 11.40 of the La Cañada Flintridge Municipal Code.[22,23,24]

Historical resources are also protected at Descanso Gardens, which was designated as a California Point of Historical Interest (CPHI) in 1968 due to its association with early California rancho history and excellent example of California native plant gardens. Descanso Gardens is currently being reevaluated for California Register of Historical Resources (CRHR) status and evaluated for National Register of Historic Places (NRHP) status. The Boddy House and Garage were deemed eligible for listing in the NRHP and the CRHR in 2009. The Camellia Forest (East and West) is a contributing element to the recently nominated Descanso Gardens Historic District, as well as the Boddy Complex, Boddy Lodge, Boddy Drive landscape features, Descanso Creek landscape features, and the caretaker's cottage near the Japanese Garden (Figure 1.8.2-4, *Historic Districts*).[25] Similarly, the tea house, minka, and bridge in the Japanese Garden are contributing elements to the nominated Descanso Gardens Historic District. The Boddy Complex, Boddy Lodge, tea house, minka house, five Heritage Oak Trees, and the Bird Observation Station (now called Lakeside Lookout) are also individually eligible for listing in the NRHP, CRHR, and Los Angeles County Register of Landmarks and Historic Districts (County Register).

[20] Descanso Gardens. December 9, 2018. *Descanso Gardens Basemap.* GIS Data.

[21] April 2019. Historical Resources Evaluation. Prepared by Sapphos Environmental, Inc., 430 N. Halstead Street, Pasadena CA 91107. Prepared for County of Los Angeles Department of Parks and Recreation.

[22] County of Los Angeles Department of Regional Planning. *Title 22 – Planning and Zoning: Volume 1.* Available at: http://planning.lacounty.gov/assets/upl/data/title22_volumeI_CW.pdf

[23] City of La Cañada Flintridge. Accessed July 25, 2019. *Private Property Trees and Water Efficient Landscaping.* Available at: http://www.lcf.ca.gov/planning/private-property-trees

[24] City of La Cañada Flintridge. Accessed July 25, 2019. *Title 11 Zoning.* Available at: http://qcode.us/codes/lacanadaflintridge/view.php?topic=11&frames=off

[25] April 2019. Historical Resources Evaluation. Prepared by Sapphos Environmental, Inc., 430 N. Halstead Street, Pasadena CA 91107. Prepared for County of Los Angeles Department of Parks and Recreation.

FIGURE 1.8.2-3

Existing Native Coast Live Oak Trees

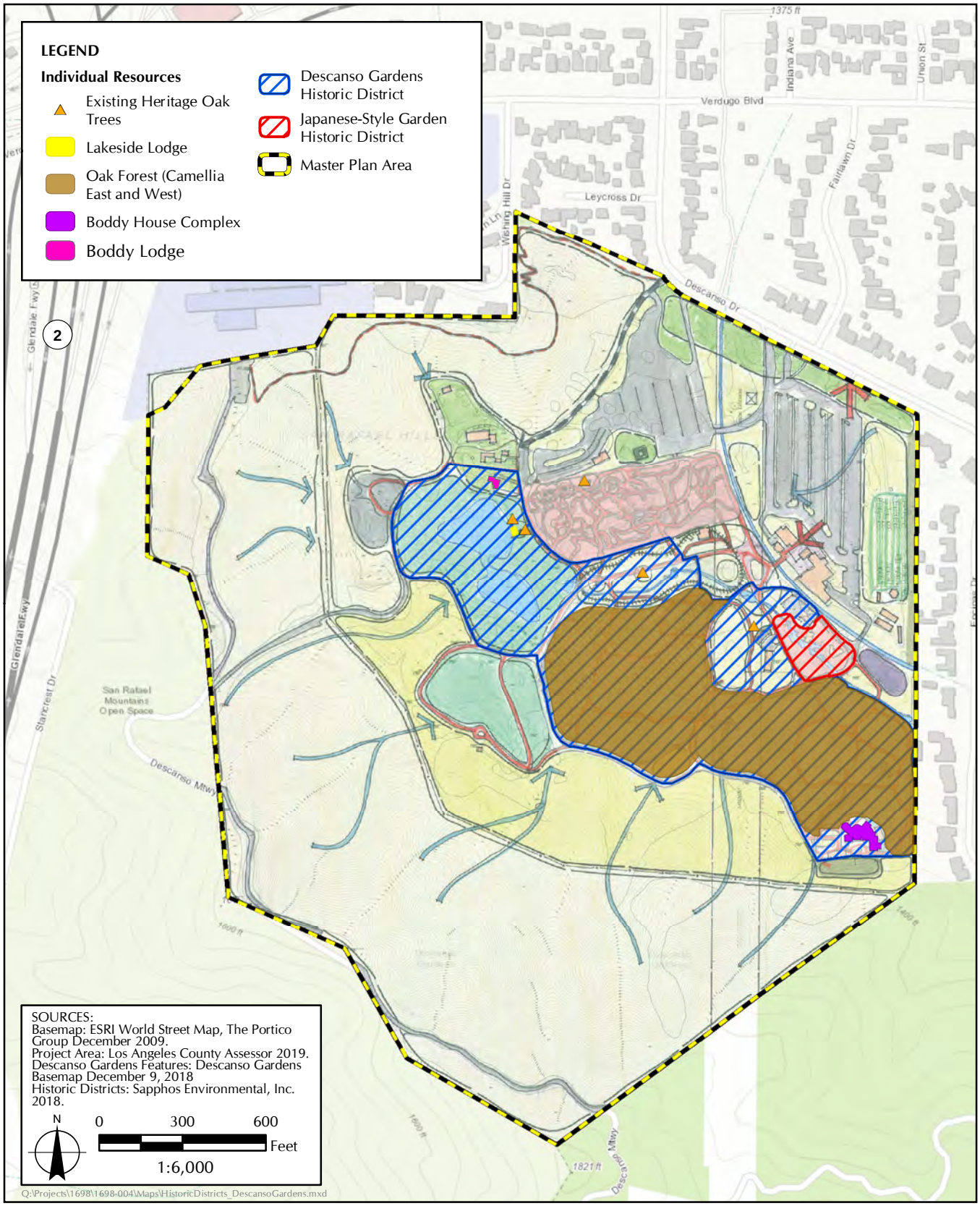


FIGURE 1.8.2-4

Historic Districts

Undeveloped Areas

Approximately 83 acres (55.7 percent) of the Master Plan Area have not been developed as part of Descanso Gardens, including the southwestern 57 acres of the property that are not enclosed by a fence (see Figure 1.8.2-1). Of the approximately 149 acres within the Master Plan Area, the western, southern, and eastern margins retain remnants of extant native plant communities, primarily coastal sage scrub and chaparral. Conditions vary, however, because of the presence of non-native and invasive plant species that have been introduced or self-seeded. These near-native habitats provide a backdrop for the formal gardens. Native habitat types within the undeveloped areas of the Master Plan Area include scrub oak chaparral, California buckwheat scrub, laurel sumac scrub, lemonade berry scrub, and oak woodland. Riparian vegetation is present in natural drainages including western sycamore (*Platanus racemosa*), California mugwort (*Artemisia douglasiana*), and mule fat (*Baccharis salificolia*). Coast live oak woodland and riparian habitats transition to more open coastal sage scrub and chaparral plant communities on the slopes of the undeveloped area, including characteristic plants such as California sagebrush (*Artemisia californica*), sage (*Salvia mellifera* sp.), California buckwheat (*Eriogonum fasciculatum*), poison oak (*Toxicodendron diversilobum*), toyon (*Heteromeles arbutifolia*), and lemonade berry (*Rhus integrifolia*).

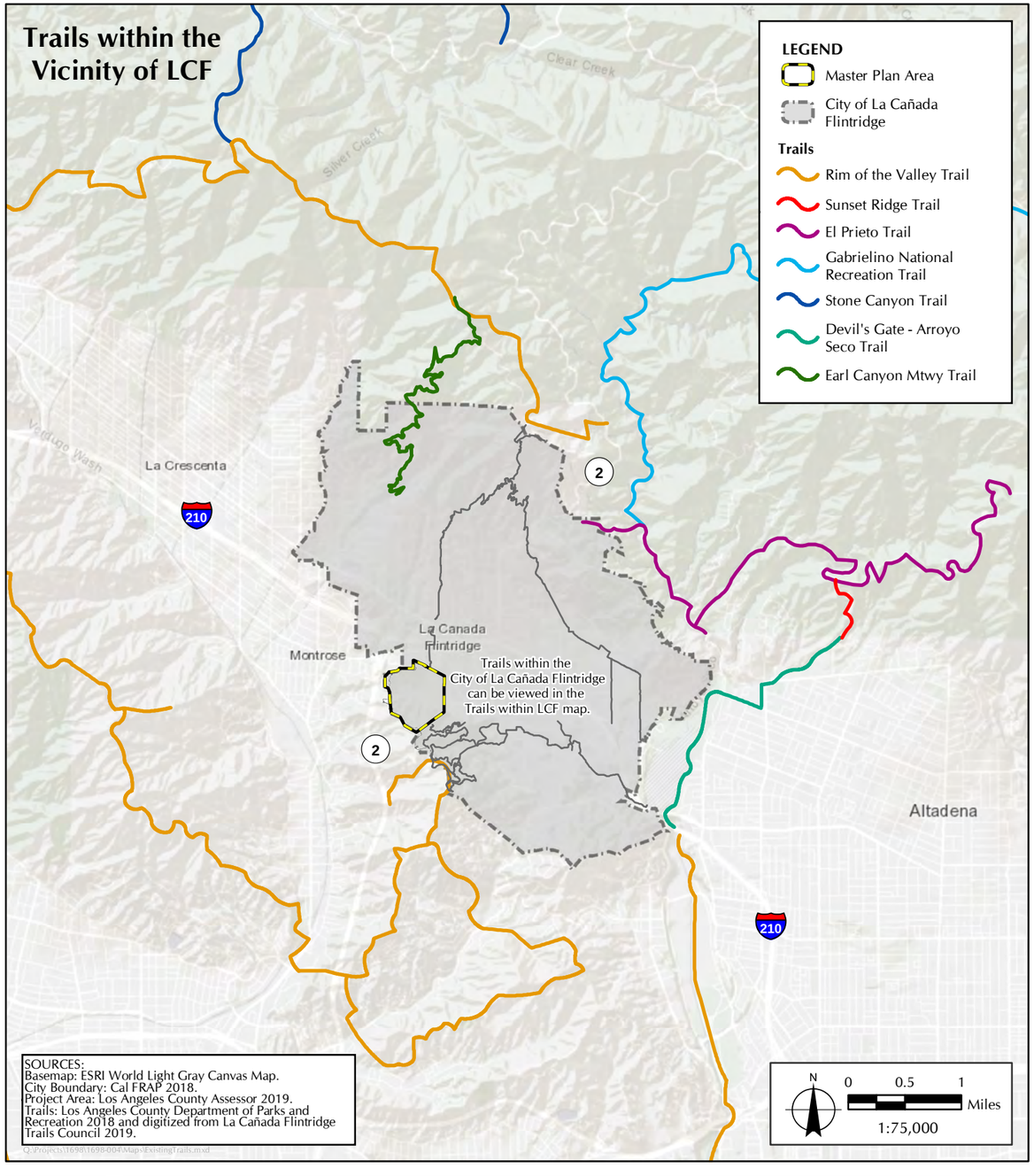
The more open areas of coastal sage scrub intergrade with non-native grasslands along the slopes. The chaparral plant community at Descanso Gardens includes scrub oak (*Quercus berberdifolia*), mountain mahogany (*Cerocarpus betuloides*), and chamise (*Adenostoma fasciculatum*), along with many other plant species. There are small remnants of native grassland in the Master Plan Area, in both shady and sunny habitats, that hold a diversity of native bulbs and wildflowers.

Public Trails

The Master Plan Area provides a key recreational linkage to a larger (23-mile) trail network in the City of LCF maintained by the LCF Trails Council.[26] The Descanso Trail, a predominantly ridgeline trail and segment of the 12.7 Mile City Loop Trail leading hikers and equestrians from Descanso Drive near the Auxiliary Parking Lot south into Cherry Canyon Park, traverses the undeveloped areas of the Master Plan Area along the northern, western, and southern edges (Figure 1.8.2-5, *Existing Trails*). An existing public trail (Descanso Motorway/Descanso Loop Trail) was extended in 2008 for hikers, bicyclists, and equestrians from Descanso Drive north of the Auxiliary Parking Lot through a new trail easement along the northern edge of the Master Plan Area to provide a connection to a hilltop terminus at the previously existing Cherry Canyon trail along the western and southern ridgelines of the Master Plan Area (Figure 1.8.2-6, *Existing Walking Loops*).[27] Within the northern portion of the Master Plan Area, the County has granted a 99-year riding and hiking trail easement to the City of LCF (starting in 2008). The Descanso Trail connects to the La Cañada Open Space Trail to the north and a network of trails in Cherry Canyon to the south.

[26] La Cañada Flintridge Trails Council. Accessed July 25, 2019. *La Cañada Flintridge Trails Council.* Available at: https://www.lcftrails.org/

[27] April 2019. Historical Resources Evaluation. Prepared by Sapphos Environmental, Inc., 430 N. Halstead Street, Pasadena CA 91107. Prepared for County of Los Angeles Department of Parks and Recreation.



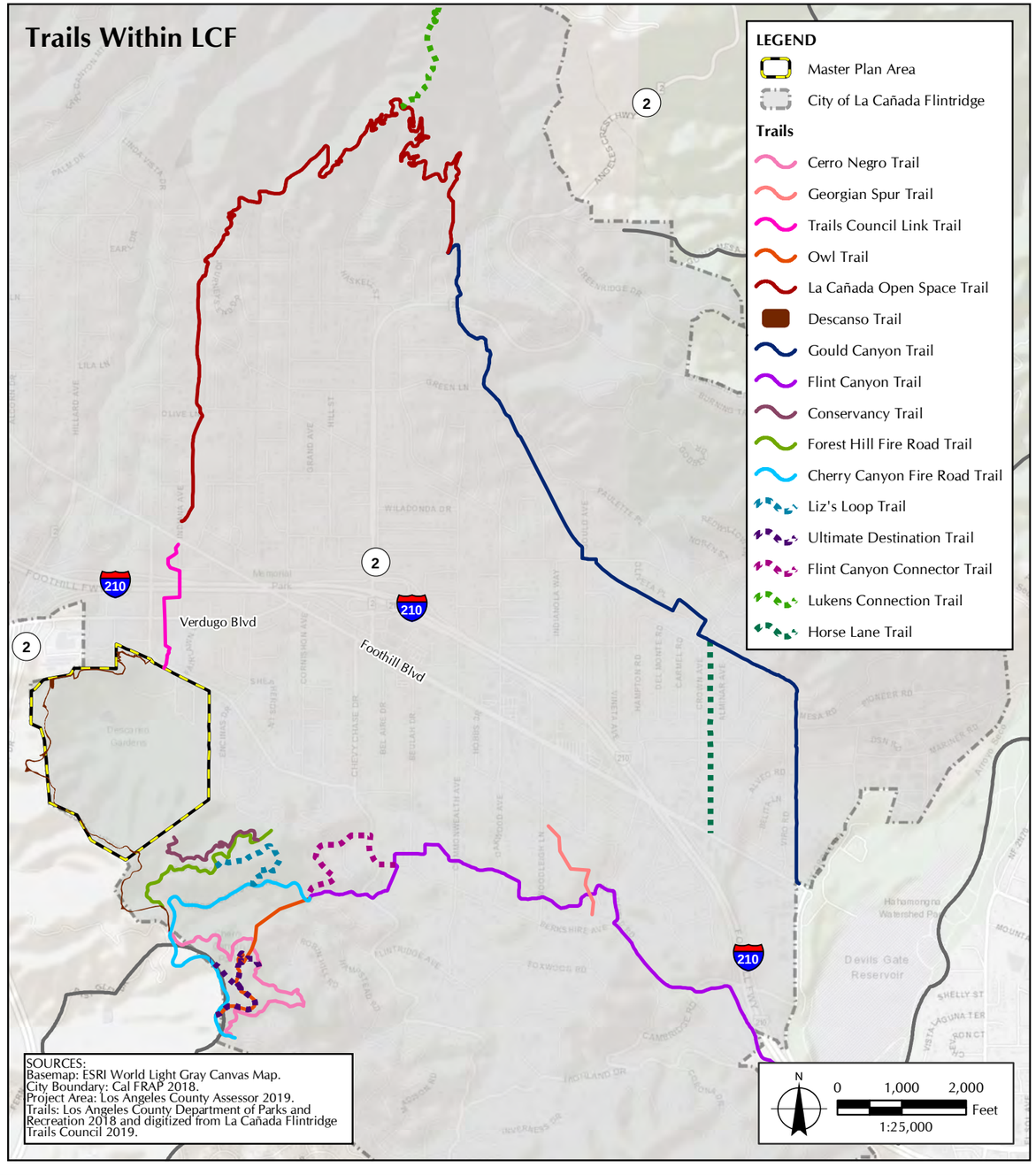


FIGURE 1.8.2-5
Existing Trails

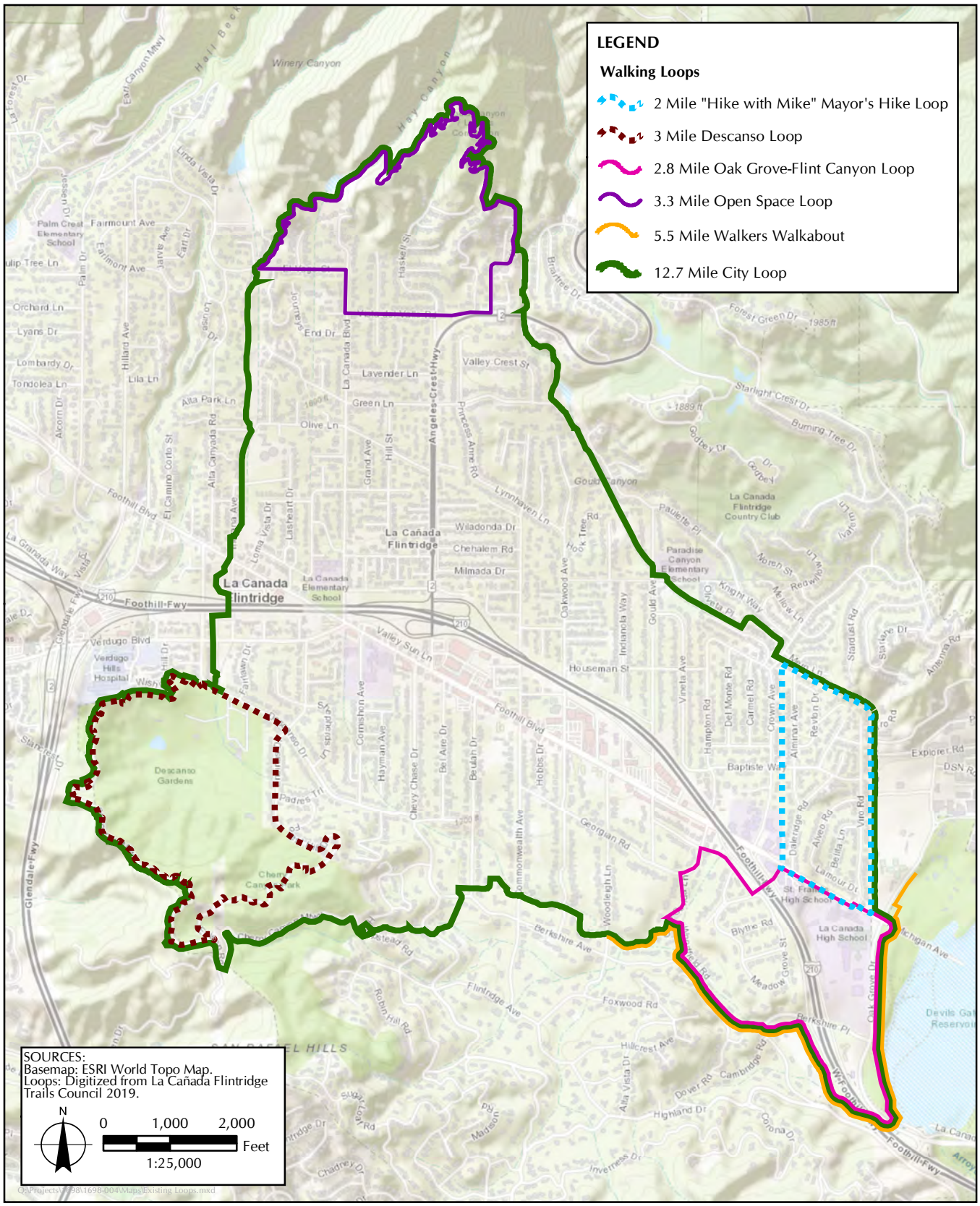


FIGURE 1.8.2-6

Existing Walking Loops

Topography and Geology

The topography of the Master Plan Area consists of a relatively flat area in the northeastern portion of the property where the parking area and visitor buildings are located, sloping upwards to the west, south, and east. The Master Plan Area lies at the foot of the Transverse Ranges and is characterized by alluvial fan gravel and sand derived from the San Gabriel Mountains during the Pleistocene era. Rock units within the central Transverse Ranges adjacent to the study area consist of early Cretaceous and older plutonic and meta-igneous rocks such as quartz diorite. The geological structure surrounding the property immediately to the north, south, and west consists of early Cretaceous age non-gneissoid quartz diorite and late Mesozoic granitic rock.[28] The soil classifications of the Master Plan Area are primarily Hanford Fine Sandy Loam at the lower elevations of the property, with Upper Los Angeles River soil classification from the canyon edges to the ridgeline (Figure 1.8.2-7, *Soil Classifications*).

Operations and Maintenance

The Guild employs a staff of 60 to 78, including gardeners who oversee day-to-day maintenance of the collections; the education department that administers all public and educational programs; the team that operates rentals, gift shop, and visitor services; and the development and communications departments. As of September 2019, Descanso Gardens staff comprises 60 full-time employees, 18 part-time employees, and 11 seasonal employees to support the winter Enchanted: Forest of Light event. Approximately 45 full-time administrative staff use office space at Descanso Gardens. The Guild sustains a vigorous volunteer program, with more than 250 committed individuals who provided more than 15,000 combined hours of annual service in all aspects of the gardens' operations in 2017.

During large events, parking attendants are hired to direct vehicles in the two existing parking lots. However, there have been instances in which visitors have parked in the surrounding neighborhood after the parking lots are both full. Descanso Gardens has responded to the high visitor turnout during events by offering a limited number of timed entry tickets for events at no additional cost beyond the cost of the event itself. This approach has been used at events including the winter Enchanted Forest of Light, classes, the spring Night Garden event series, and summer evening concert events.

[28] Dibblee, Thomas W. Jr. May 1989. Geologic Map of the Pasadena Quadrangle Los Angeles Country, California.

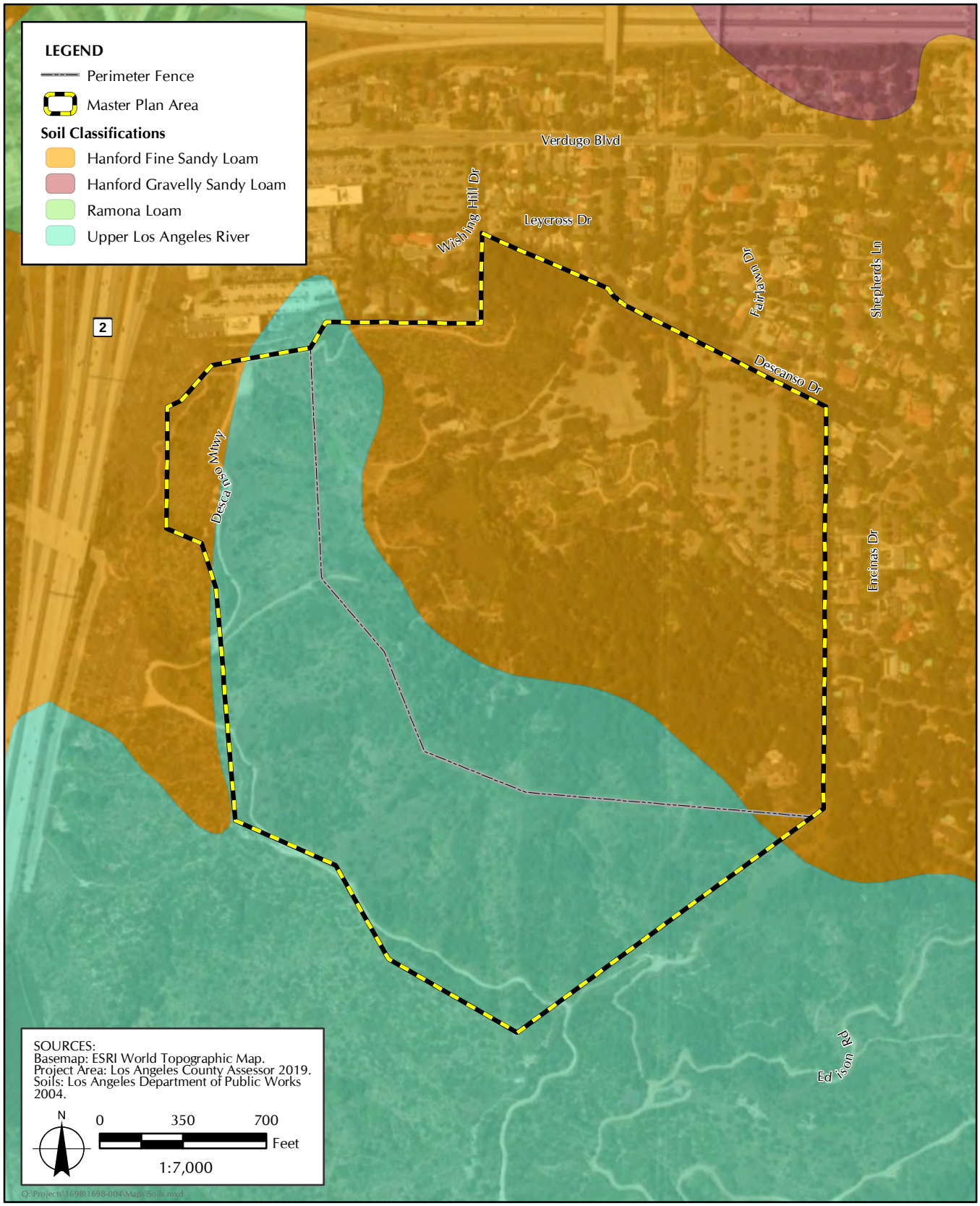


FIGURE 1.8.2-7

Soil Classifications

1.9 STATEMENT OF OBJECTIVES

The proposed project would build upon past planning efforts and guide the Gardens' development over the next 15 years, consistent with Descanso Gardens' mission and the five goals established in the Descanso Gardens Strategic Plan 2018-2020:[29]

> **Descanso Gardens Mission:** Descanso Gardens is a unique Southern California landscape distinguished by its specialized botanic collections, historical significance, and rare natural beauty. Our mission is to practice exemplary stewardship of Descanso's distinctive character and assets; offer people an experience close to nature; and cultivate understanding of the natural world and people's place in it through inspiration, education and example.
>
> **Descanso Gardens Strategic Plan 2018-2020 Goals:**
>
> - **Goal 1:** Create fulfilling, "close to nature" experiences for our guests that encourage engagement with Descanso's unique landscape and botanical collections.
> - **Goal 2:** Display, maintain, and enhance our collections in ways that protect our assets and consider the needs and interests of a growing and diverse set of guests.
> - **Goal 3:** Engage in planning and fundraising necessary to sustain operations and invest in major garden improvement projects.
> - **Goal 4:** Establish the Gardens as an important community resource for understanding nature in Los Angeles and people's relationship to natural spaces.
> - **Goal 5:** Strengthen our infrastructure and organization.

The goals and objectives of the Master Plan have also been developed in consideration of regulations, planning documents, agreements, and ordinances including

- The Public Park Preservation Act of 1971 (Descanso Gardens is a public garden)[30]
- The Americans with Disabilities Act (ADA) of 1990 (Descanso Gardens is open to the general public)[31]
- The Parks and Recreation Element of the County General Plan 2035 (Descanso Gardens is classified as a regional recreational special use facility [botanical garden])[32]
- The County's current operating agreement with the Guild, the National Historic Preservation Act of 1966[33]
- California Public Resources Code Section 5020-5029.6 (Historic Resources)[34]

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[29] Descanso Gardens Guild, Inc. Revised and approved by the Board of Trustees on February 15, 2018. *Descanso Gardens Strategic Plan 2018-2020.*

[30] State of California. Accessed September 25, 2019. *Public Resources Code, Division 5, Chapter 2.5: Preservation of Public Park*s. Available at: https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=5.&title=&part=&chapter=2.5.&article=

[31] U.S. Department of Labor. Accessed September 25, 2019. *Americans with Disabilities Act.* Available at: https://www.dol.gov/general/topic/disability/ada

[32] Los Angeles County Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. *Chapter 10: Parks and Recreation Element.* Available at: http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch10.pdf

[33] Department of Homeland Security, FEMA. Amended 2000. *National Historic Preservation Act of 1966.* Available at: https://www.fema.gov/media-library/assets/documents/12524

[34] State of California. Accessed September 25, 2019. *Public Resources Code, Division 5, Chapter 1, Article 2: Historic Resources.* Available at: http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=5.&title=&part=&chapter=1.&article=2.

- The County's Historic Preservation Ordinance No. 2015-0033[35]
- The County's Low Impact Development Standards Ordinance No. 2008-0063[36]
- The County's Hillside Management Area (HMA) Ordinance[37] and
- The County's Tree Planting Ordinance No. 2016-0016.[38]

1.9.1 Master Plan Goals

Six goals relate to the proposed project:

1. **World-Class Collections:** Preserve Descanso Gardens' unique landscape and botanic collections by enhancing horticultural operations and engaging framing and displays.
2. **Seamless Visitor Experience:** Create a seamless visitor experience through improved amenities and circulation.
3. **Exemplary Stewardship:** Protect and enhance Descanso's natural assets through ecological restoration, water conservation, and habitat considerations.
4. **Resilient Infrastructure:** Enhance the long-term resilience of Descanso by optimizing botanical relationships and reducing off-site dependency of water and energy.
5. **Revealing Stories:** Celebrate the rich cultural and ecological assets through meaningful storytelling.
6. **Operational Excellence:** Create streamlined operations to enable a more efficient and productive team.

1.9.2 Master Plan Objectives

There are 23 objectives that are important to achieving the proposed project goals:

1. **World-Class Collections:**
   - Improve the nursery facilities to enhance horticultural operations and facilitate on-site plant propagation in support of continued botanic collection curation at Descanso Gardens.
   - Reconfigure the Rose Garden for optimal visitor experience.
   - Expand the Ancient Forest Garden and California Native Garden to diversify the unique collections.
   - Enhance the visibility and curation of the camellia collection.
2. **Seamless Visitor Experience:**
   - Provide ADA access to all existing destinations at Descanso Gardens.
   - Optimize the vehicular and parking facilities, including a minimum of 750 vehicular parking spaces, 5 bus parking spaces, and one drop-off location.
   - Improve the distribution of restrooms throughout the gardens.

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[35] Los Angeles County Department of Regional Planning. Adopted September 1, 2015. *Historic Preservation Ordinance.* Available at: http://planning.lacounty.gov/preservation/ordinance

[36] Los Angeles County Department of Regional Planning. Effective January 1, 2009. *Ordinance No. 2008-0063: Low Impact Development Standards.* Available at: http://planning.lacounty.gov/view/green_building_program

[37] Los Angeles County Department of Regional Planning. Effective November 5, 2015. *Hillside Management Area (HMA) Ordinance.* Available at: http://planning.lacounty.gov/hma

[38] Los Angeles County Department of Regional Planning. Adopted March 29, 2016. *Ordinance No. 2016-0016: Tree Planting Ordinance.* Available at: http://planning.lacounty.gov/tree

3. **Exemplary Stewardship:**
   - Develop a plan consistent with relevant County plans and policies.
   - Retain the historical significance of the two nominated Historic Districts and eligible contributing elements at Descanso Gardens, including five protected heritage oak trees.
   - Avoid or minimize environmental impacts.
   - Restore the understory of historic oak woodlands at Descanso Gardens.
   - Enhance the immersive experience of the camellia forest while protecting native oak trees.
   - Create and enhance habitat at Descanso Gardens.
4. **Resilient Infrastructure:**
   - Enhance the ecological function of the property through the treatment of stormwater.
   - Expand existing on-site energy production at Descanso Gardens.
   - Reduce reliance on potable water through lake and stream improvements (storage), stormwater capture, improved irrigation efficiency, and wastewater recycling.
5. **Revealing Stories:**
   - Improve educational opportunities at the gardens regarding gardening, ecology, and hydrology through interpretative signage and programming.
   - Provide new experiences for engaging and interacting with nature for all ages.
6. **Operational Excellence:**
   - Improve the overall function of operations and maintenance of the property consistent with the mission of Descanso, 2014 operating agreement with the County, and goals identified in the Descanso Gardens Strategic Plan 2018-2020.
   - Provide improved lighting and power access to better support nighttime events.
   - Provide a consolidated office area and streamlined circulation for employees.
   - Improve vehicular and pedestrian traffic ingress and egress.
   - Develop a strategy to implement and maintain projects identified within the Master Plan.

1.9.3 Master Plan Strategies and Tactics

The proposed project is discussed in consideration of circulation, gardens, and the built environment as they relate to the existing conditions of the Master Plan Area and the four overarching master plan strategies & tactics for the proposed Master Plan:

1. **A New Circulation Framework** to improve wayfinding, create gateway moments at garden thresholds, and increase accessibility.
2. **Activating the Gardens** with new and improved gardens and facilities to create new experiences and lasting activation of the gardens.
3. **Weaving Water and Ecology** to intersect the site's water and ecology with the gardens and circulation in celebratory, educational, and performative ways.
4. **Organizing Operations** with new buildings, structures, and infrastructure to create new efficiencies in garden operations and vehicular circulation.

1.10 PROJECT DESCRIPTION

The Master Plan would act as a framework to guide new development within a 15-year timeframe and recommend improvements to existing gardens, seeking to provide implementable projects that would sustain operations. The Master Plan would include recommendations for improving the quality of Descanso Gardens, a County special use park facility, in the West San Gabriel Valley Planning Area, the Fifth Supervisorial District, and Los Angeles County.

1.10.1 Circulation Framework Improvements

The proposed project would restructure the hierarchy of existing paths and provide additional paths to help improve visitor orientation and better showcase garden stories and experiences, guide visitors through the gardens instead of around the gardens, separate the visitor experience from maintenance routes, organize site amenities, and strategically distribute utilities (power and water). The circulation framework improvements would focus on five primary circulation routes (Figure 1.10.1-1, *New Primary Circulation Routes*; Table 1.10.1-1, *New Primary Circulation Routes*).

TABLE 1.10.1-1
NEW PRIMARY CIRCULATION ROUTES

Name of Route	Approx. Length	Path Width	Path Surface	Path Amenities	ADA Accessible?
Arrival Procession	0.2 mile	5–10 feet	Decorative paving; bridges over swales	Interpretive signage	Yes
Gardens Loop	0.8 mile	15 feet	Decorative paving	Formal amenities, seating at frequent interval, utilities under path Interpretive signage	Yes
Woodland Walk	0.7 mile	10 feet	Stabilized mulch or decomposed granite (DG), with stone edging and reclaimed wood decking along lake and arroyo crossings	Interpretive signage Observation Terrace at Lake boardwalk	Yes
Nature Walk	0.6 to 1.3 miles	4–6 feet	Natural trail with wood decking at arroyo crossings	Minimal seating; 2 access gates for The Wilds Loop; observation decks for the Oak Canopy Walk Interpretive signage	Yes for Main Path and Oak Canopy Walk; not The Wilds Loop
Service Route	1.7 miles	20+ feet	Asphalt road	Fire/emergency access, with gates at key junctures to discourage pedestrian use Interpretive signage	Not Eastern Driveway to Boddy House

Existing Paths to Remain or Be Removed

Approximately 85 percent of the existing path network at Descanso Gardens would remain as-is or be resurfaced for ADA accessibility (Figure 1.10.1-2, *Existing Paths to Be Removed, Existing Paths to Remain or Be Resurfaced, and New Paths*). The circulation framework improvements would involve the removal of approximately 219 feet of paved path in one location (between the California Garden and the Oak Grove); removal of approximately 8,878 feet (1.7 miles) of unpaved path in the Rose Garden, Camellia Forest, and Lilac Garden; and retention of approximately 13,063 feet (2.5 miles) of paved path and approximately 17,874 feet (3.4 miles) of unpaved path.

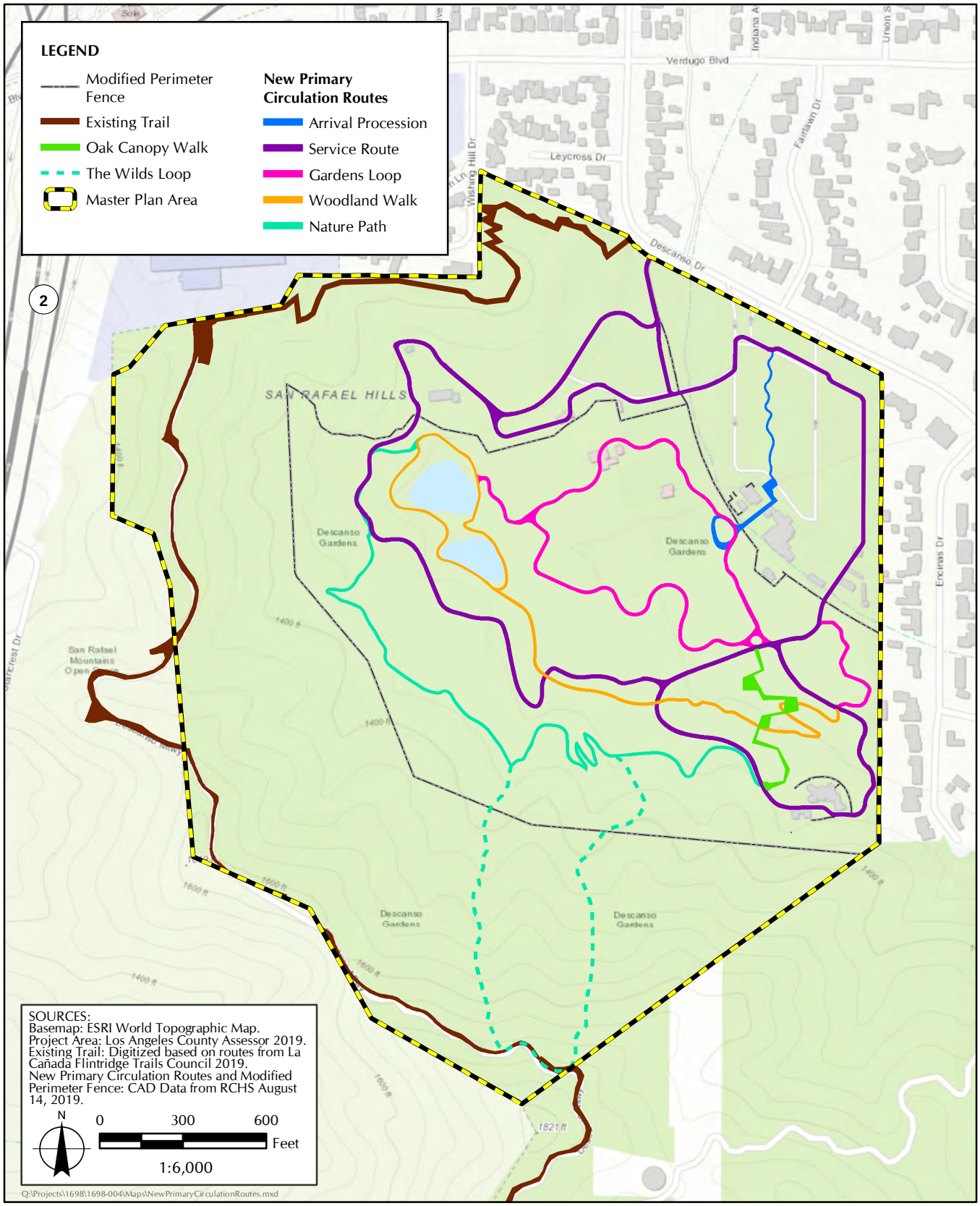


FIGURE 1.10.1-1

New Primary Circulation Routes

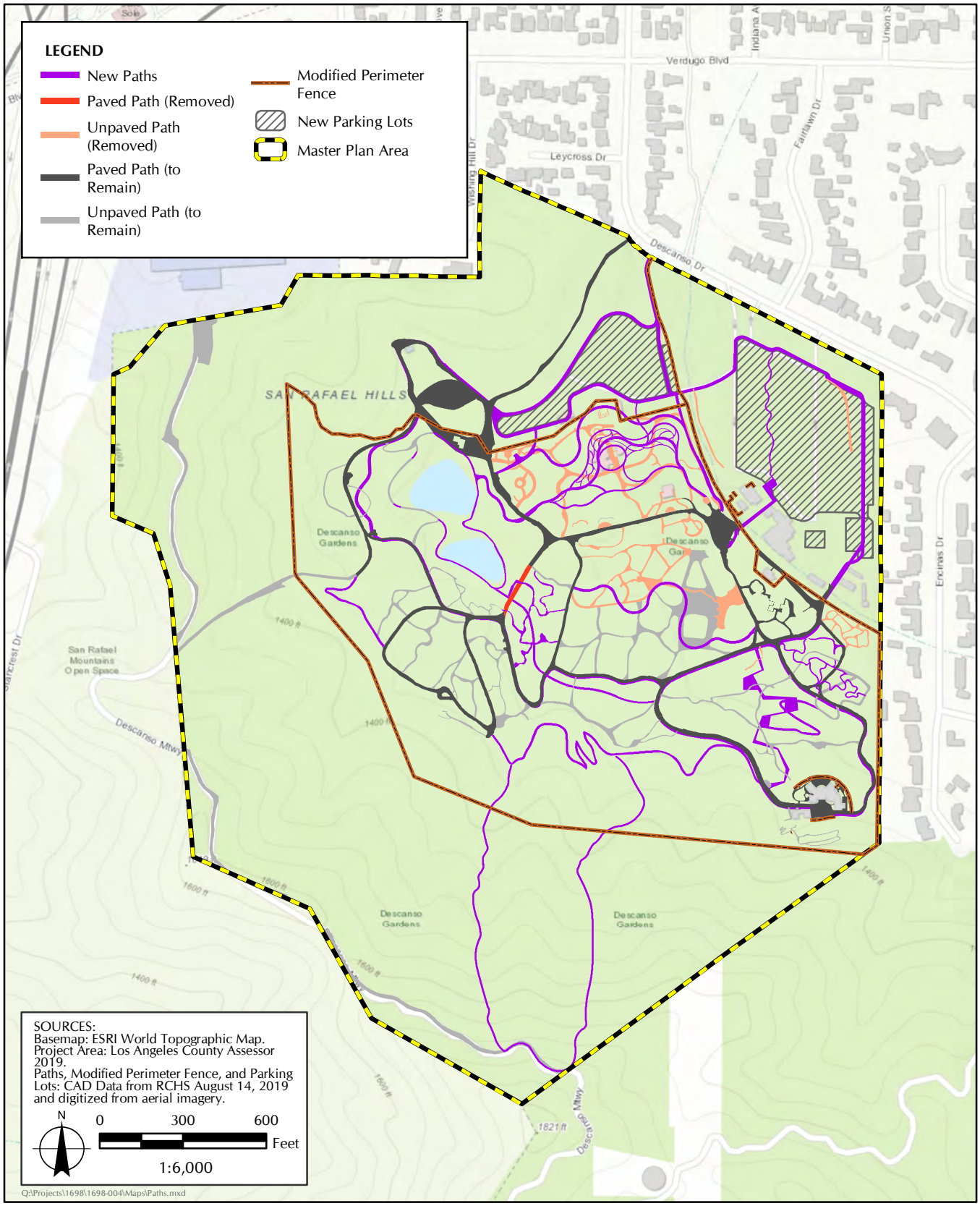


FIGURE 1.10.1-2

Existing Paths to Be Removed, Existing Paths to Remain or Be Resurfaced, and New Paths

New Paths

The circulation framework improvements would involve the addition of approximately 5,431 feet (1.0 mile) of new paved path and approximately 14,214 feet (2.7 miles) of new unpaved path in the Master Plan Area. Approximately 15 percent of the circulation network would involve development of new paths. The circulation framework improvements would involve the development of a new primary path (including the Garden Loop, Lake Perimeter Boardwalk, and ADA switchbacks) and a new secondary path to help internal circulation with enhanced gardens. Most of the new path network would be surfaced with natural materials that are stabilized and ADA accessible, such as decomposed granite. Three locations would remain too steep to meet ADA requirements: the historic Boddy House driveway along the eastern edge of the Master Plan Area, the new Wilds Loop trial extension south of the existing fence line, and the dirt road between the California Garden and Oak Woodland near the existing southwest fence line.

1. Arrival Procession

This approximately 0.2-mile route would usher visitors into the property through the main parking area across a decorative paved path and a new series of bridges over bioswales, past the Visitor Center, Van de Kamp Hall, and renovated courtyard, into the Entry Court (including the Center Circle; see Figure 1.10.1-2). The bioswales would create a grassland garden setting in the parking lot through installation of grasses up to approximately 2 to 5 feet tall between the rows of parking stalls. Shade trees would be planted throughout the bioswales to provide comfort and shade throughout the parking lot and arrival procession.

2. Gardens Loop

This approximately 0.8-mile loop would provide visitors with a tour of the Descanso "Highlights" by leading from the Entry Court northwest to the River of Roses and Gathering Lawn (existing Rose Garden), southwest on an out-and-back segment to the Lake near the Boddy Lodge, southeast through the Oak Savannah, continuing southeast through the Camellia Strolling Gardens, south of the existing Under the Oaks Theater and further southeast to the existing Ancient Forest, north through the new Marsh Garden (existing Lilac Garden), west to the Japanese Garden, and finally back to the Entry Court. Seating would be provided at frequent intervals along this route, and new utilities would be installed under the path to improve garden operations and minimize the footprint. The Gardens Loop would be a paved path (see Figure 1.10.1-2).

3. Woodland Walk

This approximately 0.7-mile route featuring oaks and water at Descanso Gardens would provide visitors with a full loop to walk around the Lake by the existing Boddy Lodge, existing Oak Woodland, and a new wetland edge; then southeast through the meadow clearing of the Oak Savannah, continuing southeast through the Restored Oak Forest, east past the Seasonal Stream, and to the existing Ancient Forest. The Woodland Walk would be composed primarily new unpaved paths, with the exception of the existing unpaved paths in the Oak Woodland and an existing unpaved path in the Camellia Forest – East (see Figure 1.10.1-2).

4. Nature Walk

This approximately 0.6- to 1.3-mile route focusing on ecology and habitat at Descanso Gardens would lead visitors from the new Nature Discovery Gardens (north of the existing Oak Woodland) south and southeast through the enhanced Oak Woodland and California Native Garden to an optional The Wilds (Chaparral) & Wilds Loop past the existing fence line to the south, then east past the Seasonal Stream to an Elevated Oak Canopy Walk under the existing coast live oak trees, and north to the existing Under the Oaks Theater. The

Nature Walk would be composed of primarily new unpaved paths and the elevated Oak Canopy Walk, with the exception of the existing paved paths in the Oak Woodland and California Garden (see Figure 1.10.1-2).

The Wilds Loop

The approximately 0.5-mile Wilds Loop would provide an opportunity for visitors to explore the Master Plan Area beyond the existing fence line and showcase different microclimates of the undeveloped 57 acres of the Master Plan Area south of the fence line, including valley and ridge. The Wilds Loop would lead along a ridgeline to a new security gate, then to an Overlook area with seating at the connection point to the existing public Descanso Loop hiking trail. The Overlook area would be located near the highest elevation point in the Master Plan Area (1,820 feet above MSL) to provide scenic view into the surrounding hills. From the Overlook area, The Wilds Loop would follow a valley north to another security gate at the existing fence line, then connect to the main Nature Walk path.

Visitors would need to be provided access to the Wilds Loop through the two locked security gates as part of admission. The two security gates would provide access back into Descanso Gardens from the Wilds Loop only to visitors during operating hours (8:00 a.m. to 5:00 p.m. for members and 9:00 a.m. to 5:00 p.m. for nonmembers). Members would need to be provided with either full access during operating hours or temporary access granted at the entrance as part of admission. Nonmembers would need to be provided with a one-day access mechanism as part of admission. This could be accomplished by a one-day code on entry tickets that can be scanned at the gates, a mobile application (app) that can be scanned at the gates, and/or designated volunteers or staff stationed at each gate to provide access.

Elevated Oak Canopy Walk

The approximately 0.2-mile elevated Oak Canopy Walk would provide an opportunity to visitors to meander through the mature canopies between the Garden Loop (near the Camellia Strolling Gardens) and the Nature Path and paved western driveway near the Boddy House. This elevated walk would be gently inclined for ADA accessibility, include ADA access ramps at the northern and southern ends, and provide three observation decks and two sets of stairs that would connect to the Woodland Walk.

5. Service Route

This approximately 1.7-mile maintenance/service/emergency route would use the existing asphalt circulation as much as possible to provide a loop for vehicular access between Backstage and the North Yard (existing Auxiliary Parking Lot) and the new Nursery location, a West Maintenance Yard, a North Maintenance Yard, a new service corridor along the eastern edge of the property, an East Maintenance Yard, and through the gardens between the Japanese Garden and Ancient Forest south to the Boddy House, then northwest through the Restored Oak Forest and Oak Woodland, and finally north through the new Nature Discovery Gardens to the nursery and West Maintenance Yard. New paved paths would be developed along the eastern edge of the Master Plan Area to provide a maintenance route from the location of the existing purple Horticulture/Operations administrative office trailer through the existing (relocated) Harvest Garden and Nursery to the Main Parking Lot and new exit driveway (see Figure 1.10.1-2). A segment of the existing paved path between the Promenade and the California Garden would be removed and replaced with an unpaved path for the Woodland Walk to clarify the hierarchy of the Service Route. The eastern driveway leading to the Boddy House would be widened and regraded to a minimum 20-foot width in order to provide adequate fire/emergency access.

1.10.2 New and Improved Gardens and Facilities

The proposed project would include the development of two new gardens (plus a new nursery and storage yard), one new temporary overflow parking area, major improvements to 11 existing gardens, and improvements to the entrance complex and the two existing parking lots (Table 1.10.2-1, *New and Improved Gardens*; Table 1.10.2-2, *New and Improved Facilities*; Figure 1.10.2-1, *New and Improved Gardens and Facilities*). The proposed project would increase the existing number of available parking stalls by 32 percent (184 stalls) from 574 existing parking stalls to 758 proposed parking stalls to accommodate projected visitor use. Additionally, the SCE utility corridor would be graded to provide temporary overflow parking for up to 70 vehicles during events to reduce potential overflow parking in the surrounding neighborhood. The increased number of parking spaces would bolster Descanso Gardens' capacity to meet existing parking needs and reduce the occurrence of street parking by existing visitors during peak periods (events). It is not intended to accommodate an increased capacity of visitors during peak events.

TABLE 1.10.2-1
NEW AND IMPROVED GARDENS

Existing Location/ Garden Name	New Garden	Major Improvements
Main Parking Lot	N/A	**Arrival Grassland Garden** Bioswale planted with shade trees and grasses Bridges over bioswales
Rose Garden	N/A	**River of Roses** **Gathering Lawn** **New Meeting Pavilion and Event Terrace**
Promenade/ Center Circle/ Former Nature's Table	N/A	**Enhanced Promenade & Entry Court**
Magnolia Lawn	N/A	Updated planting and seating
Main Lawn	N/A	**Camellia Strolling Gardens** A new lawn would be provided in the Rose Garden to support the existing programing at the Main Lawn.
Japanese Garden	N/A	Additional lighting would be provided to support evening events in the garden.
Lilac Garden	**Marsh Garden** • Relocate Lilacs to Promenade and repurpose area as a stormwater detention garden capturing water from Winery Canyon Channel for lake refill and irrigation. • Create bioretention and detention basins at the low point of creek and site for supplemental water storage and irrigation reuse. • Expand the current stream recirculation pool as a bioretention basin. • Recirculate collected water to stream and pump to lake as overflow or reuse for irrigation.	The existing lilac collection would be relocated along the Promenade.
Ancient Forest	N/A	**Ancient Forest Expansion**
Camellia Forest - East	N/A	**Elevated Canopy Walk** **Restored Oak Woodland**
Camellia Forest - West	N/A	**Camellia Strolling Gardens** (northern area) **Restored Oak Woodland** (southern area)

TABLE 1.10.2-1
NEW AND IMPROVED GARDENS

Existing Location/ Garden Name	New Garden	Major Improvements
California Garden	N/A	**California Garden Expansion** • Ethnobotanical Garden • Native succulent collection • Perennial grassland & wildflowers • Channel Islands collection • Baja California collection • Desert arroyos collection • High desert collection • Fire succession garden • Climate change gardens
Oak Grove	N/A	**Restored Oak Woodland**
Lake & Surroundings	N/A	**Lake Perimeter Walk** • Enhance ecological performance of main water features, optimizing the lake for stormwater capture for non-potable use. • Dredge lake sediments and improve aeration system. • Install new liner in lake and stream to reduce leaking and enhance recirculation of water. • Regrade to create wetland shelves, sediment bays and floating wetlands. • Install check dams and revegetate hillside to slow water flow and reduce sediment transport from the arroyos to lake. • Install irrigation reuse pump.
Oak Woodland	**Nature Discovery Gardens** (western area) • Get Dirty Zone & Nature Play • Water Interaction & Education Zone • Learning Pavilion • Restrooms • Outdoor Kitchen • Harvest Garden Beds	N/A
Harvest Garden	N/A	Relocate to western side of developed gardens (as part of the new Nature Discovery Gardens).
Hope's Garden	N/A	N/A
Undeveloped Area west of Oak Woodland	**Nature Discovery Gardens**	Irrigation expansion

TABLE 1.10.2-2
NEW AND IMPROVED FACILITIES

Existing Location/ Facility Name	New Facility	Major Improvements
Main Parking Lot	N/A	**Arrival Grassland Garden** • Expansion of parking lot from 428 existing stalls to 506 proposed stalls (78 new stalls) • Relocated driveways • Replacement of streetscape landscaping with an immersive planting area, new pedestrian entry, entry meadow, and decomposed granite (DG) area with a water bottle station for cyclist groups • Expansion of parking area towards the east • Reorientation of parking stalls from north-south to northwest-southeast orientation • Addition of north-south pedestrian pathways through parking lot from street to main entrance
Auxiliary Parking Lot	N/A	**Backstage** • Expansion of parking lot from 146 existing stalls to 252 proposed stalls (106 new stalls) • 5 designated bus parking spaces • New Groups and Private Event Entry
SCE Utility Corridor near Descanso Drive	**Temporary Overflow Parking** (70 spaces)	The decomposed granite (DG) path from the existing picnic area would be expanded north to connect to the parking overflow area.
Entrance	N/A	New Café Kiosk or Information Stand Relocate restaurant in Van de Kamp Hall New queuing plaza Relocated walkway from parking lot Courtyard improvements
Undeveloped Area Northwest of Auxiliary Parking Lot	**New Nursery**	New greenhouse and nursery facilities
Undeveloped Area Northwest of Auxiliary Parking Lot	**New Service Yard (West Yard)**	
Northern portion of Auxiliary Parking Lot		**North Yard**
Administrative Trailers / Harvest Garden		**East Yard** **Administrative Headquarters Building**

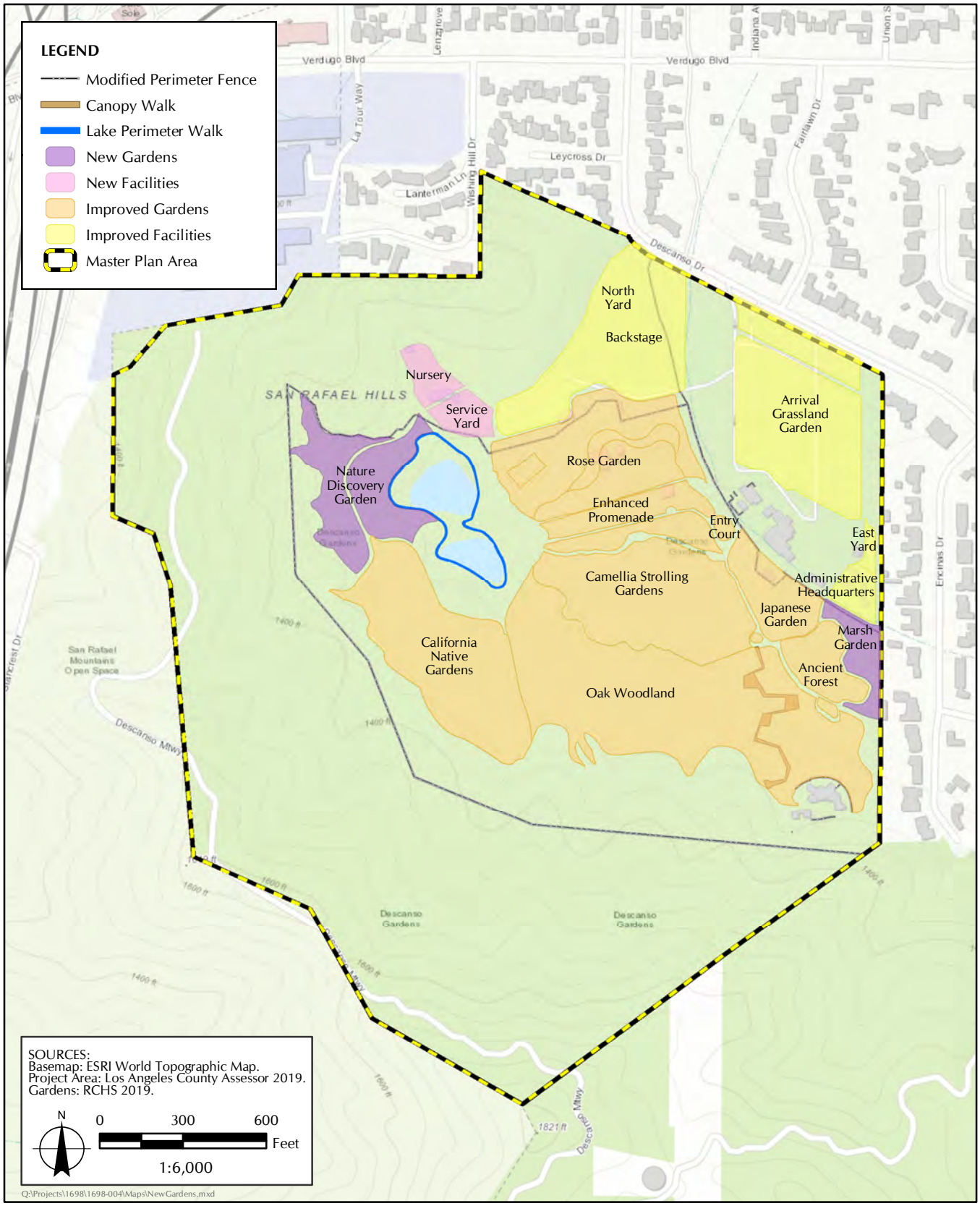


FIGURE 1.10.2-1

New and Improved Gardens and Facilities

New Gardens and Facilities

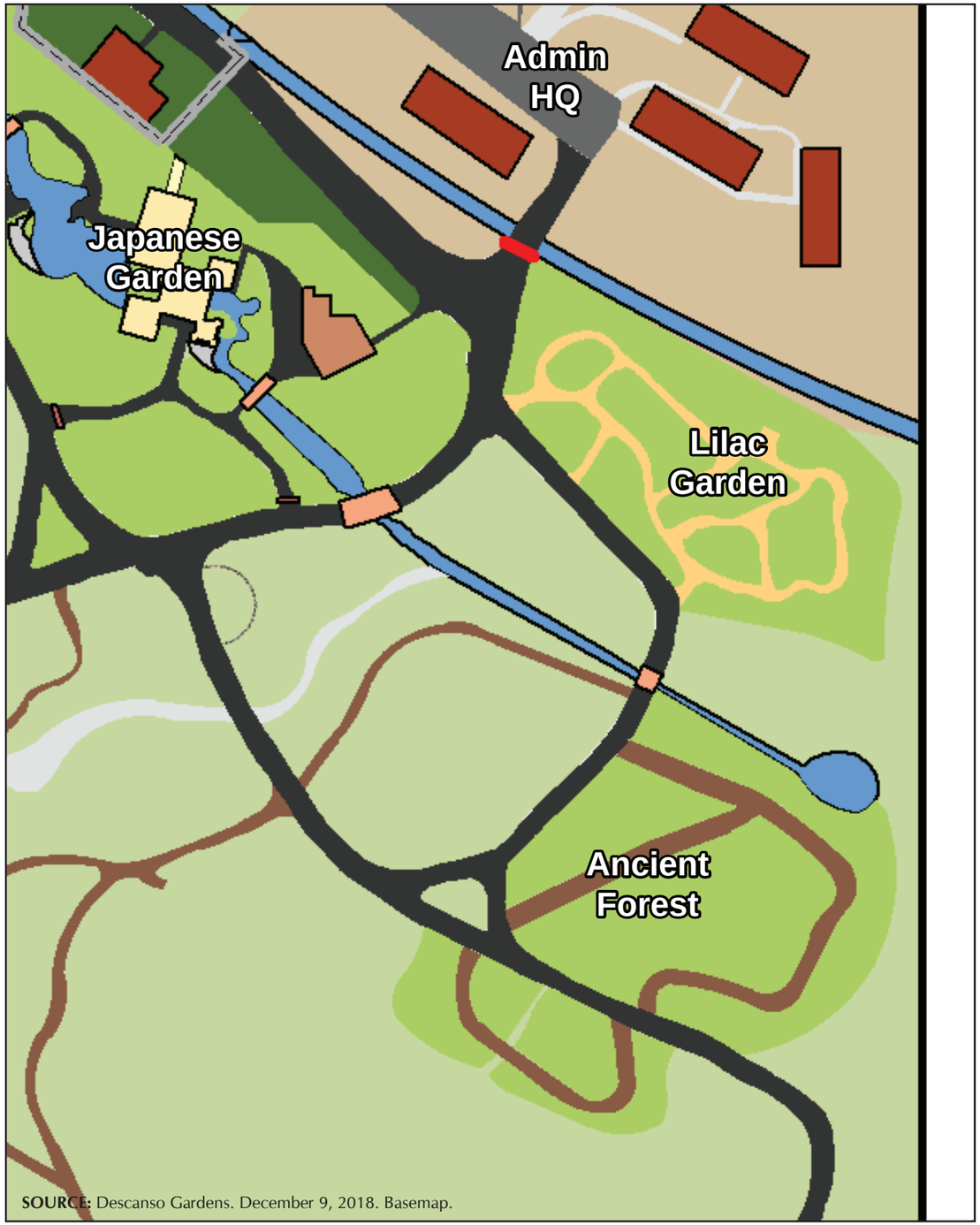
Marsh Garden. The Lilac Garden would be replaced with a treatment wetland that would function as a stormwater detention garden and provide an opportunity for ecological interpretive exhibits (Figure 1.10.2-2, *New Marsh Garden and Ancient Forest Expansion*).

Nature Discovery Garden. The Harvest Garden (including an outdoor kitchen, restroom, and learning pavilion) would be relocated from the eastern edge of the property to west of the Boddy Lodge (Figure 1.10.2-3, *New Nature Discovery Gardens*). The northern portion of the Oak Woodland would become Outdoor Classrooms & Junior Ranger Stations, an Interpretive & Interactive Water Zone would be installed along the northwestern edge of the Lake, and a Get Dirty & Active Zone would extend beyond the Oak Woodland. All existing oaks would be protected in place.

New Nursery & West Service Yard. The existing nursery would be replaced with an expanded parking lot and planted berm, and a new nursery and the west service yard would be developed to the west of the Auxiliary Parking Lot (Figure 1.10.2-4, *New Nursery and Service Yard*). The nursery would include a shade house and greenhouse in addition to the grounds for plant propagation. The new nursery and greenhouse area would double the size of the existing nursery for increased propagation space, include parking for maintenance vehicles and EV charging stations, provide a state-of-the-art greenhouse for plant propagation needs, and repurpose the existing sheds in the nursery for re-use. A service area would be provided for EV maintenance. The materials stockpile and storage would be relocated to the West Yard, and the existing tool shed at the site for the new nursery would be relocated.

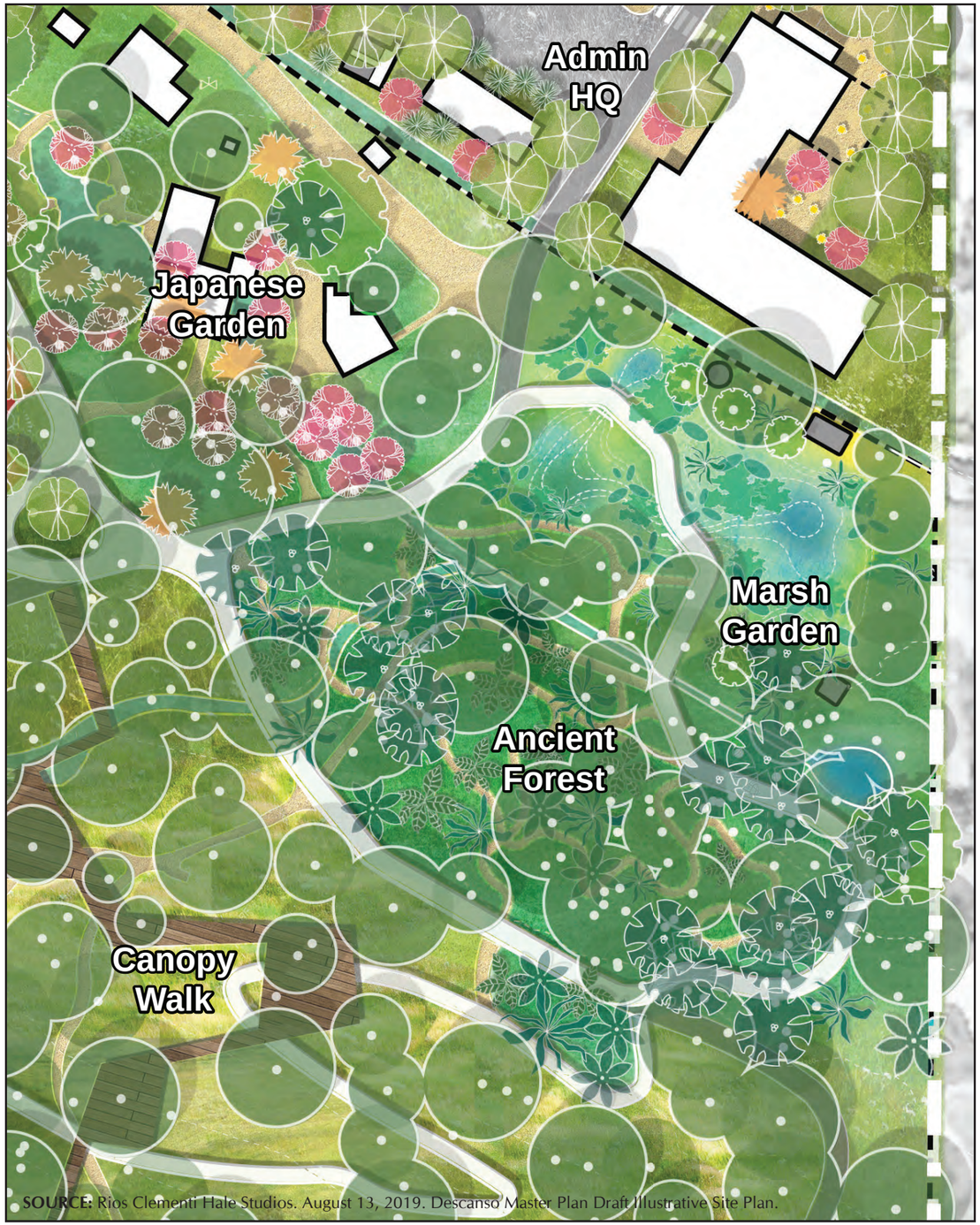
Major Improvements to Gardens and Facilities

Arrival Grassland Garden. The Main Parking Lot would be redesigned and expanded to provide a new arrival garden between the reconfigured rows of parking stalls. The streetscape landscaping along Descanso Drive would be replaced with an immersive planting area, new pedestrian entry, entry meadow, and decomposed granite (DG) area with a water bottle station for cyclist groups. The proposed project would expand the existing Main Parking Lot to the east from 428 spaces to 506 spaces, develop a planted berm at the eastern boundary with the neighborhood, and reorient the existing north-south parking stalls in a northwest-southeast direction to provide four safer pedestrian walkways from the new streetscape landscaping south through the center of the parking lot to an immersive planting area and the Visitor Center (Figure 1.10.2-5, *New Arrival Grassland Garden and Backstage*). There would be 351 parking stalls in the main parking area, 110 parking stalls in the side parking area near the eastern edge of the property, and 45 designated staff parking stalls in the southeastern corner of the parking lot near the new Administrative Headquarters building. The increased number of parking spaces at the Arrival Grassland Garden would bolster Descanso Gardens' capacity to meet existing parking needs and reduce the occurrence of street parking by existing visitors during peak periods (events). It is not intended to accommodate an increased capacity of visitors during peak events. Instead of the existing trees in tree wells in the Main Parking Lot, planted buffers with trees would be installed between the rows of parking spaces to provide shade and stormwater filtration.



SOURCE: Descanso Gardens. December 9, 2018. Basemap.

Existing

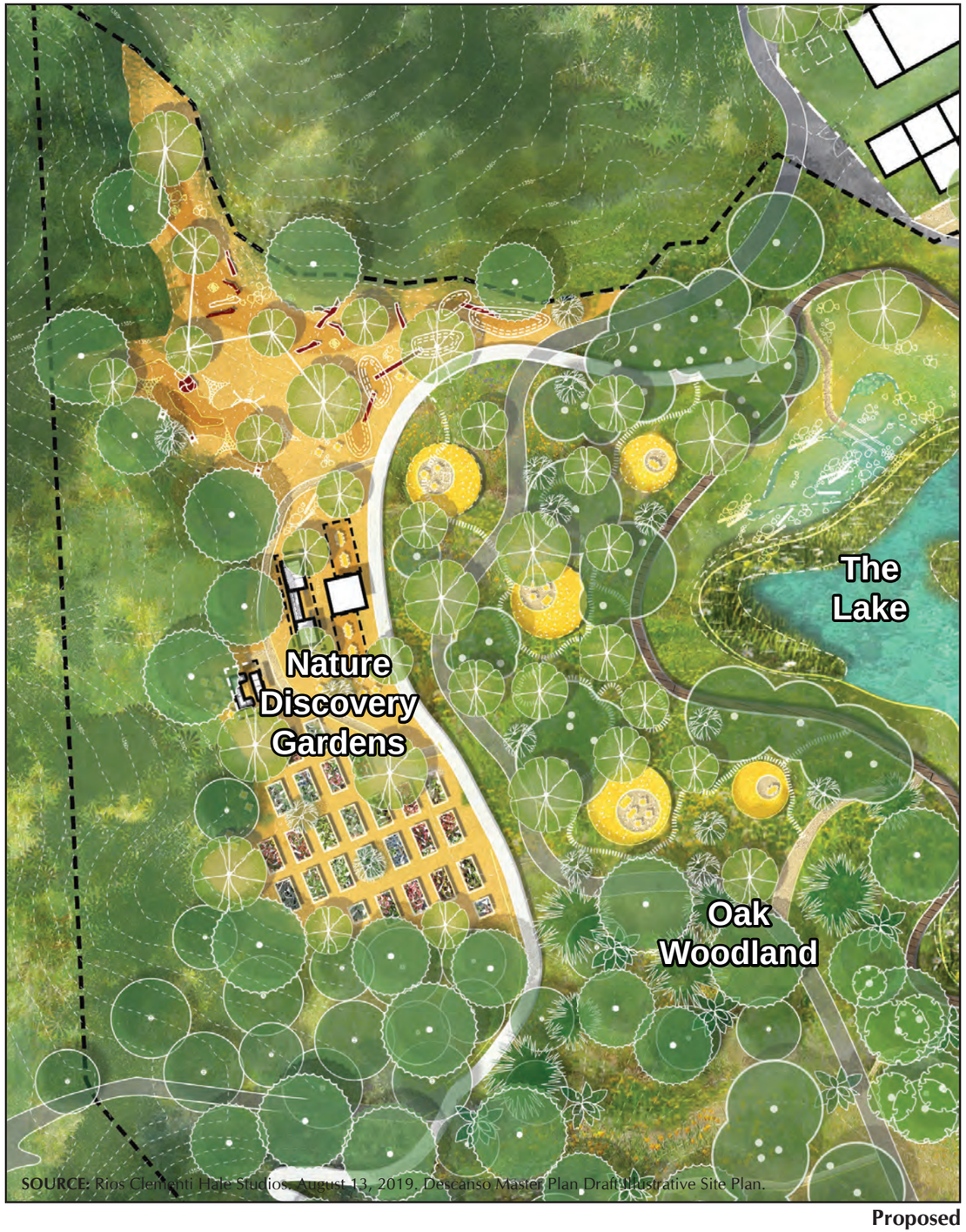


SOURCE: Rios Clementi Hale Studios. August 13, 2019. Descanso Master Plan Draft Illustrative Site Plan.

Proposed

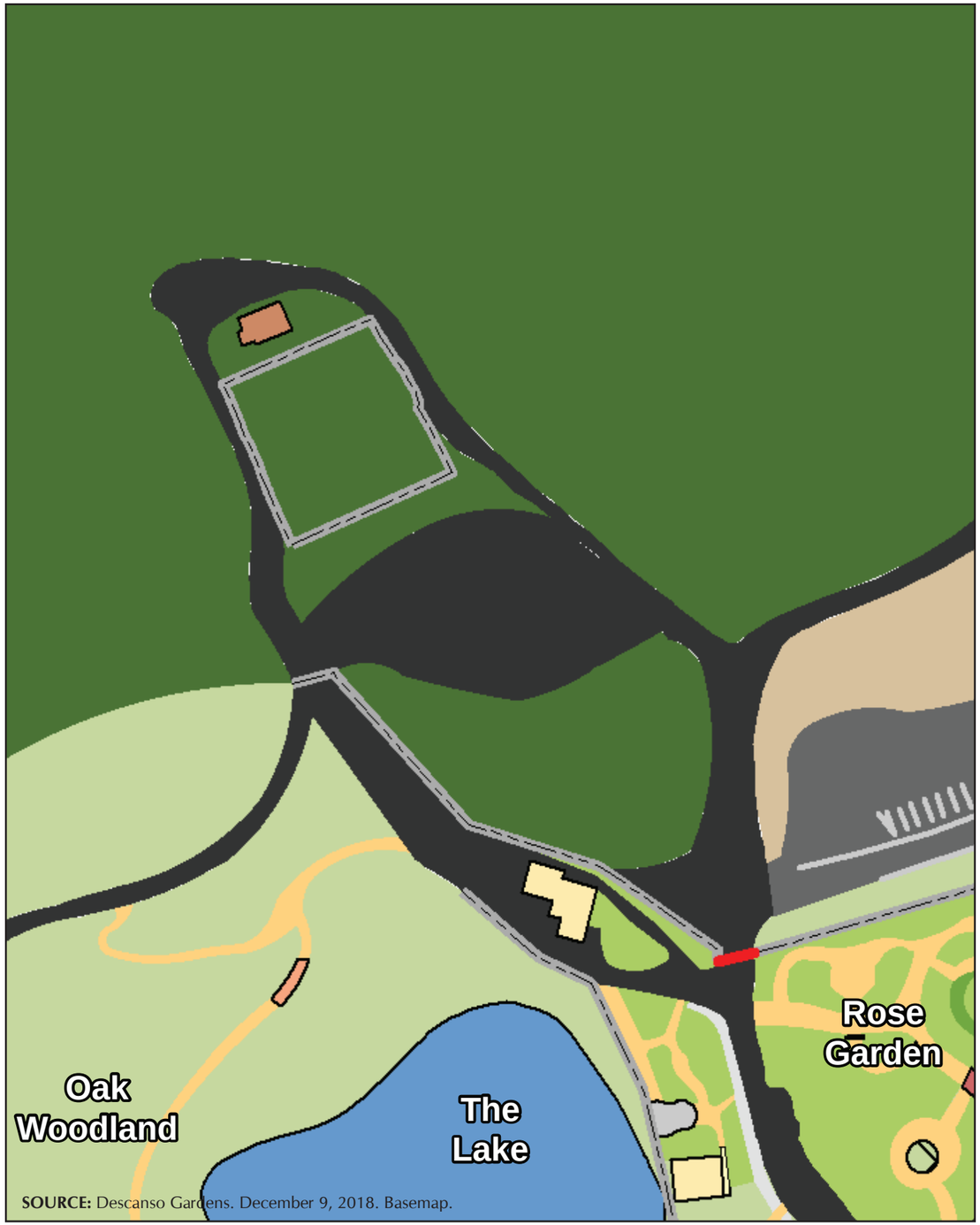
FIGURE 1.10.2-2
New Marsh Garden and Ancient Forest Expansion

Existing



Proposed

FIGURE 1.10.2-3
New Nature Discovery Gardens



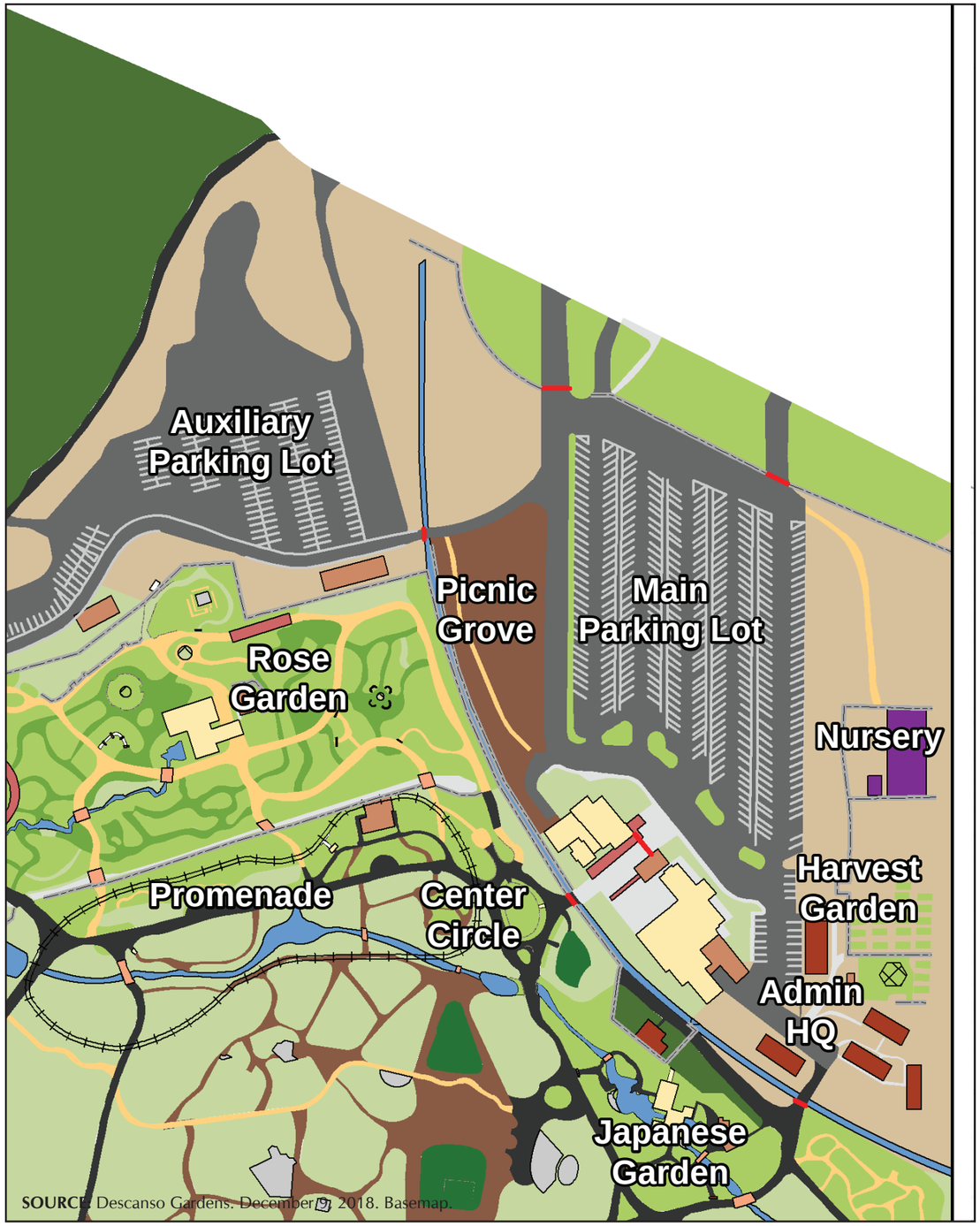
SOURCE: Descanso Gardens. December 9, 2018. Basemap.

Existing

SOURCE: Rios Clement Hale Studios. August 13, 2019. Descanso Master Plan Draft Illustrative Site Plan.

Proposed

FIGURE 1.10.2-4
New Nursery and Service Yard



SOURCE: Descanso Gardens. December 5, 2018. Basemap.

Existing

SOURCE: Rios Clementi Hale Studios. August 13, 2019. Descanso Master Plan Draft Illustrative Site Plan.

Proposed

FIGURE 1.10.2-5
New Arrival Grassland Garden and Backstage

Entrance Visitor Center, Courtyard, & Van de Kamp Hall. This area would continue to remain open to the general public. The entry walkway from the existing drop-off/pick-up portion of the Main Parking Lot would be relocated northwest to a new queuing plaza and ticket windows for the visitor center (Figure 1.10.2-6, *Enhanced Promenade and Entry Court*). The existing Maple Restaurant would be converted to multipurpose spaces for meetings, Van de Kamp Hall would be developed into an approximately 4,000-square-foot restaurant, and the courtyard would be improved and expanded to provide seating on the southwest side of Van de Kamp Hall. The southeastern portion of Van de Kamp Hall would be converted to an enhanced kitchen, near an improved back-of-house and loading area. A Café Kiosk or Information Stand would be installed in the western corner of the courtyard to orient visitors before they walk under a new pergola gateway to the ticketed guest entry point.

Enhanced Promenade & Entry Court. The Promenade would be repaved in a straight line to create the only linear path at Descanso Gardens (see Figure 1.10.2-6). This would create a stronger arrival moment and axial end points for the Promenade. An arrival plaza would replace the center circle, a rotating garden installation would replace the former Nature's Table garden, queuing for the Enchanted Railroad would be shifted from the center of the Promenade to the southeastern edge near the new arrival plaza, the restrooms would be renovated, and the Promenade would become a flexible exhibit grounds that could support temporary exhibits and fairs.

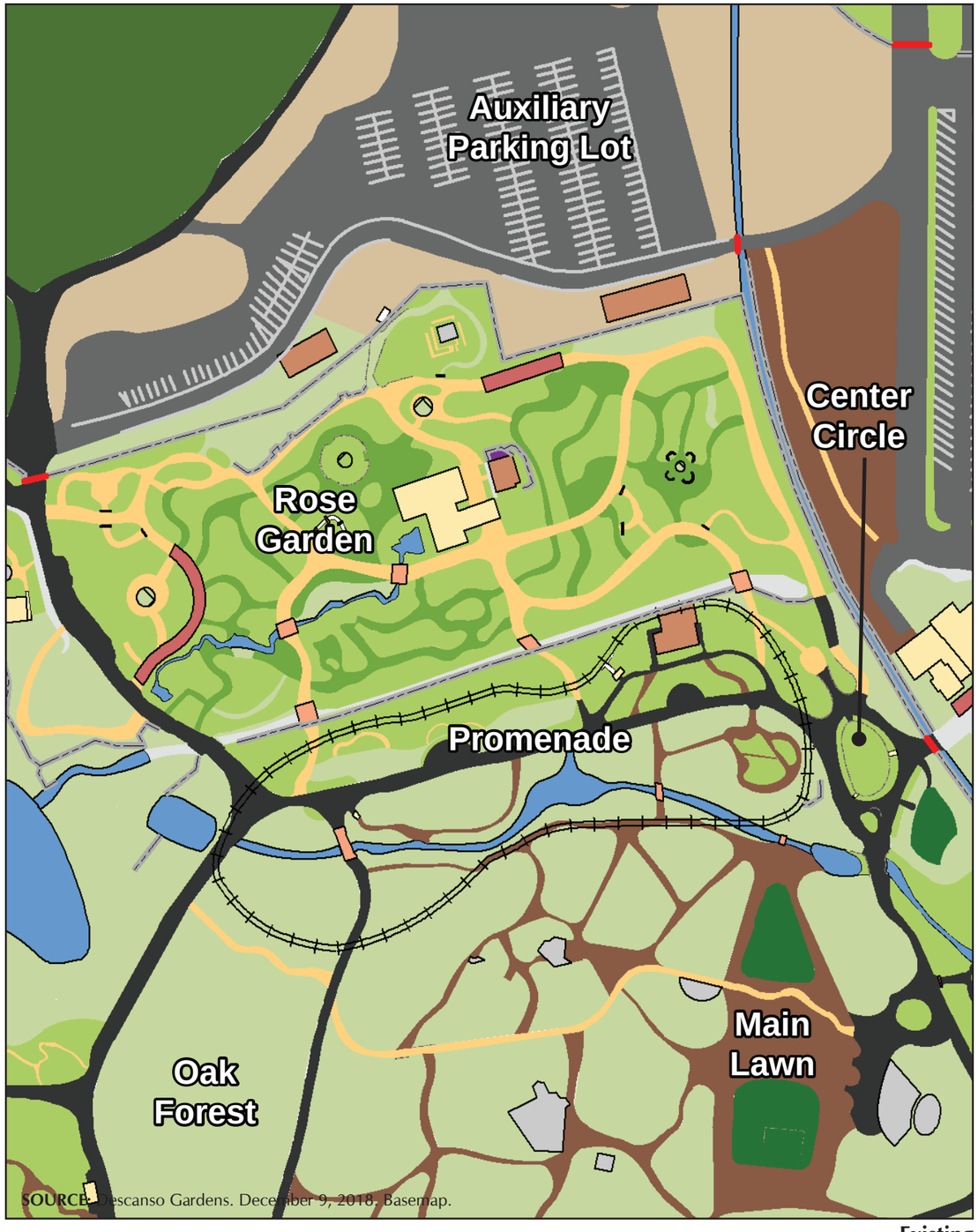
River of Roses, Gathering Lawn, and New Meeting Pavilion. The Rose Garden would be redesigned by consolidating the flower beds for maintenance and "WOW factor," replacing the existing Rose Pavilion and cottage with a new approximately 9,200-square-foot Meeting Pavilion and Event Terrace near the western edge of the garden, and consolidating the lawn into a centrally located Gathering Lawn that would accommodate large programs with better access and infrastructure than the existing Main Lawn (Figure 1.10.2-7, *Improved Rose Garden*). The new Meeting Pavilion would be designed to accommodate multiple small events to one large event through moveable walls (Figure 1.10.2-8, *New Meeting Pavilion*). The pavilion would welcome and process large groups, especially educational groups, and serve as a venue for the majority of Descanso's private events, supported by a separate entry and parking from general visitors. The pavilion would include a group orientation area, lunch storage, eating areas, restrooms, auditorium, classrooms, an event reception area, kitchen prep and food storage, and a bridal suite.

Camellia Strolling Gardens. The 2,470 camellias in excellent, good, and fair conditions would be consolidated from a 9-acre area to a 3-acre area in development of the Camellia Strolling Gardens (Figure 1.10.2-9, *New Camellia Strolling Gardens*). This consolidated camellia collection garden would reorganize the layout to facilitate maintenance and ensure maximum visibility. Furthermore, existing camellias that are too close to oak root zones would be transplanted, and the oak understory would be restored where camellias have been removed. A new Camellia Labyrinth would replace the Children's Maze in the Rose Garden. The Under the Oaks Theater would be enhanced and expanded.

Japanese Garden. Additional lighting would be provided to support evening events in the garden.

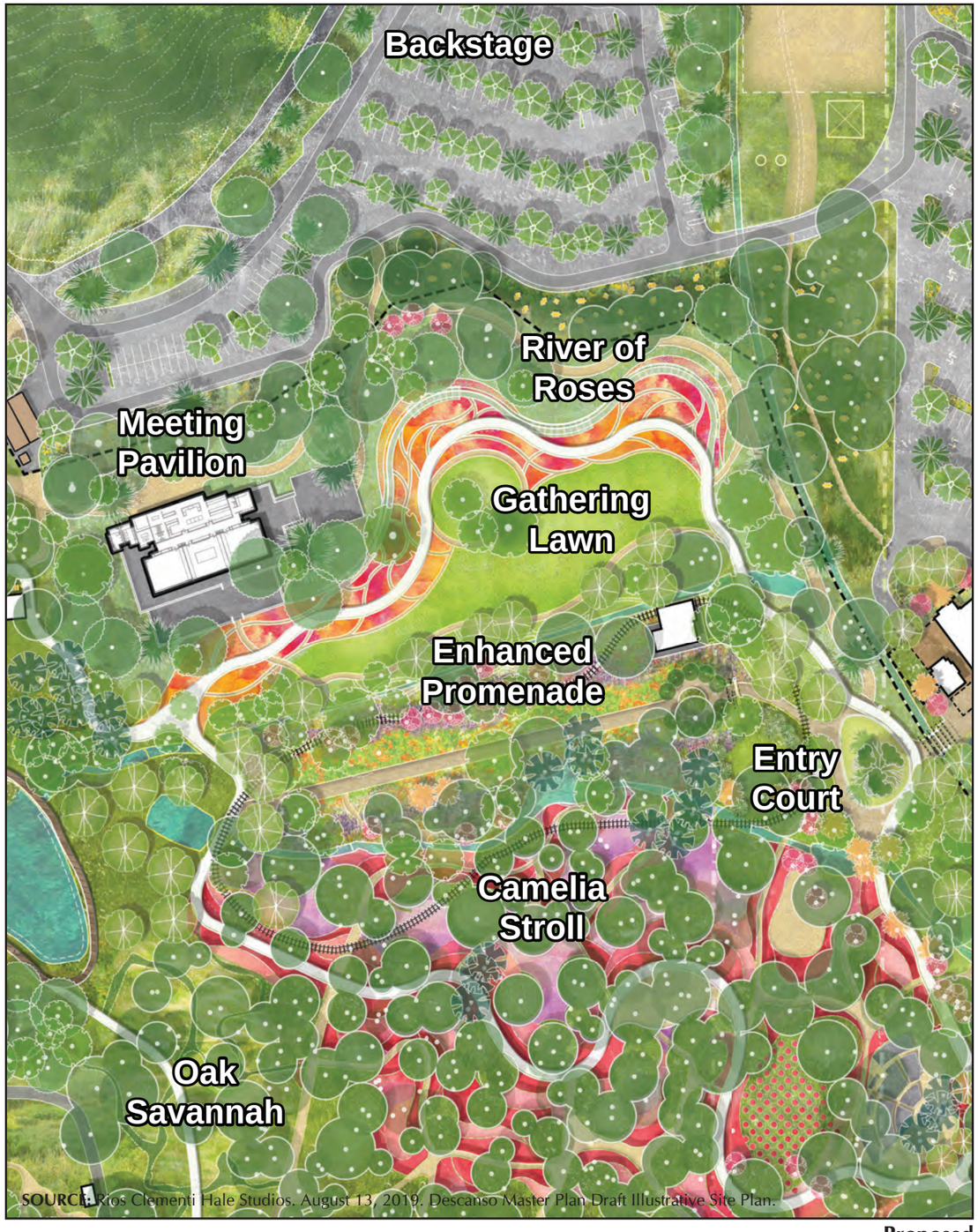
Ancient Forest Expansion. The area of the collection would be expanded, with new specimens to bolster the collection and new pathways to meander through the garden (see Figure 1.10.2-2).

Lake Perimeter Walk. An improved boardwalk circulation would be installed around and across the Lake, and an observation deck would be installed from Boddy Lodge (Figure 1.10.2-10, *New Lake Perimeter Walk and Lake & Stream Improvements*). There would be an opportunity for ecological interpretive exhibits along the improved boardwalk circuit. A water play area would be designated in the northwestern portion of the Lake, the manmade Lake would be relined and regraded to create shallow shelves for planting soil, wetland shelves would be installed along the western and eastern edges of the Lake, a floating wetland would be installed immediately west of the bird observation station (Lakeside Lookout), and a marsh/riparian area would be installed along the southwestern edge of the Lake.



SOURCE: Descanso Gardens. December 9, 2018. Basemap.

Existing



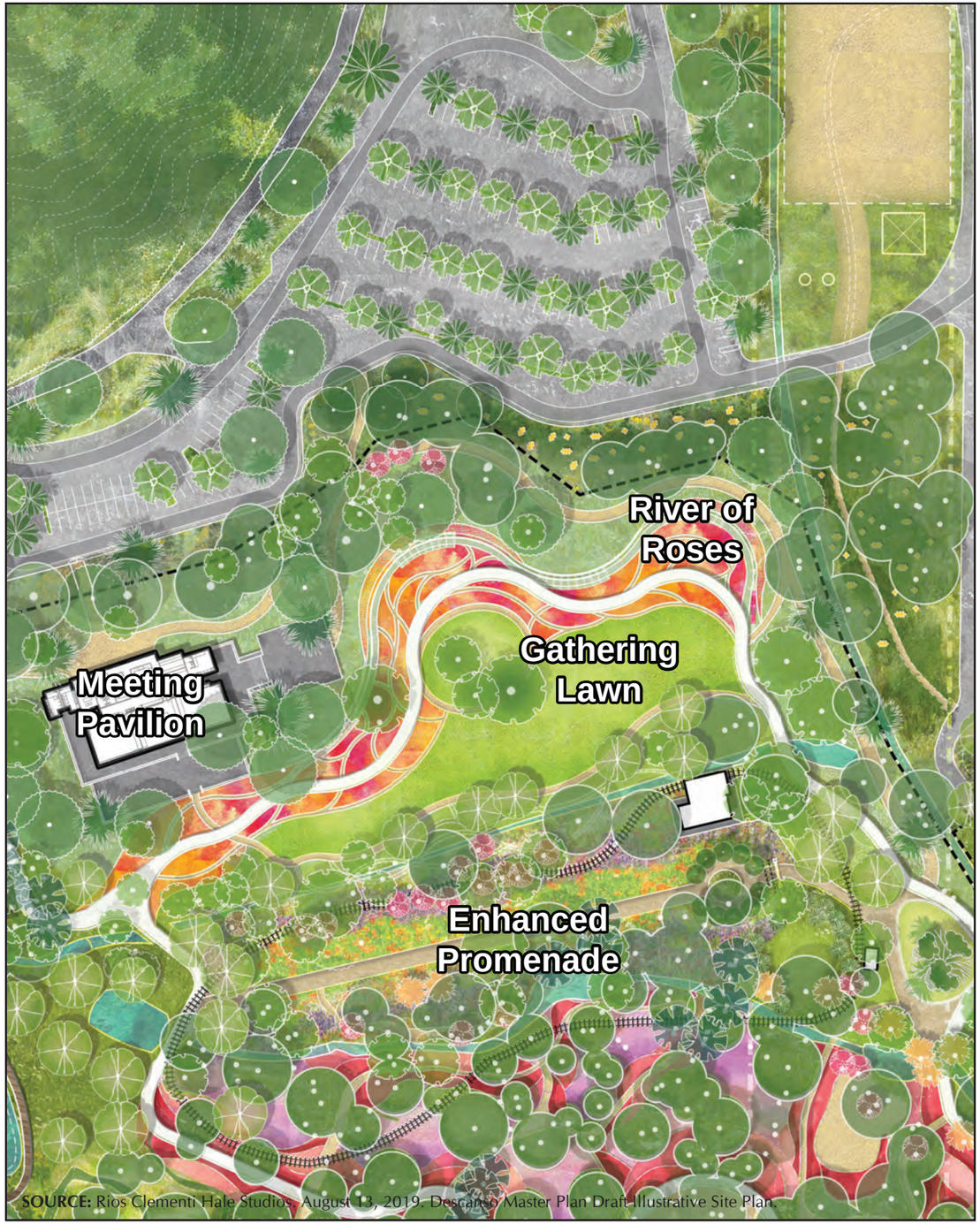
SOURCE: Rios Clementi Hale Studios. August 13, 2019. Descanso Master Plan Draft Illustrative Site Plan.

Proposed

FIGURE 1.10.2-6
Enhanced Promenade & Entry Court

SOURCE: Descanso Gardens. December 9, 2018. Basemap.

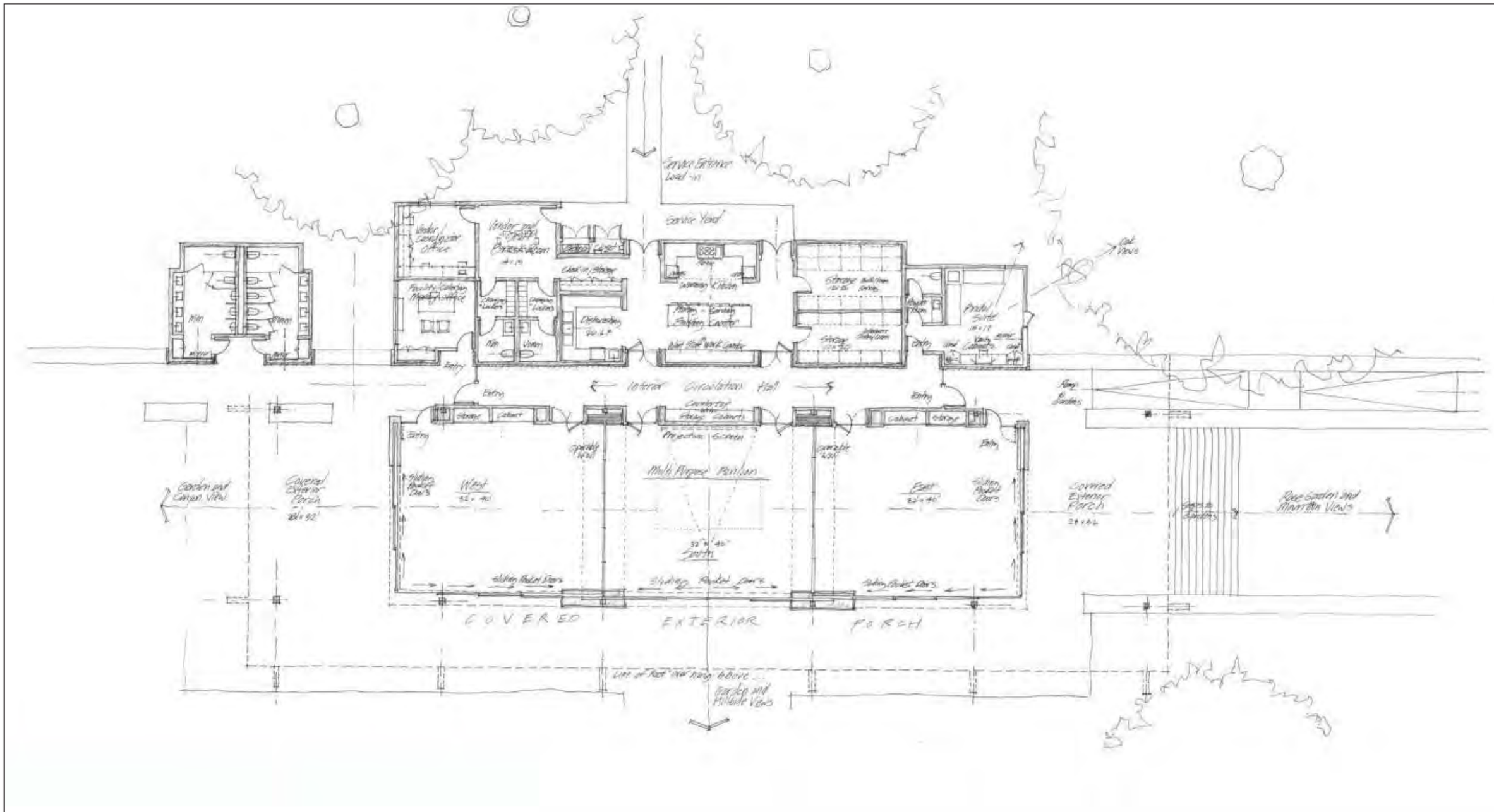
Existing



SOURCE: Rios Clementi Hale Studios. August 13, 2019. Descanso Master Plan Draft Illustrative Site Plan.

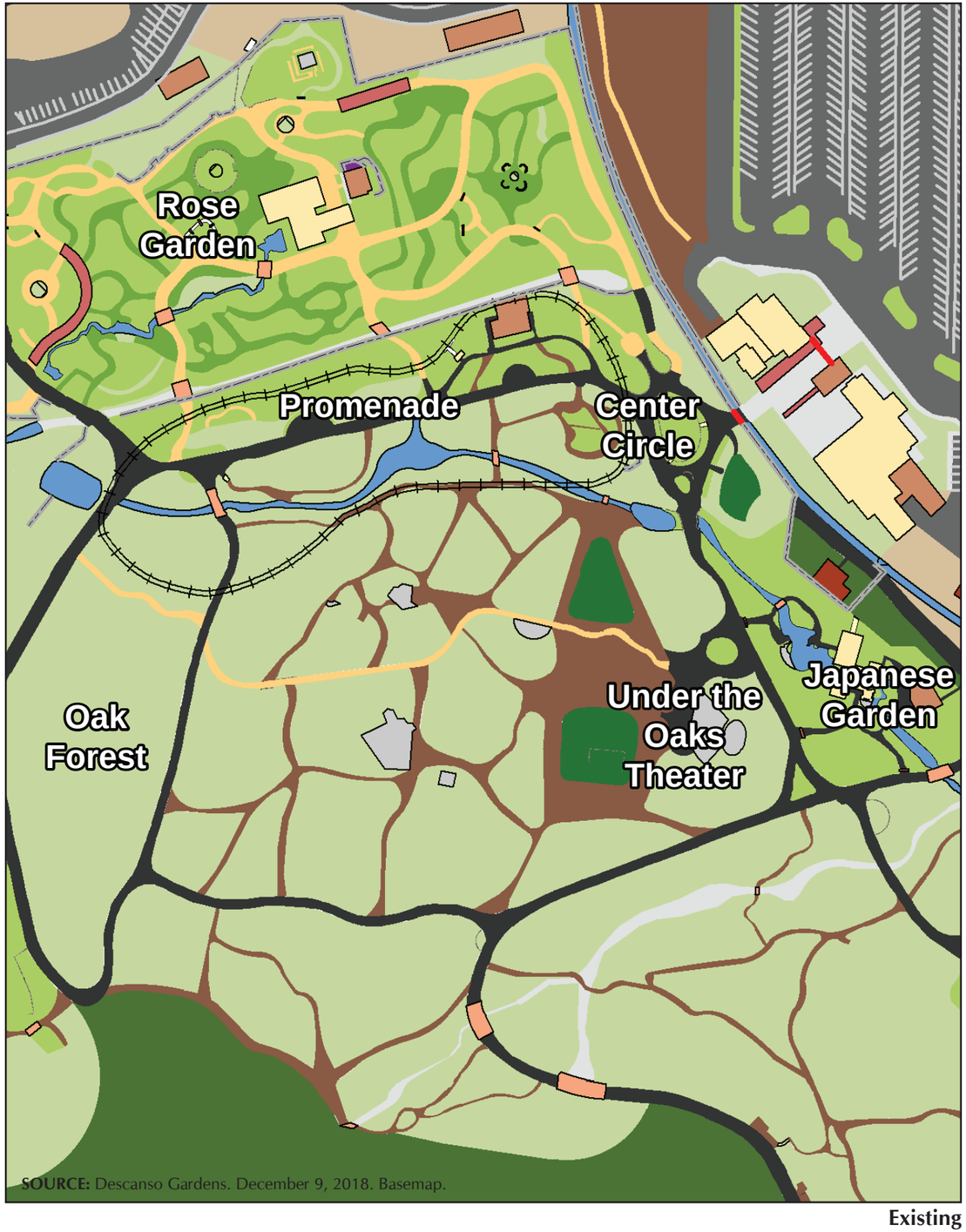
Proposed

FIGURE 1.10.2-7
Improved Rose Garden

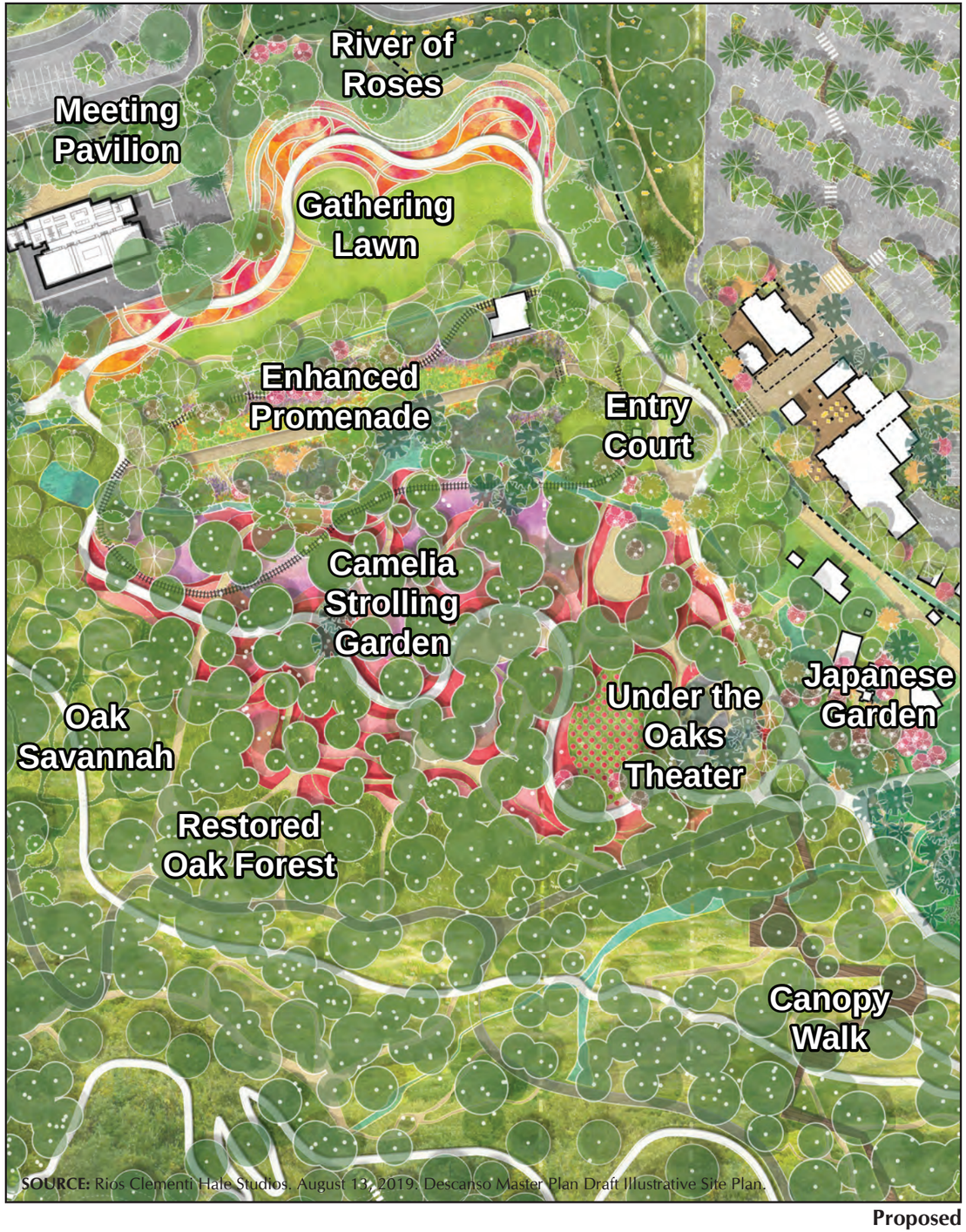


SOURCE: Rios Clementi Hale Studios. August 8, 2019. Draft Master Plan Descanso Board Presentation. Page 28.

FIGURE 1.10.2-8
New Meeting Pavilion



Existing



Proposed

FIGURE 1.10.2-9
New Camellia Stroll Garden

SOURCE: Descanso Gardens. December 9, 2018. Basemap.

Existing

SOURCE: Rios Clementi Hale Studios. August 13, 2019. Descanso Master Plan Draft Illustrative Site Plan.

Proposed

FIGURE 1.10.2-10
New Lake Perimeter Walk and Lake & Stream Improvements

Elevated Canopy Walk. An immersive walk among the oak canopy in the existing Camellia Forest – East would provide ADA access to the Boddy House (Figure 1.10.2-11, *New Elevated Canopy Walk*; please see Section 1.10-1 for more details).

Oak Woodland & Meadow. Existing camellias that are too close to oak root zones would be transplanted into the Camellia Strolling Gardens, after which the oak understory would be restored where camellias have been removed. Additionally, the understory of the existing Oak Grove would be replaced with meadow plantings and mowed lawn as secondary circulation. A more dedicated and regenerative native oak understory would be opened up between the Garden Loop and The Wilds routes by the consolidation of the camellias. To encourage the long-term health of the oak woodland ecosystem, diverse understory treatments would be planted, creating a variety of unique experiences under the oaks. Oak Gardens would be curated closer to the Garden Loop featuring the historic Camellias and shade-tolerant botanical specimens. An Oak Savannah/Meadow understory would be planted in the more open and sunnier areas featuring perennial grasses, sedges, and flowers. An Oak Woodland/Savanna Ecotone would feature a more natural understory towards The Wilds Loop, featuring taller perennial grass and shrub species. The Oak Woodland understory would be featured in the uppermost and densest areas of the Oak Canopy, leaving the understory to its own devices to encourage the establishment of oak seedlings on either side of the drip line of the oaks.

California Native Gardens. The native plant collection would be expanded to feature the following native plant communities:

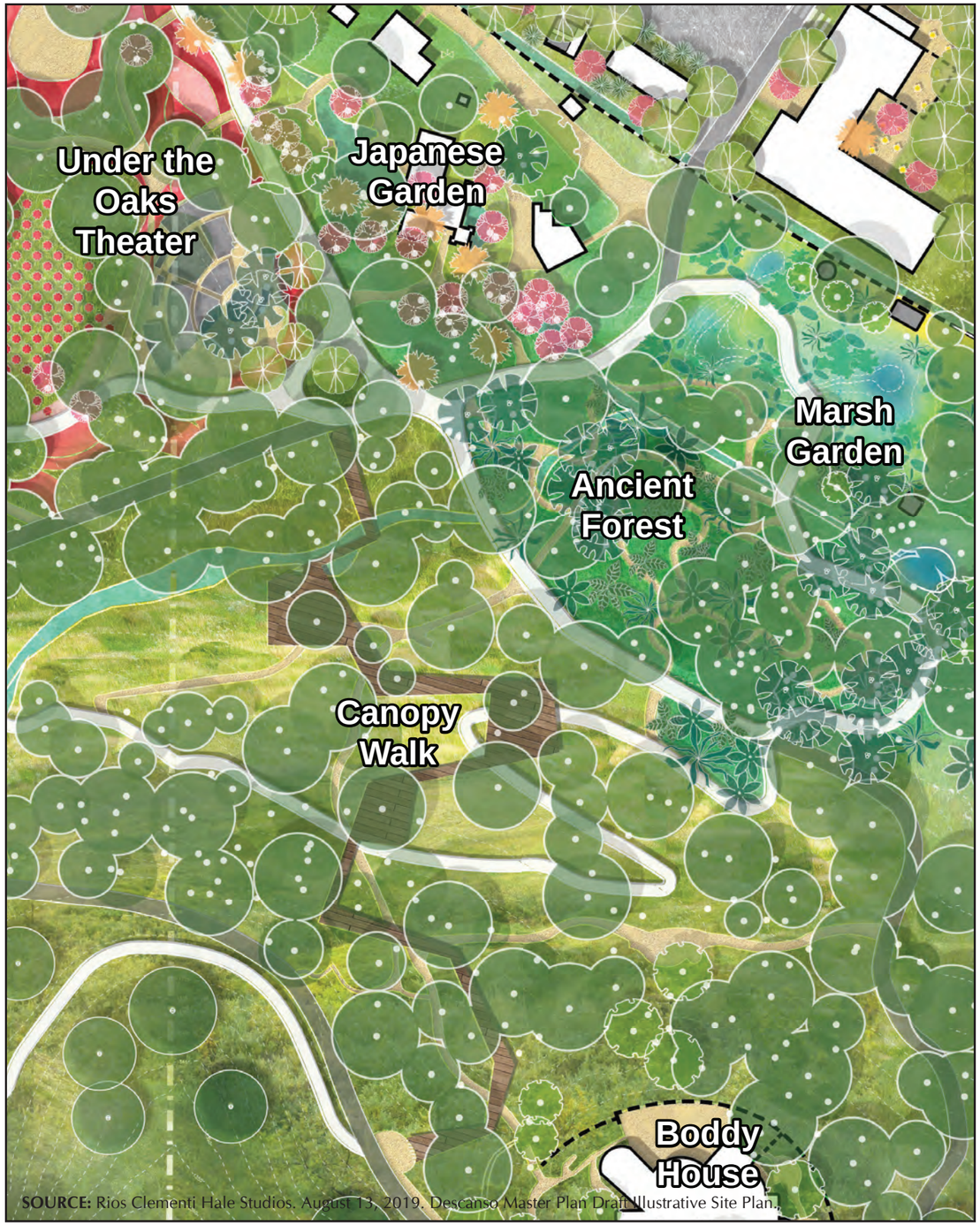
- California Buckwheat
- Chaparral/Shrub Restoration
- Shady Southern Woodland
- Channel Island
- Eriosonum/Artemesia/Sage Collection
- Mixed Manzanita Forest
- Baja California Collection
- Valley Grassland/Open Sage Bank
- Redwood Forest Floor and Stream
- San Gabriel High Country

The gardens would also feature Climate Change Gardens. Additionally, an Ethnobotanical Garden would be installed near the northeastern portion of the gardens to support interpretive experiences and programming.

Administrative Headquarters & East Yard. A new approximately 10,500-square-foot administrative center would replace the five existing administrative office trailers, supported by staff parking, electric vehicle charging stations, a new approximately 1,500-square-foot multipurpose meeting room, and an operations staging area (Figure 1.10.2-12, *New Administrative Headquarters*; see Section 1.10-3).

SOURCE: Descanso Gardens. December 9, 2018. Baseman.

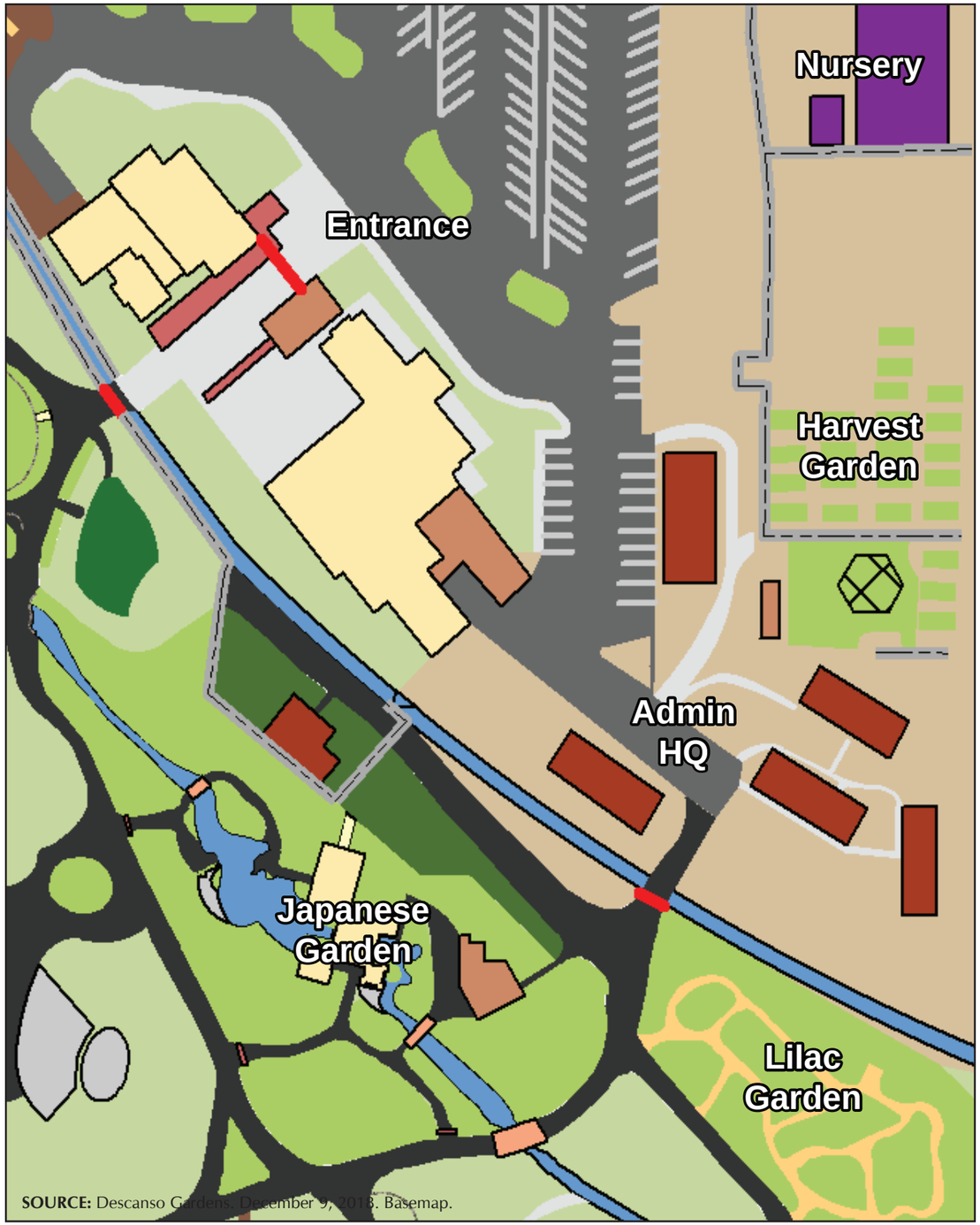
Existing



SOURCE: Rios Clementi Hale Studios. August 13, 2019. Descanso Master Plan Draft Illustrative Site Plan.

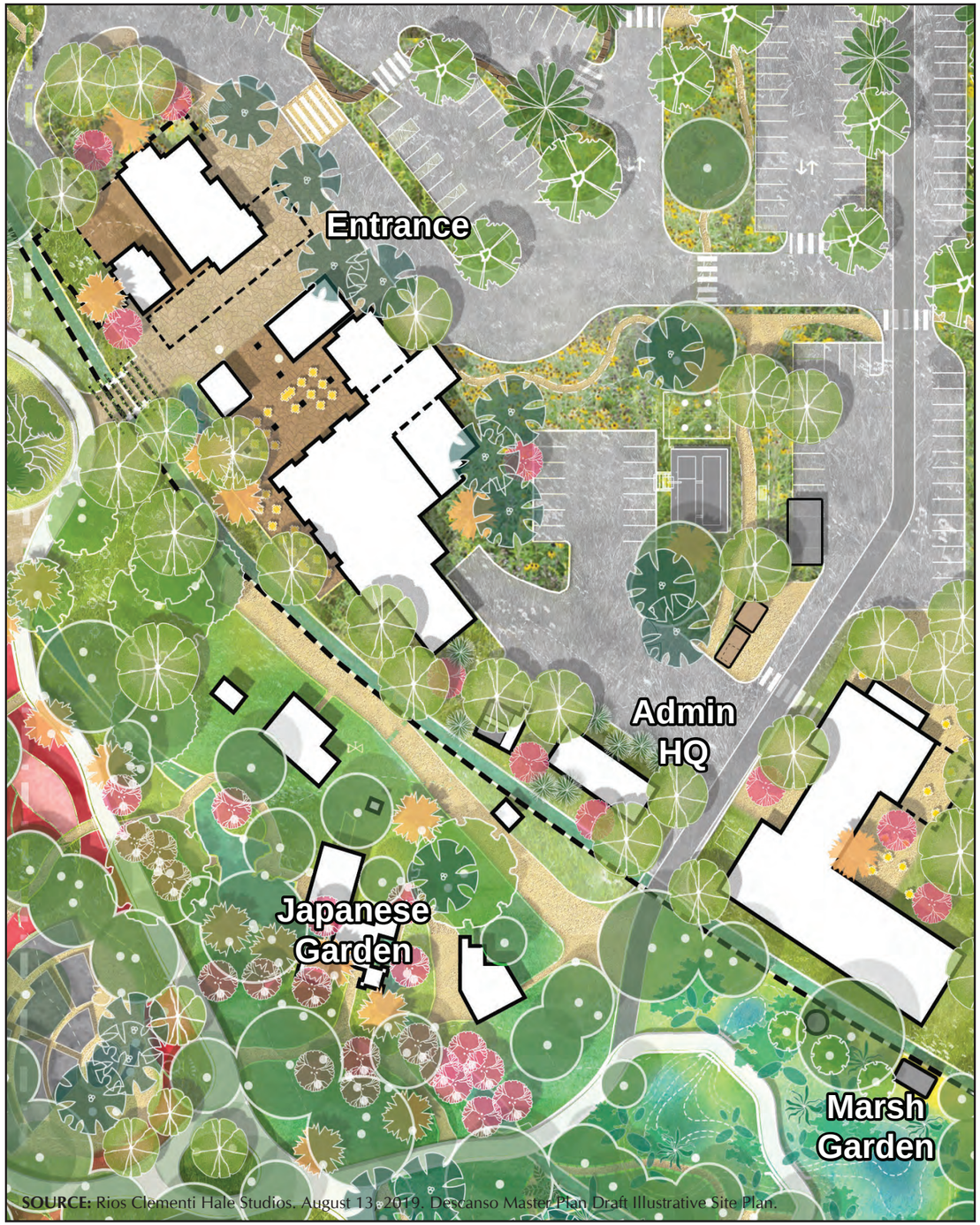
Proposed

FIGURE 1.10.2-11
New Elevated Canopy Walk



SOURCE: Descanso Gardens. December 9, 2018. Basemap.

Existing



SOURCE: Rios Clementi Hale Studios. August 13, 2019. Descanso Master Plan Draft Illustrative Site Plan.

Proposed

FIGURE 1.10.2-12
New Administrative Headquarters

Backstage (Auxiliary Parking Lot) & North Yard. The layout of the existing Auxiliary Parking Lot would be reconfigured to provide drop-off and parking for group arrivals and private events, including a widened entry road and bridge crossing at the SCE utility corridor (to accommodate large trucks and buses) and an expansion of the striped parking spaces from 146 existing parking spaces to 252 spaces in the Auxiliary Parking Lot (see Figure 1.10.2-5). The parking stalls would be reconfigured with east-west oriented stalls and trees would be installed between the rows of parking stalls. A drop off area would be designated near the Rose Garden for groups and private events. The existing Auxiliary Parking Lot (Backstage) would include five designated bus parking spaces and a bus & truck exit to provide parking for both delivery trucks and group tours. The increased number of parking spaces at Backstage would bolster Descanso Gardens' capacity to meet existing parking needs and reduce the occurrence of street parking by existing visitors during peak periods (events). It is not intended to accommodate an increased capacity of visitors during peak events. The North Yard would include space for storage trailers, a shop, and an electric vehicle charging area to support garden operations.

1.10.3 New Buildings, Structures, and Infrastructure

Critical infrastructure upgrades would support existing programs (such as Enchanted Forest of Light) and new programs at Descanso Gardens without requiring major temporary equipment rentals. The Master Plan proposes installation of new infrastructure (lighting, electricity, and Wi-Fi) to provide maximum flexibility for Descanso to curate new programs and installations, including permanent power hookups to support existing and future programming without temporary generators, on-site energy production to expand Descanso Gardens' use of renewable energy sources, new lighting along pathways and in event areas to support and enable nighttime programming, and consideration of flexible lighting design for installations (such as Enchanted) and programmable lighting elements that can be used by lighting designers to create special effects.

To refine programs and events at Descanso Gardens, the proposed project would involve upgrades to event centers, the Boddy Lodge & Lake Terrace, the Boddy House & Sturt Haaga Gallery, and Van de Kamp Hall (Table 1.10.3-1, *New Buildings and Structures*). Event spaces would be re-positioned along the perimeter of the gardens to improve service access for set up and take down and minimize interruption to the general visitors' experience. To refine operations activities at Descanso Gardens, the proposed project would involve upgrades to the existing Visitor Center, five-trailer Administrative Headquarters complex, Nursery & Maintenance Areas, and parking in the Master Plan Area. All new buildings and structures would be one story tall.

TABLE 1.10.3-1
NEW BUILDINGS AND STRUCTURES

Existing Building/Structure	Approx. Existing Square Feet	New or Upgraded Building/Structure
Entrance Complex / Van De Kamp (VDK) building	12,163	The VDK Complex would be remodeled and a kiosk for a pop-up gift store or café stand would be installed in the courtyard. • Move Maple restaurant into VDK Hall • Improvements include interior remodel, shell improvements (windows & doors) and renovation of courtyard • Improve kitchen & back-of-house (e.g. access to dining areas; cold and dry storage; loading) Visitor Center • Proposal for kiosk for pop-up gift store or cafe stand • Simple aesthetic improvements to gift store and ticket windows

TABLE 1.10.3-1
NEW BUILDINGS AND STRUCTURES

Existing Building/Structure	Approx. Existing Square Feet	New or Upgraded Building/Structure
Boddy House Complex (buildings and landscape)	9,877	No physical change
Boddy Lodge	1,008	Boddy Lodge • New outdoor prep kitchen behind Boddy Lodge • Restore existing restroom for staff use • Provide new potable water connection • Upgrade electrical/power service • Upgrade existing restroom (for staff) Lake Terrace • Expand and enhance outdoor area to accommodate small-medium sized private events or public programming • Terrace to extend out into lake for immersive lake experience
Caretaker's Cottage	1,421	No physical change
Boddy Drive Features (stone bridge and walls)	N/A	No physical change
Descanso Creek Features (ponds and waterfall)	N/A	The manmade stream would be improved as part of the overall improvements to hydrologic function of the gardens.
Japanese-style Garden Tea House	905	No physical change
Japanese-style Garden Bridge	N/A	No physical change
Japanese-style Garden Minka House	818	Convert existing restrooms from staff use to public use; add one new restroom for public use
Bird Observation Station (Lakeside Lookout)	648	No physical change
Promenade Comfort Station (restroom)	812	Renovate restrooms
Rose Garden Comfort Station (cottage)	600	Replacement with new restrooms at different location in Rose Garden (integrated into new meeting pavilion)
Rose Garden Pavilion	5,750	Replacement with new meeting pavilion at different location in Rose Garden
"Weeping Wall" sculpture	N/A	No physical change
Obelisk Sculpture	N/A	No physical change
Under the Oaks Theater	N/A	Expand and enhance existing theater
Children's Maze	N/A	Replacement with a labyrinth in the Camellia Strolling Gardens
Victorian Gazebo	N/A	Removal
Wedding Gate	N/A	Enhancements to perimeter fence, including Wedding Gate
Mission Fountain	N/A	Removal
Redwood Rest Ramada (Canyon View Structure)	N/A	No physical change
Mountain View Structure	N/A	No physical change
El Portal Ramada	N/A	No physical change
Enchanted Gardens Railroad	N/A	Upgrade for improved functionality Train entry would be relocated from Promenade to Entry Court (near existing Center Circle)

TABLE 1.10.3-1
NEW BUILDINGS AND STRUCTURES

Existing Building/Structure	Approx. Existing Square Feet	New or Upgraded Building/Structure
5 Administrative Office Trailers	N/A	New Administration Facility • New administration center to house staff in one centralized location accommodating current and future staffing needs, approx. 10,500 square feet • New approximately 1,500-square-foot stand-alone meeting room between administrative building and Van de Kamp Hall • Parking for senior staff, guests and EV cart stations New Service Yard • New service corridor to the east reduces congestion at pinch point at kitchen loading dock • East side service yard for EV maintenance or other maintenance/horticulture staging and storage needs Location of existing purple horticulture trailer would become multipurpose meeting room

Wildlife Management. Exclusion fencing around the perimeter of the ticketed entry area would be improved and upgraded to protect the developed garden and removed to allow for a wildlife corridor in the undeveloped portions of the property. The Master Plan proposes improvements to existing fencing including shoring up the existing perimeter fence along the southern and southwestern edges of the ticketed entry portion of the Master Plan Area to improve deer exclusion functionality, replacing existing fencing along the northern and eastern edges of the ticketed entry portion of the Master Plan Area with a decorative garden security fence, and removing the existing fencing northwest of the ticketed entry area to allow for increased wildlife movement in the San Rafael Hills.

Wastewater Management. After installation of the MBR is completed, all existing and new restrooms would be connected to the MBR. All existing restrooms would be improved for function and aesthetics. Several new restrooms would be installed in the developed portions of the gardens, including staff restrooms at the Administrative Headquarters and Boddy House, and public restrooms at Nature Discovery Zone, Rose Garden, and Minka.

Water Quality & Quantity Improvements. The proposed Master Plan would include stormwater capture and treatment improvements to enhance the ecological performance of main water features and optimize the lake for stormwater capture for non-potable use. In addition, Low Impact Development (LID) best management practices (BMPs) would be installed per the County's LID ordinance. These features include harvesting stormwater from Winery Creek Channel for treatment in the Marsh Garden, installed wetlands around the Lake edge, a bioswale in the picnic grove, and recirculation of water using pumps from the Marsh Garden to the Lake in the winter.

The proposed project would increase the total acreage of impervious surfaces within the Master Plan area by 27.0 percent (approximately 4.1 acres) to approximately 19.1 acres, including a reduction of existing building footprints from 1.4 to 0.9 acres and an increase in paved surfaces from 13.3 to 18.2 acres (Figure 1.10.3-1 *Proposed Impervious Surfaces*). There would be no change to the 0.4-acre impervious area of concrete drainage channel (Winery Canyon Channel).

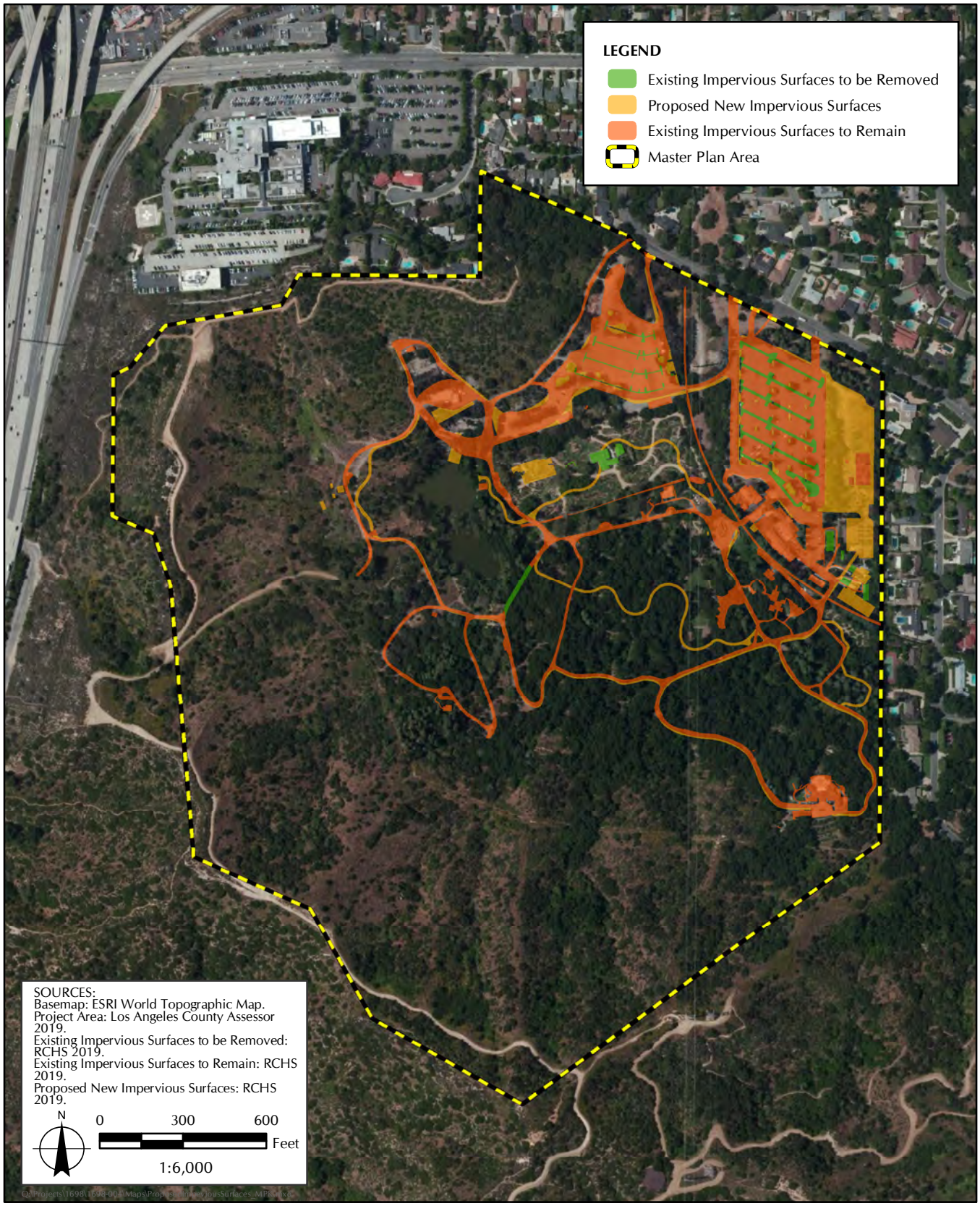


FIGURE 1.10.3-1

Proposed Impervious Surfaces

1.11 CONSTRUCTION SCENARIO

This MND is based on an evaluation of the construction that would be required to build out the proposed projects in the general configurations of the Master Plan. Proposed projects in the Master Plan are conceptual and would require additional survey, design, and engineering work to support design development and ultimately project construction, operation, and maintenance. The project designs are subject to refinement in relation to environmental, geologic, hydrologic, ownership, topology, and other factors.

Descanso Gardens would remain open during the construction of individual projects, with portions of the property closed off with fencing surrounding the construction activity areas (including staging). The proposed buildings and structures described in the Master Plan would be constructed within existing Master Plan Area boundaries. Portions of the Auxiliary Parking Lot (Backstage) would be used as construction staging areas where necessary. The existing administrative trailers would be temporarily relocated (likely within the Main Parking Lot) during construction of the new administrative headquarters building, then removed after the new administrative building is completed. Evaluation of the balance of cut and fill on-site would need to be evaluated on a project-by-project basis, with the goal of balancing cut and fill where possible.

Site preparation and construction for the proposed individual projects identified within the Master Plan would be undertaken in accordance with all federal, state, and County building codes. Daily construction activities would be undertaken Monday through Friday, between 7:00 a.m. and 6:00 p.m. (7:00 a.m. to 7:00 p.m. during Daylight Saving Time) and on Saturdays between 9:00 a.m. and 5:00 p.m., consistent with the City of LCF's Noise Ordinance.[39] No work shall be conducted on Sundays or any recognized federal, state, or local holidays. Construction equipment would be turned off when not in use. All heavy equipment would be mobilized at night and would have no conflicts with circulation. The construction contractor shall ensure that all construction and grading equipment is properly maintained. All vehicles and compressors shall utilize exhaust mufflers and engine enclosure covers (as designed by the manufacturer) at all times. All stockpiles shall be covered at all times when not in use.

The environmental analysis for the proposed project is based on a potential worst-case scenario for construction activities, including improvements to existing gardens and paths, construction of new gardens and paths, site grading for facilities and access roads, and delivery and hauling of construction materials and equipment. The proposed project involves the demolition/removal of approximately 20,716 square feet of existing buildings, renovation of six existing buildings, and construction of approximately 35,563 square feet of new buildings and structures, for an overall increase by 25 percent in building square footage at Descanso Gardens. While phasing of the individual projects proposed in the Master Plan has not yet been determined, this analysis assumes that construction activities would be completed within an overall 15-year time frame, with phasing determined based on availability of funding for individual projects. The construction scenario assumes that construction activities would occur in two overall phases, over a total duration of 11 years (Table 1.11-1, *Project Phasing*). The construction scenario for the impact analysis assumes that the direct impact area for the building construction of individual projects would be approximately 1.3 acres (Figure 1.11-1, *Sensitive Receptors within One-Half Mile of Construction Activities*; see Figures 1.10.1-2 and 1.10.2-1).

[39] La Cañada Flintridge, California. Accessed September 27, 2019. La Cañada Flintridge Municipal Code. Chapter 5.02, Regulation of Community Noise. Available at: http://qcode.us/codes/lacanadaflintridge/

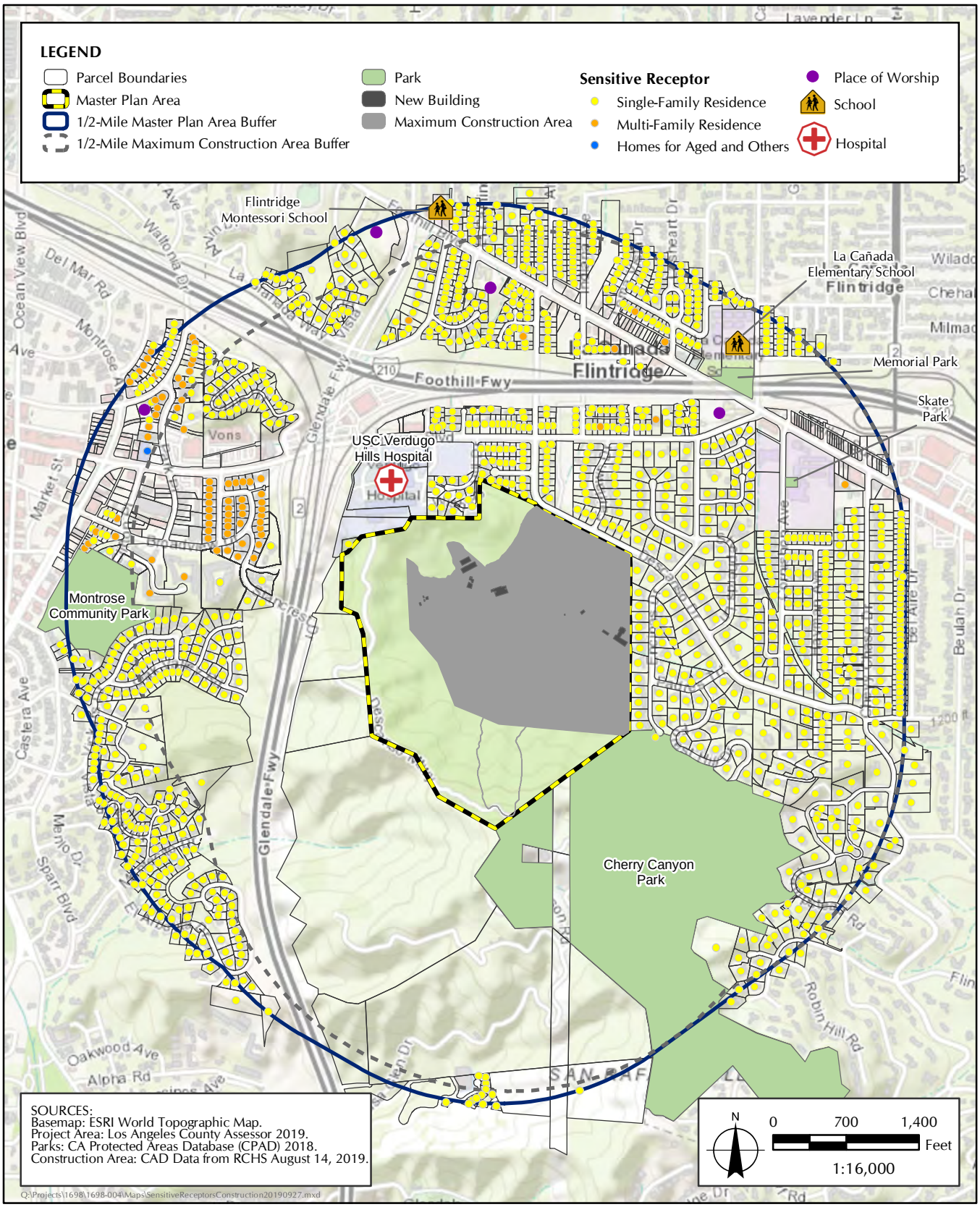


FIGURE 1.11-1

Sensitive Receptors within 1/2 Mile of Construction Activities

Phase 1 would be completed in approximately 5.5 years and includes improvements to the nursery, expansion of the main parking lot, visitor center improvements, several trail updates, and enclosure improvements. Phase 2 would be completed in approximately 5.5 years and includes improvements to the Promenade, Entry Courtyard, Nature Discovery Zone, Boddy Lodge, Boddy House, and Van de Kamp Hall. The MND assumes a worst-case peak scenario involving the concurrent construction of the improvements to gardens and infrastructure in the two phases and the construction of a new administrative facility in the Master Plan Area.

TABLE 1.11-1
PROJECT PHASING

Project Phase	Group	Duration (Months)	Project Elements
1	A	12	New Nursery + Greenhouse Parking – Main Lot/Relocate Material Yard (Arrival Grassland Garden) Parking – Auxiliary Lot (Backstage) Visitor Center Improvements
	B	18	Service Loop Woodland Walk Nature Path Wilds Loop Canopy Walk Perimeter Enclosure Improvements
	C	18	Lake Improvements Lake Perimeter Walk and Pier Irrigation System Upgrades Stream Restoration Marsh Garden 400 feet of Garden Loop at Marsh Garden
	D	18	Rose Garden – Landscape 1,000 feet of Garden Loop at Rose Garden Rose Garden – Meeting Pavilion
	Subtotal	**66 months (5.5 years)**	
2	A	18	Camellia Crescent 1,250 feet of Garden Loop at Camellia Strolling Garden 650 feet of Garden Loop at Ancient Forest Ancient Forest WiFi and power connection
	B	24	Promenade Entry Courtyard Japanese Garden Improvements Nature Discovery Zone California Native Garden Expansion
	C	12	Boddy Lodge Improvements Boddy House Improvements Van de Kamp Improvements
	D	12	Administrative Center Orchard Picnic Area Sewage Connections Irrigation System & Stormwater Management
	Subtotal	**66 months (5.5 years)**	
Total duration		**11 years**	

Demolition

Construction activities associated with the proposed project, as currently conceived, would entail demolition of two buildings, removal of the existing nursery structures, removal of five administrative trailers, and removal of the harvest garden structures (Table 1.11-2, *Buildings and Structures to Be Demolished;* Table 1.11-3, *Demolition Construction Equipment*). The 5,750-square-foot Rose Garden Pavilion and 600-square-foot Rose Garden Comfort Station would be demolished during one phase, anticipated to take less than 3 months. As stated in a Phase I Environmental Site Assessment conducted at Descanso Gardens, no lead or asbestos removal would be required for demolition of these buildings that were constructed in 1994 (Appendix 5, *Descanso Gardens Master Plan Phase I Environmental Site Assessment*). However, disturbance of soil in and around the Rose Garden would necessitate additional soil investigation for pesticides that were used prior to 2015 and possibly remediation.

TABLE 1.11-2
BUILDINGS AND STRUCTURES TO BE DEMOLISHED

Building/ Structure Location (see Figure 1.8.2-2)	Project Phase/Group	Existing Building/Structure Name	Approx. Square Feet of Demolition/Removal[1]
East of Main Parking Lot (Arrival Grassland Garden)	1 A	Nursery structure (plant propagation)	6,118
East of Main Parking Lot (Arrival Grassland Garden)		Nursery Greenhouse structure	480
East of Main Parking Lot (Arrival Grassland Garden)		Nursery Shed structure	112
A	1 D	Rose Garden Pavilion	5,750
B		Rose Garden Comfort Station (cottage)	600
H	2 D	Five Administrative Office Trailers	7,581 (removal)
Southwest of C	2 B	Enchanted Railroad structure	75
	TOTAL SQUARE FEET		**20,716 square feet**

[1] 2018 GIS data from Descanso Gardens.

TABLE 1.11-3
DEMOLITION CONSTRUCTION EQUIPMENT

Approximate Quantities	Type of Equipment/Vehicle	Approximate Duration of On-Site Construction Activity (days)
3	Cranes	20
3	Excavators	20
4	Bulldozers	20

Construction

Construction activities associated with the proposed project, as currently conceived, would entail consolidation of the existing storage structures; construction of 11 new buildings; renovation and improvements to 7 existing buildings; resurfacing of up to 85 percent of the 7.6-mile existing path network for ADA accessibility; installation of approximately 1.0 mile of new paved paths and approximately 2.7 miles of new unpaved paths; resurfacing of the two existing parking lots with bioswales and an unpaved parking overflow area in the SCE utility corridor; relocation of existing lilacs and camellias to other portions of the property; installation of a planted buffer along the eastern side of the main parking lot; installation of two new gardens and two new facilities; strategic removal, replacement, and upgrades to fencing in the Master Plan Area; and restoration of the understory of the Oak Woodland (Table 1.11-4, *New Buildings and Structures to Be Constructed*).

TABLE 1.11-4
NEW BUILDINGS AND STRUCTURE TO BE CONSTRUCTED

Building/ Structure Location	Existing Building/Structure to Be Replaced	Existing Approx. Square Feet[1]	Proposed Master Plan Construction Activity	New Approx. Square Feet[2]
A, B	Rose Garden Pavilion and Rose Garden Comfort Station (cottage)	4,353 768	Demolish/replace at different location in Rose Garden	9,193 (one consolidated new building)
Near C	Enchanted Railroad structure	75	Demolish/replace Train Entry and/or Information Stand at different location	75
H	Five Administrative Office Trailers	7,581	Remove/replace with permanent building at same location	10,452
Near H	N/A	N/A	Multipurpose Meeting Room	1,515
Near L	N/A	N/A	Prep Kitchen with Service Entry to support Boddy Lodge	346
Near O	N/A	N/A	Café Kiosk or Information Stand	989
West of Lake	N/A	N/A	Learning Pavilion	573
West of Lake	N/A	N/A	Outdoor Kitchen	427
West of Lake	N/A	N/A	Restrooms	359
West of Auxiliary Lot (Backstage)	N/A	N/A	Climate Controlled Greenhouse	4,256
West of Auxiliary Lot (Backstage)	N/A	N/A	Shade Houses	7,467
Total Square Feet		**12,777**		**35,653**

Source:
[1] December 9, 2018 Descanso Gardens Basemap from Descanso Gardens.
[2] August 13, 2019 AutoCAD data from Rios Clementi Hale Studios.

A list of the type and quantity of equipment that would potentially be used in construction of the proposed project was used in assessing the potential of the proposed project to result in unanticipated significant construction impacts to air quality (Table 1.11-5, *Anticipated Construction Equipment*).

TABLE 1.11-5
ANTICIPATED CONSTRUCTION EQUIPMENT

Approximate Quantities	Type of Equipment/Vehicle	Approximate Duration of On-Site Construction Activity (days)
3	Dump truck	100
1	Graders or dozers for earthwork	50
8	Concrete/Industrial Saws	60
20	Crew vehicles	550
2	Rubber Tired Dozers	200
5	Tractors/Loaders/Backhoe	200
8	Delivery trucks	550
2	Scrapers	150
2	Excavators	200
1	Cranes	250
3	Forklifts	250
1	Generator Sets	150
1	Welders	100
2	Pavers	80
2	Paving Equipment	80
2	Rollers	50

Remediation

Aerially deposited lead (ADL), pesticides, and herbicides may be present in the soil in the Master Plan Area. Prior to the initiation of construction activities, surface and near-surface soil samples would be collected and analyzed for these hazardous materials, and, if they exist, they would be removed using standard protocols that would not constrain development. Disturbance of soil in the following locations would necessitate additional soil investigation and possibly remediation (see Appendix 5):

- Promenade (Enchanted Railroad Building) and Auxiliary Parking Lot (southeastern area near Rose Garden) – evaluation for volatile organic compounds (VOCs)
- Camellia Forest East (driveways leading to Boddy House) – evaluation for polychlorinated biphenyls (PCBs)
- Boddy Lodge and Boddy House – evaluation for lead-based paints (LBPs) and asbestos
- Camellia Forest West, Camellia Forest East, and Rose Garden – evaluation for pesticide residue
- Developed gardens – evaluation for fertilizer residue
- Within a 30-foot radius of Auxiliary Parking Lot, Main Parking Lot, maintenance areas of the staff carts, the Enchanted Railroad, and existing paths that served as parking/travel areas for gas-powered vehicles prior to 1991 – evaluation for ADL

LBPs and asbestos-containing materials (ACMs) may occur in pre-1970s buildings in the Master Plan Area. LBPs and ACMs could be released into the environment by altering or demolishing structures containing them. These buildings would first be inspected for LBPs and ACMs, which would then be removed safely using standard removal protocols that would not constrain the development (see Appendix 5).

Best Management Practices

All construction activities related to the proposed project shall implement BMPs to reduce or eliminate non-storm discharges to the storm water system. BMPs incorporated into the proposed project to address hydrologic and surface water quality impacts include stormwater BMPs; erosion and sediment control BMPs to be implemented during construction; and postdevelopment site design, source control, and LID BMPs. These BMPs are considered a part of the proposed project and are included in the impact analysis. These requirements meet the water quality standards as set forth by the responsible agencies and address storm runoff quantity and flow rate, suspended solids (primarily from erosion), and contaminants such as phosphorus and hydrocarbons. The plans and specifications for the proposed individual projects would include a requirement for the construction contractor to comply with all provisions of the National Pollutant Discharge Elimination System (NPDES) Program administered by the Los Angeles Regional Water Quality Control Board (RWQCB) as they relate to avoiding impacts on storm water quality during construction. In addition, LID BMPs would be installed per the County's LID ordinance. The construction contractor would be required to incorporate BMPs consistent with the guidelines provided in the California Storm Water Quality Association (CASQA) Best Management Practices Handbook: Construction Activities and in accordance with the Los Angeles County Stormwater Ordinance, the County General Plan 2035, and all applicable County of Los Angeles code requirements for construction and access to the wastewater treatment system. Should the construction period continue into the rainy season, supplemental erosion measures would need to be implemented, including but not limited to the following:

- Mulching
- Geotextiles and Mats
- Earth Dikes
- Temporary Drains and Gulleys

- Silt Fence
- Straw Bale Barriers
- Sand Bag Barrier
- Brush or Rock Filter
- Sediment Trap

Wherever possible, grading activities would be undertaken outside the normal rainy season (i.e., October 15 to April 15 for most of Southern California), thus minimizing the potential for increased surface runoff and the associated potential for soil erosion. A recommended construction period would begin in early June and would be completed in December to early January, assuming that the majority of the construction would be completed within this recommended nine-month period. BMPs to control surface runoff and soil erosion would be required for construction taking place during rainy periods.

Hydrologic Management Strategies

Furthermore, Hydrologic Management Strategies would be incorporated into the proposed project to address potential on- and off-site hydrologic conditions of concern and manage hydrologic impacts to less than significant levels. The measures are organized according to nonstructural and structural measures as recommended by a Hydrology Technical Report prepared to assess the potential impacts on local hydromodification and hydrology associated with the proposed project (Appendix 6, *Descanso Gardens Master Plan Hydrology Technical Report*). Structural and nonstructural Hydrological Management Strategies that would be incorporated into the proposed project include the following:

- Minimize impervious areas / preserve open spaces
- Prioritization of soils for infiltration
- Lake operations
- Monitoring and adaptive management
- Distributed volume and flow management, with the installation of stormwater BMPS including
  - Parking lot bioswales
  - Picnic grove bioswale
  - Rainwater harvesting tanks, or other localized BMPs, for new buildings
- Regional detention / retention basins
- Drainage conveyances
- Sediment and erosion controls

The implementation of these Hydrologic Management Strategies would avoid impacts for on- and off-site erosion and siltation, surface runoff and flooding, LID, release of pollutants with flood and seiche hazard, and more. These Hydrologic Management Strategies are considered a part of the proposed project and are included in the impact analysis.

1.12 OPERATIONS AND MAINTENANCE

Gardens operation and maintenance activities would be conducted by Descanso staff, volunteers, and subcontractors such as the Los Angeles Conservation Corps and Oakridge Landscaping in accordance with the current operating agreement with the County. Use of noisy landscaping tools such as lawn mowers and blowers would continue to be used only during the following hours consistent with the City of LCF's Noise Ordinance:[40]

- Monday-Thursday: 7:00 a.m. – 7:00 p.m.
- Friday-Sunday: 7:00 a.m. – 6:00 p.m.

The Guild anticipates a future staff increase of less than 10 percent to provide marketing, horticultural, gardening, facilities, and special events support. The new administrative headquarters building would provide office space for the existing 45 administrative staff and up to 10 additional full-time administrative staff (a 13 percent increase), for office space that would support up to 55 full-time staff. There is no anticipated expansion to the volunteer program.

1.13 RELATED PROJECTS

The area surrounding the Master Plan Area was examined to determine whether there are currently any projects in progress or proposed for the future that could potentially benefit the project or add to the impacts of the proposed project, creating cumulative significant impacts (evaluated in Section 2.21, *Mandatory Findings of Significance*). It was determined that there are 19 related projects that could affect the cumulative impacts analysis for the proposed project (Figure 1.13-1, *Related Projects Map*). These projects are anticipated to be implemented within the next 15 years (when implementation of the Master Plan is anticipated to occur) (Table 1.13-1, *List of Related Projects*).

[40] La Cañada Flintridge, California. Accessed September 27, 2019. La Cañada Flintridge Municipal Code. Chapter 5.02, Regulation of Community Noise. Available at: http://qcode.us/codes/lacanadaflintridge/

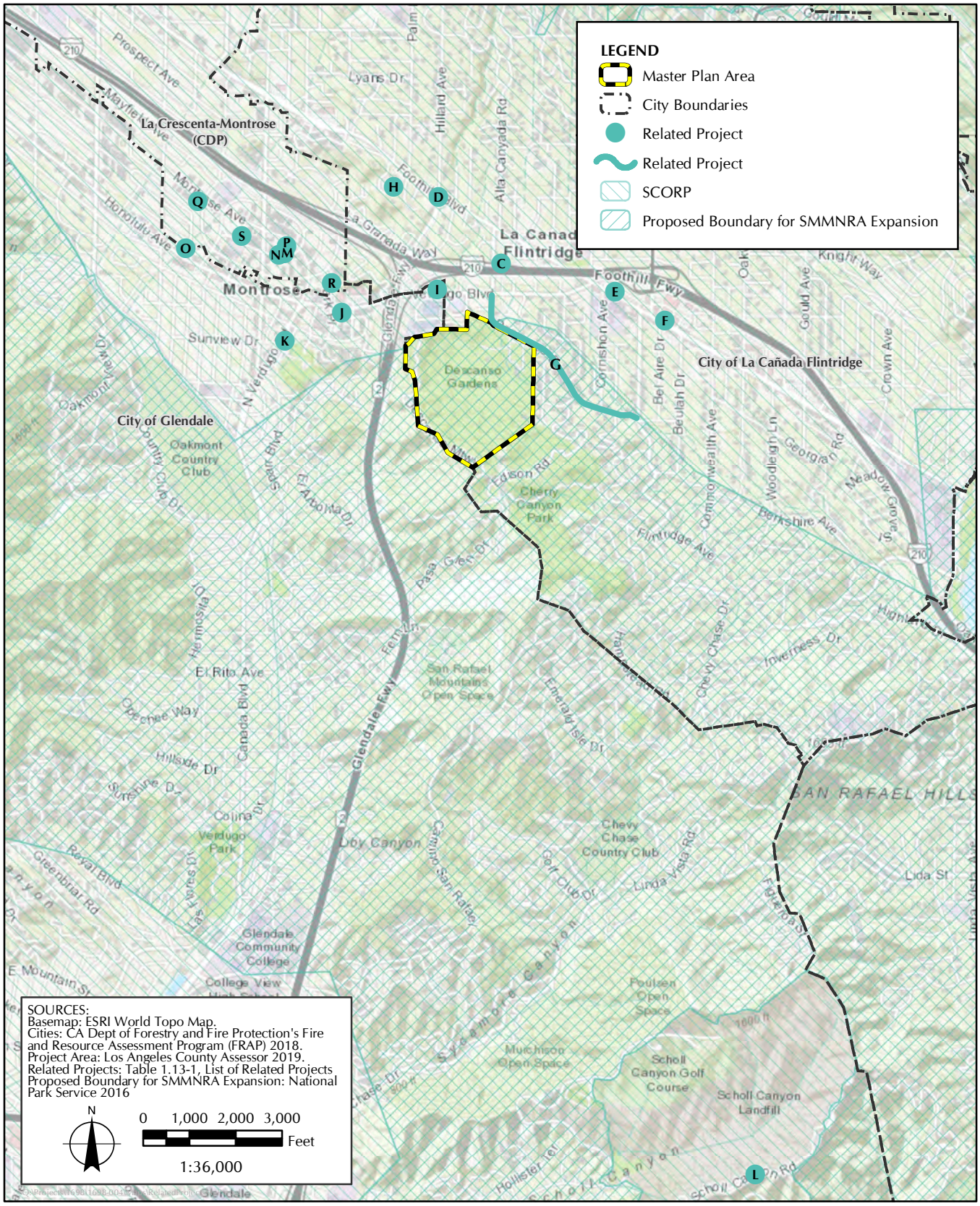


FIGURE 1.13-1

Related Projects Map

TABLE 1.13-1
LIST OF RELATED PROJECTS[1]

Label	Project Name	Location	Proposed Recreational Facility or Improvements?	Description
A	Statewide Comprehensive Outdoor Recreation Plan (SCORP)[1]	State of California; includes Master Plan Area	No; Guiding Document	**Approved** (2015) **–** California Department of Parks and Recreation's statewide master plan for state and local parks and outdoor recreational open space areas. The SCORP offers policy guidance to federal, state, local, and special district agency recreation providers and establishes priorities for Land and Water Conservation Fund grant allocations to local governments.
B	Rim of the Valley Corridor Special Resource Study[2]	Rim of the Valley Corridor (Ventura and Los Angeles counties); includes Master Plan Area	No; Proposed Boundary for SMMNRA Expansion includes Descanso Gardens	**Approved** (2016) **–** National Park Service study evaluating whether portions of the area known as the Rim of the Valley Corridor are nationally significant, suitable, and feasible for inclusion in the national park system. The study also evaluated whether any portions of the corridor would be eligible for inclusion in the Santa Monica Mountains National Recreation Area (SMMNRA).
C	I-210 Soundwalls Improvement Project, Phase III[3]	North and south sides of I-210 Freeway between Alta Canyada Road and Foothill Blvd in City of LCF; approximately 0.1 mile north of Master Plan Area	No; Noise Reduction Project	**Proposed** (2019 request for bid) – In August 2019, the City of LCF released a request for proposals for plans, specifications, and estimates for construction of 3 soundwalls (S311, S335, and S336) to reduce exposure to traffic noise for the residents of the City of LCF. Construction is anticipated to begin in September 2021.
D	HSIP Cycle 9 Foothill Boulevard Traffic Signals Improvement Project[4]	Foothill Boulevard in City of LCF; approximately 0.5 mile north of Master Plan Area	No; Traffic Safety Improvement Project	**Proposed** (2019 request for bid) – In August 2019, the City of LCF released a request for proposals for plans, specifications, and estimates for traffic signal improvements at 5 intersections along Foothill Boulevard: Palm Drive, Hillard Avenue, Gould Avenue, Commonwealth Avenue, and Hampton Road. Construction is anticipated to begin in April 2022.
E	Office[5]	1109 Foothill Boulevard, La Cañada, CA 91011	No; office	**Proposed**
F	Core Power Yoga[5]	965 Foothill Boulevard, La Cañada, CA 91011	Yes; private recreation facility	**Proposed**
G	Rebuild Descanso Drive[6]	Descanso Drive from Chevy Chase Drive to Verdugo Boulevard, La Cañada, CA 91011	No; Transportation Infrastructure Upgrade Project	**Contemplated** (November 2019 mentioned at meeting with City of LCF) – The City plans to eventually rebuild the approximately 0.9-mile Descanso Drive as part of standard transportation infrastructure upgrades for the City. This project is not yet included in a capital improvements program, and no timeline has been established.

TABLE 1.13-1
LIST OF RELATED PROJECTS[1]

Label	Project Name	Location	Proposed Recreational Facility or Improvements?	Description
H	YMCA of the Foothills Project[5]	1930 Foothill Blvd., La Cañada, CA 91011	Yes	**Proposed** – YMCA Renovation Project would reduce gross square feet of YMCA facility from 65,052 to 40,463
I	New Residential Congregate Living/Medical Facility (La Canada Assisted Living)[7]	1809 Verdugo Blvd., Glendale CA 91208; approximately 0.1 mile northwest of Master Plan Area	No; Residential Development Project	**Proposed** (2019 Notice of Intent [NOI] released) – In July 2019, the City of Glendale released an NOI to adopt an MND for development of a new 3-story 35,000-square-foot residential congregate living/medical facility with 79 beds and 142 parking spaces.
J	14 dwelling unit and 2,762 square feet of gross leasable floor area retail space[5]	3510 North Verdugo Road, Glendale, CA 91208	No; Mixed Use Development Project	**Approved;** under construction as of September 2019
K	New Mixed Use Building[7]	3510 N. Verdugo Rd., Glendale CA 91208; approximately 0.5 mile west of Master Plan Area	No; Mixed Use Development Project	**Proposed** (2019 NOI released) – In July 2019, the City of Glendale released an NOI to adopt an ND for development of a new 3-story mixed use project composed of 14 residential dwellings, 2,762 square feet of retail/office space, and 49 parking spaces.
L	City of Glendale Biogas Renewable Generation Project[7,8]	3001 Scholl Canyon Rd., Glendale, CA 90041; approximately 2.8 miles southeast of Master Plan Area	No; Power Generation Facility (Scholl Canyon Landfill serves City of LCF, including Master Plan Area)	**Proposed** (2019 Notice of Preparation [NOP] released) – In March 2019, the City of Glendale released a NOP of an EIR for construction and operation of an approximately 12-megawatt (MW) power generation facility that would utilize landfill gas as fuel to generate renewable energy. The life of the project is anticipated to be 20 years, after which the equipment would be removed and the area would become part of the landfill reclamation plan.
M	9 dwelling unit apartment in Montrose[5]	2225 Mira Vista Avenue, Montrose CA 91020	No; residential project	**Approved**
N	4 dwelling unit apartment in Montrose[5]	2231 Mira Vista Avenue, Montrose CA 91020	No; residential project	**Approved**
O	3 dwelling unit apartment in Montrose[5]	2500 Hermosa Avenue, Montrose CA 91020	No; residential project	**Approved**
P	8 dwelling unit apartment in Montrose[5]	2218-1/2 Montrose Avenue, Montrose CA 91020	No; residential project	**Approved**
Q	16 dwelling unit condominium in Montrose[5]	2454 Montrose Avenue, Montrose CA 91020	No; residential project	**Approved;** under construction as of September 2019
R	28 dwelling unit apartment in Montrose[5]	3908 Park Place, Montrose CA 91020	No; residential project	**Approved**

TABLE 1.13-1
LIST OF RELATED PROJECTS[1]

Label	Project Name	Location	Proposed Recreational Facility or Improvements?	Description
S	6 dwelling unit apartment in Montrose[5]	2341 Mira Vista Avenue, Montrose CA 91020	No; residential project	**Approved**

Sources:
[1] California Department of Parks and Recreation. Accessed July 31, 2019. Parks for All Californians. Available at: https://www.parksforcalifornia.org/scorp
[2] National Park Service. Accessed July 31, 2019. Rim of the Valley Corridor Special Resource Study. Available at: https://parkplanning.nps.gov/document.cfm?documentID=70887
[3] City of La Cañada Flintridge Department of Public Works. Released August 15, 2019. *Request for Proposals: I-210 Soundwall Improvements Projects, Phase III.* Available at: https://cityoflcf.org/wp-content/uploads/2019/09/Soundwall_Ph_III_RFP_9-19-19.pdf
[4] City of La Cañada Flintridge Department of Public Works. Released August 29, 2019. *Request for Proposals: HSIP Cycle 9 Foothill Boulevard Traffic Signals Improvements Project.* Available at: https://cityoflcf.org/wp-content/uploads/2019/09/Foothill_Signals_HSIP_RFP_9-19-19.pdf
[5] Linscott, Law & Greenspan, Engineers review of County of Los Angeles Department of Regional Planning, City of LCF Department of Planning, and City of Glendale Department of Planning websites. September 2019.
[6] Male, Laura. Sapphos Environmental, Inc. Correspondence with City of LCF Director of Public Works Patrick DeChellis at meeting held on November 4, 2019.
[7] City of Glendale, California. Accessed September 25, 2019. *Environmental Review.* Available at: https://www.glendaleca.gov/government/departments/community-development/planning-division/current-projects/environmental-review
[8] City of Glendale Water & Power. Accessed September 25, 2019. NOP Released March 21, 2019. *Proposed Biogas Renewable Generation Project.* Available at: http://glendalebiogasgeneration.com/#draft-eir-nop

1.14 REQUIRED APPROVALS

- **County of Los Angeles Board of Supervisors:** Master Plan approval, CEQA documentation approval
- **County of Los Angeles Department of Parks and Recreation:** Construction Plan and Design Plan Review, Director Approval of any Capital Improvement projects over $50,000 in value (requires a permit), Master Plan and CEQA documentation review
- **County of Los Angeles Department of Public Works:** issuance of grading permits, encroachment permits, and infrastructure improvement permits; approval of hydrology reports, approval of storm drain plans, and incorporation of potential stormwater capture element
- **County of Los Angeles Department of Regional Planning:** Master Plan and CEQA documentation review
- **City of La Cañada Flintridge:** issuance of grading permits, encroachment permits, and infrastructure improvement permits for projects within City boundaries
- **City of Glendale:** issuance of grading permits, encroachment permits, and infrastructure improvement permits for projects within City boundaries
- **California Department of Fish and Wildlife:** issuance of permits under Section 1600 of the Fish and Game Code related to lake or streambed alterations, as applicable
- **Regional Water Quality Control Board:** issuance of Notice of Intent prior to construction operations related to National Pollutant Discharge Elimination System (NPDES) Construction Permit; issuance of water quality certification pursuant to Section 401 of the Clean Water Act (CWA) in connection with issuance of a Section 404 CWA permit, as applicable; and issuance of a Dewatering Permit for discharge of water in the Lake
- **U.S. Army Corps of Engineers:** issuance of Section 404 permit under the CWA, as applicable
- **Southern California Edison:** approval of projects within SCE utility corridor, under license agreement with Descanso Gardens (including clearance review for proposed grading activities)

Section 2

Environmental Checklist and Impact Analysis

Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Parks and Recreation

Project title: "Descanso Gardens Master Plan"

Lead agency name and address: Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

Contact Person and phone number: Julie Yom, (626) 588-5311

Project sponsor's name and address: Descanso Gardens Guild, Inc., 1418 Descanso Drive, La Cañada Flintridge, CA 91011

Project location: 1418 Descanso Drive, La Cañada Flintridge, CA 91011
APN: 5813-008-009, 5813-008-910, 5813-008-902, 5813-008-903, 5813-008-904 *USGS Quad*: Pasadena

Gross Acreage: 150 acres (approximately 139 acres owned by the County of Los Angeles)

General plan designation: Open Space

Community/Area wide Plan designation: West San Gabriel Valley Planning Area

Zoning: PS (Public/Semi-public)

Description of project:

The Master Plan would act as a framework to guide new development within a 15-year timeframe and recommend improvements to existing gardens, seeking to provide implementable projects that would sustain operations. The Master Plan would include recommendations for improving the quality of Descanso Gardens, a County Special Use Park Facility, in the West San Gabriel Valley Planning Area, the Fifth Supervisorial District, and Los Angeles County. See Section 1, *Project Description,* for further details.

Surrounding land uses and setting: The Descanso Gardens property is roughly bound to the north by Verdugo Hills Hospital, single-family residences, and Descanso Drive; to the east by single-family residences along Encinas Drive; and to the south and west by a ridgeline traversed by Descanso Motorway (designated as the Descanso Trail in the City of La Cañada Flintridge Trails Master Plan). The Master Plan Area is traversed by the Winery Canyon Channel and an approximately 10-acre utility corridor on land owned by Southern California Edison.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes, consultation has begun.

Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

Public Agency	*Approval Required*
County DPW	Permits, approval of hydrology reports, transportation reports
City of LCF	Permits for project elements within City boundaries
City of Glendale	Permits for project elements within City boundaries
CDFW	Permits under Section 1600 of the Fish and Game Code
RWQCB	Notice of Intent prior to construction operations related to National Pollutant Discharge Elimination System (NPDES) Construction Permit; issuance of water quality certification pursuant to Section 401 of the Clean Water Act (CWA) in connection with issuance of a Section 404 CWA permit, as applicable; and issuance of a Dewatering Permit for discharge of water in the Lake
USACE	Section 404 permit under the CWA, as applicable

Major projects in the area:

Project/Case No.	*Description and Status*
_____	_____
_____	_____
_____	_____

Reviewing Agencies:

Responsible Agencies

- ☐ None
- Regional Water Quality Control Board:
  - ☒ Los Angeles Region
  - ☐ Lahontan Region
- ☐ Coastal Commission
- ☒ Army Corps of Engineers
- ☐ LAFCO

Special Reviewing Agencies

- ☒ None
- ☐ Santa Monica Mountains Conservancy
- ☐ National Parks
- ☐ National Forest
- ☐ Edwards Air Force Base
- ☐ Resource Conservation District of Santa Monica Mountains Area
- ☐

Regional Significance

- ☒ None
- ☐ SCAG Criteria
- ☐ Air Quality
- ☐ Water Resources
- ☐ Santa Monica Mtns. Area
- ☐

Trustee Agencies

- ☒ None
- ☐ State Dept. of Fish and Wildlife
- ☐ State Dept. of Parks and Recreation
- ☐ State Lands Commission
- ☐ University of California (Natural Land and Water Reserves System)

County Reviewing Agencies

- ☒ DPW
- ☒ Fire Department
  - Forestry, Environmental Division
  - Planning Division
  - Land Development Unit
  - Health Hazmat
- ☒ Public Health/Environmental Health Division: Land Use Program (OWTS), Drinking Water Program (Private Wells), Toxics Epidemiology Program (Noise)
- ☒ Regional Planning
- ☒ Sanitation District
- ☒ Sheriff Department
- ☐ Subdivision Committee

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially significant impacts affected by this project.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture/Forestry	☐ Hazards/Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology/Water Quality	☐ Transportation
☐ Biological Resources	☐ Land Use/Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities/Services
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology/Soils	☐ Population/Housing	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Department.)
On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature (Prepared by)	Date
Signature (Approved by)	1/23/2020 Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources the Lead Department cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the Lead Department has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significance. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

2.1. AESTHETICS

This analysis is undertaken to determine if the proposed Descanso Gardens Master Plan (proposed project) may have a significant impact to aesthetics that would require the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State of California Environmental Quality Act Guidelines (State CEQA Guidelines) and the County of Los Angeles (County) Department of Parks and Recreation's Environmental Checklist Form.[1] Aesthetics in the project vicinity were evaluated with regard to the California Department of Transportation's (Caltrans) Scenic Highway System designations,[2] Los Angeles County General Plan 2035,[3] the City of La Cañada-Flintridge (LCF) General Plan,[4] previously published information regarding the visual character of the Master Plan Area, including light and glare, site reconnaissance, and a review of the draft Master Plan. Site visits were conducted to characterize existing conditions within the Master Plan Area and views of the Master Plan Area from nearby roads, freeways, and trails on November 8, 13, and 25, 2018; December 2, 9, and 24, 2018; January 23, 2019; February 9, 2019; October 27, 2019; and November 2, 10, 16, 18, and 23, 2019. Site visits included five nighttime event evenings: December 9, 2018, November 23, 2019, and December 8 and 27, 2019, at the annual Enchanted: Forest of Light winter event; and February 9, 2019 at the Night Garden: Campfire Stories event.

REGULATORY FRAMEWORK

Federal

There are no federal regulations applicable to aesthetics for the proposed project.

State

Caltrans California Scenic Highways Program

The California Scenic Highways Program was created in 1963 under Senate Bill 1467, which added Sections 260 through 263[5] to the Streets and Highways Code, to preserve and protect scenic highway corridors from change that would reduce the aesthetic value of lands adjacent to highways.[6] According to Caltrans' Scenic Highway Guidelines, scenic highway corridors consist of land that is visible from, adjacent to, and outside the highway right-of-way, and is composed primarily of scenic and natural features. Topography, vegetation, viewing distance, and/or jurisdictional lines determine the corridor boundaries.[7] To be included in the state program, the highways proposed for designation must meet Caltrans' eligibility requirements and have visual merit. County highways and roads that meet the Caltrans Scenic Highways Program standards may also be officially designated. The state laws governing the Scenic Highway Program are provided in the California Streets and Highways Code, Sections 260 through 263. The State Scenic Highway System includes a list of highways that have been designated by Caltrans as scenic highways or are eligible for designation as scenic

[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[2] California Department of Transportation. Accessed November 12, 2019. Scenic Highways. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

[3] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan

[4] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[5] State of California. Accessed November 12, 2019. Streets and Highways Code – Section 263. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=263.&lawCode=SHC

[6] California Department of Transportation. Accessed November 1, 2019. Frequently Asked Questions. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways/lap-liv-i-scenic-highways-faq2

[7] California Department of Transportation. April 2012. Scenic Highway Guidelines. https://dot.ca.gov/-/media/dot-media/programs/design/documents/scenic-hwy-guidelines-04-12-2012.pdf

highways. These highways are designated in Section 263 of the Streets and Highways Code. A scenic corridor is the land generally adjacent to and visible from the highway and is identified by using a motorist's line of vision. A reasonable boundary is selected when the view extends to the distant horizon. Caltrans outlines the following minimum requirements for scenic corridor protection (Section 261 of the Streets and Highways Code): (1) regulation of land use and intensity (density) of development, (2) detailed land and site planning, (3) control of outdoor advertising, (4) careful attention to and control of earthmoving and landscaping, and (5) the design and appearance of structures and equipment. Caltrans defines noncompliance for a Corridor Protection Program as a program that (1) no longer complies with the five legislatively required elements under Section 261 of the Street and Highways Code, (2) no longer affords protection because required elements have been amended or changed, or (3) no longer is being enforced by the local governing body. Caltrans also maintains approximately 135 vista points along state highways where motorists can safely view scenery or park and relax.[8]

Local

Los Angeles County General Plan 2035

The Los Angeles County General Plan 2035 (County General Plan 2035) was adopted by the Los Angeles County Board of Supervisors on October 6, 2015, to provide the policy framework for the growth and development of the unincorporated County and County properties through 2035.[9] The Parks and Recreation Element classifies arboreta and botanical gardens such as Descanso Gardens as special use facilities that serve greater regional recreational or cultural needs and have no defined size criteria or service radius areas.[10] A special use facility is generally a single-purpose facility that typically includes passive features such as wilderness parks, nature preserves, botanical gardens, and nature centers; or active uses such as performing arts, water parks, gold driving ranges, and golf courses. The Land Use Element provides strategies and planning tools to facilitate and guide future development and revitalization efforts.[11] The County recognizes that scenic features in the region, such as the coastline and mountain vistas, are significant natural resources for the County. The Land Use Element includes land use policies that protect the visual quality of scenic resources, including Hillside Management Areas (HMAs), ridgelines, scenic viewsheds, and areas along scenic highways. The purpose of the Conservation (OS-C) land use category is to preserve open space and scenic resources in perpetuity. The Conservation and Natural Resources Element serves as the policy guide for conservation of scenic resources in the County.[12] The Conservation and Natural Resources Element identifies the three official State Scenic Highways in the County, describes scenic viewsheds, and identifies significant ridgelines that need to be protected and preserved. According to County Policy C/NR 13.10, significant ridgelines are identified by five criteria: (1) topographic complexity; (2) uniqueness of character and location; (3) presence of cultural or historic landmarks; (4) visual dominance on the skyline or viewshed (e.g., height and elevation of a ridgeline); and (5) environmental significance to natural ecosystems, parks, and trail systems. The Conservation and Natural Resources Element has established Goal C/NR 13: Protected visual and scenic resources, supported by seven policies relevant to aesthetics in consideration of the proposed project:

[8] California Department of Transportation. September 30, 2016. Vista Point Planning and Design. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-k-vista-points

[9] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan

[10] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/generalplan

[11] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 6: Land Use Element.

[12] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 9: Conservation and Natural Resources Element. http://planning.lacounty.gov/generalplan

- Policy C/NR 13.1: Protect scenic resources through land use regulations that mitigate development impacts.
- Policy C/NR 13.2: Protect ridgelines from incompatible development that diminishes their scenic value.
- Policy C/NR 13.3: Reduce light trespass, light pollution, and other threats to scenic resources.
- Policy C/NR 13.4: Encourage developments to be designed to create a consistent visual relationship with the natural terrain and vegetation.
- Policy C/NR 13.5: Encourage required grading to be compatible with the existing terrain.
- Policy C/NR 13.8: Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.
- Policy C/NR 13.9: Consider the following in the design of a project that is located within an HMA, to the greatest extent feasible:
    - Public safety and the protection of hillside resources through the application of safety and conservation design standards;
    - Maintenance of large contiguous open areas that limit exposure to landslide, liquefaction and fire hazard and protect natural features, such as significant ridgelines, watercourses, and significant ecological areas (SEAs).

County Municipal Code Sections 22.56.2050–22.56.2260 – Oak Tree Ordinance

The County Oak Tree Ordinance requires a permit prior to the cutting, removing, destroying, relocating, inflicting damage on, or encroaching into a protected zone of any tree within the oak genus. The Ordinance regulates only oak trees (genus *Quercus*) located within unincorporated areas of Los Angeles County. In addition, the circumference of an oak tree with one trunk must be 25 inches (8 inches in diameter) or more. For oak trees with multiple trunks, any two trunks must have a circumference of 38 inches (12 inches in diameter) or more. Measurements must be recorded at 4.5 feet above mean natural grade.

City of LCF General Plan – Vision 2030

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The General Plan provides direction for the City of LCF's planning efforts through 2030. The City of LCF's vision through 2030 is to maintain the community's "quiet, safe, small-town feeling and semi-rural, predominantly single-family character amid the beauty of its natural open spaces, trails, trees, parks, wildlife, and stunning mountain views." The Conservation Element of the General Plan identifies views of the valley (including the Los Angeles Basin and Arroyo Seco), topography of the San Gabriel Mountains and San Rafael Hills, lush vegetation, and extensive urban forest as scenic contributors to the semi-rural atmosphere of the City. Key public vantage points for vistas and scenic vistas identified in the Conservation Element include

- I-210 as it enters and passes through the City of LCF
- SR-2 as it enters and passes through the City of LCF
- Foothill Boulevard
- Angeles Crest Highway (SR-2 from I-210 north to the Angeles National Forest)
- Public recreational and open space areas, such as Cherry Canyon and trails throughout the City of LCF

Additionally, the General Plan identifies prominent ridgelines in Figure CNE-3, *Topographic and Visual Resources*, that include the southwestern ridgeline of the Master Plan Area. The goals, objectives, and policies in the Land

Use Element, Conservation Element, and Open Space and Recreation Element establish five goals, nine objectives, and 32 policies related to aesthetics.[13]

LUE Goal 1: Provide an appropriate mix and balance of land uses that retain and enhance the community's distinctive character and preserve its valuable resources.

- **LUE Objective 1.1:** Preserve and enhance the City's character as a low density, wooded, hillside, predominately single-family residential community.
  - LUE Policy 1.1.7: Foster the preservation, rehabilitation, and maintenance of landmark and historic properties in the City, such as through implementation of the Mills Act.
  - LUE Policy 1.1.8: Preserve and protect individual homeowners from invasion of privacy resulting from building design and/or electronic surveillance equipment from neighboring properties.
- **LUE Objective 1.2:** Encourage the development of an attractive and balanced commercial base for the community that meets the needs of the residents without negatively impacting the circulation network, infrastructure capacity, or existing residential neighborhoods.
  - LUE Policy 1.2.5: Provide standards and guidance for the design and development of commercial facilities in the community that enhance the City's appearance, aesthetic qualities, and business potential.
- **LUE Objective 1.5:** Ensure that new and rehabilitated development is compatible with the residential character of the City, the project's surrounding land uses, the circulation network, availability of public facilities, and existing development constraints.
  - LUE Policy 1.5.1: Require all new development to be designed to minimize impacts on adjoining residential neighborhoods by providing adequate and appropriate buffers and protections to assure compliance with the City's goals and policies for compatible and complementary development.
  - LUE Policy 1.5.2: Ensure the character of existing neighborhoods is not detrimentally altered as a result of land divisions and/or new development.
  - LUE Policy 1.5.3: Ensure the character of existing residential neighborhoods is not detrimentally altered as a result of home occupations or by other related non-residential uses.
  - LUE Policy 1.5.5: Mitigate unacceptable levels of noise, odors, pollution, dust, light, and glare that affect residential areas and other sensitive receptors.
  - LUE Policy 1.5.6: Ensure a sensitive transition between commercial and residential land uses and other sensitive receptors by employing techniques such as buffering, landscaping, and setbacks.
  - LUE Policy 1.5.7: Encourage and/or create incentives to improve existing undesirable edge conditions and buffer areas between residential neighborhoods and other sensitive receptors and adjacent commercial uses and highways.

LUE Goal 4: Maintain hillside areas for the purpose of preserving the visual quality of the City, protecting the public from safety hazards, and conserving natural resources.

- **LUE** Objective 4.1: New development and/or remodeling of existing structures and property will be designed, constructed, and maintained to preserve important viewscapes, topographic and other natural features, and the semi-rural character of the City's hillsides.
  - LUE Policy 4.1.1: Preserve ridgelines, natural slopes, knolls, canyons, and bluffs in their natural state to protect important viewscapes and topographic and other natural features. The land forms identified in Figure CNE-3 of the Conservation Element are examples of landforms that will be protected.

[13] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. Segment 3; Open Space and Recreation. Segment 4; Conservation Element. https://cityoflcf.org/planning/

- LUE Policy 4.1.3: Ensure that development preserves the City's natural environment, setting, and viewsheds, through design, siting, and construction that avoids obtrusive breaks in the natural skylines and minimizes the visual impact of grading, intrusion of highly visible cut and/or fill slopes, building and roof lines, and/or roadway surfaces.
- LUE Policy 4.1.4: Require human-made slopes to be irrigated and landscaped to prevent erosion and to soften the visual appearance of the finished slope.
- LUE Policy 4.1.5: Continue to implement the City's Hillside Development Chapter of the Zoning Ordinance, which establishes standards to minimize landform alteration, preserve significant environmental features, and control development densities.

LUE Goal 5: Preserve and enhance the scenic beauty of the community.

- **LUE Objective 5.1:** Encourage overall development of the community to be designed and constructed in a manner that is visually pleasing, preserves and enhances the semi-rural character of the local environment, and protects the scenic qualities of the community.
  - LUE Policy 5.1.1: Encourage the preservation and enhancement of scenic vistas and discourage development and additions that obstruct views.
  - LUE Policy 5.1.2: Implement the goals, objectives, and policies in the Conservation Element regarding protection of the City's topographic and scenic resources.
  - LUE Policy 5.1.3: Review all plans for development for compatibility with surrounding developments and established design guidelines, in accordance with the City's Design Review process and the DVSP.
  - LUE Policy 5.1.5: Review and revise, as necessary, architectural design, landscaping, and signage guidelines to achieve commercial development of the highest quality and to retain the City's small-town character.
- **LUE Objective 5.2:** Preserve and improve the aesthetic quality of the community through enhancements to the City's gateways and scenic corridors.
  - LUE Policy 5.2.1: Install and maintain visual and infrastructure linkages on the City's designated scenic corridors through landscaping and street trees, hardscape, lighting, signage and identity graphics, and street furniture through public improvements and private investment.
  - LUE Policy 5.2.2: Maintain Verdugo Boulevard as a visually pleasing residential corridor that serves as a significant entry point into the City by its designation as the Descanso Gateway District.
  - LUE Policy 5.2.3: Implement programs that support the gateway and scenic corridor characteristics along the City's major roadways.
  - LUE Policy 5.2.4: Preserve the unique views of the mountains and foothills as seen from the City's designated scenic corridors (as designated on Figure CNE-3 in the Conservation Element) by continuing to implement the development standards and design guidelines in the Hillside Development Ordinance, DVSP, and the design review process, including mixed use and commercial development.
  - LUE Policy 5.2.5: The City will work with utility companies to improve the appearance of Foothill Boulevard, Verdugo Boulevard, and Angeles Crest Highway by undergrounding public utility lines and equipment and eliminating utility poles along these roads as economic resources permit.
  - LUE Policy 5.2.6: In order to improve the general appearance of the community as recommended in this and other elements of the General Plan, the City will evaluate the possibility of using community improvement district(s) as a tool for making certain improvements, such as: 1) the undergrounding of overhead utility lines on Verdugo Boulevard and Angeles Crest Highway; 2) landscaping within the public rights-of-way; and 3) assisting the private sector in land acquisition and development of landscaped commercial parking areas.

CNE GOAL 2: Preserve the remaining natural ridgelines, canyons, streams, springs, urban forest, and other natural resources and attributes which contribute to the aesthetic and scenic qualities of the community.

- **CNE Objective 2.1:** Require new development to be compatible with the natural and existing human-made resources that make the community special.
  - CNE Policy 2.1.1: Protect natural and aesthetic resources through continued implementation of the Hillside Development Ordinance.
  - CNE Policy 2.1.2: Maintain prominent landforms within the community in their natural state to the maximum extent feasible, including but not limited to: ridges, knolls, waterways, creeks (either dry or active), canyons, or other unique topographic features or viewscapes. The most significant landforms are identified on Figure CNE-3 in the Conservation Element.
  - CNE Policy 2.1.3: Protect major hillside viewscapes visible from points within the City from detrimental alteration by the intrusion of highly visible cuts and/or fill slopes, building lines, and/or road surfaces.
  - CNE Policy 2.1.4: Minimize the visual impact of grading. Irrigate and landscape human-made slopes to prevent erosion and soften the visual appearance of the finished slope.
  - CNE Policy 2.1.5: Preserve and protect the city's urban forest in order to maintain the community's wooded character and protect the scenic beauty of the area, through continued implementation of the City's Preservation, Protection, and Removal of Trees Ordinance.
  - CNE Policy 2.1.6: Pursue opportunities to acquire undeveloped land that includes prominent landforms and other natural and scenic resources.
- **CNE Objective 2.2:** Preserve the scenic beauty of views capes as seen from public vantage points and designated streets and locations.
  - CNE Policy 2.2.2: Preserve the unique views of the mountains and foothills as seen from Foothill Boulevard by continuing to implement the development standards and design guidelines in the Hillside Development Ordinance and DVSP.
  - CNE Policy 2.2.3: Consider pursuing official State Scenic Highway Designation for the portion of Angeles Crest Highway between the I-210 Freeway north and the City boundary.

OSRE Goal 2: Preserve, protect, and enhance open space areas within and adjacent to the City.

- **OSRE Objective 2.1:** Preserve or enhance open space for preservation of natural resources.
  - OSRE Policy 2.1.3: The semi-rural, hillside character of the community should be maintained by regulation and development control, thus preserving the unique setting and significant resources in the San Gabriel Mountains and San Rafael Hills.

Tree City USA Program

The City of LCF is a Tree City USA community.[14,15] The Tree City USA program was established in 1976 by the Arbor Day Foundation in collaboration with the USDA Forest Service, Urban & Community Forest, and the National Association of State Foresters.[16] Tree City USA communities must meet four core standards of sound urban forestry management: maintaining a tree board or department, having a community tree ordinance, spending at least $2 per capita on urban forestry and celebrating Arbor Day. As a Tree City USA, LCF is recognized as a community that cares about well managed urban forests and the communities that benefit from them.

[14] Arbor Day Foundation. Accessed November 4, 2019. 2018 Tree City USA Communities in California. https://www.arborday.org/programs/treecityusa/treecities.cfm?chosenstate=California

[15] City of La Cañada Flintridge. Accessed November 12, 2019. Trees. https://cityoflcf.org/trees_landscaping/

[16] Arbor Day Foundation. Accessed November 4, 2019. What Is Tree City USA? https://www.arborday.org/programs/treecityusa/about.cfm

City of LCF Municipal Code

Although the County is not subject to city municipal codes, City LCF Municipal Code information has been provided to inform the County's decision-making process. Chapter 11.40, *Preservation and Protection of Designated Trees on Private Property*, of the City of LCF Municipal Code protects several species of native oak trees and native California sycamore trees located in the R-1 single-family residential zone, as well as any species of tree greater than five feet in height on property in a non-R-1 single-family residential zone, except city-owned or controlled property.[17] Chapter 4.24, *Trees in the Public Right-of-Way*, protects city trees that are located in the public right-of-way.[18]

Chapter 11.35.047, *Landscaping and Lighting Guidelines*, of the Municipal Code states that site lighting shall be oriented away from public rights-of-way and adjacent properties (Ord. 329 Section 1.2, 2002). Chapter 11.16.060, *Site Planning and Building Design*, specifies that exterior lighting devices for parking and pedestrian walkways shall provide for safety and security, without excessive lighting or glare, and accent lighting of buildings and landscaping is encouraged. Chapter 8.03.070, *Design and Development Standards*, states that any required lighting shall be shielded to eliminate, to the maximum extent possible, impacts on the surrounding neighborhoods.

IMPACT ANALYSIS

	Potentially Significant Impact	***Less than Significant Impact with Mitigation Incorporated***	***Less than Significant Impact***	***No Impact***
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

The proposed project would result in no impact to aesthetics in relation to scenic vistas. There are no designated scenic vista points within the Master Plan Area. The Master Plan Area is not visible from any scenic vistas designated within the County General Plan 2035 or by Caltrans due to distance, intervening topography and tree canopy, and single-family residential development between Descanso Gardens and designated scenic vistas.[19,20] The nearest designated scenic vistas to Descanso Gardens are County-designated public viewing areas in the Santa Monica Mountains approximately 23.4 miles southwest of the Master Plan Area and Caltrans-designated Lamont Odett Scenic Vista Point approximately 24.4 miles northeast of the Master Plan Area (Figure 2.1-1, *Scenic Vistas*).

[17] City of La Cañada Flintridge. Accessed November 4, 2019. La Cañada Flintridge Municipal Code. http://qcode.us/codes/lacanadaflintridge/

[18] City of La Cañada Flintridge. Accessed November 4, 2019. La Cañada Flintridge Municipal Code. http://qcode.us/codes/lacanadaflintridge/

[19] The County has designated Public Viewing Areas in the Santa Monica Mountains Land Use Plans, which are located more than 23 miles south of the project study area.

[20] Male, Laura, Sapphos Environmental, Inc. July 3, 2015. Communication with Daniel Kitowski, Transportation Manager (GIS), California Department of Transportation.

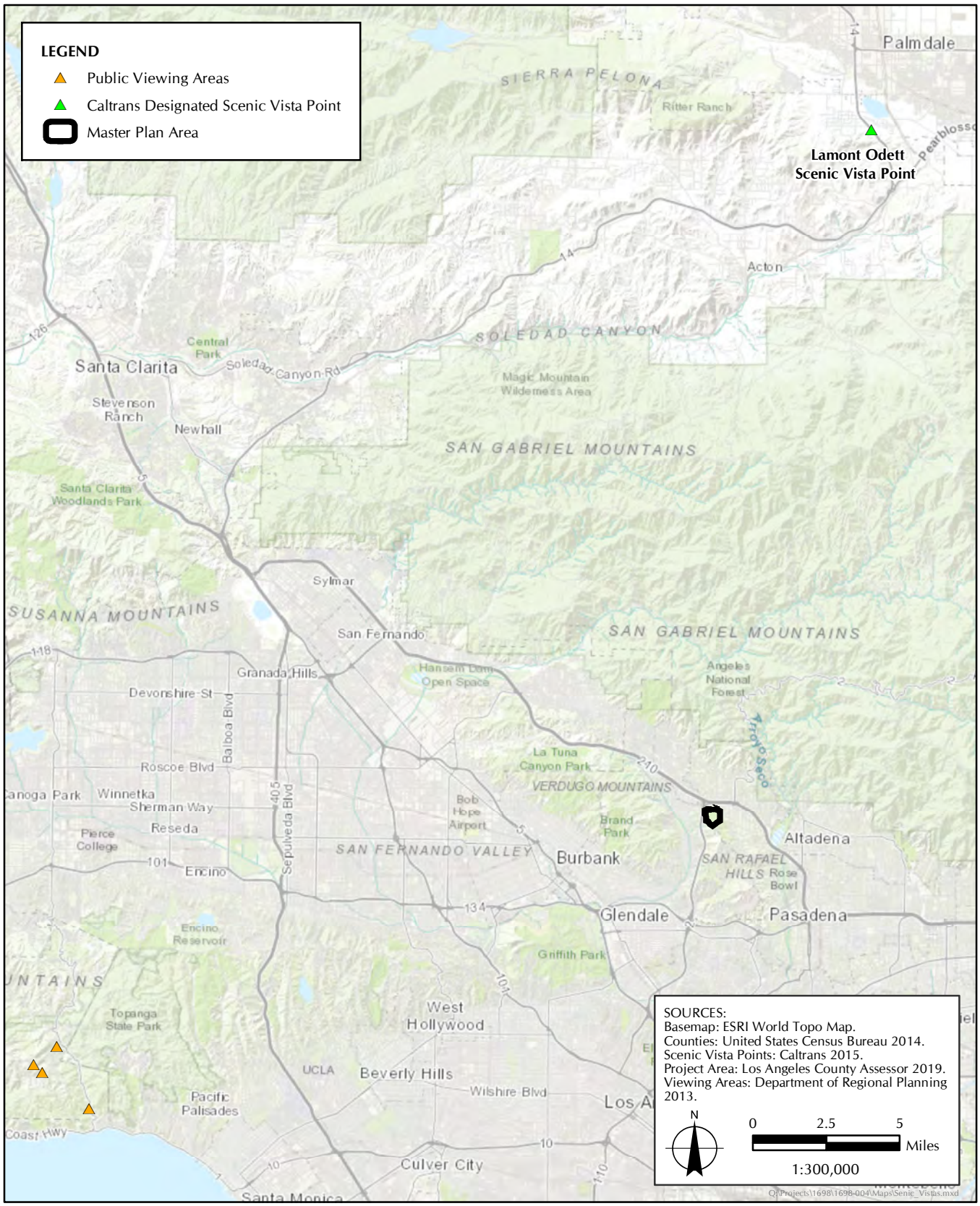


FIGURE 2.1-1

Scenic Vistas

Caltrans has designated one vista point within Los Angeles County, Lamont Odett Vista Point, which is located north of Angeles National Forest, at Post Mile 57.8 along the northbound side of SR-14 and overlooks the Aerospace Valley, Lake Palmdale, and the California Aqueduct toward the north and northeast.[21] Site reconnaissance was conducted on November 25, 2018; December 2, 2018; January 23, 2019; February 9, 2019; October 27, 2019; and November 2 and 10, 2019, to document the potential visibility level of the Master Plan Area at key locations from nearby roads, freeways, and trails in the vicinity of the Master Plan Area. Additionally, a desktop review of Google Earth Pro using historic and current aerial imagery, Street View, and Elevation Profiles of views and the topography in the vicinity of the Master Plan Area was conducted in evaluation of the visibility level of the Master Plan Area.

As Descanso Gardens is nestled below the ridgeline in the eastern slope of the northern edge of the San Rafael Hills within the Crescenta Valley, the property is not visible from the west or south except from the unpaved ridgeline Descanso Motorway / Descanso Trail and an unpaved utility access road for SCE between the City of LCF's Descanso Trail and Conservancy Trail (see Figure 1.4-2, *Topographic Map with USGS 7.5 Minute Quadrangle Index*, Figure 1.8.2-1, *Developed Gardens and Undeveloped Areas of the Property*, and Figure 1.8.2-5, *Existing Trails*). Descanso Gardens is located along the southwestern edge of the City of LCF, bordered by the City of Glendale to the south and west. With the exception of elevation drops at the I-210 freeway and the Alta Canyada canyon, the topography of the Crescenta Valley slopes steadily from the Master Plan Area at the base of the San Rafael Hills north to the San Gabriel Mountains. The topography of the Crescenta Valley slopes steadily from the Master Plan Area at the base of the San Rafael Hills east to the I-210 freeway where it crosses over Foothill Boulevard. South of the ridgeline that follows the southern boundary of the Master Plan Area, there is another ridgeline of the San Rafael Hills with a peak approximately 115 feet southeast of the 1,820-foot peak at the southern tip of the Master Plan Area. This ridgeline is approximately 5 feet higher south of this second ridgeline. The Master Plan Area is not visible from this second ridgeline. The undeveloped western edge of the Master Plan Area extends up to 300 feet west of the ridgeline near Descanso Motorway / Descanso Trail. Additionally, a short segment of the Descanso Trail located approximately 300 feet of the Master Plan Area is visible from Verdugo Road west of the Master Plan Area. However, no changes would be made to the western portion of the property west of the existing perimeter fence. The proposed modifications to the perimeter fence would be at a lower elevation than the ridgeline near Descanso Motorway. Therefore, the proposed project would not affect any views from the south or west.

From the north of the Master Plan Area, only the streetscape, Main Parking Lot, tree canopy, undeveloped southern slope, and SCE electrical transmission lines in the Master Plan Area are visible from the Main Parking Lot driveways along Descanso Drive to the southernmost ridgelines of the San Gabriel Mountains. From the north, the tree canopy, and SCE electrical transmission lines within the Master Plan Area are visible from Earl Canyon Motorway Trail, La Cañada Open Space Trail, Lukens Connection Trail, the Mt. Lukens Truck Trail segment of the Rim of the Valley Trail, and Trails Council Link Trail (see Figure 1.8.2-5, *Existing Trails*). Due to distance, intervening topography, and the presence of single-family residences and dense tree canopy within the City of LCF between Gould Canyon Trail and Descanso Gardens, the Master Plan Area is not part of the trail's viewshed. The proposed project would involve the removal of existing trees at locations along the Descanso Drive streetscape and within the two existing parking lots, maintenance area west of the Auxiliary Parking Lot, Harvest Garden, and staff office area southeast of Van de Kamp Hall to allow for the development of Master Plan elements including the Arrival Grassland Garden and Administrative Headquarters. No native oak trees are anticipated to be removed as a result of the Master Plan elements. The native sycamore trees in the Rose Garden and along the Promenade would be retained as well.

[21] California Department of Transportation. 2018. 2017 Named Freeways, Highways, Structures and Other Appurtenances in California. Accessed November 3, 2019. https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/f0016502-named-freeways-final-a11y.pdf

Although the City of LCF has not designated any scenic vistas, the City's General Plan has designated four scenic corridors to the north and east of the Master Plan Area that offer key vantage points from which prominent viewscapes can be seen:[22]

1. Foothill Boulevard from Pickens Canyon southeast to Oak Grove Drive
2. I-210 from approximately 155 feet east of Waltonia Drive east to approximately 550 feet southeast of the Foothill Freeway Overpass
3. SR-2 from Foothill Boulevard north to approximately 1,090 feet northeast of Bay Tree Road
4. Verdugo Boulevard from approximately 360 feet east of Valihi Way east to Foothill Boulevard

To the north and east of the Master Plan Area, a dense canopy of trees, single-family residences, and commercial development along Foothill Boulevard obstruct views of Descanso Gardens for the most part. Where the tree canopy of Descanso Gardens is visible between these landscape features, it blends in with the existing urban tree canopy of the City. The southern slope of the Master Plan Area, as well as utilities on the ridgelines of the San Rafael Hills, are occasionally visible between trees and development from these four scenic corridors. However, the Master Plan Area is not prominent in the viewscapes from these four routes due to the dense street tree canopy, residential and commercial development, and below-grade elevation of the I-210 through the majority of the City of LCF in the foreground. Descanso Gardens is considered an open space and aesthetic resource to the City of LCF that contributes to the aesthetic of the Tree City USA community. Therefore, there would be no impact. No further analysis is warranted.

b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to aesthetics regarding being visible from or obstructing views from a regional riding, hiking, or multi-use trail. Although the proposed project would potentially be visible from nearby existing regional trails, it would not obstruct views due to intervening topography, trees, and shrubs, as well as the small scale and height of the proposed facilities that would be visible from a distance. Regional trails in the vicinity of the Master Plan Area include the Pacific Crest National Scenic Trail, located approximately 12.2 miles north of the Master Plan Area, as well as five County trails (Figure 2.1-2, *Regional Hiking Trails*). Due to distance and intervening topography, as well as the low elevation of Descanso Gardens compared to the San Gabriel Mountains, the proposed project would not be expected to be visible from or obstruct views from Pacific Crest National Scenic Trail. The Angeles National Forest Land Management Plan and County trails website were reviewed to identify existing regional trails.[23,24] Site reconnaissance was conducted on November 25, 2018; December 2 and 24, 2018; January 23, 2019; October 27, 2019; and November 2, 2019, to document the potential visibility level of the Master Plan Area at key locations from nearby trails in the vicinity of the Master Plan Area (Figure 2.1-3, *Photographs from Regional Hiking Trails*). Additionally, a desktop review of Google Earth Pro using historic and current aerial imagery, Street View, and Elevation Profiles of views and the topography in the vicinity of the Master Plan Area was conducted to evaluate of the visibility level of the Master Plan Area.

[22] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[23] U.S. Forest Service. Accessed November 12, 2019. Angeles National Forest: Land Management Planning. https://www.fs.usda.gov/main/angeles/landmanagement/planning

[24] County of Los Angeles Department of Parks and Recreation. Accessed November 12, 2019. Trails LA County. https://trails.lacounty.gov/Trail/List

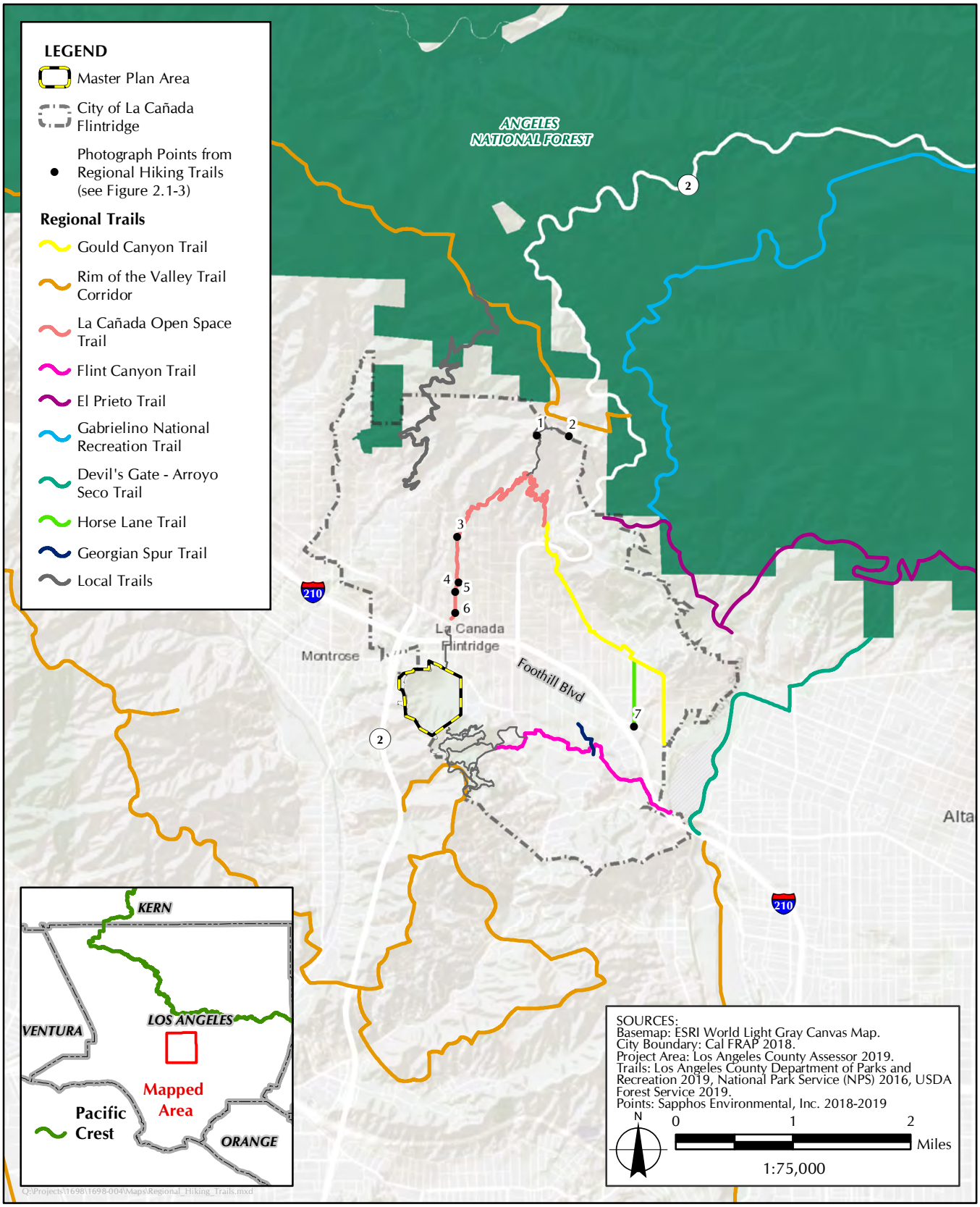


FIGURE 2.1-2

Regional Hiking Trails

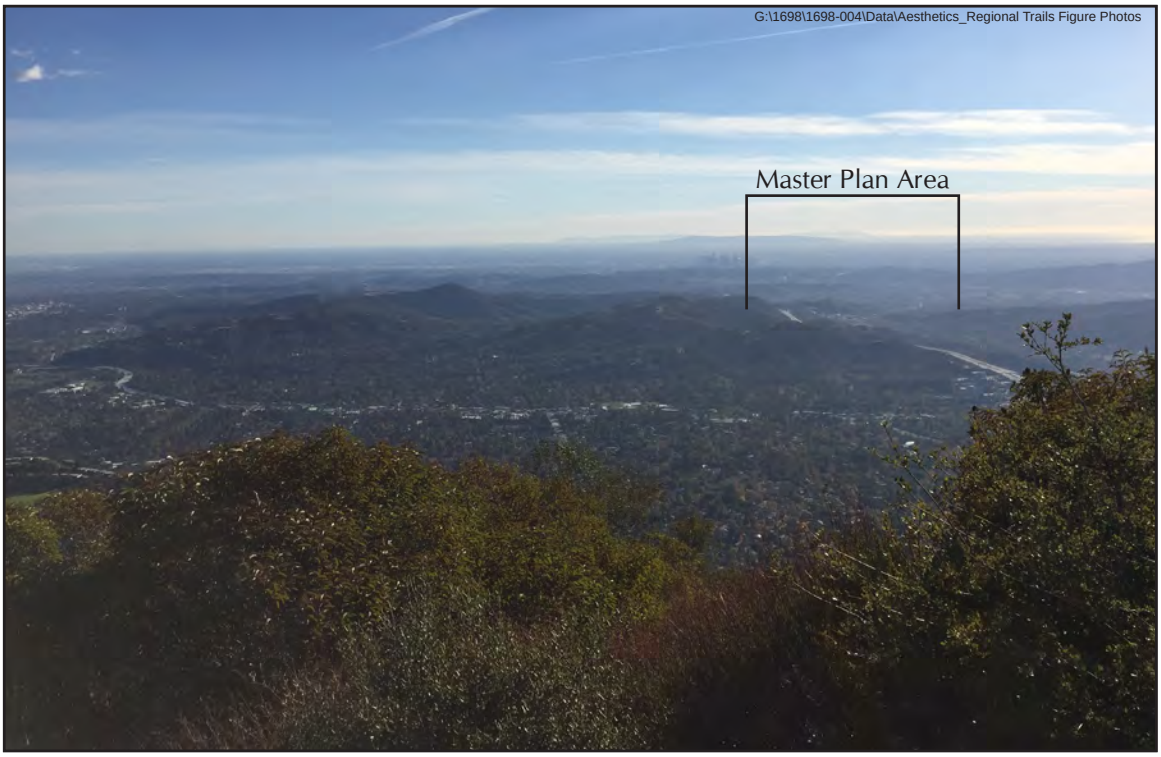


PHOTO 1
Mt. Lukens Connector - December 2, 2018 Facing South

PHOTO 2
Mt. Lukens Truck Trail - December 2, 2018 Facing South-Southwest

FIGURE 2.1-3
Photographs from Regional Hiking Trails

PHOTO 3
La Cañada Open Space Trail - October 27, 2019 Facing South

PHOTO 4
La Cañada Open Space Trail - October 27, 2019 Facing South

FIGURE 2.1-3
Photographs from Regional Hiking Trails

PHOTO 5
La Cañada Open Space Trail Mile 0.25 - October 27, 2019 Facing South

PHOTO 6
La Cañada Open Space Trail - October 27, 2019 Facing South-Southwest

FIGURE 2.1-3
Photographs from Regional Hiking Trails

PHOTO 7
Horse Lane Trail - October 27, 2019 Facing West-Northwest

FIGURE 2.1-3
Photographs from Regional Hiking Trails

The steeper slopes of the southern and western portions of the Master Plan Area, as well as the texture and overall color and pattern of the tree canopy within the Master Plan Area, are visible from the Mt. Lukens Connector Trail (2.2 miles north-northeast) and Mt. Lukens Truck Trail (2.3 miles north-northeast) along the southern ridgelines of the San Gabriel Mountains near the regional Rim of the Valley Trail Corridor (see Photos 1 and 2 in Figure 2.1-3). However, the ridgelines are the main focus of vistas that include the Master Plan Area as the tree canopy blends in with the rest of the Crescenta Valley from this distance. The proposed Wilds Loop Trail has the potential to be visible but not prominent in the landscape from this regional trail corridor.

The nearest regional (County) trail from which the Master Plan Area is La Cañada Open Space Trail (north of Foothill Boulevard, which is located within the SCE utility corridor north of the Master Plan Area (see Photos 3, 4, 5, and 6 in Figure 2.1-3). From 1.1 mile north of the Master Plan Area near El Vago Street (Photo 3), the north-facing southern slope of the Master Plan Area is visible but not prominent. From 0.8 mile north of the Master Plan Area, just south of Olive Lane (Photo 4), the existing fire roads that have been adopted as City of LCF trails south of the Master Plan Area and a portion of Descanso Trail (in the Master Plan Area) are visible, but not prominent; the two parallel SCE electrical transmission lines and supporting towers are visible at the southern ridgeline of the Master Plan Area and farther south, as well as a ridgeline water tower to the east of the electrical transmission lines (see Figure 2.1-3). From Mile 0.25 of the La Cañada Open Space Trail, approximately 0.7 mile north of the Master Plan Area (see Photo 5 in Figure 2.1-3). These existing trails and electrical transmission utilities are visible enough in the landscape that the proposed Wilds Loop trail would likely be visible from this distance, especially during and immediately after construction. From a half-mile north of the Master Plan Area (Photo 6) near Indiana Avenue and Foothill Boulevard, individual trees and shrubs are defined in the view of the landscape (see Figure 2.1-3). The proposed Wilds Loop would be clearly defined from this segment of the trail. However, as this potentially visible feature would be a trail with no vertical elevation gain or loss, it would not obstruct views from this trail or any other trail. Furthermore, as this northern portion of the San Rafael Hills contains an extensive network of fire roads/City trails, at least three of which are visible from Photo 6, and the electrical utilities in the corridor occupy a prominent portion of the view, the change in scenic quality from this trail segment would be relatively minor. Potential visibility from local trails (such as the portion of the La Cañada Open Space Trail south of Foothill Boulevard) is evaluated under visual character (see Figure 1.8.2-5 and question (d) below).

The Master Plan Area is not visible from three County trails in the City of LCF (Gould Canyon Trail, Horse Lane Trail [1.5 miles east; Photo 7], or Flint Canyon Trail) due to distance and intervening topography, residential and commercial development, freeway bridges, and tree canopy (see Figure 2.1-3). Therefore, there would be less than significant impacts to aesthetics regarding being visible from or obstructing views from a regional riding, hiking or multi-use trail. No further analysis is warranted.

c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to aesthetics regarding substantially damaging scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. According to the California Scenic Highway Program, the nearest officially designated state scenic highways to the Master Plan Area are Angeles Crest Highway (SR-2) within the Angeles National Forest, approximately 2.3 miles north-northeast of the Master Plan Area; and SR-27, approximately 27.5 miles southwest of the Master Plan Area (Figure 2.1-4, *Designated and Eligible California Scenic Highways*).

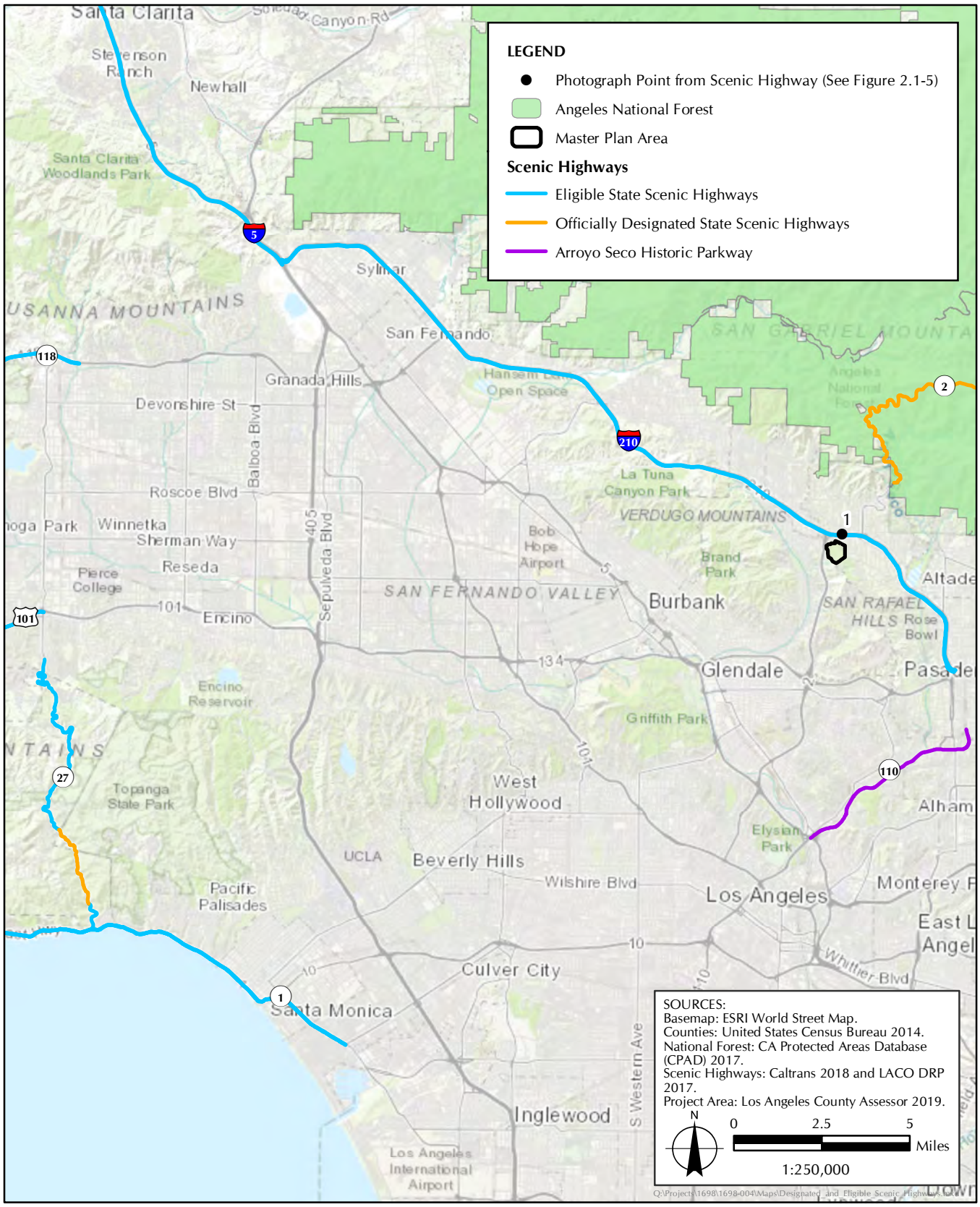


FIGURE 2.1-4

Designated and Eligible California Scenic Highways

The nearest eligible state scenic highway is the Foothill Freeway (I-210), located approximately 0.2 mile north of the Master Plan Area. The nearest designated County scenic highway is Malibu Canyon-Las Virgenes Highway, located approximately 27.5 miles southwest of the Master Plan Area. Due to distance and intervening topography of the San Rafael Hills adjacent to the Master Plan Area, Descanso Gardens is not visible from SR-27 or Malibu Canyon. Site reconnaissance was conducted on December 2, 2019, October 27, 2019, and November 2, 2019, to document the potential visibility level of the Master Plan Area at key locations from nearby freeways and trails in the vicinity of the Master Plan Area.

The portion of Angeles Crest Highway (SR-2) that is an officially designated state scenic highway, starting from 2.7 miles north of I-210, located north of the City of LCF, has been cut into the hillside, obstructing views to the north and south. Farther north, SR-2 provides dramatic views of the topography of the San Gabriel Mountains and canyons. The Master Plan Area is not visible from SR-2 due to intervening topography from the steep canyons of the San Gabriel Mountains.

The portion of I-210 from the Golden State Freeway (I-5) in the San Fernando Valley east to SR-134 in Pasadena is an eligible state scenic highway. With the exception of elevation drops at the I-210 freeway and the Alta Canyada canyon, the topography of the Crescenta Valley slopes steadily from Master Plan Area at the base of the San Rafael Hills north to the San Gabriel Mountains. The topography of the Crescenta Valley slopes steadily from the Master Plan Area at the base of the San Rafael Hills east to the I-210 freeway where it crosses over Foothill Boulevard. The elevation I-210 is below the surrounding community from Pennsylvania Avenue in La Crescenta (2.3 miles northwest of the Master Plan Area) east to Ocean View Boulevard (0.8 mile northwest of the Master Plan Area), then through the majority of the City of LCF from Alta Canyada Road (0.2 mile north of the Master Plan Area) to Vineta Avenue (1.2 miles east of the Master Plan Area). An approximately 1.0-mile stretch of the I-210 freeway northeast of the Master Plan Area is located at or near the elevation of the surrounding area. The I-210 freeway is lined with trees on the southern (eastbound) side from Pennsylvania Avenue in La Crescenta through the eastern edge of the City of LCF at Arroyo Seco except at bridges over and under the freeway. One park (Memorial Park) and two pedestrian bridges cross over I-210 in the City of LCF. One of the pedestrian bridges is located approximately one-quarter mile north of the Master Plan Area (Figure 2.1-5, *Photograph at Nearest California Scenic Highway [I-210]*). Where the tree canopy of Descanso Gardens is visible between these landscape features, it blends in with the existing urban tree canopy of the City. The southern slope of the Master Plan Area, as well as utilities on the ridgelines of the San Rafael Hills, are occasionally visible between trees and development from I-210 (see Figure 2.1-5). However, the Master Plan Area is not prominent in the viewscapes from I-210 due to the dense tree canopy and below grade elevation of the I-210 through the majority of the City of LCF in the foreground.

The proposed project would not create any obstructions to the hillside views or views from the scenic highways. Therefore, the proposed project would have the potential to result in less than significant impacts to aesthetics regarding scenic resources within a state scenic highway. No further analysis is warranted.

PHOTO 1
Horse Lane Trail - October 27, 2019 Facing West-Northwest

FIGURE 2.1-5
Photograph at Nearest California Scenic Highway (I-210)

d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point)	☐	☐	☒	☐

The proposed project would result in less than significant impacts to aesthetics regarding substantial degradation of the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features or conflicts with applicable zoning and other regulations governing scenic quality. Due to the limited visibility of Descanso Gardens, impacts to visual character or quality of public views of the site and its surroundings would be predominantly limited to the overall tree canopy, the southern slope of the Master Plan Area, and features along the northern edge of the perimeter fence for the ticketed entry points. As the proposed project would retain the majority of existing tree canopy and involve improvements to the perimeter fencing and landscaping, with a proposed trail up to six-feet-wide extending into the southern slope of the Master Plan Area, impacts to visual character regarding these features would be less than significant. Site visits were conducted to characterize existing conditions within the Master Plan Area and views of the Master Plan Area from nearby roads, freeways, and trails on November 8, 13, and 25, 2018; December 2, 9, and 24, 2018; January 23, 2019; February 9, 2019; October 27, 2019; and November 2, 10, 16, 18, and 23, 2019 (Figure 2.1-6, *Existing Visual Character*).

Publicly accessible vantage points in the Master Plan Area and vicinity include views from above along the Descanso Trail that borders the northwestern, western, and southern ridgelines of the Master Plan Area; Descanso Drive along the northeastern edge of the Master Plan, which includes the one entry driveway and two exit driveways for Descanso Gardens; La Cañada Open Space Trail to the north of Descanso Drive, from certain locations between trees and buildings; a Main Parking Lot and Auxiliary Parking Lot, with a public picnic area, concrete lined drainage channel, and electrical transmission corridor separating the two lots; and the Descanso Gardens Entrance Courtyard, including a gift shop, restrooms, Van de Kamp Hall, Birch Room, and Maple Restaurant (see Figure 2.1-6).[25] The five administrative trailers to the southeast of the designated staff parking stalls of the Main Parking Lot are brightly colored. There are 10 protected coast live oak trees located in the approximately 15-foot-wide City right-of-way between Descanso Gardens and Descanso Drive. All 10 of these oak trees would be preserved with implementation of the proposed project.

[25] Publicly accessible locations within the Master Plan Area are the locations that do not require ticketed entry.

PHOTO 1
La Cañada Open Space Trail North of I-210 - October 27, 2019 Facing South

PHOTO 2
La Cañada Open Space Trail South of I-210 - October 27, 2019 Facing South

FIGURE 2.1-6
Existing Visual Character

PHOTO 3
La Cañada Open Space Trail North of Verdugo Blvd. - October 27, 2019 Facing South

PHOTO 4
La Cañada Open Space Trail at Verdugo Boulevard – October 27, 2019
Facing South Towards La Cañada Substation

FIGURE 2.1-6
Existing Visual Character

PHOTO 5
La Cañada Open Space Trail South of Verdugo Blvd. - October 27, 2019 Facing South

PHOTO 6
La Cañada Open Space Trail at Descanso Drive - November 2, 2019 Facing Southeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 7
Descanso Drive at La Cañada Open Space Trail - November 2, 2019 Facing Southeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 8
Descanso Drive Entrance Driveway - November 2, 2019 Facing Southwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 9
Descanso Drive Streetscape Landscaping - November 2, 2019 Facing South

FIGURE 2.1-6
Existing Visual Character

PHOTO 10
Descanso Drive Streetscape Landscaping - November 2, 2019 Facing Southwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 11
Descanso Drive Streetscape After Distressed Redwood Tree and Understory Removal – November 23, 2019 Facing Southwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 12
Descanso Drive Exit Driveway - November 2, 2019 Facing Southeast

PHOTO 13
Descanso Drive Exit Driveway after Distressed Redwood Tree Removal –
November 18, 2019 Facing Southeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 14
Descanso Drive Streetscape Landscaping Near Exit Driveway - November 2, 2019 Facing South-Southeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 15
Descanso Drive in Northeastern Portion of Master Plan Area - November 2, 2019 Facing South-Southwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 16
Descanso Drive in Northeastern Portion of Master Plan Area After Distressed Redwood Tree Removal – November 23, 2019 Facing South

FIGURE 2.1-6
Existing Visual Character

PHOTO 17
Descanso Drive at Northeastern Corner of Master Plan Area and Residences to East - November 2, 2019 Facing Southeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 18
Main Parking Lot - November 13, 2018 Facing Northwest

PHOTO 19
Main Parking Lot - October 27, 2019 Facing East-Northeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 20
Employee Parking at Main Parking Lot - November 13, 2018 Facing Southwest

PHOTO 21
Main Parking Lot - November 13, 2018 Facing North-Northwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 22
Main Parking Lot - January 24, 2019 Facing Northwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 23
Main Parking Lot – November 18, 2019 After Distressed Redwood Tree Removal Facing North-Northeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 24
Employee Parking at Main Parking Lot - November 13, 2018 Facing South-Southeast

PHOTO 25
Employee Parking in Southeastern Corner of Main Parking Lot - November 13, 2018
Facing Southeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 26
Maple Restaurant at Van de Kamp Hall from Main Parking Lot - November 13, 2018
Facing Southwest

PHOTO 27
Dropoff Zone at Main Parking Lot - November 13, 2018 Facing Southwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 28
Northeastern Corner of Main Parking Lot - November 13, 2018 Facing South

PHOTO 29
Northeastern Corner of Main Parking Lot - November 13, 2018 Facing West-Southwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 30
Northeastern Corner of Main Parking Lot – November 18, 2019 After Distressed Redwood Tree Removal Facing Northwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 31
Main Parking Lot Exit Driveway at Descanso Gardens - November 13, 2018 Facing Northwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 32
Picnic Area Between Main Parking Lot and Auxiliary Parking Lot - November 13, 2018
Facing North-Northwest

PHOTO 33
Picnic Area and View of Rose Garden - November 13, 2018 Facing Northwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 34
Picnic Area and View of Rose Garden - November 13, 2018 Facing Southwest

PHOTO 35
Picnic Area and Winery Canyon Channel Between Main Parking Lot and Auxiliary Parking Lot - November 13, 2018 Facing South-Southwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 36
Winery Canyon Channel From Bridge Between Picnic Area and Main Parking Lot - November 13, 2018 Facing South

PHOTO 37
SCE Utility Corridor Between Main Parking Lot and Auxiliary Parking Lot - November 13, 2018 Facing North-Northeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 38
Southeastern Corner of Auxiliary Parking Lot - November 13, 2018 Facing South Towards Rose Garden

PHOTO 39
Southeastern Corner of Auxiliary Parking Lot - November 3, 2018 Facing West Towards Service Vehicles and Storage

FIGURE 2.1-6
Existing Visual Character

PHOTO 40
Auxiliary Parking Lot - November 18, 2018 Facing Northwest

PHOTO 41
Western Side of Auxiliary Parking Lot - November 13, 2018 Facing North Towards Exit-Only Driveway

FIGURE 2.1-6
Existing Visual Character

PHOTO 42
Auxiliary Parking Lot - November 13, 2018 Facing South-Southeast Towards SCE Utility Corridor and Southern Ridgeline of Master Plan Area

PHOTO 43
Wedding Guest Entrance Gate to Rose Garden from Auxiliary Parking Lot - November 13, 2018 Facing Southwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 44
Southern Driveway of Auxiliary Parking Lot - November 13, 2018 Facing East

FIGURE 2.1-6
Existing Visual Character

PHOTO 45
Bridal Prep Room and Wedding Gate to Rose Garden from Auxiliary Parking Lot - November 13, 2018 Facing South-Southwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 46
Southwestern Portion of Auxiliary Parking Lot Near Purple Bridal Prep Room - November 13, 2018 Facing Northeast

PHOTO 47
Storage Area in Southern Portion of Auxiliary Parking Lot - November 13, 2018 Facing Southwest Towards Rose Garden

FIGURE 2.1-6
Existing Visual Character

PHOTO 48
Northern Fence of Rose Garden from Auxiliary Parking Lot - November 13, 2018
Facing South

FIGURE 2.1-6
Existing Visual Character

PHOTO 49
Northern Portion of Auxiliary Parking Lot - May 10, 2018 Facing North Towards West Coast Arborists Crew

PHOTO 50
Visitor Center Entrance - November 13, 2018 Facing South-Southwest from Main Parking Lot

FIGURE 2.1-6
Existing Visual Character

PHOTO 51
Southwestern Corner of Entrance Courtyard - November 8, 2018 Facing North-Northwest Towards Gift Shop and Visitor Center

PHOTO 52
Southwestern Corner of Entrance Courtyard - December 24, 2018 Facing South Towards Fence and Winery Canyon Channel

FIGURE 2.1-6
Existing Visual Character

PHOTO 53
Entrance Courtyard - November 8, 2018 Ikebana Display Facing Southeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 54
Entrance Courtyard – November 18, 2019 Facing East Towards Van de Kamp Hall

FIGURE 2.1-6
Existing Visual Character

PHOTO 55
Entrance Courtyard - November 13, 2018 Decorative Lighting Facing Southeast Towards Van de Kamp Hall

FIGURE 2.1-6
Existing Visual Character

PHOTO 56
Visitor Center Entrance - November 13, 2018 Facing South-Southwest from Main Parking Lot

PHOTO 57
Descanso Trail Switchbacks - November 25, 2018 Facing Southwest Towards Parking Lots

FIGURE 2.1-6
Existing Visual Character

PHOTO 58
Descanso Trail - November 25, 2018 Facing Southwest Towards Descanso Gardens

FIGURE 2.1-6
Existing Visual Character

PHOTO 59
Descanso Trail - November 25, 2018 Facing South

FIGURE 2.1-6
Existing Visual Character

PHOTO 60
Descanso Trail - November 25, 2018 Facing East

FIGURE 2.1-6
Existing Visual Character

PHOTO 61
Descanso Trail - November 25, 2018 Facing East Towards Descanso Gardens

FIGURE 2.1-6
Existing Visual Character

PHOTO 62
Descanso Trail - November 25, 2018 Facing East Towards Descanso Gardens

FIGURE 2.1-6
Existing Visual Character

PHOTO 63
Descanso Trail - November 25, 2018 Facing East Towards Descanso Gardens

FIGURE 2.1-6
Existing Visual Character

PHOTO 64
Descanso Trail - November 25, 2018 Facing East Towards Descanso Gardens

FIGURE 2.1-6
Existing Visual Character

PHOTO 65
Descanso Trail - November 25, 2018 Facing East Towards Descanso Gardens

FIGURE 2.1-6
Existing Visual Character

PHOTO 66
Descanso Trail - November 25, 2018 Facing Northeast Towards Descanso Gardens

FIGURE 2.1-6
Existing Visual Character

PHOTO 67
Fire Road Near Descanso Trail - November 20, 2018
Facing Northeast Towards Oak Woodland at Descanso Gardens

FIGURE 2.1-6
Existing Visual Character

PHOTO 68
Descanso Trail - November 25, 2018 Facing Northeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 69
Descanso Trail - November 25, 2018 Facing Northwest

FIGURE 2.1-6
Existing Visual Character

PHOTO 70
Descanso Trail - November 25, 2018 Facing Northeast

FIGURE 2.1-6
Existing Visual Character

PHOTO 71
Descanso Trail - November 25, 2018 Facing East Towards SCE Electrical Utility Corridor

FIGURE 2.1-6
Existing Visual Character

PHOTO 72
Descanso Trail at Forest Hill Fire Road Trail - November 25, 2018 Facing North Towards Large Water Tank and SCE Transmission Towers

FIGURE 2.1-6
Existing Visual Character

PHOTO 73
Forest Hill Fire Road Trail - November 25, 2018 Facing North Towards Descanso Gardens Main Parking Lot

FIGURE 2.1-6
Existing Visual Character

PHOTO 74
Forest Hill Fire Road Trail - November 25, 2018 Facing North Towards SCE Electrical Utility Corridor and San Gabriel Mountains

FIGURE 2.1-6
Existing Visual Character

PHOTO 75
Forest Hill Fire Road Trail - November 25, 2018 Facing Northwest Towards SCE Electrical Utility Corridor and San Gabriel Mountains

FIGURE 2.1-6
Existing Visual Character

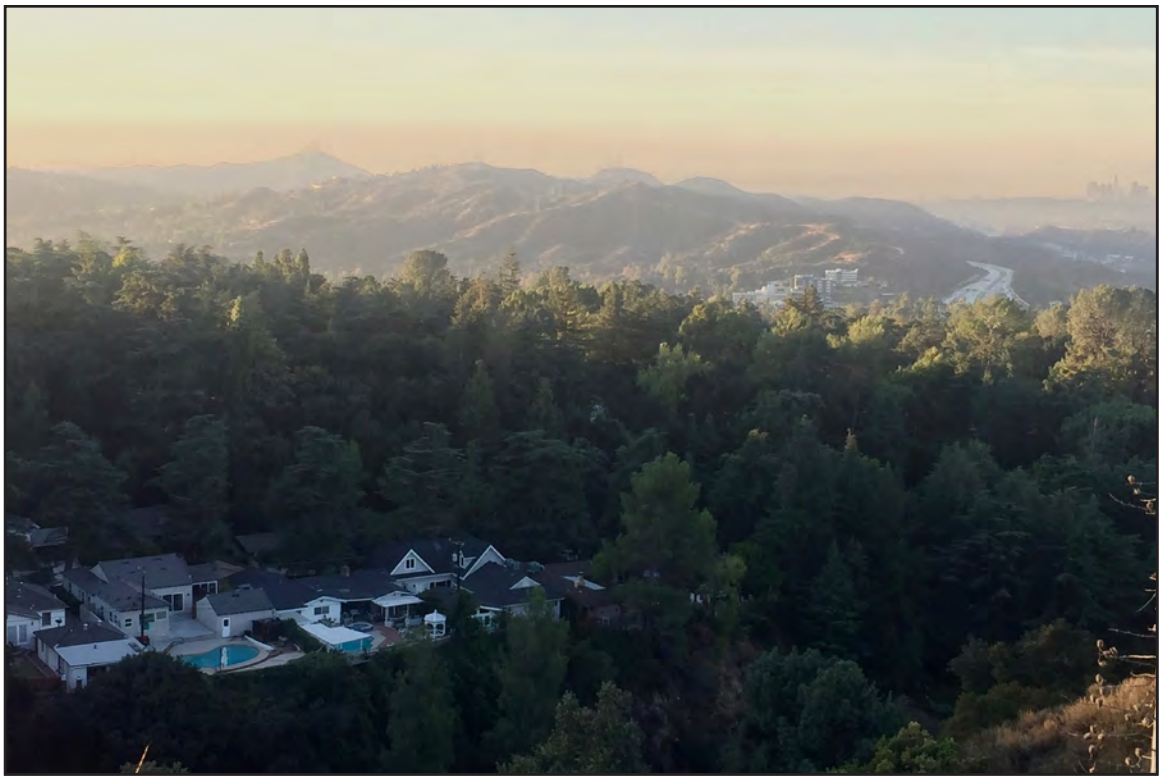


PHOTO 76
Earl Canyon Motorway - October 28, 2019 Facing South Towards
Verdugo Hills Hospital and Descanso Gardens - Photo by Doug Spitznagel

FIGURE 2.1-6
Existing Visual Character

Existing conditions at Descanso Gardens include temporary construction activities as the membrane bioreactor (MBR) is installed in the southeastern portion of the Main Parking Lot to irrigate the approximately 1.5-acre front-entrance garden along Descanso Drive with recycled irrigation water (see Figure 2.1-6).[26] Although planted redwood trees once bordered both the northern and southern sides of the Main Parking Lot and the planters near the pedestrian crosswalk leading from parking stalls to the entrance courtyard, recent drought and extreme heat days have resulted in sickness and mortality of these coastal trees. The redwood trees in the parking lot planters near the pedestrian crosswalk have been recently replaced with cypress trees that are more adapted to an inland climate. For approximately 5 years, the front drive entry along the northern edge of the Master Plan Area has been landscaped with a nonirrigated, low-maintenance entry garden between coast live oak trees along Descanso Drive and the redwood trees along the northern edge of the Main Parking Lot. On November 14, 2019, the distressed redwoods on the front drive entry that did not survive the 100+ degree Fahrenheit heat in the summer of 2018 were removed because they constituted a fire hazard. Between the end of January 2020 and early February 2020, the removed redwood trees will be replaced with a diverse number of large shade tree species that are also found within the gardens. The November 16, 2019, site photographs in Figure 2.1-6 show the front drive entry after the removal of the redwoods. Between November 17 and 22, 2019, the understory vegetation of the entry garden, characterized by nonirrigated, drought-stressed streetscape landscaping, was cleared to install a new water system using recycled irrigation water. The existing oak trees along Descanso Drive were retained and would remain in place, along with many of the other trees, as part of the redesigned entry garden. The November 23, 2019, site photographs show the front drive entry after the removal of the understory vegetation (see Figure 2.1-6).

The proposed project would maintain the existing visual quality of the entrance complex by retaining the 10 existing redwood trees along the southern border of the Main Parking Lot, the exteriors of the existing buildings in the entrance complex, and the water feature along the southern side of the entry courtyard and Winery Canyon Channel. An additional structure in the courtyard near the water feature would more fully enclose the courtyard, and a trellis over the ticketed entrance point would distinguish the publicly accessible area from the ticketed entry area. The reconfiguration of the staff parking area would increase the visual separation between the public and service areas with a landscaped buffer that also serves as a pedestrian path. The additional landscape buffer between the Rose Garden (River of Roses) and the Auxiliary Parking Lot (Backstage) would emphasize the garden setting more than the existing wooden fence behind maintenance vehicle parking and storage sheds, in support of the parking lot's proposed use as a separate entrance for large groups.

Descanso Gardens is characterized by its specialized botanical collections and unique landscape under an oak canopy that visually connects the Master Plan Area to the larger canopy of the Tree City USA of LCF. The oak canopy is first visible to the public from a canopy of coast live oak trees along both sides of Descanso Drive south of Verdugo Boulevard (see Figure 2.1-6). Farther into the property, oak trees border the eastern and western sides of the Main Parking Lot, providing shade over an existing picnic area northeast of the Rose Garden, and inhabit the majority of the sloped southeastern portion of the gated entry developed portion of Descanso Gardens, with additional oak trees along the northwestern fence of the Rose Garden and west of the Lake in the Oak Woodland (see Figure 1.8.2-3, *Existing Coast Live Oak Trees*). Deciduous trees scattered in the northern and western portions of the developed gardens provide seasonal canopy color variation that is visible from the Descanso Trail, Descanso Drive, and trails along the southern aspect of the San Gabriel Mountains facing Descanso Gardens. The proposed project would retain the existing oaks in the Master Plan Area and proposes restoration of the oak woodland that would improve the health of the oak canopy that is so characteristic of public views of the Master Plan Area and Flintridge neighborhood immediately north and northeast of the Master Plan Area. No direct removal of oak trees is anticipated. Direct impacts to oaks could

[26] Cardine, Sara. December 11, 2019. New "Plant" at Descanso Will Turn Sewage into Reclaimed Irrigation Water. La Cañada Valley Sun. https://www.latimes.com/socal/la-canada-valley-sun/news/story/2019-12-11/descansos-new-plant-turns-sewage-into-reclaimed-irrigation-water

occur during the construction of the proposed widened service road in southeast corner of the Master Plan Area. Indirect impacts could result from construction of the Canopy Walk in areas where it is not possible to avoid activities within the dripline of oak trees. However, the Master Plan proposes to restore the existing woodlands within the developed garden by removing, and transplanting elsewhere, existing camellias that are too close to oak root zones and replacing them with species more compatible with the native oak understory. This would encourage the long-term health of the oak woodland ecosystem and encourage the establishment of oak seedlings on either side of the drip line of the oaks. Proposed projects in the Master Plan are conceptual and would be designed to avoid the removal or disturbance of any protected oak tree. The Master Plan would seek to ensure the continued protection and stewardship of these woodlands. Impacts to visual character or quality as a result of the accidental loss of oak canopy would be less than significant because public vantage points of these oak trees are at such a distance that the loss of a few trees would not substantially degrade the visual quality of public views. Furthermore, with required oak tree replacement in accordance with Public Resources Code 21083.4 and County Municipal Code Sections 22.56.2050–22.56.2260 (the County Oak Tree Ordinance), as well as implementation of Mitigation Measure BIO-6, impacts to oak woodlands would be less than significant (please see Section 2.4, *Biological Resources*, for more details regarding protected oak trees).

Architectural features and front signage in the Master Plan Area that are visible from publicly accessible vantage points are predominantly brown painted wood and brick, creating an overall craftsman-style reminiscent semi-rural aesthetic. There are three signs along Descanso Drive: one wooden entrance sign near the entry driveway and two small "Exit Only" signs along the exit driveway. Fences in the Master Plan Area vary in style, from painted brown wooden slats to wrought iron fencing, chain-link fencing, brown wooden picket fencing, and brick walls. Black overhead lampposts in the parking lot each contain two opposite rectangular lanterns that are shielded downward. SCE's electrical transmission corridor, which extends from the foothills of the San Gabriel Mountains south through the City of LCF and the Master Plan Area into the San Rafael Hills in the adjacent City of Glendale, is visible high above the tree canopy in the City of LCF and the Master Plan Area. Two parallel sets of SCE electrical transmission lines are clearly visible yet easily ignored from a pedestrian stroll because of their contrasting scale towering above the tree canopy. The transmission towers for the eastern set of SCE electrical transmission lines is shorter and wider than the towers for the western set, characterized by a narrower painted steel lattice structure pylons. The transmission towers for the western set of SCE electrical transmission lines is characterized by two matte beige-painted tubular poles with three cross arms.

From public views, the proposed project would serve to benefit the community of LCF's semirural character amid natural beauty of the area's open spaces, trails, trees, parks, wildlife, and stunning mountain views by redesigning the recently cleared entry streetscape along Descanso Drive with an immersive planting area, pedestrian entry, entry meadow, and DG area with a water bottle station for cyclist groups that utilize the public bike lane on Descanso Drive adjacent to the Master Plan Area. The 10 existing coast live oak trees in the Descanso Drive right-of-way would be retained (see Figure 2.1-6 and Figure 1.10.2-5). Additionally, the redesign of the Main Parking Lot as the Arrival Grassland would increase the public view of green landscaping space from Descanso Drive by reorienting the existing north-south parking stalls in a northwest-southeast direction with trees and grasses.

The proposed project would retain its visual character and existing land use as a botanical garden. As stated in the Project Description, the Master Plan Area has Public/Semi-Public and Open Space zoning designations (see Figure 1.7-1, *Zoning Designations*). The proposed project would be consistent with the County's Goal C/NR 13 and policies regarding the protection of scenic resources. There are no County-designated significant ridgelines, scenic viewsheds, or scenic highways in the San Rafael Hills or Master Plan Area.[27] According to

[27] County of Los Angeles Department of Regional Planning. 2014. Figure 9-8: Hillside Management Areas. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-8_hillside_management_areas.pdf

Figure 9.8, *Hillside Management Areas and Ridgeline Management Map*, of the County General Plan, the Master Plan Area contains areas with over 25 percent slope and over 50 percent slope. Master Plan projects in steeper areas would have a limited footprint affecting the slopes because they would be comprised of predominantly trails (such as the Wilds Loop), oak woodland restoration, the Elevated Canopy Walk, and widening of the existing service road to facilitate fire truck access. The nearest County-designated significant ridgeline to the Master Plan Area is located approximately 2.8 miles northeast in the San Gabriel Mountains, in the unincorporated community of Altadena at an elevation range of over 1,775 feet above MSL. As shown in Figure 9.7, *Scenic Highways*, of the County General Plan and Caltrans' scenic highways program website, the nearest designated scenic highway is the portion of Angeles Crest Highway (SR-2) starting from 2.7 miles north of I-210, located north of the City of LCF approximately 2.3 miles northeast of the Master Plan Area.

The proposed project would not result in impacts to aesthetics in relation to the substantial degradation of the existing visual character of the site and its surroundings. The Master Plan Area is designated in the City's General Plan as public Open Space.[28] The temporary construction of individual projects may adversely alter the existing visual quality of the site and its surroundings. However, construction-related activities would be temporary, and the long-term operational activities associated with the proposed project are designed to enhance the experience and aesthetic character of the site.

Descanso Gardens is a seasonal horticultural facility, characterized by its specialized botanic collections, historic significance, and natural aesthetic attributes. The intent of the proposed project is to improve and protect the current resources, including the visual character and quality of the site and its surroundings, for the next 15 years. Therefore, the proposed project would result in less than significant impacts to aesthetics regarding degradation of the existing visual character or quality of the site and its surroundings because of height, bulk, pattern, scale, character, or other features as a result of the proposed project, or other features or conflicts with applicable zoning and other regulations governing scenic quality. No further analysis is warranted.

e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. The proposed project would not be expected to result in significant effects regarding light trespass or light pollution (County General Plan Policy C/NR 13.3) because the Wilds Loop would not include nighttime lighting and the proposed elements that would add nighttime lighting to the Master Plan Area would be located in the developed portions of the gardens such as the Japanese Garden, which are bordered by a dense canopy of trees. The new buildings proposed under the proposed project would only be one story tall, and new landscaping would not be expected to create a new source of substantial shadows because the low point in the Master Plan Area is towards the eastern center of the property, well below the ridgeline where views in the area could be obstructed. The proposed project would not involve installation of any towers or features tall enough to extend above the ridgelines of the Master Plan Area. The proposed project would not be expected to increase light trespass as a result of additional nighttime lights along the main Gardens Loop path because it would also include the installation of more trees in the parking lots than the existing condition and retain the existing oak tree canopy between the new light sources and public view points. Existing nighttime sky glow in the general area is high due to its urban context. The Descanso Trail, which was dedicated in 2011, is a local City of LCF trail. Unlike County trails, City of LCF trails are open at night, with trail etiquette specifying that trail users should have white lights visible from 250 feet (hikers) to 500 feet (bicyclists) to the

[28] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

front and a red or amber light visible from 250 to 500 feet to the rear.[29] Descanso Gardens contains existing sources of nighttime lighting in support of evening events (e.g., weddings) in both parking lots, the entrance complex, Van de Kamp Hall, the Boddy House, the Rose Garden Pavilion (with a few lanterns spaced throughout the Rose Garden), and the Center Circle and Promenade. Temporary nighttime lighting enhancements are installed for special evening events, including the annual winter Enchanted: Forest of Light event. The proposed project would provide permanent infrastructure for these events to reduce the need for rentals powered by generators. It is not anticipated that the proposed project would dramatically increase light levels as a result of the switch from temporary installations to permanent infrastructure.

In Los Angeles County, the major sources of nighttime sky glow are cities, transportation corridors, and established communities. The Master Plan Area is located within the incorporated City of LCF, near the northern edge of the urbanized Los Angeles basin, with a high level of existing nighttime sky glow (Figure 2.1-7, *Existing Nighttime Light Levels*). Site visits were conducted to characterize existing conditions within the Master Plan Area and from Descanso Drive for five evenings: December 9, 2018, November 23, 2019, and December 8 and 27, 2019 at the annual *Enchanted: Forest of Light* winter event; and February 9, 2019 at the *Night Garden: Campfire Stories* event (Figure 2.1-8, *Photographs of Descanso Gardens at Night*). Although the area's sky glow is visible from Descanso Drive over the southern and western ridgelines, the dense tree canopy in the neighborhood, along Descanso Drive, and within Descanso Gardens reduce the local nighttime lighting level to a low or moderate level. Car headlights and lights on private residential properties are existing sources of nighttime light in the vicinity of the Master Plan Area. There are no streetlights on Descanso Drive or other residential streets; the I-210 freeway and commercial streets such as Verdugo Boulevard and Foothill Boulevard are well lit with streetlights at night.

[29] La Cañada Flintridge Trails Council. Accessed November 12, 2019. Trails Etiquette. https://www.lcftrails.org/trails-etiquette/

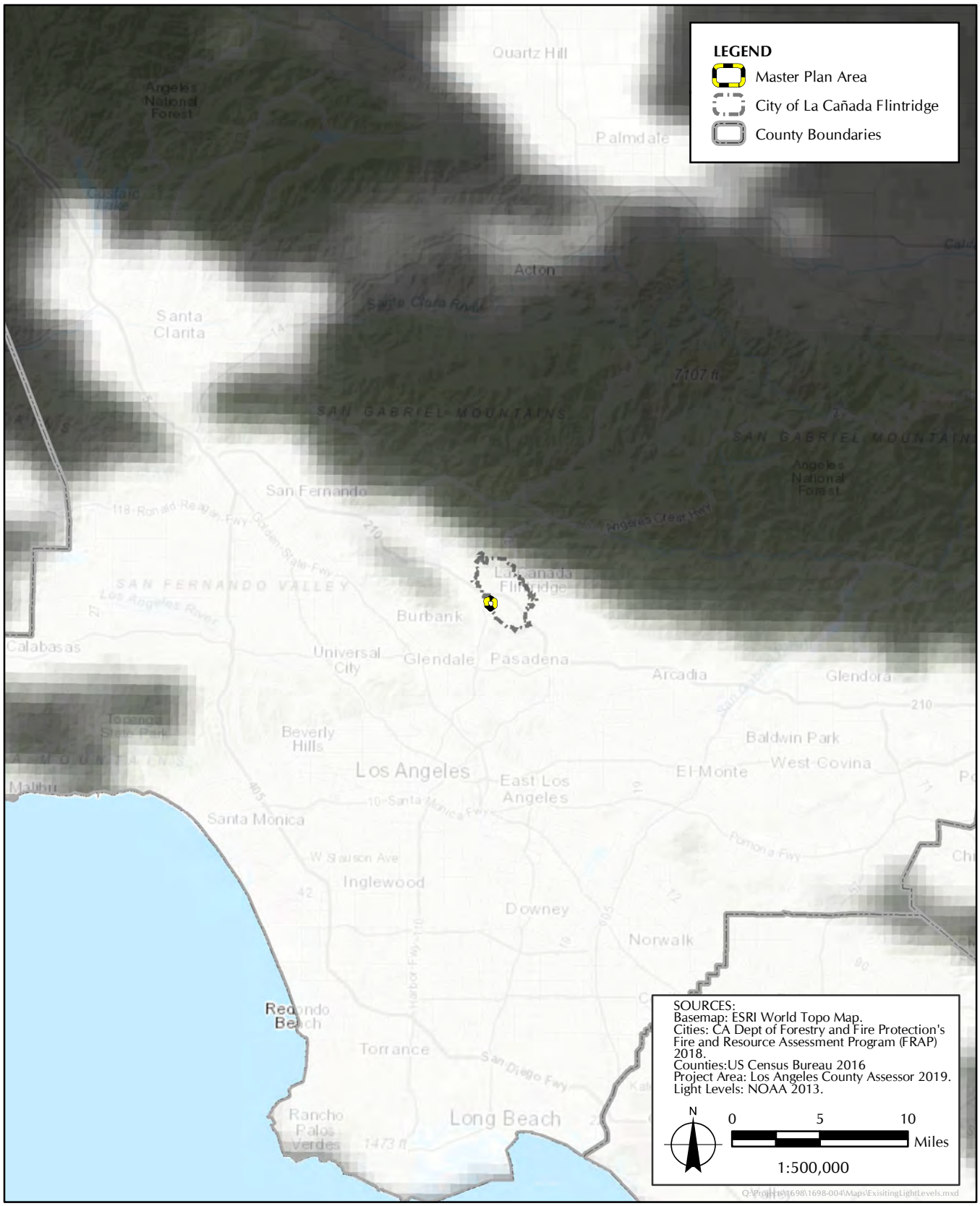


FIGURE 2.1-7

Existing Nighttime Light Levels

Typical Nighttime Event

PHOTO A1
February 9, 2019: Facing South-Southeast

PHOTO A2
February 9, 2019: Facing North

Enchanted: Forest of Light

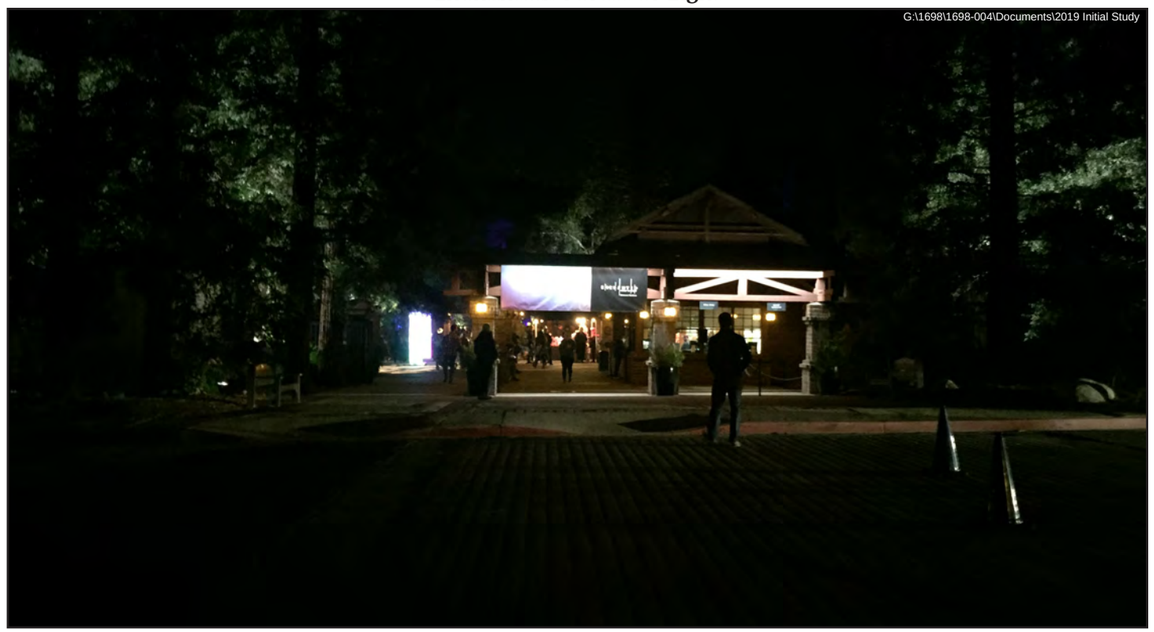


PHOTO B1
December 9, 2018: Pedestrian Crosswalk Facing South Towards Entrance

PHOTO B2
November 23, 2019: Main Parking Lot Facing South-Southwest

FIGURE 2.1-8
Photographs of Descanso Gardens at Night - Main Parking Lot

Enchanted: Forest of Light

PHOTO B3
December 9, 2018: Descanso Drive Facing South Toward Main Parking Lot

FIGURE 2.1-8
Photographs of Descanso Gardens at Night - Main Parking Lot

PHOTO B4
November 23, 2019: Descanso Drive Facing South Toward Main Parking Lot

FIGURE 2.1-8
Photographs of Descanso Gardens at Night - Main Parking Lot

Typical Nighttime Event

PHOTO C1
February 9, 2019: Facing Northeast Towards Magnolia Lawn

PHOTO C2
February 9, 2019: Facing South

Enchanted: Forest of Light

PHOTO D1
December 9, 2018: From Northwest

PHOTO D2
December 9, 2018: Facing Southwest Towards Promenade

FIGURE 2.1-8
Photographs of Descanso Gardens at Night - Center Circle

Typical Nighttime Event

PHOTO E1
February 9, 2019: Facing West

PHOTO E2
February 9, 2019: Facing West

Enchanted: Forest of Light

PHOTO F1
December 9, 2018: Facing Southwest

PHOTO F2
December 9, 2018: Facing Southwest

FIGURE 2.1-8
Photographs of Descanso Gardens at Night - Promenade

Typical Nighttime Event

PHOTO G1
Februray 9, 2019: Pavilion from Western Side

PHOTO G2
February 9, 2019: Pavilion from Southwest

Enchanted: Forest of Light

PHOTO H1
December 9, 2018: Western Side, Facing South Towards Promenade

PHOTO H2
December 9, 2018: Western Edge, Facing Southeast

FIGURE 2.1-8
Photographs of Descanso Gardens at Night - Rose Garden

Typical Nighttime Event

PHOTO I1
February 9, 2019: From North

Enchanted: Forest of Light

PHOTO J1
December 9, 2018: From North

PHOTO J2
December 9, 2018: From Northeast

FIGURE 2.1-8
Photographs of Descanso Gardens at Night - Lakeside Lookout

PHOTO K1
November 23, 2019: Security Lighting in Auxiliary Parking Lot Facing South Towards Rose Gardens

FIGURE 2.1-8
Photographs of Descanso Gardens at Night – Auxiliary Parking Lot

PHOTO K2
November 23, 2019: Auxiliary Parking Lot

FIGURE 2.1-8
Photographs of Descanso Gardens at Night – Auxiliary Parking Lot

Within the Master Plan Area itself, overhead lamps in the Main Parking Lot and Auxiliary Parking Lot provide the main sources of nighttime light (see Figure 2.1-8). Nighttime lighting is also permanently installed at the entrance courtyard, Van de Kamp Hall, Center Circle, Promenade, Rose Garden (especially the Rose Garden Pavilion), Lakeside Lookout, in the Camellia Forest over the paved service road, and the Boddy House complex. These lights support evening events such as weddings at the Van de Kamp Hall, Boddy House complex, and Rose Garden. These lights have a warm, yellow color, except for the small white lights along the path in the Center Circle and along the Promenade. The lights in the parking lots are shielded downward, and the yellow lights in the entrance courtyard, Van de Kamp Hall, Rose Garden, Lakeside Lookout, and Camellia Forest are oriented down and to the side in order to provide more ambient lighting. During seasonal evening events, temporary lighting is installed to guide attendees along paths. During the winter Enchanted: Forest of Light event, nighttime levels within the gardens increase from November to early January with several colored lights highlighting the gardens and sculptures within the gardens, with white spotlights to highlight the heritage oak trees. Nighttime light levels are fairly low from Descanso Drive and the surrounding neighborhood during these events because of the dense tree canopy and intervening topography. As the proposed project would not dramatically affect the tree canopy in the Master Plan Area, changes to nighttime light levels in the Master Plan Area viewed from public locations would be minimal compared to the existing programming. The 10 coast live oak trees in the Descanso Drive right-of-way would remain as-is, and additional landscaping would replace the streetscape to continue to visually shield the parking lot from Descanso Drive. The proposed project would not expand nighttime lighting at the Boddy House complex near the residences adjacent to the eastern edge of the Master Plan Area. One location that would have additional nighttime lighting would be the Japanese Garden; but as this area is located within the edge of the Camellia Forest south of Van de Kamp Hall and west of the Ancient Forest, light trespass is not anticipated outside the Master Plan Area. A new berm on the eastern side of the Main Parking Lot / Arrival Garden would help shield some of the parking lot lighting from residences to the east of the Master Plan Area. Any light attributed to the proposed project would be minimal and consistent with the current levels of light and glare in the existing condition.

Sources of daytime glare in the Master Plan Area and vicinity include cars, heat waves reflecting off the pavement of the parking lots on hot days, and reflective water bodies such as the Lake and ponds in the gardens. The new buildings would be developed near the lower elevations of the Master Plan Area and situated in the gardens with trees and shrubs near the buildings that would help minimize the potential effects of glare from reflective building surfaces such as glass windows on views in the area. Additionally, the reorientation of the parking lot stalls and landscaping between stalls would reduce glare from cars and the parking lot pavement due to the increase in trees in the parking lots. Therefore, there would be less than significant impacts to aesthetics related to creation of substantial shadows or a new source of light or glare. No further analysis is warranted.

2.2 AGRICULTURE / FOREST

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

This analysis is undertaken to determine if the proposed project may have a significant impact on agriculture and forestry resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. Agriculture and forestry resources in the project study area were evaluated with regard to the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP),[1] County General Plan 2035,[2] and City of LCF General Plan.

The State CEQA Guidelines (Section 21060.1(a), PRC 21000-21177) define agricultural land to mean "prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture (USDA) land inventory and monitoring criteria, as modified for California," and is herein collectively referred to as "Farmland."

REGULATORY FRAMEWORK

Federal

There are no federal policies and regulations that supersede state and local policies and regulations for agricultural and forestry resources within the Master Plan Area.

State

Farmland Mapping and Monitoring Program

The FMMP was established in 1982 to assess the location, quality, and quantity of agricultural lands in the State of California and conversion of these lands over time. The goal of the FMMP is to provide consistent and impartial data to decision makers for use in planning for the future of California's agricultural land resources. The California Department of Conservation (CDC) applies the Natural Resources Conservation Service (NRCS) soil classifications to identify agricultural lands, and these agricultural designations are used in planning for the present and future of California's agricultural land resources. The CDC has a minimum mapping unit of 10 acres, with parcels smaller than 10 acres being absorbed into the surrounding classifications. The list below provides a comprehensive description of all the categories mapped by the CDC:

- Prime Farmland. Farmland that has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

[1] California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program. Accessed September 20, 2019. https://www.conservation.ca.gov/dlrp/fmmp.

[2] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 9: Conservation and Natural Resources Element. http://planning.lacounty.gov/generalplan/generalplan

- Farmland of Statewide Importance. Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- Unique Farmland. Farmland of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.

- Farmland of Local Importance. Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

- Grazing Land. Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres.

- Urban and Built-up Land. Land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

- Other Land. Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres. Vacant and non-agricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

California Land Conservation Act (Williamson Act)

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is the State's primary program for the conservation of private land in agricultural and open space. The Williamson Act (California Government Code Section 51200–51297.4) enables local governments to enter into contracts with private landowners in order to restrict specific parcels of land to agricultural or related open space use in return for reduced property tax assessments.

Farmland Security Zone Act

The Farmland Security Zone Act is similar to the Williamson Act and was passed by the California State Legislature in 1999 to ensure that long-term farmland preservation is part of public policy. Farmland Security Zone Act contracts are sometimes referred to as "Super Williamson Act Contracts." Under the provisions of this act, a landowner already under a Williamson Act contract can apply for Farmland Security Zone status by entering into a contract with the county. Farmland Security Zone classification automatically renews each year for an additional 20 years. In return for a further 35 percent reduction in the taxable value of land and growing improvements (in addition to Williamson Act tax benefits), the owner of the property promises not to develop the property into non-agricultural uses.

PRC Section 12220(g)

"Forest land" is defined in PRC Section 12220(g) as land that can support 10 percent native tree cover of any species including hardwoods, under natural conditions, and that allows for management of one of more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

PRC Section 4526

"Timberland" is defined in PRC Section 4526 as land other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products.

California Government Code Section 51104(g)

A "Timberland Production Zone" (TPZ) is defined in Government Code § 51104 (g) as an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses.

Local

County General Plan 2035

The County General Plan 2035 follows five guiding principles to emphasize the concept of sustainability, one of which is to promote excellence in environmental resources management by carefully managing the County's natural resources, including agricultural land and forests, in an integrated way that is both feasible and sustainable.

The County General Plan 2035 views agricultural land as an important resource in California and in Los Angeles County. Much of the agricultural land in Los Angeles County has been developed. Therefore, agricultural land is viewed as a non-renewable resource that needs to be protected from conversion and encroachment of incompatible uses. The County General Plan 2035 defines Agricultural Resource Areas (ARAs) as farmland identified by the California Department of Conservation including Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland. In addition, the ARAs include lands that received permits from the Los Angeles County Agricultural Commissioner/Weights and Measures. The County encourages the preservation and sustainable utilization of agricultural land, agricultural activities, and compatible uses within these areas. The ARAs exclude the following: Significant Ecological Areas; approved specific plans; approved large-scale renewable energy facilities; lands outside of the Santa Clarita Valley and Antelope Valley, where farming is concentrated; and lands that are designated Public and Semi-Public.

Goal Conservation/Natural Resources 8: Productive farmland that is protected for local food production, open space, public health, and the local economy.

- Policy C/NR 8.1: Protect ARAs, and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, from encroaching development and discourage incompatible adjacent land uses.
- Policy C/NR 8.2: Discourage land uses in ARAs, and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, that are incompatible with agricultural activities.

- Policy C/NR 8.3: Encourage agricultural activities within ARAs.

The County is responsible for the land use regulation of the nearly 40,000 acres of privately owned in-holdings within the National Forest boundaries. Much of this land is in remote locations, subject to a high degree of natural hazards, and lacks adequate access to paved roads and water supply. The County does not encourage development in the national forests, and regulation is coordinated closely with the U.S. Forest Service.

Goal C/NR 3: Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and Significant Ecological Areas.

- Policy C/NR 3.4: Conserve and sustainably manage forests and woodlands.
- Policy C/NR 3.5: Ensure compatibility of development in the National Forests in conjunction with the U.S. Forest Service Land and Resource Management Plan.

City of LCF General Plan

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The City of LCF General Plan has no mention of agricultural resources, and therefore it is not considered an important resource to the City of LCF. The City of LCF General Plan outlines Open Space and Recreation Element (OSRE) goals and objectives, some of which relate to forest land. However, none of the OSRE goals and objectives are related to forestry resources.

IMPACT ANALYSIS

Would the project:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

The proposed project would result in no impacts related to converting Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the FMMP, to non-agricultural use. There are no lands mapped in the FMMP as Prime Farmland, Unique Farmland, or Farmlands of Statewide Importance within or adjacent to the Master Plan Area. The CDC, Division of Land Resource Protection, FMMP allows use of the California Important Farmland Finder, which serves as a current inventory of agricultural land resources using the most recent maps and data from 2016. Much of the County, including the Master Plan Area, falls outside of the soil survey boundary and was not mapped by the FMMP. The available maps prior to 2016 were also not surveyed in the Master Plan Area. Therefore, the

Master Plan Area is not categorized as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance according to FMMP.[3,4] No further analysis is warranted.

b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to agricultural resources as a result of a conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract. The Conservation and Natural Resources Element of the County General Plan 2035 characterizes agricultural land as an important, nonrenewable resource that needs to be protected from conversion and encroachment of incompatible uses, and therefore encourages the preservation of agricultural land and activities. The County General Plan 2035 defines an ARA as farmland identified by the CDC and that has received permits from the County Agricultural Commissioner/Weights and Measures. The ARA Policy Map within County General Plan 2035 identifies where the preservation of agricultural land is promoted and encouraged. The Master Plan Area and immediately adjacent lands are not designated as an ARA by the County General Plan.[5,6]

The Land Use Element of the City of LCF General Plan designates the Master Plan Area as Open Space. Open Space is defined as public and private properties in permanent open space that contribute to the preservation of natural resources, habitat protection, protection and management of natural resources; protection from and management of natural hazards; and hillside protection. There is no specific agricultural zoning, and the City of LCF General Plan does not mention agriculture or farming in the City of LCF, except to say that zero percent of the population is employed by farming, fishing, or forestry.[7]

The Williamson Act Program enters local governments and private landowners in a contract to restrict agricultural and open space lands to farming and ranching uses through the CDC, Division of Land Resource Protection. However, no agricultural or open space lands are used for farming or ranching in the Master Plan Area. There is no farmland located in or immediately adjacent to the Master Plan Area that is in a Williamson Act Contract. Therefore, there would be no impacts regarding conflict with existing zoning for agricultural use, with a designated ARA or with a Williamson Act contract. No further analysis is warranted.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to agricultural resources in relation to conflict with existing zoning, for cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. "Forest land" is defined in Public Resources Code § 12220 (g) as land that can support 10 percent native tree cover

[3] California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program. Accessed September 20, 2019. Important Farmland Finder. 2016 Data. https://maps.conservation.ca.gov/DLRP/CIFF/

[4] California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program. Accessed September 20, 2019. Los Angeles County Farmland Data. 2006-2016 Data. https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx

[5] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 9: Conservation and Natural Resources Element. http://planning.lacounty.gov/generalplan/generalplan

[6] County of Los Angeles Department of Regional Planning. May 2014. Figure 9.5: Agricultural Resource Areas Policy Map.

[7] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

of any species including hardwoods, under natural conditions, and that allows for management of one of more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.[8] Under this definition, the Master Plan Area can be considered existing zoning for forest land. However, the proposed project would not conflict with this existing zoning or cause rezoning of forest land, as it would not alter the Master Plan Area in a way that it should no longer be considered forest land under this definition. Furthermore, none of the trees at Descanso Gardens are harvested as a forestry resource.

"Timberland" is defined in PRC Section 4526 as land other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products.[9] None of the trees at Descanso Gardens, which are primarily protected coast live oak trees, are harvested as a timberland or forestry resource. Although the Master Plan Area contains a nursery for plant propagation that would be replaced as part of the proposed project, Descanso Gardens does not propagate or harvest plants for commercial use and does not plan to obtain a permit for commercial production or nursery sales as part of the proposed project. The proposed replacement nursery would be dedicated solely for propagation and planting at Descanso Gardens, and plants sold at the gift shop would continue to be purchased from other sources. The proposed project would therefore have no conflict with existing zoning or cause rezoning of timberland.

A TPZ is defined in Government Code Section 51104 (g) as an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses.[10] By this definition, the Master Plan Area is not a TPZ because it is not devoted to and used for growing and harvesting timber.

Therefore, the proposed project would have no impacts regarding conflict with existing zoning for, or causing rezoning of, forest land, timberland, or timberland zoned Timberland Production. No further analysis is warranted.

d) Result in the loss of forest land or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒

The proposed project would have no impacts regarding the loss of forest land or conversion of forest land to non-forest use. "Forest land," as defined by PRC Section 12220 (g), is land that can support 10 percent native tree cover of any species including hardwoods, under natural conditions, and that allows for management of one of more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.[11] Under this definition, the Master Plan Area can be considered existing zoning for forest land. However, the Master Plan Area is not a forestry resource, and the proposed project would aim to preserve and enhance the features that allow the Master Plan Area to be defined as "forest land." Therefore, the proposed project would have no impacts regarding loss of forest land or conversion of forest land to non-forest use. No further analysis is warranted.

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[8] California Public Resources Code, Division 10.5 California Forest Legacy Program Act of 2007 [21200-12276], Chapter 1. General provisions [12200-12231], Article 3. Definitions § 12220 (g). Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

[9] California Public Resources Code, Division 4. Forests, Forestry and Range and Forage Lands [4001-4958], Chapter 8. Z'berg-Nejedly Forest Practice Act of 1973 [4511-4630.2], Article 2. Definitions [4521-4529.5], § 4526. Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

[10] California Government Code, Title 5. Local Agencies [50001-57550], Chapter 6.7. Timberland [51100-51155], Article 1. General Provisions [51100-51104], § 51104 (g). Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

[11] California Public Resources Code, Division 10.5 California Forest Legacy Program Act of 2007 [21200-12276], Chapter 1. General provisions [12200-12231], Article 3. Definitions § 12220 (g). Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

The proposed project would result in no impacts involving other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. Much of the County, including the Master Plan Area, falls outside of the soil survey boundary and was not mapped by the FMMP. The available maps prior to 2016 were also not surveyed in the proposed project area. Therefore, the Master Plan Area is not categorized as any designation of Farmland by the FMMP.[12,13] In addition, the City of LCF General Plan states that zero percent of the population is employed by farming, fishing, or forestry in the City of LCF.[14] As such, the proposed project would not convert any Farmland.

As stated above, the Master Plan Area can be defined as "forest land" under PRC Section 12220(g).[15] However, the proposed project goals are aligned with the definition of forest land and would not convert any forest land to non-forest use. Furthermore, none of the trees at Descanso Gardens are harvested as a forestry resource. Therefore, the proposed project would result in no impacts involving other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. No further analysis is warranted.

[12] California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program. Accessed September 20, 2019. Important Farmland Finder. 2016 Data. https://maps.conservation.ca.gov/DLRP/CIFF/

[13] California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program. Accessed September 20, 2019. Los Angeles County Farmland Data. 2006-2016 Data. https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx.

[14] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[15] California Public Resources Code, Division 10.5 California Forest Legacy Program Act of 2007 [21200-12276], Chapter 1. General provisions [12200-12231], Article 3. Definitions § 12220 (g). Accessed September 23, 2019. https://leginfo.legislature.ca.gov/faces/codes.xhtml

2.3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

This analysis is undertaken to determine if the proposed project may have a significant impact to air quality, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form.[1] Air quality impacts associated with implementation of the proposed project were evaluated with regard to state, regional, and local data and forecasts for population and housing; the County General Plan 2035;[2] the City of LCF General Plan;[3] and the South Coast Air Quality Management District (SCAQMD) air quality data and forecasts for the Master Plan Area.[4]

REGULATORY FRAMEWORK

Federal

Federal Clean Air Act

Congress passed the first major Clean Air Act (CAA) in 1970 (42 U.S. Code [USC] Sections 7401 et seq.). This Act gives the U.S. Environmental Protection Agency (EPA) broad responsibility for regulating emissions from many sources of air pollution from mobile to stationary sources. Pursuant to the CAA, the EPA is authorized to regulate air emissions from mobile sources like heavy-duty trucks, agricultural and construction equipment, locomotives, lawn and garden equipment, and marine engines; and stationary sources such as power plants, industrial plants, and other facilities. The CAA sets National Ambient Air Quality Standards (NAAQS) for the six most common air pollutants to protect public health and public welfare. These pollutants include particulate matter, ozone, carbon monoxide, sulfur oxides, nitrogen oxides, and lead.

For each pollutant, the EPA designates an area as attainment for meeting the standard or nonattainment for not meeting the standard. A maintenance designation entails an area that was previously designated as nonattainment but is currently designated as attainment. The CAA directs states to develop state implementation plans (SIPs) in order to achieve these standards.

New Source Performance Standards (NSPS), described in Section 111 of the CAA and 40 Code of Federal Regulations (CFR) Part 60, are technology-based standards that apply to specific categories of stationary sources. These standards are intended to promote use of the best air pollution control technologies, taking into account the cost of such technology and any other non-air quality, health, and environmental impact and energy requirements.

National Emission Standards for Hazardous Air Pollutants, described in Clean Air Act Section 112, 42 USC Section7412; 40 CFR Part 63, establish national emission standards to limit emissions of hazardous air pollutants (HAPs, or air pollutants identified by EPA as causing or contributing to the adverse health effects of air pollution, but for which NAAQS have not been established) from facilities in specific source categories. The NESHAPS require the use of maximum achievable control technology (MACT) for major sources of

[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387, Appendix G.

[2] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan

[3] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[4] Southern California Association of Governments. May 2019. Profile of the City of La Cañada Flintridge. http://www.scag.ca.gov/Documents/LaCanadaFlintridge.pdf.

HAPs that are not specifically regulated or exempted under Part 63. These standards are implemented at the local level with federal oversight.

New Source Review, described in Clean Air Act Sections 171–193, 42 USC Section 7501 et seq.; 40 CFR Parts 51 and 52, requires pre-construction review and permitting of new or modified major stationary sources of air pollution to allow industrial growth without interfering with the attainment and maintenance of ambient quality standards. This program is implemented at the local level with USEPA oversight.

Title V—Operating Permits Program, Clean Air Act Section 501 (Title V), 42 USC Section 7661; 40 CFR Part 70, requires the issuance of operating permits that identify all applicable federal performance, operating, monitoring, recordkeeping, and reporting requirements. Title V applies to major facilities, Phase II acid rain facilities, subject solid waste incinerator facilities, and any facility listed by USEPA as requiring a Title V permit. EPA defines a major source as a facility that emits or has the potential to emit (PTE) any criteria pollutant or hazardous air pollutant (HAP) at levels equal to or greater than the Major Source Thresholds (MST). Title V requirements are implemented at the local level through SCAQMD with federal oversight. The Title V permit is tied to the SCAQMD New Source Review regulations. In addition to this CEQA document, a parallel application will be made to the SCAQMD to obtain a Permit to Construct (PTC) and Permit to Operate (PTO).

National Ambient Air Quality Standards

The federal CAA required the EPA to establish NAAQS. The NAAQS set primary standards and secondary standards for specific air pollutants (Table 2.3-1, *National Ambient Air Quality Standards*). Primary standards define limits for the intention of protecting public health, which include sensitive populations such as asthmatics, children, and the elderly. Secondary Standards define limits to protect public welfare to include protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

TABLE 2.3-1
NATIONAL AMBIENT AIR QUALITY STANDARDS

Pollutant		Primary/Secondary	Averaging Time	Level
Carbon monoxide		Primary	8 hours	9 ppm
			1 hour	35 ppm
Lead		Primary and secondary	Rolling 3-month average	0.15 $\mu g/m^3$
Nitrogen dioxide		Primary	1 hour	100 ppb
		Primary and secondary	Annual	53 ppb
Ozone		Primary and secondary	8 hours	0.070 ppm
Particulate matter	$PM_{2.5}$	Primary	Annual	12 $\mu g/m^3$
		Secondary	Annual	15 $\mu g/m^3$
		Primary and secondary	24 hours	35 $\mu g/m^3$
	PM_{10}	Primary and secondary	24 hours	150 $\mu g/m^3$
Sulfur dioxide		Primary	1 hour	75 ppb
		Secondary	3 hours	0.5 ppm

Note: ppm = parts per million by volume; $\mu g/m^3$ = micrograms per cubic meter; ppb = parts per billion by volume.
Source: California Air Resources Board. May 4, 2016. Ambient Air Quality Standards. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf

State Implementation Plan / Air Quality Management Plans

An SIP is required by the EPA to ensure compliance with the NAAQS. States must develop a general plan to maintain air quality in areas of attainment and a specific plan to improve air quality for areas of nonattainment. SIPs are a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. The SIP verifies that the state has a

proper air quality management program that adheres to or strives to reach the most up to date emissions requirements. The 1990 amendments to the federal CAA set deadlines for attainment based on the severity of an area's air pollution problem. In adherence to CAA Section 172, states must adopt additional regulatory programs for nonattainment areas. Particularly in California, the SIP not only complies with NAAQS, but also the more stringent CAAQS.

AQMPs, developed by the air districts, are required to ensure compliance with the state and federal requirements. AQMPs contain scientific information and use analytical tools to demonstrate a pathway towards achieving attainment for the criteria air pollutants. The approval process begins when the regional air districts submit their AQMPs to the California Air Resources Board (CARB). CARB is the lead agency and responsible agency for submitting the SIP to the EPA. CARB forwards SIP revisions to the EPA for approval and publication in the *Federal Register*. The CFR Title 40, Chapter I, Part 52, Subpart F, Section 52.220, lists the items required to be included in the California SIP.

State

California Clean Air Act of 1988

The California CAA of 1988 (Chapter 1568, Statutes of 1988) requires all air pollution control districts in the state to aim to achieve and maintain state ambient air quality standards for ozone, carbon monoxide, and nitrogen dioxide by the earliest practicable date and to develop plans and regulations specifying how the districts will meet this goal. There are no planning requirements for the state PM_{10} standard. The CARB, which became part of the California Environmental Protection Agency (Cal/EPA) in 1991, is responsible for meeting state requirements of the federal CAA, administrating the California CAA, and establishing the CAAQS. The California CAA, amended in 1992, requires all AQMDs in the state to achieve and maintain the CAAQS. The CAAQS are generally stricter than national standards for the same pollutants, but there is no penalty for nonattainment. California has also established state standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles, for which there are no national standards.

California Ambient Air Quality Standards

The federal CAA permits states to adopt additional or more protective air quality standards if needed. California has set standards for certain pollutants, such as particulate matter and ozone, which are more protective of public health than respective federal standards (Table 2.3-2, *California Ambient Air Quality Standards*). California has also set standards for some pollutants that are not addressed by federal standards.

TABLE 2.3-2
CALIFORNIA AMBIENT AIR QUALITY STANDARDS

Pollutant		Averaging Time	Level
Carbon monoxide		8 hours	9 ppm
		1 hour	20 ppm
Lead		30-day average	1.5 μg/m^3
Nitrogen dioxide		1 hour	0.18 ppm
		Annual	0.03 ppm
Ozone		8 hours	0.07 ppm
		1 hour	0.09 ppm
Particulate matter	$PM_{2.5}$	Annual	12 μg/m^3
	PM_{10}	24 hours	50 μg/m^3
		Annual	20 μg/m^3
Sulfur dioxide		1 hour	0.25 ppm
		24 hours	0.04 ppm
Sulfates		24 hours	25 μg/m^3
Hydrogen sulfide		1 hour	0.03 ppm
Vinyl chloride		24 hours	0.01 ppm
Visibility Reducing Particles		Extinction coefficient of 0.23 per kilometer – visibility of 10 miles or more due to particle when relative humidity is less than 70 percent[5]	

Note: ppm = parts per million by volume; μg/m^3 = micrograms per cubic meter; ppb = parts per billion by volume.
Source: California Air Resources Board. May 4, 2016. Ambient Air Quality Standards. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf

CARB Air Quality and Land Use Handbook

In April 2005, the CARB published the Air Quality and Land Use Handbook as an informational and advisory guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. Reducing diesel particulate emissions is one of CARB's highest public health priorities and the focus of a comprehensive statewide control program that is reducing diesel PM emissions each year. This document highlights the potential health impacts associated with proximity to air pollution sources, so planners explicitly consider this issue in planning processes.[6]

Regional

2016-2040 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The RTP/SCS is a long-range transportation plan that is developed and updated by SCAG every four years. The RTP provides a vision for transportation investments throughout the region. Using growth forecasts and economic trends that project out over a 20-year period, the RTP considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address our mobility needs. The 2016-2040 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with Senate Bill (SB) 375, improve public health, and meet the NAAQS as set forth by the federal CCAA.

[5] South Coast Air Quality Management District. February 2013. Final 2012 AQMP. http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan

[6] California Air Resources Board. April 2005. Air Quality and Land Use Handbook: A Community Health Perspective. http://www.arb.ca.gov/ch/handbook.pdf

SCAQMD AQMP

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 3, 2017. The Plan is a regional and multiagency effort (SCAQMD, CARB, SCAG, and EPA). State and federal planning requirements include developing control strategies, attainment demonstrations, reasonable further progress, and maintenance plans. The 2016 AQMP incorporates the latest information and planning assumptions, including the latest growth assumptions, transportation control measures and strategies, and updated emission inventory methodologies for various source categories.[7]

The 2016 AQMP showcases integrated strategies and measures to meet the following NAAQS:

- 2008 8-hour Ozone (75 ppb) by 2031
- 2012 Annual $PM_{2.5}$ (12 $\mu g/m^3$) by 2021 (moderate) and 2025 (serious)
- 2006 24-hour $PM_{2.5}$ (35 $\mu g/m^3$) by 2019
- 1997 8-hour Ozone (80 ppb) by 2023

SCAQMD Rule 401 – Visible Emissions

A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart.

SCAQMD Rule 402 – Nuisance

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

SCAQMD Rule 1303(a) – BACT

SCAQMD policy requires Best Available Control Technology (BACT) for emissions greater than 1 lb/day.

SCAQMD Rule 1303(b)(1) – Modeling

The applicant should substantiate with modeling that the Master Plan will not cause a violation, or make significantly worse an existing violation according to Appendix A of the rule or other analysis approved by the Executive Officer or designee, of any state or national ambient air quality standards at any receptor location in the District.

SCAQMD Rule 1401 – New Source Review of Toxic Air Contaminants

This rule specifies limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index (HI) from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants.

[7] South Coast Air Quality Management District. 2016. Draft Final 2016 AQMP. http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-draft-2016-aqmp

SCAQMD Regulation XXX—Federal Operating Permit

Regulation XXX (Title V Permits) provides for the issuance of federal operating permits that contain all federally enforceable requirements for stationary sources as mandated by Title V of the Clean Air Act. Regulation XXX requires major facilities and acid rain facilities undergoing modifications to obtain an operating permit containing the federally enforceable requirements mandated by Title V of the Clean Air Act. EPA defines a major source as a facility that emits or has the potential to emit (PTE) any criteria pollutant or hazardous air pollutant (HAP) at levels equal to or greater than the Major Source Thresholds. A facility shall not construct, modify, or operate equipment at a Title V facility without first obtaining a permit revision that allows such construction, modification, or operation. An application must be submitted to the SCAQMD that presents all information necessary to evaluate the subject facility and determine the applicability of all regulatory requirements.

SCAQMD Air Quality Significance Thresholds

The potential air quality impacts occurring during the construction and operation of the proposed project should be evaluated using the CEQA Guidelines and the quantitative thresholds of significance established by the SCAQMD (Table 2.3-3, *SCAQMD Air Quality Significance Thresholds*).

TABLE 2.3-3
SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds		
Pollutant	**Construction[a]**	**Operation[b]**
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and noncarcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO_2eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants[c]		
NO_2 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual average	 10.4 μg/m³ (construction)[d] & 2.5 μg/m³ (operation) 1.0 μg/m³	
$PM_{2.5}$ 24-hour average	 10.4 μg/m³ (construction)[d] & 2.5 μg/m³ (operation)	
SO_2 1-hour average 24-hour average	 0.25 ppm (state) & 0.075 ppm (federal – 99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 μg/m³ (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day average Rolling 3-month average	 1.5 μg/m³ (state) 0.15 μg/m³ (federal)	

Note: lbs/day = pounds per day; ppm = parts per million; μg/m³ = micrograms per cubic meter; MT/year CO_2eq = metric tons per year of CO_2 equivalents.
[a] Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).
[b] For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.
[c] Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.
[d] Ambient air quality threshold based on SCAQMD Rule 403.
Source: South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook.

Local

County General Plan 2035 – Air Quality Element

The air quality in Southern California does not meet state and federal standards. The Air Quality Element summarizes air quality issues and outlines the goals and policies in the General Plan that will improve air quality and reduce greenhouse gas emissions. The Community Climate Action Plan supplements the Air Quality Element which establishes actions for reaching the County's goals to reduce greenhouse gas emissions in the unincorporated areas. The Air Quality Element aims to coordinate land use, transportation and air

quality planning and a response to climate change. The Air Quality Element Implementation Program includes the Property Assessed Clean Energy (PACE) Financing Program and Climate Change Adaptation Program.

City of LCF General Plan

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The overall goal for the Air Quality Element is for the City of LCF to assist other governmental agencies in the attainment for healthful air within the City of LCF and other Basin residents. The Air Quality Element summarizes local and regional air quality conditions, sources of air pollution, health risks, and global warming and climate change.

IMPACT ANALYSIS

Would the project:	***Potentially Significant Impact***	***Less than Significant Impact with Mitigation Incorporated***	***Less than Significant Impact***	***No Impact***
a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to air quality in relation to conflicting with or obstructing implementation of the applicable air quality plans of the SCAQMD.

South Coast Air Basin (SCAB)

The project study area is located in the SCAB. The SCAB incorporates approximately 12,000 square miles, consisting of Orange County and the urbanized areas of San Bernardino, Riverside, and Los Angeles Counties. In May 1996, the boundaries of the SCAB were changed by the CARB to include the Beaumont-Banning area. The distinctive climate of the SCAB is determined by its terrain and geographic location. The SCAB is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the southwest and high mountains around the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. The SCAB is classified as a dry-hot desert climate.[8]

The vertical dispersion of air pollutants in the SCAB is hampered by the presence of persistent temperature inversions. High-pressure systems, such as the semi-permanent high-pressure zone in which the SCAB is located, are characterized by an upper layer of dry air that warms as it descends, restricting the mobility of cooler marine-influenced air near the ground surface, and resulting in the formation of subsidence inversions. Such inversions restrict the vertical dispersion of air pollutants released into the marine layer and, together with strong sunlight, can produce worst-case conditions for the formation of photochemical smog. The basin-wide occurrence of inversions at 3,500 feet above sea level or less averages 191 days per year.[9]

[8] South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook, p. A8-1.

[9] South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook, p. A8-2.

The atmospheric pollution potential of an area is largely dependent on winds, atmospheric stability, solar radiation, and terrain. The combination of low wind speeds and low inversions produces the greatest concentration of air pollutants. On days without inversions, or on days of winds averaging over 15 miles per hour, smog potential is greatly reduced.[10] Typical winter time ground based inversion layers that frequently occur result in stagnant air with very little mixing and have the potential to trap pollution within the layers closest to the ground.

The CARB-maintained air monitoring stations measure SCAB air pollutant levels. The monitoring stations that are located closest to the project study area are: the Pasadena S Wilson Avenue, located at 752 S Wilson Avenue, Pasadena, CA 91702, which is approximately 7 miles south of the Master Plan Area, and the Los Angeles North Main Street Monitoring Station, located at 1630 North Main Street, Los Angeles, CA 90012, which is approximately 10 miles to the southeast. The last three years of available data for this location include measurements for ozone, $PM_{2.5}$, PM_{10}, and NO_2 (Table 2.3-4, *Summary of Ambient Air Quality at Pasadena S Wilson Avenue and Los Angeles North Main Street Monitoring Stations*).

[10] South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook.

TABLE 2.3-4
SUMMARY OF AMBIENT AIR QUALITY AT PASADENA S WILSON AVENUE AND LOS ANGELES-NORTH MAIN STREET MONITORING STATIONS

Pollutant	Year		
	2016	2017	2018
Ozone (Pasadena)			
Maximum 1-hr Concentration (ppm)	0.126	0.139	0.112
Days exceeding California Ambient Air Quality Standards (CAAQS) (0.09 parts per million [ppm])	12	18	8
Days exceeding National Ambient Air Quality Standards (NAAQS) (no standard)	1	2	0
State Maximum 8-hour concentration (ppm)	0.090	0.100	0.090
National Maximum 8-hour concentration (ppm)	0.090	0.100	0.090
Days exceeding CAAQS (0.070 ppm)	12	18	8
Days exceeding NAAQS (0.070 ppm)	18	36	19
$PM_{2.5}$ (Pasadena)			
National Maximum 24-hour concentration (micrograms per cubic meter [$\mu g/m^3$])	48.9	54.7	51.5
State Maximum 24-hour concentration (micrograms per cubic meter [$\mu g/m^3$])	50.6	61.1	60.8
Measured Days exceeding NAAQS (35 $\mu g/m^3$)	5	9	5
Annual Average (AAM) ($\mu g/m^3$)	*	11.8	12.5
Does measured AAM exceed NAAQS (15 $\mu g/m^3$)?	*	*	*
Does measured AAM exceed CAAQS (12 $\mu g/m^3$)?	*	*	Yes
PM_{10} (Los Angeles)			
National Maximum 24-hour concentration ($\mu g/m^3$)	64.0	64.6	68.2
State Maximum 24-hour concentration ($\mu g/m^3$)	74.6	96.2	81.2
Measured Days exceeding NAAQS (150 $\mu g/m^3$)	0	0	0
Measured Days exceeding CAAQS (50 $\mu g/m^3$)	*	*	31.8
Annual Average ($\mu g/m^3$)	*	*	34.0
Does measured AAM exceed NAAQS (no standard)?	No	No	No
Does measured AAM exceed CAAQS (20 $\mu g/m^3$)?	*	*	Yes
NO_2 (Pasadena)			
National Maximum 1-hour concentration (ppb)	71.9	72.3	68.2
State Maximum 1-hour concentration (ppb)	71	72	68
Days exceeding NAAQS (0.100 ppm)	0	0	0
Days exceeding CAAQS (0.18 ppm)	0	0	0
State Annual Average (ppb)	15	15	14
Does measured AAM exceed NAAQS (0.053 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
CO (not measured at Pasadena or Los Angeles monitoring station)			
SO_2 (not measured at Pasadena or Los Angeles monitoring station)			
HS (not measured at Pasadena or Los Angeles monitoring station)			

Note: ppm = parts per million by volume; $\mu g/m^3$ = micrograms per cubic meter; ppb = parts per billion by volume.
* Denotes insufficient data.
Source: California Air Resources Board. Accessed October 24, 2019. Top 4 Summary: Select Pollutant, Years, & Area. http://www.arb.ca.gov/adam/topfour/topfour1.php

The two main plans of concern for the project study area are the Air Quality Element of the County General Plan 2035[11] and the 2016 SCAQMD AQMP.[12] The proposed project would also be consistent with SCAG's 2016–2040 RTP/SCS.[13]

The construction, operation, and maintenance of the proposed project would not cause a violation of the SCAQMD AQMP because it would not impede the ability of the basin to achieve the NAAQS attainment deadlines for those pollutants not in attainment. Designations for attainment are determined from the ambient air quality. The proposed project would be consistent with the AQMP's goals to invest in strategies that improve air quality by supporting transportation control measures to reduce vehicle miles traveled (VMT). This is also consistent with the Air Quality Element for the County General Plan 2035, which states a direct link between transportation activities and air pollution.

During operations, the proposed project would minimally increase the number of vehicles coming to and from the parks and open space areas in the project study area by providing recreational opportunities close to where people live and through the long-term conservation of open space lands. These trips would be recreational in purpose, occurring mainly on weekends and/or outside peak hour traffic, and therefore not causing additional traffic. With limited new trips (four trips/mile/hour), the proposed project would support Goal 2 of the County General Plan 2035 by coordinating land use, transportation, and air quality planning. The proposed project would also not have a long-term consequence on achieving attainment deadlines in the SCAQMD AQMP for criteria pollutants that are not in attainment because construction and operational emissions are below the level of significance. The proposed project is aligned with the 2016–2040 RTP/SCS because it would reduce VMT and encourage nearby recreation. Therefore, the proposed project would result in less than significant impacts regarding conflicting with or obstructing implementation of applicable air quality plans. No further analysis is warranted.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to air quality regarding violating any air quality standard or contributing substantially to an existing or projected air quality violation. Ambient air quality data for the proposed project vicinity recorded at the Pasadena and Los Angeles Monitoring Stations from 2016 to 2018 indicated exceedances for the applicable federal standards for 1-hour ozone, 8-hour ozone and the state standards for annual PM_{10} (see Table 2.3-4). The City of LCF's primary sources of air pollution are generated from mobile sources include exhaust and road dust from traffic on I-210, SR-2, and Angeles Crest Highway. Stationary sources of pollution generated by those living and working within the City of LCF including fugitive dust from construction activity, grading, and erosion from unvegetated and unpaved areas, chemicals from local business, and pollution generated from commercial and residential use of natural gas.

Attainment Status

The SCAB exceeds federal standards for ozone, respirable particulate matter (PM_{10}) and fine particulate matter ($PM_{2.5}$), and lead. The 1977 CAA Amendment, Section 107, requires the EPA to publish a list of geographic

[11] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County 2035 General Plan: Chapter 8: Air Quality Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch8.pdf

[12] South Coast Air Quality Management District. March 2017. Final 2016 Air Quality Management Plan. http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp

[13] Southern California Association of Governments. April 7, 2016. 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx

areas and their compliance with the NAAQS. Areas not in NAAQS compliance are deemed non-attainment areas and can be categorized into four designations of increasing severity: (1) moderate, (2) serious, (3) severe, and (4) extreme. Designations are based on a pollutant-by-pollutant basis. The EPA has classified the project area as an extreme nonattainment area for ozone and a moderate nonattainment area for $PM_{2.5}$ (Table 2.3-5 *Attainment Area Designations in Project Area*). Mobile sources, including cars, trucks, and off-road equipment, are the largest contributors to the formation of ozone, $PM_{2.5}$, diesel particulate matter, and greenhouse gas emissions in California. The CARB developed a suite of mobile source. The project area is in non-attainment status for the 8-hour ozone state and federal standard, PM_{10} state standard and $PM_{2.5}$ state and federal standard.

TABLE 2.3-5
ATTAINMENT AREA DESIGNATIONS IN PROJECT AREA

Criteria Pollutant	California State Standards	Federal Standards
8-hr ozone (O_3) (2008)	Non-attainment	Extreme non-attainment
1-hr nitrogen dioxide (NO_2) (1971)	Attainment	Attainment/maintenance
1-hr carbon monoxide (CO) (1971)	Attainment	Attainment/maintenance
Respirable particulate matter (PM_{10}) (1987)	Non-attainment	Attainment/maintenance
Fine particulate matter ($PM_{2.5}$) (2012)	Non-attainment	Moderate non-attainment
Sulfur dioxide (SO_2) (2010)	Attainment	Attainment
Lead (Pb) (2008)	Attainment	Non-attainment
Sulfates	Attainment	N/A
Hydrogen sulfide (HS)	Unclassified	N/A
Visibility reducing particles	Unclassified	N/A

Source: U.S. Environmental Protection Agency. February 1, 2016. U.S. EPA green book. Current nonattainment counties for all criteria pollutants. https://www.epa.gov/green-book
California Air Resources Board. December 2015. Area Designations Maps / State Ambient Air Quality Standards. http://www.arb.ca.gov/desig/adm/adm.htm

The proposed State Strategy for the SIP targets on-road light duty vehicles, on-road heavy duty vehicles, off-road federal and international sources, off-road equipment, and consumer products.[14] The CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations. California has set standards for certain pollutants, such as particulate matter and ozone, which are more protective of public health than respective federal standards. The CARB has also set standards for some pollutants that are not addressed by federal standards such as hydrogen sulfide, visibility reducing particles and vinyl chloride. The CAAQS are generally more stringent than the NAAQS.

The proposed project's daily construction emissions were generated using CalEEMod 2016.3.1 (Appendix 7, *CalEEMod Data*), summarizes the daily construction emissions associated with the proposed project's construction activities and indicates that emissions would be below the SCAQMD daily constructional emissions thresholds of significance. Table 2.3-6 through 2.3-13, *Estimated Daily Construction Emissions (Mitigated): Phase 1A–2D*, lists the maximum daily emission which were generated using CalEEMod 2016.3.1 compared to State thresholds to assess whether impacts associated with air quality would be significant.

[14] California Air Resources Board. May 17, 2016. Proposed 2016 State Strategy for the State Implementation Plan. https://www.arb.ca.gov/planning/sip/2016sip/2016statesip.pdf

TABLE 2.3-6
ESTIMATED DAILY CONSTRUCTION EMISSIONS (MITIGATED): PHASE 1A

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
2020 maximum daily emissions	4.2	42.5	22.4	0.04	12.0	20.5
2021 maximum daily emissions	5.1	40.5	38.9	0.08	11.9	20.3
2022 maximum daily emissions	17.2	11.2	9.3	0.02	0.6	0.7
Maximum	17.2	42.5	15.1	0.08	12.0	20.5
SCAQMD daily significance construction threshold (pounds/day)	75	100	38.9	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix 7.

TABLE 2.3-7
ESTIMATED DAILY CONSTRUCTION EMISSIONS (MITIGATED): PHASE 1B

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
2022 maximum daily emissions	3.1	31.5	18.1	0.04	1.4	19.8
2023 maximum daily emissions	32.8	10.6	16.9	0.03	0.5	2.8
2024 maximum daily emissions	32.8	1.2	2.3	4.6 e-	0.1	0.2
Maximum	32.8	31.5	18.1	0.04	1.4	19.8
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix 7.

TABLE 2.3-8
ESTIMATED DAILY CONSTRUCTION EMISSIONS (MITIGATED): PHASE 1C

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
2023 maximum daily emissions	1.2	12.4	6.9	0.01	3.4	5.9
2024 maximum daily emissions	2.2	17.6	22.6	0.04	3.4	5.8
2025 maximum daily emissions	8.8	5.3	9.2	0.01	0.3	0.4
Maximum	8.8	17.6	22.6	0.04	3.4	5.9
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix 7.

TABLE 2.3-9
ESTIMATED DAILY CONSTRUCTION EMISSIONS (MITIGATED): PHASE 1D

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
2025 maximum daily emissions	4.1	40.6	34.4	0.07	14.9	26.4
2026 maximum daily emissions	32.2	39.1	36.5	0.08	11.7	20.9
Maximum	32.2	40.6	36.5	0.08	14.9	26.4
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix 7.

TABLE 2.3-10
ESTIMATED DAILY CONSTRUCTION EMISSIONS (MITIGATED): PHASE 2A

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
2026 maximum daily emissions	29.3	25.3	18.4	0.04	11.0	19.4
2027 maximum daily emissions	29.3	29.3	2.4	5.2 e-	0.13	0.34
Maximum	29.3	29.3	18.4	0.04	11.0	19.4
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix 7.

TABLE 2.3-11
ESTIMATED DAILY CONSTRUCTION EMISSIONS (MITIGATED): PHASE 2B

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
2027 maximum daily emissions	2.5	25.3	19.8	0.04	11.0	19.4
2028 maximum daily emissions	5.5	53.2	50.0	0.13	15.5	27.5
2029 maximum daily emissions	2.2	18.8	22.8	0.07	1.38	3.77
2030 maximum daily emissions	130.5	7.1	16.2	0.03	0.37	0.55
Maximum	130.5	53.2	50.0	0.13	15.5	27.5
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**Yes**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix 7.

TABLE 2.3-12
ESTIMATED DAILY CONSTRUCTION EMISSIONS (MITIGATED): PHASE 2C

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
2030 maximum daily emissions	0.6	3.7	7.6	0.01	0.5	0.08
2031 maximum daily emissions	2.3	4.1	7.8	0.01	0.2	0.15
Maximum	2.3	4.1	7.8	0.01	0.5	0.15
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix 7.

TABLE 2.3-13
ESTIMATED DAILY CONSTRUCTION EMISSIONS (MITIGATED): PHASE 2D

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	**NO_x**	**CO**	**SO_x**	**$PM_{2.5}$**	**PM_{10}**
2031 maximum daily emissions	0.5	3.7	7.6	0.01	0.5	0.9
2032 maximum daily emissions	9.8	4.1	7.8	0.01	0.5	0.9
Maximum	9.8	4.1	7.8	0.01	0.5	0.9
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE: ROG = reactive organic gases; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter; SCAQMD = South Coast Air Quality Management District.
SOURCE: Appendix 7.

Given that the proposed project would involve the operation of recreational and open space uses that would not require any stationary sources for daily operation and maintenance, long-term operation-related air emissions in the project study area are likely to result from vehicles traveling to and from the park facilities and the parking structures. Construction emissions would be temporary and would be completed over the course of 11 years. Operational emissions associated with the proposed project are expected to be below the level of significance as determined by the SCAQMD and would not cause a cumulatively considerable net increase of an criteria pollutant. Short-term cumulative impacts related to air quality could occur if project construction and nearby construction activities were to occur simultaneously. Therefore, the proposed project would result in less than significant impacts regarding violating air quality standards or contributing substantially to an existing or projected air quality violation. No further analysis is warranted.

c) Expose sensitive receptors to substantial pollutant concentrations? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to air quality regarding exposing sensitive receptors to substantial pollutant concentrations. Sensitive receptors are facilities that house or attract children, the elderly, and people with illnesses or others who are especially sensitive to the effects of air pollutant. Land uses identified to be sensitive receptors by SCAQMD in the CARB's Air Quality Handbook include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

Sensitive receptors within one-quarter mile of the Master Plan Area, as shown in Figure 1.11-1, include the USC Verdugo Hills Hospital, located northwest of the Master Plan Area, and multi-family residential

neighborhoods surrounding the Master Plan Area. The nearest public schools located within a 0.5-mile radius of the Master Plan Area include La Cañada Elementary School, a public school located approximately 0.4 mile northeast of the Master Plan Area, and Flintridge Montessori School, a private school located approximately 0.6 mile north of the Master Plan Area.

Exposure of sensitive receptors to potential emissions would vary from day to day, depending on the amount of work being conducted, the weather conditions, the location of receptors, and the length of time that receptors would be exposed to air emissions. Best management practices would be required for dust suppression, pursuant to County building codes. On-road and off-road construction equipment would be required to comply with CARB tier standards for NOx, CO, PM, and NMHC (non-methane hydrocarbons) emissions. Due to the short-term nature and the timeline of the phases of project construction, sensitive receptors would not be expected to be adversely affected by construction. For operation or maintenance of the proposed project, sensitive receptors would experience a longer duration of exposure. These emissions are below the level of significance and would decrease rapidly with distance from the Master Plan Area. Therefore, impacts would be less than significant regarding exposing sensitive receptors to substantial pollutant concentrations. No further analysis is warranted.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

The proposed project would result in no impacts to air quality regarding creating objectionable odors affecting a substantial number of people. According to the CARB's Air Quality Handbook,[15] land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The construction, operation, and maintenance of the proposed project would not involve the type of land uses or industrial operations typically associated with odor nuisance. There are no land uses typically associated with the generation of nuisance odors in the project study area. Therefore, there would be no impact regarding other emissions. No further analysis is warranted.

[15] California Air Resources Board. April 2005. Air Quality and Land Use Handbook: A Community Health Perspective. http://www.arb.ca.gov/ch/handbook.pdf

2.4. BIOLOGICAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to biological resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. Biological impacts associated with the implementation of the proposed project were evaluated with regard to the *Biological Resources Technical Report* (Appendix 8).

REGULATORY FRAMEWORK

Federal

Federal Endangered Species Act (ESA)

The federal ESA defines listed species as "endangered" or "threatened" and provides regulatory protection for listed species. The federal ESA provides a program for conservation and recovery of threatened and endangered species; it also ensures the conservation of designated critical habitat that the U.S. Fish and Wildlife Service (USFWS) has determined is required for the survival and recovery of these listed species. Section 9 of the federal ESA prohibits the "take" of species listed by USFWS as threatened or endangered. Take is defined as follows: "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in such conduct." In recognition that take cannot always be avoided, Section 10(a) of the federal ESA includes provisions for take that is incidental to, but not the purpose of, otherwise lawful activities. Section 10(a)(1)(B) permits (incidental take permits) may be issued if take is incidental and does not jeopardize the survival and recovery of the species. A Habitat Conservation Plan (HCP) must accompany an application for an incidental take permit. The purpose of the HCP planning process associated with the permit is to ensure there is adequate minimizing and mitigating of the effects of the authorized incidental take. As defined in the federal ESA, individuals, organizations, states, local governments, and other nonfederal entities are affected by the designation of critical habitat only if their actions occur on federal lands; require a federal permit, license, or other authorization; or involve federal funding.

Migratory Bird Treaty Act (MBTA)

The MBTA makes it unlawful to pursue, capture, kill, or possess any migratory bird or part, nest, or egg of any such bird listed in wildlife protection treaties between the United States, Great Britain, Mexico, Japan, and Russia (formerly the Soviet Union).

Bald and Golden Eagle Protection Act (BGEPA)

The purpose of the BGEPA (16 U.S. Code 668–668c, as amended), administered by the USFWS, is to protect bald and golden eagles, their nests, eggs, and parts.[1] The BGEPA prohibits the "take" of bald and golden eagles unless pursuant to regulations. Take is defined by the BGEPA as an action "to pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest, or disturb (i.e., agitate or bother to a degree that causes injury, decreased productivity, or nest abandonment)." In addition, the *National Bald Eagle Management Guidelines* were published by the USFWS in May 2007 in conjunction with delisting the bald eagle to provide provisions to continue to protect bald eagles from harmful actions and impacts.[2] Under the BGEPA, a final rule was published in May 2008 in the *Federal Register* that proposed authorization for take of bald eagles for

[1] U.S. Fish and Wildlife Service. 2007. Bald Eagle Management Guidelines and Conservation Measures: Bald and Golden Eagle Protection Act. http://www.fws.gov/midwest/Eagle/guidelines/bgepa.html

[2] U.S. Fish and Wildlife Service. 2007. National Bald Eagle Management Guidelines. http://www.fws.gov/pacific/eagle/NationalBaldEagleManagementGuidelines.pdf

those with existing authorization under the federal ESA where the bald eagle is covered in an HCP or the golden eagle is covered as a non-listed species.[3]

Section 404 of the Federal Clean Water Act (CWA)

Section 404 of the CWA, which is administered by the U.S. Army Corps of Engineers (USACE), regulates the discharge of dredged and fill material into Waters of the United States, which include surface waters such as navigable waters and their tributaries, all interstate waters and their tributaries, natural lakes, all wetlands adjacent to other waters, and all impoundments of these waters. The USACE has established a series of nationwide permits that authorize certain activities in Waters of the United States, provided that a proposed activity can demonstrate compliance with standard conditions. Projects that result in the loss of less than the acreage specified by the applicable nationwide permit can normally be conducted pursuant to one of the nationwide permits, if consistent with the standard permit conditions. If the conditions of a nationwide permit cannot be met, or the project results in more than minimal adverse environmental impact, an individual permit may be required.

State

State Fish and Game Code

Sections 1600 through 1603, Notification of Lake or Streambed Alteration

All diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California are subject to the regulatory authority of the California Department of Fish and Wildlife (CDFW) (California Fish and Game Code Sections 1600–1603) and require preparation of a Lake or Streambed Alteration Agreement. Pursuant to the Code, a *stream* is defined as a body of water that flows at least periodically, or intermittently, through a bed or channel having banks and supporting fish or other aquatic life. Based on this definition, a watercourse with surface or subsurface flows that support or have supported riparian vegetation is a stream and is subject to CDFW jurisdiction. Altered or artificial waterways valuable to fish and wildlife are subject to CDFW jurisdiction.

Sections 1900–1913, Native Plant Protection Act

The Native Plant Protection Act includes measures to preserve, protect, and enhance rare and endangered native plants. The list of native plants afforded protection pursuant to the Native Plant Protection Act includes those listed as rare and endangered under the California ESA. The Native Plant Protection Act provides limitations that no person would import into this State—or take, possess, or sell within the State of California—any rare or endangered native plant, except in compliance with provisions of the Act. Where individual landowners have been notified by the CDFW that rare or native plants are growing on their land, the landowners are required to notify the CDFW at least 10 days in advance of changing land uses to allow the CDFW to salvage any rare or endangered native plant material.

Sections 2080 and 2081, California Endangered Species Act

The California ESA (California Fish and Game Code Sections 2050 et seq.) prohibits the take of listed species, except as otherwise provided in State law. The "take" for the California ESA is defined as it is in the federal ESA; however, unlike the federal ESA, the California ESA also applies the take prohibitions to species petitioned for listing as State candidates rather than only those listed species. State lead agencies are required

[3] Federal Register. May 20, 2008. Notices. 73(98): 29075–29084.

to consult with CDFW to ensure that any actions undertaken by the lead agency are not likely to jeopardize the continued existence of any State-listed species or result in destruction or degradation of required habitat. CDFW is authorized to enter into Memoranda of Understanding (MOUs) with individuals, public agencies, universities, zoological gardens, and scientific or educational institutions to import, export, take, or possess listed species for scientific, educational, or management purposes. Permits for incidental take of species protected pursuant to the California ESA are available under certain circumstances as described in Sections 2080 and 2081 of the California Fish and Game Code described below.

Section 2080 of the California ESA states,

> *No person shall import into this state [California], export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the commission [State Fish and Game Commission] determines to be an endangered species or threatened species, or attempt any of those acts, except as otherwise provided in this chapter, or the Native Plant Protection Act, or the California Desert Native Plants Act (DNPA).*

Pursuant to Section 2081 of the Fish and Game Code, CDFW may authorize individuals or public agencies to import, export, take, or possess, any State-listed endangered, threatened, or candidate species. These otherwise prohibited acts may be authorized through permits or MOUs as follows: (1) if the take is incidental to an otherwise lawful activity, (2) if impacts of the authorized take are minimized and fully mitigated, (3) if the permit is consistent with any regulations adopted pursuant to any recovery plan for the species, and (4) if the applicant ensures adequate funding to implement the measures required by CDFW. CDFW shall make this determination based on available scientific information and shall include consideration of the ability of the species to survive and reproduce.

Section 2800–2835, Natural Community Conservation Planning Act of 1991, as Amended

The Natural Community Conservation Planning Act of 1991, as amended in 2003 (California Fish and Game Code Sections 2800–2835) established the Natural Community Conservation Planning Program for the protection and perpetuation of the State's biological diversity. The CDFW established the program in order to conserve natural communities at the ecosystem level while accommodating compatible land use. A Natural Community Conservation Plan (NCCP) identifies and provides for the regional or area-wide protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. The CDFW provides support, direction, and guidance to participants in order to ensure that NCCPs are consistent with the California ESA.

Sections 3503 and 3503.5, State Protection for Birds

Sections 3503 and 3503.5 of the State Fish and Game Code provide regulatory protection to resident and migratory birds and all birds of prey within the State of California, including the prohibition of the taking of nests and eggs, unless otherwise provided for by the Code. Specifically, these sections of the Code make it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Code.

Section 3511, 4700, 5050, and 5515 State Fully Protected Species

The State of California classifies certain animals as "Fully Protected," in Section 3511 of the State Fish and Game Code. This classification was the State's initial effort in the 1960s to identify and provide additional protection to certain species that were rare or faced possible extinction. Lists were made for fish, mammals, amphibians and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under the California and/or federal ESAs. Sections 3511, 4700, 5050, and 5515 of the Fish and Game Code

state that Fully Protected species (birds, mammals, fish, reptiles, amphibians) or parts thereof may not be taken or possessed at any time, and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.

Section 4150, Non-Game Mammal or Furbearing Mammal

All mammals occurring naturally in California that are not game mammals, fully protected mammals, or furbearing mammals are nongame mammals. Nongame mammals or parts thereof may not be taken or possessed except as provided in this code or in accordance with regulations adopted by the commission. The regulations of take of furbearing mammals are established within the California Code of Regulations, Title 14, Division 1 (Subdivision 2), Chapter 5. Take is prohibited for several furbearing mammals under Title 14, Section 460 of the California Code of Regulations, including but not limited to desert kit fox (*Vulpes macrotis arsipus*), coyote (*Canis latrans*), and American badger (*Taxidea taxus*). Title 14, Section 460 is supported by Sections 200, 202, 203, and 4009.5 of the Fish and Game Code.

Public Resources Code Section 21083.4

(a) For purposes of this section, "oak" means a native tree species in the genus Quercus, not designated as Group A or Group B commercial species pursuant to regulations adopted by the State Board of Forestry and Fire Protection pursuant to Section 4526 , and that is 5 inches or more in diameter at breast height.

(b) As part of the determination made pursuant to Section 21080.1, a county shall determine whether a project within its jurisdiction may result in a conversion of oak woodlands that will have a significant effect on the environment. If a county determines that there may be a significant effect to oak woodlands, the county shall require one or more of the following oak woodlands mitigation alternatives to mitigate the significant effect of the conversion of oak woodlands:

(1) Conserve oak woodlands, through the use of conservation easements.
(2) (A) Plant an appropriate number of trees, including maintaining plantings and replacing dead or diseased trees.
(B) The requirement to maintain trees pursuant to this paragraph terminates seven years after the trees are planted.
(C) Mitigation pursuant to this paragraph shall not fulfill more than one-half of the mitigation requirement for the project.
(D) The requirements imposed pursuant to this paragraph also may be used to restore former oak woodlands.
(3) Contribute funds to the Oak Woodlands Conservation Fund, as established under subdivision (a) of Section 1363 of the Fish and Game Code , for the purpose of purchasing oak woodlands conservation easements, as specified under paragraph (1) of subdivision (d) of that section and the guidelines and criteria of the Wildlife Conservation Board. A project applicant that contributes funds under this paragraph shall not receive a grant from the Oak Woodlands Conservation Fund as part of the mitigation for the project.
(4) Other mitigation measures developed by the county.

(c) Notwithstanding subdivision (d) of Section 1363 of the Fish and Game Code , a county may use a grant awarded pursuant to the Oak Woodlands Conservation Act (Article 3.5 (commencing with Section 1360) of Chapter 4 of Division 2 of the Fish and Game Code) to prepare an oak conservation element for a general plan, an oak protection ordinance, or an oak woodlands management plan, or amendments thereto, that meets the requirements of this section.

(d) The following are exempt from this section:
   1. Projects undertaken pursuant to an approved Natural Community Conservation Plan or approved subarea plan within an approved Natural Community Conservation Plan that includes oaks as a covered species or that conserves oak habitat through natural community conservation preserve designation and implementation and mitigation measures that are consistent with this section.
   2. Affordable housing projects for lower income households, as defined pursuant to Section 50079.5 of the Health and Safety Code , that are located within an urbanized area, or within a sphere of influence as defined pursuant to Section 56076 of the Government Code .
   3. Conversion of oak woodlands on agricultural land that includes land that is used to produce or process plant and animal products for commercial purposes.
   4. Projects undertaken pursuant to Section 21080.5 of the Public Resources Code .

(e) (1) A lead agency that adopts, and a project that incorporates, one or more of the measures specified in this section to mitigate the significant effects to oaks and oak woodlands shall be deemed to be in compliance with this division only as it applies to effects on oaks and oak woodlands.
(2) The Legislature does not intend this section to modify requirements of this division, other than with regard to effects on oaks and oak woodlands.
(f) This section does not preclude the application of Section 21081 to a project.
(g) This section, and the regulations adopted pursuant to this section, shall not be construed as a limitation on the power of a public agency to comply with this division or any other provision of law.

Local

County General Plan 2035

The Conservation and Natural Resources Element of the County General Plan 2035 has established two goals and 12 policies related to biological resources:[4]

Goal C/NR 3: Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and Significant Ecological Areas (SEAs).

- Policy C/NR 3.1: Conserve and enhance the ecological function of diverse natural habitats and biological resources.
- Policy C/NR 3.2: Create and administer innovative County programs incentivizing the permanent dedication of SEAs and other important biological resources as open space areas.
- Policy C/NR 3.3: Restore upland communities and significant riparian resources, such as degraded streams, rivers, and wetlands to maintain ecological function—acknowledging the importance of incrementally restoring ecosystem values when complete restoration is not feasible.
- Policy C/NR 3.4: Conserve and sustainably manage forests and woodlands.
- Policy C/NR 3.5: Ensure compatibility of development in the National Forests in conjunction with the USFS Land and Resource Management Plan.
- Policy C/NR 3.6: Assist state and federal agencies and other agencies, as appropriate, with the preservation of special status species and their associated habitat and wildlife movement corridors through the administration of the SEAs and other programs.

[4] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 9: Conservation and Natural Resources Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch9.pdf

- Policy C/NR 3.7: Participate in inter-jurisdictional collaborative strategies that protect biological resources. Site Sensitive Design
- Policy C/NR 3.8: Discourage development in areas with identified significant biological resources, such as SEAs.
- Policy C/NR 3.9: Is considered in the design of a project that is located within an SEA.
- Policy C/NR 3.10: Require environmentally superior mitigation for unavoidable impacts on biologically sensitive areas, and permanently preserve mitigation sites.
- Policy C/NR 3.11: Discourage development in riparian habitats, streambeds, wetlands, and other native woodlands in order to maintain and support their preservation in a natural state, unaltered by grading, fill, or diversion activities.

Goal C/NR 4: Conserved and sustainably managed woodlands.

- Policy C/NR 4.1: Preserve and restore oak woodlands and other native woodlands that are conserved in perpetuity with a goal of no net loss of existing woodlands.

County Municipal Code Title 22, Section 22.56.215 – Significant Ecological Areas

Title 22, Section 22.56.215 of the County Municipal Code regulates development within SEAs. Conditional use permits are required prior to granting a building permit or grading permit within an SEA and must be approved to allow development within SEAs, subject to review by the Significant Ecological Areas Technical Advisory Committee (SEATAC) and a public hearing.

County Municipal Code Title 22, Chapter 22.44, Part 6 – Sensitive Environmental Resource Areas

Sensitive Environmental Resource Areas (SERAs) are located within the Santa Monica Mountains Coastal Zone area only. SERAs contain biological resources that, because of their special characteristics and/or vulnerability, require greater protection, and development in a SERA requires a heightened level of review to ensure that protection. Projects in a SERA are subject to review by the County Department of Regional Planning Environmental Review Board.

County Municipal Code Sections 22.56.2050–22.56.2260 – Oak Tree Ordinance

The County Oak Tree Ordinance requires a permit prior to the cutting, removing, destroying, relocating, inflicting damage on, or encroaching into a protected zone of any tree within the oak genus. The Ordinance regulates only oak trees (genus *Quercus*) located within unincorporated areas of Los Angeles County. In addition, the circumference of an oak tree with one trunk must be 25 inches (8 inches in diameter) or more. For oak trees with multiple trunks, any two trunks must have a circumference of 38 inches (12 inches in diameter) or more. Measurements must be recorded at 4.5 feet above mean natural grade.

La Cañada Flintridge General Plan Section 3 – Open Space and Recreation Element (OSRE), and Section 4 – Conservation Element (CNE)

Although the County is not subject to the city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The goals, objectives, and policies in the Open Space and Recreation Element and the Conservation Element promote the preservation and enhancement of the City of LCF open space, recreation, and trails resources. It emphasizes and supports the interrelationship between all the City of LCF General Plan elements to achieve a community whose parkland resources also support land use, circulation, conservation, and safety goals, objectives, and policies. The City

of LCF General Plan establishes 4 goals, 3 objectives, and 24 policies related to biological resources.[5]

OSRE Goal 2: Preserve, protect, and enhance open space areas within and adjacent to the City.

OSRE Objective 2.1: Preserve or enhance open space for preservation of natural resources.

- OSRE Policy 2.1.1: All publicly owned open space committed to open space land or utility right-of-way should be preserved and designated Open Space on the Land Use Policy Map.
- OSRE Policy 2.1.2: Reasonable efforts should be made to acquire from willing sellers undeveloped properties that contain significant community features and resources, such as natural chaparral and wildlife habitat, watersheds, areas of passive recreation, settings for riding and hiking trails and outdoor education, and other community-wide hillside amenities. Open space areas of particular value include Cherry Canyon, Webber Canyon, Gould Canyon, Winery Canyon, Hall Beckley Canyon, Snover Canyon, Hay Canyon, and their surrounding hillsides.
- OSRE Policy 2.1.3: The semi-rural, hillside character of the community should be maintained by regulation and development control, thus preserving the unique setting and significant resources in the San Gabriel Mountains and San Rafael Hills.
- OSRE Policy 2.1.4: Privately owned recreational and open space areas designed as an integral part of a land use development will be designated Open Space on the Land Use Policy Map.
- OSRE Policy 2.1.5: Preserve and expand non-vehicular access to the Angeles National Forest trails and open lands remaining in the San Rafael Hills and San Gabriel Mountains, in coordination with the federal Angeles Forest Plan.
- OSRE Policy 2.1.7: Encourage the dedication of additional lands to public open space, in cooperation with the Santa Monica Mountains Conservancy, Rim of the Valley Corridor Special Resource Study, and other partners and open space conservation efforts.
- OSRE Policy 2.1.8: Cooperate regionally with other municipalities and Los Angeles County to preserve natural open space corridors for wildlife.
- OSRE Policy 2.1.9: Consider the enhancement of the property currently used for utility transmission lines for use as community gardens or other complementary open space uses, within the constraints of the utility's requirements.

OSRE Objective 2.2: Provide and preserve open space areas for the protection of public health and safety

- OSRE Policy 2.2.3: Provide a combination of brush clearance, irrigated areas, and fire-resistant planting adjacent to large areas of native vegetation to serve as a buffer between highly hazardous natural fuels and developed areas. Ensure that the buffers will be completed in a manner that is sensitive to plant and animal habitats and will promote erosion control.

CNE Objective 1.5: Preserve biological resources, including vegetative communities and wildlife and its habitat, subject to the safety of residents and property.

- CNE Policy 1.5.1: Retain publicly owned open space land as such. Make reasonable efforts to acquire from willing sellers large portions of hillside and other properties that contain significant biological resources, such as coastal sage scrub–chaparral, oak woodlands, riparian communities, and wildlife habitat. Open space areas of particular value include Cherry Canyon, Weber Canyon, Gould Canyon, Winery Canyon, Hall-Beckley Canyon, Snover Canyon, Hay Canyon, and their surrounding hillsides.

[5] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. Segment 3; Open Space and Recreation. Segment 4; Conservation Element. https://cityoflcf.org/planning/

- CNE Policy 1.5.2: Consider conducting evaluations and mapping all vegetation and habitat communities on vacant and undeveloped land that is 0.5 acre or greater in area property.
- CNE Policy 1.5.3: Require development proposals in areas expected to contain important vegetation and wildlife communities to conduct biological assessments and mitigate impacts, as appropriate.
- CNE Policy 1.5.4: In areas that are adjacent to sensitive vegetation and/or wildlife communities and/or open spaces, require new development to employ site design techniques that provide buffers between the development and the biological resources and to landscape their sites with vegetation that is consistent with the adjacent resources.
- CNE Policy 1.5.5: Preserve and protect the city's urban forest, which contributes to clean air, soil conservation, shade and windbreak protection, moderation of climatic extremes, and reduction of flood hazards and risk of landslides.
- CNE Policy 1.5.6: Encourage alternative subdivision design, such as clustering, to preserve sensitive habitat.

CNE GOAL 2: Preserve the remaining natural ridgelines, canyons, streams, springs, urban forest, and other natural resources and attributes which contribute to the aesthetic and scenic qualities of the community.

CNE Objective 2.1: Require new development to be compatible with the natural and existing human-made resources that make the community special.

- CNE Policy 2.1.5: Preserve and protect the city's urban forest in order to maintain the community's wooded character and protect the scenic beauty of the area, through continued implementation of the City's Preservation, Protection, and Removal of Trees Ordinance.

Additionally, the Safety Element establishes 1 goal and 4 policies relevant to biological resources:[6]

Goal S 3: An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards.

- Policy S 3.4: Reduce the risk of wildland fire hazards through the use of regulations and performance standards, such as fire resistant building materials, vegetation management, fuel modification and other fire hazard reduction programs.
- Policy S 3.5: Encourage the use of low-volume and well-maintained vegetation that is compatible with the area's natural vegetative habitats.
- Policy S3.10: Map oak woodlands in Los Angeles County as part of implementation of the Oak Woodlands Conservation Management Plan.
- Policy S 3.11: Support efforts to address unique pest, disease, exotic species and other forest health issues in open space areas to reduce fire hazards and support ecological integrity

The Oak Woodlands Conservation Management Plan Guide

The Oak Woodlands Conservation Management Plan Guide was prepared by the County Oak Woodlands Strategic Alliance in March 18, 2014. The Guide implements portions of the Oak Woodlands Conservation Management Plan and is a resource for assisting County staff when processing development applications that are not exempt from CEQA and may impact oak woodlands. The Guide includes definitions, application procedures, case processing, project mitigation and mitigation monitoring.

[6] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 12: Safety Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch12.pdf

Chapters 4.24 and 11.40 La Cañada Flintridge Municipal Code

The goal of these portions of the municipal code is to "preserve and protect the trees that are of historic or aesthetic importance, and to provide for the protection and replacement of trees in order to maintain the community's wooded character; protect the scenic beauty of the area; reduce erosion of top soil … and to address fire concerns by discouraging the planting of … highly flammable trees." The intent is to preserve and encourage the regeneration of a healthy urban forest. Protected private property trees may only be removed by the actual homeowner or an arborist authorized by the City of LCF after approval of a Tree Removal Permit (La Cañada Flintridge Municipal Code Title 4 and Title 11). Chapter 4.24 regulates trees and shrubs in the "public right-of-way," whereas Chapter 11.40 is in regard to "Preservation, Protection and Removal of Trees" on private property. Specifically, Chapter 11.40 states,

> *On private property, no native oak, sycamore, deodar cedar, (in the historic deodar district) tree with a trunk measuring twelve (12) inches or more in diameter (as measured at a point 54 inches from the ground surface at the natural grade) shall be removed without a tree removal permit issued by the Planning Division of the Community Development Department. Where a tree trunk is divided below 54 inches above grade, the diameter of all trunks (as measured 54 inches from the natural grade) shall be summed to determine tree diameter. Topping of protected trees is prohibited.*

IMPACT ANALYSIS

	Potentially Significant Impact	***Less than Significant Impact with Mitigation Incorporated***	***Less than Significant Impact***	***No Impact***
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	☐	☒	☐	☐

The proposed project would result in potentially significant impacts to biological resources regarding having a substantial adverse effect, either directly or through habitat modifications, on species identified as listed, candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Potentially significant impacts would be limited to the proposed Wilds Loop trail, which would extend beyond the developed garden area. Incorporation of mitigation measures would reduce impacts to below the level of significance.

A California Natural Diversity Database (CNDDB) search and California Native Plant Society (CNPS) Online Inventory query for occurrence data within and surrounding the Master Plan area included nine USGS 7.5-minute series topographic quadrangles (see Appendix 8, Section 5-1). The records of listed and sensitive plants and animals within the nine-quadrangle area were reviewed to determine which federally and State-listed species and other special status species have the potential to occur within the limits of the Master Plan Area. From this desktop review, 18 species that are federally, state or candidate listed species were identified to have potential to occur within the immediate region of the Master Plan Area (see Appendix 8, Section 5-1).

Site surveys of the 149-acre Master Plan Area were conducted on November 27–29, 2018, and April 17 and 19, 2019, to determine the presence of special status species, potential suitable habitat, and sensitive communities identified during the desktop review. Of the 18 federally and state listed species identified, there was low to no potential for suitable habitat for 17 species within the Master Plan Area (see Appendix 8, Section 5-1, Table 5-1). During fall site surveys in 2018, one adult Swainson's hawk was observed flying over the Master Plan Area, which contains suitable nesting and foraging habitat for this species. However, no other federally listed plant or animal species are expected to occur, and no critical habitat for listed species is recorded within the Master Plan Area.

A total of 70 plant species that are considered rare in the State of California or are locally important to the region were identified from the records search (Appendix 8, Table 5-3). Of these species, four have suitable habitat within the undeveloped portion of the Master Plan Area and have a high to moderate potential to be present. However, during the survey efforts, Sapphos Environmental, Inc. biologists did not observe any naturally occurring rare plant species. Several rare and locally important species, including Parish's gooseberry have been planted within the botanical garden but may not occur naturally within the Master Plan Area.

A total of 29 wildlife species (2 invertebrates, 2 fish, 1 amphibian, 7 reptiles, 5 birds, and 12 mammals) that are considered sensitive in the State of California were identified during the nine-quadrangle records search for the Master Plan Area (Appendix 8, Table 5-2, *Sensitive Wildlife Species with the Potential to Occur in the Master Plan Area*) but were not observed during site surveys of the Master Plan area. Suitable habitat is present for the following CNPS rare plants: Plummer's mariposa-lily, Engelmann oak, and California black walnut. During site surveys, the only special-status species observed were coastal whiptail, Cooper's hawk, and California black walnut. A complete list of flora and fauna observed by Sapphos Environmental, Inc. and verified citizen science records from iNaturalist.com and ebird.com was compiled for baseline species data within the Master Plan Area (Appendix 8, Figure 5-1, and Appendix 8-C, Floral and Faunal Compendium).

Construction associated with the Circulation Framework Improvements; New and Improved Gardens and Facilities; and New Buildings, Structures, and Infrastructure that would occur within the developed garden area would not result in impacts to sensitive species or their habitats.

The Wilds Loop trail beyond the developed garden area could result in the direct removal of up to 0.14 acre of scrub oak chaparral, which is considered suitable habitat for listed plant species. This would not result in a significant loss of habitat, and direct impacts to individuals are not anticipated as no sensitive plants were observed in the proposed alignment. Direct impacts to these species would be limited to the disturbance of natural habitats during the construction of the Wilds Loop trail. Implementation of Mitigation Measure BIO-1 would reduce impacts of the proposed Wilds Loop trail to below the level of significance (also see Appendix 8, Section 5.5).

The environmental analysis for the Wilds Loop trail to sensitive plant and wildlife species and their habitats is based on a potential worst-case scenario for construction activities associated with building a new trail. The finalized trail design is subject to refinement, and the level of impact would be subject to additional survey, design, and engineering work to support development and ultimately project construction, operation, and maintenance.

Therefore, the proposed project would result in less than significant impacts after mitigation to biological resources regarding having a substantial adverse effect, either directly, or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

Mitigation Measure BIO-1: To mitigate potential impacts of the proposed Wilds Loop trail on **listed, sensitive, and locally important species and their habitats**:

- Directed surveys shall be conducted in the impact area for the proposed Wilds Loop trail and within 50 feet on either side of the trail. Surveys shall be conducted by a qualified biologist using approved USFWS and CDFW protocols to identify any listed, sensitive, and locally important species within the impact area.
- If sensitive biological resources are observed during the preconstruction survey, fencing and/or flagging shall be used to delineate Environmentally Sensitive Areas (ESAs), which shall be off-limits during trail construction.
- The Wilds Loop trail shall be designed, constructed, and maintained to avoid disturbance of any occupied habitat.
- For protected plans where disturbance is unavoidable, the proper agency shall be notified to salvage and relocate the plants to conserved suitable habitat.
- Qualified biological monitors shall be required on-site for initial ground disturbance and clearing as well as periods when trail construction would be undertaken within 50 feet of delineated ESAs.

b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?	☐	☒	☐	☐

The proposed project would result in potentially significant impacts to biological resources regarding having a substantial adverse effect on sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS. Incorporation of mitigation measures would reduce impacts to below the level of significance.

Existing conditions within the Master Plan Area consist of approximately 73 acres of developed botanical gardens and associated facilities and approximately 75 acres of native habitat stretching from the ridgeline down to the developed gardens (see Figure 1.8.2-1, *Developed Gardens and Undeveloped Areas of the Property*). The total area of native and developed habitats and the quality of habitat within these areas is summarized in Table 2.4-1, *Habitat Types within the Master Plan Area* (Appendix 8, Figure 5-1 depicts the location of each of these habitat types within the Master Plan Area). Based on a review of the information available through the Natural Heritage Division of CDFW, no state sensitive plant communities are present within the Master Plan Area (see Appendix 8, Section 5).

TABLE 2.4-1
HABITAT TYPES WITHIN THE MASTER PLAN AREA

Habitat Type	Area (acres)	Quality of Habitat*
Native Habitats		
California Buckwheat Scrub	2.74	Moderate quality. Somewhat disturbed by previous clearing by fire maintenance crews and public hiking trail.
Scrub Oak Chaparral	37.28	Moderate quality. Somewhat disturbed by nonnative plant species.
Laurel Sumac Scrub	31.98	Moderate quality. Somewhat disturbed by nonnative plant species.
Lemonade Berry Scrub	0.51	Moderate quality. Somewhat disturbed by nonnative plant species.
Oak Woodland	2.41	Moderate quality. Area outside the garden is disturbed by nonnative plant species and high use of trail.
Subtotal Native Habitat	*74.92*	
Developed Areas		
Mixed Riparian	3.96	Moderate quality. The vegetation around the lakes is mostly planted, maintained, and not classified as a native vegetation community; however, the structure (levels of canopy, midlayer, and understory) provides good habitat for wildlife.
Mulefat Thickets	0.67	Moderate quality. This area was created by restoration and therefore planted and maintained. Once it matures, it could provide habitat for wildlife.
Oak Woodland	13.56	Moderate quality. Area within the garden is disturbed by nonnative plant species and routine fire control maintenance.
Oak Woodland (maintained)	15.21	Moderate quality. Midlayer of planted camellia trees, and routinely maintained. However, mature oak trees provide suitable habitat for squirrels and avian species.
Planted	22.49	Poor quality. Includes mostly ornamental and garden variety plants.
Developed/Disturbed	17.88	Poor quality. Includes most urbanized areas.
Subtotal Developed Areas	*73.77*	
Grand Total	**148.69**	

Note: * Quality is defined as "the resources and conditions present in an area that produce occupancy, including survival and reproduction, by a given organism." Habitat quality is the ability of the environment to provide conditions appropriate for individual and population persistence.

Natural communities likely to be impacted as a result of the Master Plan include riparian habitat around the Lake (see Appendix 8, Figure 5-1) and scrub oak chaparral within the undeveloped area. Impacts to scrub oak chaparral are mentioned above (question a).. Additionally, oak woodlands are present throughout the Master Plan Area, and an analysis of the potential impacts to oak woodlands is discussed below (under question e).

Proposed individual projects at the Lake include the Perimeter Walk and Lake Improvements, which include improvements to the boardwalk circulation installed around the Lake, an observation deck installed near Boddy Lodge (see Figure 1.10.2-10), a floating wetland immediately west of the observation deck, a marsh/riparian area along the southwestern edge of the Lake, and a water play area in the northwestern portion of the Lake. To achieve these projects, the Lake would be drained, regraded, and relined, resulting in potential impacts to up to 3.96 acres of riparian habitat. Implementation of Mitigation Measures BIO-1 and BIO-2 would reduce these impacts to below the level of significance.

Although these activities would result in impacts to the existing riparian habitat, the overall goal of the proposed projects is to restore and improve aquatic resources and increase the long-term viability of the Lake. Installation of a new lakebed liner would reduce loss of water from leakage. Dredging of the Lake sediments, an improved aeration system as well as creating wetland shelves, sediment bays, and floating wetlands would provide habitat for native wildlife species and maintaining the water level would further promote establishment of wetland habitat at the Lake.

This analysis of impacts of individual projects included in the Master Plan to sensitive plant communities and riparian habitats is based on a potential worst-case scenario for construction activities and the current general

configurations of the Master Plan. The proposed Lake and Wilds Loop projects are conceptual and would require additional survey, design, and engineering work to support design development and ultimately project construction and are subject to verification at the project level of environmental review pursuant to CEQA. Any projects that could result in impacts to the Lake would be subject to the provisions of Section 1600 of the State Fish and Game Code in which a Lake or Streambed Alteration Agreement would need to be obtained prior to any alteration of a state jurisdictional area.

Therefore, the proposed project would result in less than significant impacts after mitigation to biological resources regarding having a substantial adverse effect on any sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS. Conversely, adoption of the Master Plan could increase the quality of the riparian habitat through restoration and stewardship consistent with Descanso Gardens' mission and goals.

Mitigation Measure BIO-2: To mitigate potential impacts on **riparian, state sensitive plant communities, state protected wetlands, and federally protected wetlands and Waters of the United States**:

- A jurisdictional delineation shall be conducted by a certified wetland delineator to identify any state or federally protected wetlands, riparian areas, and state sensitive plant communities on-site.
- Although proposed activities would take place within existing protected habitats, the overall goal of the proposed project is to restore and improve aquatic resources and increase the long-term viability of the Lake, resulting in beneficial effects to these areas. Where the jurisdictional delineation identifies State-designated sensitive plant communities, riparian habitat, state or federally protected wetlands, or Waters of the United States to be present, and that will not be improved by project activities, impact avoidance, impact minimization, and/or compensatory mitigation (i.e., on-site mitigation) shall be implemented such that there is no net loss of habitat functions or values.
- Where impacts are located in areas subject to the jurisdiction of the CDFW pursuant to Section 1600 of the State Fish and Game Code, a Lake or Streambed Alteration Agreement shall be obtained prior to commencing ground-disturbing activities or any other alternation of a lake or stream.
- Where impacts are located in areas subject to the jurisdiction of the USACE pursuant to Section 404 of the federal CWA, obtain authorization to complete the required work pursuant to a Nationwide or individual permit.
  Where impacts are subject to the jurisdiction of the Regional Water Quality Control Board (RWQCB), obtain a Waiver of Water Quality Certification or Notice of Applicability of Waste Discharge Requirement permit.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐

The proposed project would result in potentially significant impacts to biological resources regarding having a substantial adverse effect on federally or state protected wetlands or waters of the United States through the disturbance and/or diversion of federally or state protected wetlands or waters of the United States. Incorporation of mitigation measures would reduce impacts to below the level of significance.

Wetlands and waterways that have the potential to be federally and State protected are present within the Master Plan Area. A formal jurisdictional delineation would be required to be undertaken to assess the presence or absence of Waters of the United States and the potential for any projects included in the Master

Plan resulting in dredge or fill within any features subject to Section 404 of the federal CWA and requiring either a pre-construction notification pursuant to a Nationwide Permit or an individual permit from USACE.

Current National Wetland Inventory maps and USGS blue-line drainage data for the project area were reviewed for potential wetlands and waterways subject to protection under Section 404 of the federal CWA. Wetlands and waterways potentially subject to the jurisdiction of the USACE were determined to be present within the project area (see Appendix 8, Figure 5-3 and Table 5-6).

At the Lake, the proposed projects would result in up to 1.39 acres of impacts to Freshwater Pond and approximately 0.26 acers of impacts to Freshwater Forested/Shrub Wetland that have the potential to be considered federally and/or State protected wetlands and/or waters of the United States (see Figure 1.10.2-10, *New Lake Perimeter Walk and Lake and Stream Improvements*). Additionally, approximately 3.96 acres of riparian vegetation occurring around the Lake would be impacted (Table 2.4-2, *Hydrological Features*). Riparian habitat may be under jurisdiction of CDFW. The proposed project would not result in impacts to Riverine features (Winery Channel).

TABLE 2.4-2
HYDROLOGICAL FEATURES

Hydrological Feature	Acres
National Wetlands Inventory	
Freshwater Forested/Shrub Wetland	0.26
Freshwater Pond	1.39
Riverine (Winery Channel)	0.58
CDFW jurisdiction	
Riparian habitat	3.96
Total	**6.19**

Proposed Lake projects would be subject to the provisions of Section 404 of the federal CWA. Dredge or fill in Waters of the United States is subject to the regulatory authority of the USACE pursuant to Section 404 of the federal CWA and also the provisions of Section 1600 of the State Fish and Game Code, under which a Lake or Streambed Alteration Agreement would need to be obtained prior to the alteration of a State jurisdictional area.

The intent of proposed projects at the Lake is to restore and to improve wetland and riparian habitat. Additionally, implementation of Mitigation Measure BIO-3 would reduce impacts to below the level of significance. Therefore, the proposed project would result in less than significant impacts after mitigation to biological resources regarding having a substantial adverse effect on federally or State protected wetlands or Waters of the United States.

Mitigation Measure BIO-3: To mitigate for impacts to **Jurisdictional Resources** that cannot be avoided:

- The County of Los Angeles Department of Parks and Recreation (DPR) shall apply for a Section 401 permit from the RWQCB and a 1602 Streambed Alteration Agreement from CDFW. These permits shall be obtained prior to approval of improvement plans; issuance of grading permits; and/or any clearing, grading, or excavation work.
- The DPR shall ensure that the proposed projects would result in no net loss of Waters of the State by providing mitigation through impact avoidance; impact minimization; and/or compensatory mitigation (i.e., on-site mitigation) for the impact, as determined in the Streambed Alteration Agreement.

- The DPR retains responsibility for the implementation and success of the mitigation project. Evidence of secured permits shall be provided prior to approval of improvement plans; issuance of grading permits; and/or any clearing, grading, or excavation work.

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

The proposed project would result in potentially significant impacts to biological resources regarding interfering substantially with the movement of any native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors. There are no previously recorded nursery sites within the Master Plan Area; however, the Master Plan Area does contain suitable nesting habitat for bird species and suitable for bat roosting which may be impacted by the proposed project.. Incorporation of mitigation measures would reduce impacts to nesting birds and roosting and foraging bats to below the level of significance.

There are no established fish or wildlife movement corridors present within the Master Plan Area. The Master Plan Area is located within the San Rafael Hills but surrounded by large highway systems (SR-2, I-210, and SR-134), residential communities, and urban sprawl that isolate it from the San Gabriel Mountains to the north and the Verdugo Mountains to the west. Three underpasses located at Stancrest Drive, Fern Lane, and Sherer Lane pass under SR-2 and could potentially offer opportunities for wildlife movement between the Verdugo mountains and the San Rafael Hills and eventually the Master Plan Area. However, there is no continuous habitat to any of these locations to provide connectivity for the unrestricted movement of wildlife species. Therefore, the Master Plan Area does not offer direct connection or wildlife movement corridors to the Verdugo Mountains or San Gabriel Mountains. Additionally, as part of the proposed project's Wildlife Management Plan, fencing around the perimeter of the developed garden would be improved and upgraded and a portion would be removed (Figure 1.10.2-1). Removal of this portion of the fence would allow for wildlife movement in the undeveloped portions of the property and increased wildlife movement within the San Rafael Hills.

The National Park Service has included the Master Plan Area in its proposed boundary adjustment for the Santa Monica Mountains National Recreation Area as a result of the 2016 Rim of the Valley Corridor Special Resource Study, which provides a potential opportunity for cooperative conservation efforts with the National Park Service towards enhancing and maintaining habitat connectivity and protecting significant resources.

There are no previously recorded nursery sites within the Master Plan Area; however, the Master Plan Area does contain suitable nesting habitat for a variety of bird species as well as areas suitable for bat roosting and foraging (Appendix 8). Direct impacts to nesting birds and bat roosts would be limited to the construction of projects proposed within the Master Plan; however, impacts would be reduced to below the level of significance with incorporation of Mitigation Measures BIO-4, and BIO-5.

Therefore, the proposed project would result in less than significant impacts after mitigation to biological resources regarding interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impeding the use of native wildlife nursery sites.

Mitigation Measure BIO-4: To avoid impacts to **nesting birds protected under the MBTA**:

- Construction related to proposed projects should take place outside of the nesting bird season, which generally occurs between February 15 and September 1.
- If construction activities cannot avoid the nesting bird season, pre-construction nesting bird surveys shall be conducted by a qualified biologist no more than three days prior to the start of construction and shall include a 300-foot survey area for non-raptors and a 500-foot survey area for raptors.
- On the first day of construction at any given site, a qualified biologist shall perform a pre-construction "sweep" to identify any bird nests or other resources that may have appeared since the nesting bird survey.
- On each subsequent day of construction during the nesting season, a biological monitor shall first perform a daily sweep at each work site to look for nesting birds. The daily sweeps shall be conducted to identify new nests (partially built, active, or inactive) not detected during the preconstruction survey or clearance sweep.
- Should nesting birds be discovered within or adjacent to the construction footprint during these surveys, a non-disturbance buffer shall be placed around the active nest[7] to prevent impacts to nesting birds.
- Construction shall be halted within the non-disturbance buffer (typically 250 feet for non-raptors and 500 feet for raptors) until the biologist has determined that the young have fledged and are flying well enough to avoid the proposed construction activities. Established buffer sizes depend on site-specific conditions, known tolerances species and individual bird behavior and shall be determined by the qualified biologist.
- Active nests near construction work areas shall be monitored. If a nesting bird appears to be stressed as a result of project activities and is at risk of abandoning its nest, the biologist shall halt activity in the immediate area until the bird resumes its normal behavior or until the nest has been determined to no longer be active.

Mitigation Measure BIO-5: To mitigate potential impacts to **bat species**:

- Pre-construction surveys shall be conducted by a qualified biologist, including nighttime surveys, at least seven consecutive days prior to the start of project activities near suitable roosting habitat[8].
- If it is determined during the pre-activity surveys that the area (including oak woodland and riparian habitat) could be used as roost sites by bat species, to avoid the direct loss of bats that could result from disturbance to trees or structures that may provide maternity roost habitat (e.g., in cavities or under loose bark) or structures that contain a hibernating bat colony, the following steps shall be taken:
  - To the extent feasible, demolition or disturbance to suitable bat roosting habitat shall be scheduled between October 1 and February 28, outside of the maternity roosting season.
  - If suitable bat roosting habitat must be encroached during the maternity season (March 1 to September 30), a qualified bat specialist shall conduct a pre-construction survey to identify the

[7] The MBTA does not clearly define what an active (or inactive) nest is. However the USFWS has clarified that the federal regulations do not pertain to the destruction of nests alone (without birds or eggs), provided that possession of the nests does not occur and the activities do not otherwise result in take of migratory birds covered by the MBTA. (See U.S. Fish and Wildlife Service. June 14, 2018. Memorandum: Destruction and Relocation of Migratory Nest Contents. Accessed January 15, 2020. https://www.fws.gov/policy/m0407.pdf). CDFW has not provided clarification on the regulations pertaining to nesting birds. Therefore, for purposes of this measure, non-raptor, non-special-status species nests without eggs or chicks are considered inactive. For raptors, a nest is considered active when raptors exhibit nest construction or nest decorating behavior. The project biologist will determine when a nest is active based upon field observations at each nest.

[8] For sensitive bat species with potential to occur in the Master Plan Area this includes high cliffs, rocky outcrops, rock crevices, caves, mineshafts, under bridges, in buildings, tall trees, hollow trees, beneath exfoliating bark, abandoned woodpecker holes, or foliage.

habitat proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.

- Any suitable bat roosting habitat identified as potentially supporting an active maternity roost and each structure potentially supporting a hibernating colony shall be closely inspected by the bat specialist no greater than seven days prior to the habitat's disturbance to more precisely determine the presence or absence of roosting bats.
- If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, it is preferable to bring down trees, buildings, or structures in a controlled manner using heavy machinery.
- In order to ensure the optimum warning for any roosting bats that may still be present, trees, buildings, or structures shall be nudged lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. Trees, buildings, or structures may then be pushed to the ground slowly under the supervision of a bat specialist.
- Felled trees shall remain in place until they are inspected by a bat specialist. Trees that are known to be bat roosts shall not be sown up or mulched immediately. A period of at least 48 hours shall elapse prior to such operations to allow bats to escape.
- Bats shall be allowed to escape prior to demolition of structures or buildings. This may be accomplished by placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.
- Maternity season lasts from March 1 to September 30. Trees, buildings, or structures determined to be maternity roosts shall be left in place until the end of the maternity season. A suitable bat roosting habitat containing a hibernating colony shall be left in place until a qualified biologist determines that the bats are no longer hibernating.

e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?	☐	☒	☐	☐

The proposed project would result in potentially significant impacts to biological resources regarding converting oak woodlands or woodlands or other unique native woodlands. Incorporation of mitigation measures would reduce impacts to below the level of significance.

Oak and other native woodlands are present throughout the Master Plan Area (see Appendix 8, Figure 4-1). The project study area includes a total of approximately 31.12 acres of Oak Woodland (see Appendix 8, Table 5-5). Individual oak and native trees distinct from woodland communities are also present in the Master Plan area. However, the oak woodlands are not pristine habitat, having been continually disturbed and maintained by garden upkeep and fuel modification activities and contain many nonnative and/or invasive species within their understory.

No direct removal of oak trees is anticipated. Direct impacts to oaks could occur during the construction of the proposed widened service road in southeast corner of the Master Plan Area. Indirect impacts could result from construction of the Canopy Walk in areas where it is not possible to avoid activities within the dripline of oak trees. However, the Master Plan proposes to restore the existing woodlands within the developed garden by removing, and transplanting elsewhere, existing camellias that are too close to oak root zones and replacing them with species more compatible with the native oak understory. This would encourage the long-term health of the oak woodland ecosystem and encourage the establishment of oak seedlings on either side of the drip line of the oaks.

This analysis of impacts of individual projects included in the Master Plan to oak woodlands or woodlands otherwise containing oak or other unique native tress is based on a potential worst-case scenario for construction activities and the current general configurations of the Master Plan. Proposed individual projects in the Master Plan are conceptual and would be designed to avoid the removal or disturbance of any protected oak tree. The Master Plan would seek to ensure the continued protection and stewardship of these woodlands. In addition, implementation of Mitigation Measures BIO-1 and BIO-6 would reduce impacts to below the level of significance.

Therefore, the proposed project would result in less than significant impacts to biological resources regarding converting oak woodlands or woodlands otherwise containing oak or other unique native trees.

Mitigation Measure BIO-6: To mitigate potential impacts on **oak and other native woodlands**:

- Environmentally Sensitive Area fencing shall be placed around the driplines or trunks of protected oak trees within and adjacent to the limits of disturbance, depending on the scheduled construction activity, such that no work shall occur within the protected area.
- Use of on-site monitors shall be required for periods when construction shall be undertaken within 250 feet of oak woodlands, and native woodlands, and when construction is within 100 feet of the dripline of individual isolated protected native trees.
- To ensure no loss of oak trees within and adjacent to the limits of disturbance after completion of construction activities, trees shall be monitored, for up to 5 years, for mortality and replanted at the appropriate ratios below to compensate as needed. .
- Per the County Oak Tree Ordinance for every protected tree that must be removed, the same species shall be replaced at a minimum of a 2:1 ratio.
    - Compensatory mitigation for protected trees in the jurisdiction of the County may include replacement at a 3:1 ratio for trees with a diameter at breast height of 8 inches or more at an appropriate mitigation site, and replacement at a 10:1 ratio for heritage oaks.
    - Replacement trees shall be monitored by a licensed arborist, for at least one year, to ensure survivability of replacement trees meet success criteria.

To comply with Public Resources Code 21083.4:

If the County determines that there may be a significant effect to oak woodlands, the County shall require one or more of the following oak woodlands mitigation alternatives to mitigate the significant effect of the conversion of oak woodlands:

1. Conserve oak woodlands, using conservation easements.
2. Plant an appropriate number of trees, including maintaining plantings and replacing dead or diseased trees.
    a. The requirement to maintain trees pursuant to this measure terminates 7 years after the trees are planted.
3. Restore former oak woodlands.
4. Contribute funds to the Oak Woodlands Conservation Fund

f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), and Sensitive Environmental Resource Areas (SERAs) (L.A. County Code, Title 22, Ch. 22.44)?	☐	☐	☐	☒

The proposed project would result in no impacts in relation to conflicts with local policies or ordinances protecting biological resources, including Wildlife Reserve Areas, the Los Angeles County Oak Tree Ordinance, Significant Ecological Areas (SEAs), and Sensitive Environmental Resource Areas (SERAs). The Master Plan Area is not located within any Wildflower Reserve Areas, SEAs, or SERAs; therefore, the proposed project would not conflict with these policies or result in impacts to these areas. The nearest SEA to the Master Plan area is the Verdugo Mountains, located approximately 1.4 miles west, and Altadena Foothills and Arroyos, located approximately 1.8 miles east of the Master Plan Area (Appendix 8, Figure 5-4).

The goals and objectives of the Master Plan have been developed in consideration of regulations, planning documents, agreements, and ordinances including, but not limited to, the Parks and Recreation Element of the County General Plan 2035 (Descanso Gardens is classified as a regional recreational special use facility [botanical garden])[9] and The Conservation and Natural Resources Element of the General Plan 2035.[10]

The proposed project would result in no impacts to biological resources related to conflicts with the County General Plan, because proposed Master Plan projects, in particular the Wilds Loop, would be required to be designed consistent with Goal C/NR 3, Policy C/NR 3.1, Policy C/NR 3.2, Policy C/NR 3.3, Policy C/NR 3.4, Policy C/NR 3.5, Policy C/NR 3.6, Policy C/NR 3.7, Policy C/NR 3.8, Policy C/NR 3.9, Policy C/NR 3.10, Policy C/NR 3.11 and Goal C/NR 4, Policy C/NR 4.1, which requires a goal of no net loss of existing woodlands and environmentally superior mitigation for unavoidable impacts on biologically sensitive areas, no net loss of habitat functions and values. The application of the County's General Plan Parks and Recreation Element and the Conservation and Natural Resources Element to the individual trail project within the proposed project would accomplish the objectives within these plans of minimizing impacts to the natural environment. Furthermore, the implementation of the proposed project would be beneficial to biological resources because it would direct visitors to designated areas within the Master Plan Area for use rather than permit disorganized use of the land without acknowledgement and protection of environmentally sensitive areas.

The City of LCF General Plan Open Space and Recreation Element and Conservation Element contains goals and objectives related to biological resources. The application of these goals to the Master Plan would accomplish the objectives within these plans of minimizing impacts to the natural environment.

Any future Master Plan projects would be designed in accordance with the County ordinances to avoid the removal or disturbance of any protected oak trees and would be required to comply with the Los Angeles

[9] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch10.pdf

[10] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Chapter 10: Parks and Recreation Element. Chapter 9: Conservation and Natural Resources Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch9.pdf

County Oak Tree Removal Permit process should tree removal be necessary. Therefore, the proposed project would not conflict with the policies of this plan.

The proposed Master Plan would not conflict with Municipal Code Sections 22.56.2050–60 as projects would be designed to avoid the removal or disturbance of any protected oak tree, and any trails project under the proposed project would be required to comply with the Los Angeles County Oak Tree Removal Permit application process, should tree removal be necessary. Therefore, the proposed project would result in no impacts regarding conflict with local policies or ordinances protecting biological resources, and no mitigation would be required.

g) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan?	☐	☐	☐	☒

The proposed project would result in no impacts in relation to conflicts with adopted Habitat Conservation Plans (HCPs), Natural Community Conservation Plans (NCCPs), or other approved state, regional, or local habitat conservation plans. The Master Plan Area does not intersect with any HCPs or NCCPs. The closest HCP/NNCPs are in the City of Rancho Palos Verde, approximately 28 miles south, and the Orange County Transportation Authority NNCP, approximately 22 miles south west (see Appendix 8, Figure 5-5). Therefore, the proposed Master Plan would result in no impacts to biological resources regarding conflicts with the provisions of an adopted state, regional, or local habitat conservation plan. No further analysis is warranted.

2.5. CULTURAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to cultural resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. Cultural resources in the Master Plan Area were evaluated with regard to a query of the South Central Coastal Information Center and the Native American Heritage Commission for the USGS 7.5-minute series, Pasadena, topographic quadrangle in which the proposed project is located; review of published and unpublished literature; County General Plan 2035;[1] and a pedestrian survey, as documented in the *Descanso Gardens Master Plan Cultural Resources Technical Report* (Appendix 9, on file with the County, available on a need-to-know basis only). Although the County is not subject to the City of LCF General Plan, the relevant information has been provided to inform the County's decision-making process.[2]

REGULATORY FRAMEWORK

Federal

Historic Sites Act of 1935

The Historic Sites Act (49 Stat. 666; 16 USC 461–467) became law on August 21, 1935 and declared that it is national policy to "Preserve for public use historic sites, buildings, and objects of national significance." The National Historic Preservation Act (NHPA) expanded the scope to include important state and local resources. Provisions of NHPA established the National Register of Historic Places (NRHP) maintained by the National Park Service, Advisory Council on Historic Preservation (Advisory Council), State Historic Preservation Officers, and grants-in-aid programs. Section 106 of the NHPA requires all federal agencies to consult the Advisory Council before continuing any activity affecting a property listed in or eligible for listing in the NRHP. The Advisory Council has developed regulations for Section 106 (36 Code of Federal Regulations [CFR] Part 800) to encourage coordination of agency cultural resource compliance requirements (Executive Order 11593).

United States Department of Transportation Act of 1966

Section 4(f) of the U.S. Department of Transportation Act of 1966 affords special protection to public recreational lands and facilities, including local parks and school facilities that are open and available to the general public for recreational purposes, significant cultural resources, historic properties, and natural wildlife refuges. Federally funded transportation improvement projects are prohibited from the encroachment (direct or constructive use, or a take) of Section 4(f) lands unless it can be demonstrated that no prudent and feasible alternative exists.

National Historic Preservation Act of 1966

Enacted in 1966, the NHPA (Public Law 89-665; 16 U.S. Code [USC] 470 et seq.) declared a national policy of historic preservation and instituted a multifaceted program, administered by the NPS, to encourage the achievement of preservation goals at the federal, state, and local levels. The NHPA authorized the expansion and maintenance of the NRHP, established the position of State Historic Preservation Officer (SHPO), provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assisted Native American tribes to preserve their cultural heritage, and created the Advisory Council. Section 106 of the NHPA states that federal agencies with direct or indirect jurisdiction

[1] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan

[2] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

over federally funded, assisted, or licensed undertakings must take into account the effect of the undertaking on any historic property that is included in, or eligible for inclusion in, the NRHP, and that the Advisory Council must be afforded an opportunity to comment, through a process outlined in 36 CFR Part 800 on such undertakings.

The NPS administers two Federal recognition programs, the NRHP and the National Historic Landmarks (NHL) Program.

National Register of Historic Places

Working with State Historic Preservation Offices, Tribal Historic Preservation Offices, and Federal Preservation Offices, the NPS maintains the NRHP. This is the official list of properties that are deemed worthy of preservation. Properties listed in the NRHP tell stories that are important to a local community, the citizens of a specific state, or all Americans. Properties listed in the NRHP may be owned by private individuals, universities, nonprofits, governments, and/or corporations.

The NRHP was established by the NHPA of 1966 as "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

Criterion A:	It is associated with events that have made a significant contribution to the broad patterns of our history.
Criterion B:	It is associated with the lives of persons who are significant in our past.
Criterion C:	It embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.
Criterion D:	It has yielded, or may be likely to yield, information important in prehistory or history.

Cemeteries, birthplaces, or graves of historic figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; and properties that are primarily commemorative in nature are not considered eligible for the NRHP unless they satisfy certain conditions. In general, a resource must be at least 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance.

National Historic Landmarks Program

The NPS also administers the NHL Program. Properties designated as NHLs tell important stories related to the history of the nation overall. These properties must also possess a high level of historic integrity. All properties designated NHLs are automatically included in the NRHP.

Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines

The Standards and Guidelines are prepared under the authority of Sections 101(f) (g), and (h), and Section 110 of the NHPA of 1966, as amended. The Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation. These standards and guidelines are not regulatory and do not set or interpret agency policy. They are intended to provide technical advice about archaeological and historic preservation activities and methods. The NPS has not republished "The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation" since 1983 (48 Federal Register 44716). The NPS has updated portions of the Standards and Guidelines. NPS has officially revised portions and published the revisions in the Federal Register, such as the Historic Preservation Project standards and the treatment definitions. The purposes of the Standards are

- To organize the information gathered about preservation activities.
- To describe results to be achieved by federal agencies, states, and others when planning for the identification, evaluation, registration and treatment of historic properties.
- To integrate the diverse efforts of many entities performing historic preservation into a systematic effort to preserve our nation's culture heritage.

Secretary of the Interior's Standards for the Treatment of Historic Properties

The current version of The Secretary of the Interior's *Standards for the Treatment of Historic Properties* (36 CFR Part 68, 1995) consists of four treatment standards—Preservation, Rehabilitation, Restoration, and Reconstruction—and is regulatory for NPS Grants-in-Aid programs. The Secretary of the Interior's *Standards for Rehabilitation* (36 CFR Part 67, 1990), which are included in the treatment standards, are regulatory for the Federal Historic Preservation Tax Incentives program and used as the criteria to determine if a project qualifies as "a certified rehabilitation." The 1990 and the 1995 versions of the Rehabilitation Standards are identical except for their use of "shall" and "will," respectively. The Secretary of the Interior's *Standards for the Treatment of Historic Properties*, in particular the *Standards for Rehabilitation*, are intended as general guidance for work on all historic properties and are widely used and have been adopted at the Federal, State and local levels.

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act (NAGPRA; Public Law 101-601; 25 USC 3001–3013) also applies if human remains of Native American origin are discovered on federal land. NAGPRA requires federal agencies and federally assisted museums to return "Native American cultural items" to the federally recognized Indian tribes or Native Hawaiian groups with which they are associated. Regulations (43 CFR Part 10) stipulate the following procedures be followed. If Native American human remains are discovered, the following provisions would be followed to comply with regulations:

- Notify, in writing, the responsible federal agency.
- Cease activity in the area of discovery and protect the human remains.
- Certify receipt of the notification.
- Take steps to secure and protect the remains.
- Notify the Native American tribes or tribes likely to be culturally affiliated with the discovered human remains within one working day.
- Initiate consultation with the Native American tribe or tribes in accordance with regulations described in 43 CFR, Part 10, Subpart B, Section 10.5.

Paleontological Resources Preservation Act

The Paleontological Resources Preservation Act (PRPA) was signed into law on March 30, 2009 (Public Law 111-11, Title VI, Subtitle D; 16 USC Sections 470aaa–470aaa-11). PRPA directs the Department of Agriculture (U.S. Forest Service) and the Department of the Interior (NPS, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to implement comprehensive paleontological resource management programs. Section 6310 of PRPA specifically states, "As soon as practical after the date of enactment of this Act, the Secretary shall issue such regulations as are appropriate to carry out this subtitle, providing opportunities for public notice and comment."

STATE

California Implementation of Federally and State-Mandated Historic Preservation Program

The California State Office of Historic Preservation (OHP) is responsible for administering federally and state mandated historic preservation programs to further the identification, evaluation, registration, and protection of California's irreplaceable archaeological and historical resources under the direction of the State Historic Preservation Officer (SHPO), a gubernatorial appointee, and the State Historical Resources Commission.

OHP's responsibilities include

- Identifying, evaluating, and registering historic properties
- Ensuring compliance with federal and state regulatory obligations
- Encouraging the adoption of economic incentives programs designed to benefit property owners
- Encouraging economic revitalization by promoting a historic preservation ethic through preservation education and public awareness and, most significantly, by demonstrating leadership and stewardship for historic preservation in California

OHP reviews and comments on thousands of federally sponsored projects annually pursuant to Section 106 of the NHPA and state programs and projects pursuant to Sections 5024 and 5024.5 of the PRC. OHP also reviews and comments on local government and state projects pursuant to CEQA.

The purpose of OHP's project review program is to promote the preservation of California's heritage resources by ensuring that projects and programs carried out or sponsored by federal and state agencies comply with federal and state historic preservation laws and that projects are planned in ways that avoid any adverse effects to heritage resources. If adverse effects cannot be avoided, the OHP assists Lead Agencies in developing measures to minimize or mitigate such effects.

OHP administers the NRHP, the CRHR, the California Historical Landmarks, and the California Points of Historical Interest programs. Each program has different eligibility criteria and procedural requirements; all register nominations must be submitted to the Commission for review and approval.

National Register of Historic Places

Applications to nominate California properties to the NRHP are submitted to OHP for review and approval by the State Historic Resources Commission. Authorized under the NHPA, the NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect historic and archaeological resources. The NRHP is administered by the NPS, which is part of the U.S. Department of the Interior. Prior to forwarding Nomination Packages for consideration for the NRHP, OHP must review the package and make a determination that it conforms to the guidelines published by NPS Bulletin 16A. If

approved by the State Historic Resources Commission, the nomination is sent to the SHPO for nomination to the NRHP.

California Register of Historical Resources

The CRHR is an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change. The criteria for eligibility for the CRHR are based upon NRHP criteria. These criteria are:

Criterion 1: Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California of the United States;
Criterion 2: Associated with the lives of persons important to local, California or national history;
Criterion 3: Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; and
Criterion 4: Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The CRHR consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The CRHR automatically includes the following:

- California properties listed in the NRHP (Category 1 in the State Inventory of Historical Resources) and those formally Determined Eligible for listing in the NRHP (Category 2 in the State Inventory)
- California Registered Historical Landmarks from No. 077 onward
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion in the CRHR

Other resources that may be nominated for listing in the CRHR include:

- Historical resources with a significance rating of Categories 3 through 5 in the State Inventory (Categories 3 and 4 refer to potential eligibility for the NRHP, while Category 5 indicates a property with local significance);
- Individual historical resources;
- Historical resources contributing to historic districts; and
- Historical resources designated or listed as a local landmark.

Additionally, a historic resource eligible for listing in the CRHR must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.

California Historical Landmarks

California Historical Landmarks are sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. The specific standards now in use were first applied in the designation of Landmark # 770. California Historical Landmarks #770 and above are automatically listed in the CRHR.

To be designated as a California Historical Landmark, a resource must meet at least one of the criteria listed below; have the approval of the property owner(s); be recommended by the State Historical Resources Commission; and be officially designated by the Director of California State Parks.

Criteria for Designation. To be eligible for designation as a Landmark, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
- Associated with an individual or group having a profound influence on the history of California.
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer or master builder.

Effects of Designation.

- Limited protection: Environmental review may be required under CEQA if property is threatened by a project. Contact your local planning agency for more information.
- Local assessor may enter into contract with property owner for property tax reduction (Mills Act).
- Local building inspector must grant code alternative provided under State Historic Building Code. Registration will be recorded on the property deed.
- Automatic listing in CRHR.
- Bronze plaque at site (underwritten by local sponsor) ordered through OHP; highway directional sign available through local Department of Transportation (Caltrans) district office.

California Points of Historical Interest

If a site is primarily of local interest, it may meet the criteria for the California Points of Historical Interest Program. California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historical resource may be designated as both a Landmark and a Point. If a Point is subsequently granted status as a Landmark, the Point designation will be retired.

Criteria for Designation. To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type within the local geographic region (city or county).
- Associated with an individual or group having a profound influence on the history of the local area.
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer or master builder.

Effects of Designation.

- Limited protection: Environmental review may be required under CEQA if property is threatened by a project. Contact your local planning agency for more information.
- Local assessor may enter into contract with property owner for property tax reduction (Mills Act).

- Local building inspector must grant code alternative provided under State Historic Building Code.
- Registration is recorded on property deed.
- A small enamel directional sign (no text) available through local Caltrans district office. Owner may place his or her own marker at the site.

California Environmental Quality Act[3]

Pursuant to CEQA, a *historical resource* is a resource listed in, or eligible for listing in, the CRHR. In addition, resources included in a local register of historic resources or identified as significant in a local survey conducted in accordance with state guidelines are also considered historical resources under CEQA, unless a preponderance of the facts demonstrates otherwise. According to CEQA, the fact that a resource is not listed in or determined eligible for listing in the CRHR, or is not included in a local register or survey, shall not preclude a Lead Agency from determining that the resource may be a historic resource as defined in PRC Section 5024.1.[4]

CEQA applies to archaeological resources when (1) the archaeological resource satisfies the definition of a historical resource or (2) the archaeological resource satisfies the definition of a "unique archaeological resource." A unique archaeological resource is an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:[5]

(1) The archaeological resource contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
(2) The archaeological resource has a special and particular quality such as being the oldest of its type or the best available example of its type.
(3) The archaeological resource is directly associated with a scientifically recognized important prehistoric or historic event or person.

California Health and Safety Code, Section 7050 and Sections 18950 through 18961

Consistent with the provisions of Section 50907.9 of the PRC, Section 7050 of the Health and Safety Code authorizes the Native American Heritage Commission (NAHC) to regulate Native American concerns regarding the excavation and disposition of Native American cultural resources. Among its duties, the NAHC is authorized to resolve disputes relating to the treatment and disposition of Native American human remains and items associated with burials. Upon notification of the discovery of human remains by a county coroner, the NAHC notifies the Native American group or individual most likely descended from the deceased.

State Historic Building Code

The State Historic Building Code, Sections 18950–18961, provides alternative building regulations and building standards for the rehabilitation, preservation, restoration (including related reconstruction), or relocation of buildings or structures designated as historic buildings. Such alternative building standards and building regulations are intended to facilitate the restoration or change of occupancy so as to preserve their original or restored architectural elements and features, to encourage energy conservation and a cost-effective approach to preservation, and to provide for the safety of the building occupants.

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[3] California Public Resources Code, Division 13, Sections 21083.2 and 21084.1.

[4] California Code of Regulations, Title 14, Chapter 3: Guidelines for the Implementation of the California Environmental Quality Act as Amended October 6, 2005, Section 15064.5(a).

[5] California Public Resources Code, Division 13, Section 21083.2(g).

California Penal Code Section 622 – Destruction of Historical Properties

This section of the California Penal Code makes it a misdemeanor for anyone (except the owner) to willfully injure or destroy anything of archaeological interest or value whether on private lands or within any public park or place. In addition, Penal Code Section 622.5 sets the penalties for the damage or removal of cultural resources.

Senate Bill 18 – Traditional Tribal Cultural Places

Senate Bill (SB) 18, enacted in 2004, requires local governments to consult with Native American groups at the earliest point in the local government land use planning process. The consultation intends to establish a meaningful dialogue regarding potential means to preserve Native American places of prehistoric, archaeological, cultural, spiritual, and ceremonial importance. It allows for tribes to hold conservation easements and for tribal cultural places to be included in open space planning.

Assembly Bill 52

Assembly Bill (AB) 52 creates a new category of environmental resources that must be considered under CEQA: "tribal cultural resources." AB 52 is applicable to a project for which a Notice of Preparation is filed on or after July 2015.

Recognizing that tribes may have expertise with regard to their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. If the tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. Consultation may include discussing the type of environmental review necessary, the significance of tribal cultural resources, the significance of the project's impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe.

The parties must consult in good faith, and consultation is deemed concluded when either the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource (if such a significant effect exists) or when a party concludes that mutual agreement cannot be reached.

Local

County General Plan 2035

The County's cultural resources objective, found in the Conservation and Natural Resources Element of the County General Plan 2035, is to preserve and protect cultural resources including historic, archaeological, and paleontological resources.[6] Under this objective, the County has established the following policies:[7]

- Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
- Policy C/NR 14.2: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural and paleontological resources.

[6] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County 2035 General Plan: Chapter 9: Conservation and Natural Resources Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch9.pdf

[7] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County 2035 General Plan: Chapter 9: Conservation and Natural Resources Element. http://planning.lacounty.gov/assets/upl/project/gp_2035_Chapter9_2014.pdf

- Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.
- Policy C/NR 14.4: Ensure proper notification procedures to Native American tribes in accordance with SB 18 (2004).
- Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

Los Angeles County Historical Landmarks and Records Commission

The Los Angeles County Board of Supervisors established and has maintained the Los Angeles County Historical Landmarks and Records Commission pursuant to Los Angeles County Code Chapter 3.30. Pursuant to Section 26490 of the California Government Code, the Commission is designated as a historical records commission to foster and promote the preservation of historical records and properties. The Commission considers and recommends to the Board of Supervisors applications to designate properties as Landmarks or Historic Districts. The Commission may also comment for the Board of Supervisors on applications relating to the NRHP or CRHR. The Commission is also charged with fostering and promoting the preservation of historical records. In its capacity as the memorial plaque review committee of the County, the Commission screens applications for donations of historical memorial plaques and recommends to the Board of Supervisors plaques worthy of installation as County property.[8]

County of Los Angeles Historic Preservation Ordinance (Title 22 – Planning and Zoning of the Los Angeles County Code, Part 29 of Chapter 22.52)

22.52.3010 Purpose

The County of Los Angeles Historic Preservation Ordinance has seven established basic purposes:

A. Enhance and preserve the distinctive historic, architectural, and landscape characteristics which represent the County's cultural, social, economic, political, and architectural history.
B. Foster community pride in the beauty and noble accomplishments of the past as represented by the County's historic resources.
C. Stabilize and improve property values, and enhance the aesthetic and visual character and environmental amenities of the County's historic resources.
D. Recognize the County's historic resources as economic assets.
E. Encourage and promote the adaptive reuse of the County's historic resources.
F. Promote the County as a destination for tourists and as a desirable location for businesses.
G. Specify significance criteria and procedures for the designation of landmarks and Historic Districts, and provide for the ongoing preservation and maintenance of landmarks and Historic Districts.

22.52.3060 Criteria for Designation of Landmarks and Historic Districts

A. Property which is more than 50 years of age may be designated as a Landmark if it satisfies one or more of the following criteria:
    1. It is associated with events that have made a significant contribution to the broad patterns of the history of the nation, State, County, or community.
    2. It is associated with the lives of persons who are significant in the history of the nation, State, County, or community.

[8] County of Los Angeles Department of Auditor-Controller. October 21, 2002. Sunset Review for the Los Angeles County Historical Landmarks and Records Commission. http://auditor.co.la.ca.us/cms1_003345.pdf

3. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction; or represents the work of an architect, designer, engineer, or builder whose work is of significance to the nation, State, County, or community; or possesses artistic values of significance to the nation, State, County, or community.
4. It has yielded, or may be likely to yield, information important locally in prehistory or history.
5. It is listed or has been formally determined eligible by the NPS for listing in the NRHP, or is listed or has been determined eligible by the State Historical Resources Commission for listing in the CRHR.
6. It is one of the largest or oldest trees of the species located in the County.
7. It is a tree, plant, landscape, or other natural land feature having historical significance due to an association with a historic event, person, site, street, or structure, or because it is a defining or significant outstanding feature of a neighborhood.

B. Property less than 50 years of age may be designated as a Landmark if it meets one or more of the criteria set forth in Section 22.52.3060.A, above, and exhibits exceptional importance.
C. The interior space of a property, or other space held open to the general public, including but not limited to a lobby, may itself be designated as a Landmark or included in the Landmark designation of a property if the space is more than 50 years of age and satisfies one or more of the criteria set forth in Subsection A, above, or if the space is less than 50 years of age and satisfies the requirements of Section 22.52.3060.B, above.

City of LCF General Plan

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The Land Use Element and Conservation Element establish 2 goals, 1 objective, and 7 policies related to historic preservation:

LUE Goal 1: Provide an appropriate mix and balance of land uses that retain and enhance the community's distinctive character and preserve its valuable resources.

- LUE Policy 1.1.7: Foster the preservation, rehabilitation, and maintenance of landmark and historic properties in the City, such as through implementation of the Mills Act.

CNE Goal 3: Encourage the preservation of significant historical resources within the City.

CNE Objective 3.1: Mitigate the loss or compromise of significant archaeological, historical, and other cultural resources within the City.

- CNE Policy 3.1.1: Encourage designation and preservation of local historical resources.
- CNE Policy 3.1.2: Encourage use of the Mills Act as economically feasible.
- CNE Policy 3.1.3: Encourage public awareness of the significance of the area's cultural resources and historic features.
- CNE Policy 3.1.5: Require that archaeological reports (prepared by a certified archaeologist and including a literature search and a site survey) be completed for large, undeveloped parcels for which development is proposed, consistent with CEQA.
- CNE Policy 3.1.6: If any archaeological excavations are recommended on a project site, require that such investigations include Native American consultation prior to project approval.
- CNE Policy 3.1.7: If any significant archaeological sites or artifacts are discovered on a site, require coordination with professional archaeologists, relevant State agencies, and concerned Native

American tribes regarding preservation of sites or professional retrieval and preservation of artifacts prior to development of the site.

	Potentially Significant Impact	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
Would the project: **a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?**	☐	☒	☐	☐

The proposed project would result in potentially significant impacts to cultural resources related to a substantial adverse change in the significance of a historical resource. Incorporation of mitigation measures would reduce these impacts to below the level of significance.

Descanso Gardens is currently being reevaluated for California Register of Historical Resources (CRHR) status and evaluated for National Register of Historic Places (NRHP) status. The Boddy House and Garage were deemed eligible for listing in the NRHP and the CRHR in 2009. Descanso Gardens contains 13 resources that contribute to the nominated Descanso Gardens Historic District including 7 buildings, 5 sites, and 1 structure: the Boddy House, Garage, and associated landscaping (the Boddy Complex), Boddy Lodge, Caretaker's Cottage, Boddy Drive Landscape, Descanso Creek Landscape, Camellia Forest, Japanese Garden, Tea House, Minka House, Japanese Garden Bridge, and Lakeside Lookout (Table 2.5-1, *Descanso Gardens Historic District Contributing Resources*; see Appendix 9). Table 2.5-1 summarizes their status, description, and character-defining features.

TABLE 2.5-1
DESCANSO GARDENS HISTORIC DISTRICT CONTRIBUTING RESOURCES

Resource	CRHR Code	Description	Character-Defining Features
The Boddy Complex	3B	Boddy House, Garage and associated landscape features built in 1938 for Manchester Boddy by L.D. Richardson and Company	Low pitched gabled roof; four radiating wings; brick veneered and horizontal wood clad walls on house; gabled dormers; bay, casement, and oval windows on house; metal hoods over windows; full height entry porch on house; six total single-car garage doors on the garage; three wood-paneled and glazed doors on the north façade of the garage; shed roof and partial loggia; metal sash casement windows; brick and wood siding exterior of garage; cupola-crowned gable-and-hip roof; round motor court; central planter; brick pavers
Boddy Lodge	3D	One-story vernacular cabin built circa 1950	Gable and shed roof; exposed rafter tails; wide horizontal, clapboard siding; full width lakeside porch; brick chimney
Caretaker's Cottage	3D	Ranch style residence built prior to 1951	Side-gabled roof, vertical board and batten; full-length covered front porch; exposed rafter ends; brick chimney
Boddy Drive Landscape	3D	Trail leading to the Boddy Complex that was the original driveway leading to the house from the north and west	Stone curbing; stone retaining wall; stone culvert and bridge
Descanso Creek Landscape	3D	Manmade lake and Rose Garden Pond	Waterfall; mulberry pond
Camellia Forest	3D	Manmade forest of oak trees and camellia plants located near the center of the Historic District	9 acres of oak trees and camellia plants
Japanese Garden	3D	Designed by Eijiro Nunokawa in 1966 and redesigned in 1969	Curling paths; raised concrete platforms between buildings
Tea House	3D	Designed by Whitney R. Smith and Wayne Williams of Smith & Williams in 1966	Raised tapered concrete patio; unpainted wood batten and boards siding; open porch with striated cylindrical wood columns; blue glazed tile roofing; pyramidal, low-slope hipped skirt roof; sliding doors
Minka House	3D	Constructed in 1969 to resemble a traditional Japanese country-style farmhouse and designed by Kenneth Masao Nishimoto	Gable-on hip roof; rounded pilasters; large fixed-pane windows; sliding doors; sliding bamboo panels
Japanese Garden Bridge	3D	Constructed in 1969 and designed by Kenneth Masao Nishimoto	Wood and concrete arched deck; railings with rectangular balusters with notched tops; arched round and square baluster; small pillars with globe caps and rounded finials; color
Lakeside Lookout	3S	Constructed in 1968 in partnership with the San Fernando Audubon Society and the Descanso Gardens Guild, Inc.	Viewing platform facing the lake; half-height wall of matchboard-type vertical wood siding; side gabled roof with central accent beam

Also located within the Master Plan Area but not contributor elements to the Descanso Gardens Historic District are DG Site 1 and DG Site 2. These sites represent late 19th- or early-20th-century gold mining shafts that were fenced off at some point in the mid-20th century. The location data for these archaeological resources will not be circulated for public review. To protect the sites from unauthorized excavation, looting, and/or vandalism, the County has been notified of the need to keep confidential the location of known archaeological resources beyond what is necessary. The National Register nomination of the Descanso Gardens Historic District is pending committee approval for February 2020.

Circulatory Framework Improvements

Improvements and additions of new circulatory routes would impact known historical resources including the Japanese Garden, Boddy Lodge, Lakeside Lookout, and the Camellia Forest. The Garden Loop, Woodland Walk, the Wilds Loop, Nature Walk, and Service Route would include the construction of approximately 1.0 mile of paved and 2.7 miles of unpaved paths, removal of 219 feet of paved paths and 1.7 miles of unpaved paths, new seating, and the installation of underground utilities all either running through or in close proximity to these historical resources. There would also be an addition of an Oak Canopy Walk through the mature canopies of the oak trees within the Camellia Forest. This would consist of an elevated path terminating at the Boddy House, three observation decks, and two sets of stairs located within the Camellia Forest. The construction of these new paths, removal of old paths, seating, installation of underground utilities and construction of the Oak Canopy walk would result in impacts to historical resources and would require the consideration of mitigation measures to ensure that there are no unauthorized impacts to known historical resources.

New Buildings, Structures, and Infrastructures

Improvements and additions of new buildings, structures, and infrastructures would impact known historical resources including the Boddy Lodge; Descanso Creek features; and the Japanese-style Minka House.

A Lake Terrace would be added to the southwest façade of the Boddy Lodge extending from the existing enclosed patio to the lake. The project would also include a new prep kitchen located behind the Boddy Lodge. The construction of the terrace to the exterior of the Boddy Lodge and the prep kitchen in the rear has the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation measures to avoid, reduce, or compensate for the impacts of this alteration.

Improvements to the manmade stream of the Descanso Creek Landscape are proposed as part of the overall improvements to hydraulic function of the gardens. Improvements to the Descanso Creek Landscape has the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation measures to avoid, reduce, or compensate for the impacts of this alteration.

The Japanese-style Garden Minka House would be converted from a staff bathroom to a public bathroom and an additional restroom would be added to the structure. The addition of an additional restroom to the structure has the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation measures to avoid, reduce, or compensate for the impacts of this alteration.

Improved Gardens

Improvements and additions of new gardens within the Master Plan Area would impact known historical resources including the Japanese Gardens; the Camellia Forest; and the Lakeside Lookout.

Lighting would be added to the Japanese Gardens to support evening events. The addition of lighting has the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation measures to avoid, reduce, or compensate for the impacts of this alteration.

The proposed project would create a Camellia Strolling Garden in the northern area of the of the existing Camellia Forest. This element would remove camellias from the 9-acre camellia forest that are designated in poor or alive condition and relocate those designated in excellent, good, or fair condition away from the Oak Root Zone. The Camellia Forest was historically an oak forest which now contains an abundance of camellia plants which were planted in the 1940s. The movement of the camellias away from the roots of the oak trees would preserve the health of the camellia plants and allow for a better focus on the plants themselves. Seventy-five percent of the camellia plants would be preserved and replanted adjacent to the north of the oak trees in a more concentrated footprint of 3 acres. With the consolidation of the camellia plants, the area known as the Camellia Forest would be updated as the Oak Woodland and Meadow. Treatments to the understory would help promote long term health of the trees. The movement of the camellia plants from the Camellia Forest north to a more concentrate footprint has the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation measures to avoid, reduce, or compensate for the impacts of this alteration.

The Lake Perimeter Walk would provide an elevated walk along the water's edge. The walk would run along the western façade of the Lakeside Lookout. No alterations to this façade are anticipated with the construction of the Lake Perimeter, but construction of the walk in close proximity of the Lakeside Lookout has the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation measures to avoid, reduce, or compensate for the impacts of this alteration.

All alterations and additions to the Minka House, Boddy Lodge, and addition of the Oak Canopy Walk in the Camellia Forest must comply with the Secretary of the Interior's *Standards for Rehabilitation*, which states, "new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment."

Additions and removal of circulatory paths through and adjacent to the Japanese Gardens; Boddy Lodge; Lakeside Lookout; and the Camellia Forest; improvements to the Descanso Creek; construction of the Lake Perimeter Walk; and the addition of lighting in the Japanese Garden must comply with the Secretary of the Interior's *Standards for Preservation*, which states, "distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the property would be preserved."[9] The movement of the camellia plants from the Camellia forest for the health of both the camellia plants and the oak trees must also comply with the Secretary of the Interior's *Standards for Preservation*, which states, "a property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces, and spatial relationships."[10] The preservation of the camellias' and oak trees in their original setting, and the preservation of the oak tree's location is recommended to ensure less than significant impacts to these resources and compliance with this standard.

Design review by an architectural historian who meets the Secretary of the Interior's *Professional Qualification Standards* for Architectural History and History is recommended for all work on or adjacent to the Japanese Gardens; the Boddy Lodge; Lakeside Lookout; Camellia Forest; Descanso Creek; and Minka House to ensure compatibility and compliance.

Mitigation Measures CULTURAL-1 and CULTURAL-2 would reduce impacts to below the level of significance.

[9] National Park Service. Accessed October 2019. Standards for Preservation. https://www.nps.gov/tps/standards/four-treatments/treatment-preservation.htm

[10] National Park Service. Accessed October 2019. Standards for Preservation. https://www.nps.gov/tps/standards/four-treatments/treatment-preservation.htm

Mitigation Measure CULTURAL-1: *Archaeological and Historical Resources – Avoidance and Monitoring.* Completion of a Worker Education and Awareness Program (WEAP) for all personnel who will be engaged in ground-disturbing activities shall be required prior to the start of ground-disturbing activities. This shall include training that provides an overview of cultural resources that might potentially be found and the appropriate procedures to follow if cultural resources are identified. This requirement extends to any new staff prior to engaging in ground-disturbing activities.

Prior to the initiation of ground-disturbing activities, the County of Los Angeles Department of Parks and Recreation (DPR) shall review the construction plans to ensure that any known cultural resources that are required to be avoided have been marked as "off-limits" areas for construction and construction staging. In addition, DPR shall require monitoring of all ground-disturbing activities by a qualified archaeologist within 60 feet of a known extant unique archaeological resource or significant historical resource.

In the event that previously unknown unique archaeological resources or significant historical resources are encountered during construction, the resources shall either be left *in situ* and avoided, or the resources shall be salvaged, recorded, and reposited at the Natural History Museum of Los Angeles County (NHM) or other repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan.[11] Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate adverse effects to cultural resources eligible or listed under Section 106 Criterion D/CRHR Criterion 4, as it preserves important information that will otherwise be lost.

Mitigation Measure CULTURAL-2: *Pre-Construction Surveys.* At the time that any construction activity is proposed that would require ground-disturbing activities in soils that have been predominantly *in situ* during the past 50 years, records and archival information shall be reviewed to determine if there are any recorded unique archaeological resources and significant historical resources as defined in Section 15064.5(a) of the CEQA Guidelines. At a minimum, the records and archival review shall include a search of the South Central Coastal Information Center if more than five years have passed since the previous records search. The appropriate course of action shall be undertaken in light of the results of the records search:

(A) Where the Master Plan Area has been subject to a Phase I Walkover Survey within two years of the proposed activity and no unique archaeological resources or significant historical resources are known within the project footprint, work shall proceed per the provision of Mitigation Measure CULTURAL-1.

(B) Where all or a portion of the project footprint has not been surveyed for cultural resources within two years of a proposed ground-disturbing activity, a qualified archaeologist who meets the Secretary of the Interior's *Professional Qualification Standards* for Archaeology and shall conduct a Phase I Walkover Survey to ascertain the presence or absence of unique archaeological and/or significant historical resources, as defined in Section 15064.5(a) of the CEQA Guidelines.

a. If the survey and record searches determine no unique archaeological resources or significant historical resources, including potential Tribal cultural resources, then the work shall proceed consistent with the provisions of Mitigation Measure CULTURAL-1.

b. If the survey determines potential unique archaeological resources or significant historical resources, then one of two courses of action shall be employed:

[11] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

i. Where avoidance is feasible, construction should avoid the potentially significant cultural resource, and the work shall then proceed consistent with the provisions of Mitigation Measure CULTURAL-1. The project area shall be surveyed by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior. An archaeological monitor under direction of a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior shall be present during ground-disturbing activities within 60 feet of previously recorded cultural resources.

ii. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior to determine the significance of the cultural resource. If the Phase II investigation identifies a unique/eligible cultural resource within the area proposed for ground-disturbing work, the County shall determine whether to avoid the resource through redesign or to proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of Mitigation Measure CULTURAL-1.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?	☐	☒	☐	☐

The proposed project would result in potentially significant impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource. Incorporation of mitigation measures would reduce these impacts to below the level of significance.

The archival research did not identify any previously recorded archaeological resources within the Master Plan Area. Two newly recorded historic-period archaeological sites (DG Site 1 and DG Site 2) were recorded during the Phase I cultural resources survey.

Projects requiring excavation within 60 feet of DG Site 1 and DG Site 2 would require monitoring by a qualified archaeologist. Where archaeological resources are encountered, evaluation, avoidance or recovery, documentation, and curation of such resources would reduce impacts to below the level of significance. Additionally, the results of the Sacred Lands File (SLF) record search conducted through the NAHC were positive for the Pasadena USGS quadrangle map in its entirety. Ground-disturbing work associated with this previously underdeveloped area would have the potential to damage or destroy previously recorded, previously unknown, and/or buried Tribal Cultural Resources (TCRs). Therefore, coordination with the Native American contacts identified by the NAHC is recommended to address unanticipated discovery of materials during construction.

The Wilds Loop, the Nature Discovery Garden, the Nursey, and the New Service Yard would be constructed in the western and northwestern edges of the Master Plan Area. Most of this area is undeveloped and ground disturbing activity has not occurred here. Implementation of Mitigation Measures CULTURAL-1 and CULTURAL-2 would reduce impacts to below the level of significance regarding ground-disturbing construction for the Wilds Loop; the Nature Discovery Garden, the Nursery; and the New Service Yard.

Therefore, impacts to archeological resources related to a substantial adverse change in the significance of an archeological resources from the proposed project would be reduced to below the level of significance with the incorporation of mitigation measures.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The proposed project would result in potentially significant impacts to cultural resources related to a substantial adverse change in the significance of a paleontological resource or site or unique geologic feature. Incorporation of mitigation measures would reduce these impacts to below the level of significance.

The presence of recorded paleontological resources and fossil localities within the Master Plan Area were assessed using information obtained from records searches at the NHM. Geologic maps of the region were also examined to evaluate the potential for the geological deposits within the Master Plan Area to yield unique paleontological resources. The results of the map review indicate that the Master Plan Area is characterized by a variety of sedimentary rock formations. The property lies at the foot of the Transverse Ranges and is characterized by alluvial fan gravel and sand derived from the San Gabriel Mountains during the Pleistocene era. Rock units within the central Transverse Ranges adjacent to the study area consist of early Cretaceous and older plutonic and meta-igneous rocks such as quartz diorite. The geological structure surrounding the property immediately to the north, south, and west consists of early Cretaceous age non-gneissoid quartz diorite and late Mesozoic granitic rock.

The NHM does not have on file any vertebrate fossil localities that lie directly within the Master Plan Area boundaries, but there are localities nearby from sedimentary deposits similar to those that may occur at depth in the Master Plan Area. In the elevated western and southern portions of the Master Plan Area, the bedrock is composed of igneous or metamorphic rocks that will not contain recognizable fossils. The less elevated northeastern portion of the Master Plan Area has surficial deposits that consist of older Quaternary alluvial fan deposits derived from the adjacent San Rafael Hills and the San Gabriel Mountains to the north. The closest vertebrate fossil locality in these older Quaternary deposits is LACM (CIT) 342, in Eagle Rock almost due south of the western-most portion of the Master Plan Area east of the Glendale Freeway (Highway 2) and Eagle Rock Boulevard just south of York Boulevard, that produced fossil specimens of turkey, *Parapavo californicus*, and mammoth, *Mammuthus*, at a depth of 14 feet below the surface. The fossil turkey specimen from locality LACM (CIT) 342 was published in the scientific literature by L.H. Miller in 1942,[12] and the mammoth specimen was a rare, nearly complete skeleton and was published in the scientific literature by V.L. Roth in 1984.[13] A little farther but to the southeast of the Master Plan Area, in Pasadena south of Washington Boulevard and west of Allen Avenue near the western end of Brigden Road, the older Quaternary locality LACM 2027 produced a fossil specimen of mammoth, *Mammuthus*.

The construction of the Nature Discovery Garden, the Nursery, and the New Service Yard would require a qualified paleontologist to be consulted to determine if additional paleontological studies and/or monitoring are necessary. Mitigation Measure CULTURAL-3 would reduce impacts to below the level of significance.

Mitigation Measure CULTURAL-3: *Paleontological Resources – Paleontological Monitoring.* Impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance by monitoring, salvage, and curation at the NHM.[14] Unanticipated paleontological resources discovered during ground-disturbing activities in

[12] Miller, L.H. 1942. A New Fossil Bird Locality. Condor 44 (6): 283–84.

[13] Roth, V.L. 1984. How Elephants Grow: Heterochrony and the Calibration of Developmental Stages in Some Living and Fossil Species. Journal of Vertebrate Paleontology 4 (1): 126–45.

[14] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

previously undisturbed native soils located five or more feet below the ground surface that would have the potential to contact geologic units with a high to moderate potential to yield unique paleontological resources. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, DPR shall require and be responsible for salvage and recovery of those resources by a qualified paleontologist consistent with standards for such recovery established by the Society of Vertebrate Paleontology.[15]

Paleontological Resources Sensitivity Training given by a qualified paleontologist or archaeologist cross-trained in paleontology shall be required for all project personnel involved in ground disturbing activities prior to the start of these activities in geologic units with a moderate to high potential to yield unique paleontological resources. This shall include a brief field training that provides an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified. This requirement extends to any new staff involved in earth disturbing that joins the project.

Construction monitoring by a qualified monitor (archaeologist cross-trained in paleontology or paleontologist) shall be implemented during all ground-disturbing activities that affect previously undisturbed geologic units 5 or more feet below the ground surface and have the potential to encounter geologic units with a moderate to high potential to yield unique paleontological resources. In the event that a paleontological resource is encountered during construction, all ground-disturbing activity within 100 feet of the find shall be halted until a qualified paleontologist can evaluate the significance of the discovery. Additional monitoring recommendations may be required. If the resource is found to be significant, the paleontologist shall determine the most appropriate treatment and method for stabilizing and collecting the specimen. Curation of the any significant paleontological finds shall be housed at a qualified repository, such as the NHM.

Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to DPR with an appended, itemized inventory with representative snapshots of specimens. The report and inventory, when submitted to DPR, shall signify the completion of the program to mitigate impacts to paleontological resources. A copy of the report/inventory shall be filed with the DPR and the NHM.

d) Disturb any human remains, including those interred outside of dedicated cemeteries? ☐ ☒ ☐ ☐

The proposed project would result in potentially significant impacts to cultural resources related to disturbing any human remains, including those interred outside of dedicated cemeteries. Incorporation of mitigation measures would reduce these impacts to below the level of significance.

Although no resources have been identified as a result of prior investigations; the potential exists to encounter human remains when conducting excavations in native soils. There are no recorded cemeteries within the Master Plan Area. Ground-disturbing activities associated with the construction would not be expected to

[15] A Qualified Professional Paleontologist (Principal Investigator, Project Paleontologist) is a practicing scientist who is recognized in the paleontological community as a professional and can demonstrate familiarity and proficiency with paleontology in a stratigraphic context. A paleontological Principal Investigator shall have the equivalent of the following qualifications:

1. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.

2. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.

3. Proficiency in recognizing fossils in the field and determining their significance.

4. Expertise in local geology, stratigraphy, and biostratigraphy.

5. Experience collecting vertebrate fossils in the field.

directly or indirectly affect or destroy human remains. However, because there are known historic archaeological sites within the Master Plan Area, ground-disturbing work associated with the project has the potential to damage or destroy previously recorded, previously unknown, and/human remains.

Three previously recorded Native American village sites with burials are located within 0.5 mile of the Master Plan Area. No formal historic or modern cemeteries were identified within the Master Plan Area or the 0.5-mile buffer. No formal cemeteries or previously recorded burial sites are known within the Master Plan Area (Appendix 9). The proposed project has been designed to avoid the location of extant and historical cemeteries and burial grounds. The chance of an unanticipated discovery remains, but implementation of Mitigation Measure CULTURAL-4 would reduce impacts to below the level of significance.

Mitigation Measure CULTURAL-4: *Regulatory Requirements – Human Remains.* In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

2.6. ENERGY

This analysis is undertaken to determine if the proposed project may have a significant impact to energy, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form.[1] Energy impacts associated with implementation of the proposed project were evaluated with regard to the County General Plan 2035,[2] the City of LCF General Plan Air Quality and Conservation Element,[3] and the SCAG 2016–2040 RTP/SCS[4] for the Master Plan Area.[5]

REGULATORY FRAMEWORK

Federal

Energy Policy and Conservation Act of 1975

The Energy Policy and Conservation Act of 1975 responded to the 1973 oil crisis by developing a comprehensive federal energy policy. The act's main goals are to increase energy production and supply, reduce energy demand, provide energy efficiency, and empower the executive branch to minimize disruption to energy supply. The act has eight main purposes (of which two have been repealed): (1) to grant specific authority to the president to fulfill obligations of the United States under the international energy program; (2) to provide for the creation of a Strategic Petroleum Reserve capable of reducing the impact of severe energy supply interruptions; (3) Repealed by Section 102(2) of Public Law 106–469, 114 Statute 2029; (4) to conserve energy supplies through energy conservation programs, and, where necessary, the regulation of certain energy uses; (5) to provide for improved energy efficiency of motor vehicles, major appliances, and certain other consumer products; (6) Repealed by Section 102(2) of Public Law 106–469, 114 Statute 2029; (7) to provide a means for verification of energy data to assure the reliability of energy data; and (8) to conserve water by improving the water efficiency of certain plumbing products and appliances.

Energy Policy Act of 2005

The Energy Policy Act of 2005 addresses energy production in the United States, including energy efficiency, renewable energy, oil and gas, coal, tribal energy, nuclear, vehicles and motor fuels, hydrogen, electricity, energy tax incentives, hydropower and geothermal energy, and climate change technology. The act includes loan guarantees to encourage innovative technologies that reduce GHG emissions and increases the amount of biofuel required to be mixed in with gasoline.[6]

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[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387, Appendix G.

[2] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan

[3] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[4] Southern California Association of Governments. April 2016. 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf

[5] Southern California Association of Governments. May 2019. Profile of the City of La Canada Flintridge. http://www.scag.ca.gov/Documents/LaCanadaFlintridge.pdf

[6] U.S. Environmental Protection Agency. February 7, 2017. Summary of the Energy Policy Act 42 USC §13201 et seq. (2005). https://www.epa.gov/laws-regulations/summary-energy-policy-act

Executive Order 13783

President Trump signed Executive Order (EO) 13783 on March 28, 2017. EO 13783 is known as the "Promoting Energy Independence and Economic Growth" Executive Order and is intended to protect jobs and strengthen energy security. The EO directs agencies responsible for regulating domestic energy production to submit plans to the White House so that regulatory barriers can be removed to achieve energy independence. It is in the national interest to promote clean and safe development of U.S. domestic energy resources including coal, natural gas, nuclear, hydropower, and renewables. The EO reviews and potentially rescinds the Clean Power Plan and several policies related to climate change that were passed under the Obama administration.[7]

State

California's Renewables Portfolio Standard

In 2002, California Governor Gray Davis signed SB 1078 requiring a percentage of all retail electricity sales to be from a renewable source. This program was accelerated in 2006 increasing the mandate to require 20 percent of all retail electricity sales to come from renewable sources by 2010. In April 2011, with the adoption of SB 2, the Renewables Portfolio Standard (RPS) mandates that 33 percent of electricity delivered in California be generated by renewable sources such as solar, wind, and geothermal by 2020. Most recently in October 2015, Governor Jerry Brown signed SB 350, which would require both retail sellers and publicly owned utilities to procure 50 percent of electricity used from eligible renewable energy sources by 2030.

Assembly Bill 32

AB 32, California Global Warming Solutions Act of 2006, requires that California's GHG emissions be reduced to 1990 levels by 2020. The reduction will be accomplished through an enforceable statewide cap on global warming emissions which was phased in beginning in 2012. AB 32 directs the CARB to develop regulations and a mandatory reporting system to track and monitor global warming emissions levels (AB 32, Chapter 488, Statutes of 2006). The California Climate Action Team Report to the Governor (2006) includes a range of strategies to reduce GHG emissions. One of these strategies is the Accelerated Renewables Portfolio Standard Program, which requires investor-owned public utilities to transition to renewable energy sources. The report shows this program to be one of the most promising strategies for reducing GHG emissions, with reductions projected to be 5 million metric tons (CO_2 equivalent) by 2010 and 11 million metric tons by 2020.

Senate Bill 350

SB 350 sets ambitious annual targets for energy efficiency and renewable electricity aimed at reducing GHG emissions. SB 350 directs the California Energy Commission (CEC) to establish annual targets that will achieve a statewide cumulative doubling of energy efficiency savings and demand reductions in electricity and natural gas final end uses by January 1, 2030. This mandate is one of the primary measures to help the state achieve its long-term climate goal of reducing GHG emissions to 40 percent below 1990 levels by 2030.

[7] The White House. March 28, 2017. Presidential Executive Order on Promoting Energy Independence and Economic Growth. https://www.whitehouse.gov/presidential-actions/presidential-executive-order-promoting-energy-independence-economic-growth/

Senate Bill 743

SB 743 was signed in 2013, requiring a move away from vehicle delay and level of service (LOS) in CEQA transportation analysis. It requires vehicle miles traveled (VMT) per capita, VMT per employee, and net VMT as new metrics for transportation analysis. SB 743 allows the implementation of multimodal transportation plans, adds certainty to the development process by reducing development cost and encouraging economic growth, and more appropriately balances the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduces GHG emissions.

Senate Bill 32

SB 32 was signed into law by Governor Jerry Brown on September 8, 2016. SB 32 requires California to reduce GHG emissions by 40 percent below 1990 levels by 2030. SB 32 is a continuation of AB 32, signed in 2006, which set a GHG reduction target of reducing GHG emissions to 1990 levels by 2020. The passing of SB 32 is tied to another bill, AB 197. AB 197 mandates the CARB to prioritize disadvantaged communities in climate change related regulations and to prepare a scoping plan that uses the maximum technologically feasible and cost-effective reductions in GHG emissions.

California Code of Regulations Title 24 Part 11 (CALGreen)

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. The 2008 edition, the first edition of the CALGreen Code, contained only voluntary standards. The 2010 CALGreen Code is a code with mandatory requirements for state-regulated buildings and structures throughout California beginning on January 1, 2011. The code requires building commissioning, which is a process for the verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings Title 24, Part 6, and associated administrative regulations in Part 1

The 2016 Building Energy Efficiency Standards contain energy and water efficiency requirements for newly constructed buildings, additions to existing buildings, and alternations to existing buildings. The standards include both a prescriptive option, using known efficient methods, and a performance option, which allows building designers to use their own methods as long as they achieve equivalent building energy efficiency as the prescriptive option. The 2016 update brings the California standard in consistency with the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards, which describe the minimum requirements for energy-efficient design and construction of most buildings and is the benchmark for commercial building energy codes in the United States.

California Public Utilities Commission, Public Utilities Code

The California Public Utilities Commission (CPUC) regulates and authorizes the construction of investor-owned utility facilities and has exclusive jurisdiction over the siting and design of the natural gas transmission network. Although these projects are exempt from local land use and zoning regulations and permitting, CPUC takes into consideration local plans and policies. Investor-owned utilities are required to obtain a permit from the CPUC for construction of certain specified infrastructure listed under Public Utilities Code Sections 1001. The CPUC reviews permit applications under two concurrent processes: (1) an environmental review pursuant to the CEQA, and (2) the review of project need and costs pursuant to Public Utilities Code Sections 1001 et seq. and General Order 131-D (Certification of Public Necessity and Convenience or Permit to

Construct). The Infrastructure Permitting and CEQA Section of the Energy Division conducts and manages environmental reviews of infrastructure projects that are required to file for permits at the CPUC.

Regional

SCAQMD 2016 Air Quality Management Plan

The SCAQMD 2016 AQMP presents control strategies, regulatory measures, and incentives to demonstrate how the South Coast Air Basin will achieve ozone and $PM_{2.5}$ standards. The main AQMP policy objectives are to eliminate reliance on future technologies measures to the maximum extent possible by quantifying specific control measures; calculate and take credit from other planning efforts for GHG, energy efficiency, and transportation; and develop a strategy with fair-share emission reductions at the federal, state, and local level. SCAQMD will develop industry source category-specific control alternatives such as low NOx emitting equipment at stationary sources. Even with the move to 50 percent renewables, fossil fuels like natural gas will be able to meet spikes in demand and support renewable power intermittency. As part of the deployment of new technologies and distributed energy resources, Southern California looks to reduce criteria, toxic, and GHG emissions, achieve a resilient energy infrastructure, and gain significant economic benefits.

SCAG RTP/SCS[8]

The most recent (2016) Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) lays the framework for sustainable development within the region, envisioning a region that grows by almost four million people by 2040. It encompasses many communities that are more compact and yet connected seamlessly by numerous public transportation options. Residents live closer to work, school, and shops, and neighborhoods are more conducive to active forms of transportation. A few key features are paramount to the success of the 2016 RTP/SCS, including high-quality transit areas, livable corridors, and neighborhood mobility areas. The plan serves to reduce GHG emission levels, improve regional air quality, and reduce VMT. Pursuant to SB 375, SCAG has a GHG target recommendation of 8 percent by 2020 and 18 percent by 2035. One of the seven goals of the 2016 RTP/SCS is to actively encourage and create incentives for energy efficiency, where possible.

County of Los Angeles Green Building Standards Code

The purpose of the County Green Building Standards Code[9] is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental air quality. The Code provides both general and specific requirements applicable to different materials, methods of construction and other requirements.

[8] Southern California Association of Governments. April 2016. 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. http://scagrtpscs.net/Pages/default.aspx

[9] Los Angeles County Code of Ordinances. Accessed November 12, 2019. Green Buildings Standards Code. http://lacounty-ca.elaws.us/code/coor_title31_ch1_101

IMPACT ANALYSIS

	Potentially Significant Impact	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒

The proposed project would result in no impacts to energy regarding wasteful, inefficient, or unnecessary consumption of energy resources. The proposed project would not conflict with CALGreen, the 2016 Building Energy Efficiency or the Los Angeles County Green Building Standards Code. Existing consumptive uses of energy at the Master Plan Area include electricity use at the facilities, nonpotable and potable water use for irrigation and landscaping maintenance, and vehicular traffic by staff (parking lots and grounds) and visitors (parking lots only). Existing surface parking consists of two parking lots with one-way drive aisles oriented in a north-south direction. ADA parking is provided and located close to the main visitor entrance as well as staff parking and vehicle loading near the southeast corner of the main parking lot. Descanso Gardens employs a staff of 60 to 78 day-to-day maintenance employees. As of September 2019, Descanso Gardens staff comprises 60 full-time employees, 18 part-time employees, and 11 seasonal employees. Daily trips consist of employees, various guests, and seasonal guests for events. Existing bicycle networks are provided including bicycle lanes and routes. Existing solar energy infrastructure at Descanso Gardens includes solar panels on the roof of Van de Kamp Hall, Maple Restaurant, and the Visitor Center (Figure 2.6-1, *Existing Solar Panels at Descanso Gardens*).

The County Green Building Standards Code applies to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure in the County. Its purpose is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental air quality. Some of the key SCAG SCS policies include striving for sustainability, protecting and preserving existing transportation infrastructure, increasing capacity though improved systems management, providing transportation choices, and promoting economic growth, environmental protection and public health.

Existing structures at the Master Plan Area are consistent with the Code and the key SCAG SCS goals. The proposed project involves improvements and the provision of parking spaces, ADA access, a plant nursery, and educational opportunities. The proposed project consists of the demolition of approximately 20,716 square feet of inefficient structures and the construction of approximately 35,653 square feet of new buildings and structures including a Rose Garden in a different location, the replacement of the Train Entry and/or Information Stand at a different location, five administrative office trailers that would be removed and replaced with a permanent building at the same location, and improvements to other existing facilities. The proposed administrative headquarters building would also provide office space for the existing 45 administrative staff and up to 10 additional full-time administrative staff.

FIGURE 2.6-1

Existing Solar Power at Descanso Gardens

The proposed sustainability strategies also include replacing the irrigation system, capturing stormwater for reuse and gathering solar power, expanding on-site energy production to expand Descanso Gardens' use of renewable energy sources, and reorganizing the parking layout for maximum efficiency, which are in line with the Code and SCAG SCS policies and goals.

The improvements of features of the Master Plan Area, water quality, waste reduction, and stormwater management would be consistent with the Code. The proposed project would increase energy efficiency; therefore, there would be no impacts. No further analysis is required.

b) Conflict with or obstruct a state or local plan for renewal energy or energy efficiency? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to energy related to a conflict or obstruction of a local plan for renewable energy or energy efficiency. Energy efficiency goals of the County as per the Energy Briefing[10] include reducing health-related impacts of energy on disadvantaged communities, supporting access to clean and affordable energy, decarbonizing fuel sources, modernize the energy system and infrastructure, reducing energy consumption, and improving demand management. The proposed project aims to decrease overall per capita energy consumption band increase reliance on renewable energy sources. The proposed project emphasizes avoiding and reducing the inefficient, wasteful, and unnecessary consumption of energy. Additionally, the proposed project includes installation of permanent power hookups to support existing and future programming without temporary generators, as well as on-site energy production to expand Descanso Gardens' use of renewable energy sources. The proposed activities include optimizing botanical relationships, enhancing the resiliency of infrastructure, and reducing off-site dependency of water and energy. The proposed project involves enhancements to the ecological function of the property and would provide more parking spaces, improved circulation, and a drop-off location to reduce the consumption of energy on-site of the Master Plan Area. Provision of parking spaces, bus parking spaces, and a drop-off location would reduce traffic congestion and energy use as a result of congestion.

The motorized equipment used during construction would comply with CARB regulations for diesel programs relating to mobile source, stationary engines, and portable equipment. The operation of the proposed project would involve both the use of the recreational activities by residents and visitors, as well as the maintenance of the gardens and facilities. All maintenance activities would comply with the County's Operating Agreement with the Guild. The anticipated energy use during operation, including maintenance, would be minimal and would improve efficiency compared to existing uses; therefore, the energy requirements of the project on local supply would not induce the need for additional generation capacity in the region. Therefore, there would be no impact. No further analysis is required.

[10] Los Angeles County. July 2018. Energy Briefing. http://file.lacounty.gov/SDSInter/lac/1040989_OurCountyEnergyBriefing-FinalDraft.pdf?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=

2.7. GEOLOGY AND SOILS

This analysis is undertaken to determine if the proposed project may have a significant impact to geology and soils, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. The Master Plan Area is owned by the County. It is located within the City of LCF, directly adjacent to the City of Glendale. This section describes existing geologic and soil conditions within the Master Plan Area. Geologic and soil conditions within the Master Plan Area were evaluated with regard to the Los Angeles County (County) 2035 General Plan,[1] City of La Cañada-Flintridge (City) General Plan,[2] the USGS 7.5-minute Pasadena series topographic quadrangle,[3] literature by the California Division of Mines and Geology (CDMG),[4] and most recent Alquist-Priolo Earthquake Fault Zoning (APEFZ) Maps.[5], and the *Geology and Soils Descanso Gardens, La Cañada Flintridge, California Memorandum*, prepared by Geosyntec Consultants, prepared on October 31, 2019 (Appendix 10).

REGULATORY FRAMEWORK

Federal

International Building Code

The model building code that is predominantly adopted in the United States is the International Building Code (IBC) from the International Code Council (ICC), a nongovernmental organization. The ICC produces other model codes such as the International Residential Code (IRC). The IBC and its companion ICC documents form the basis of the building codes in most states and have been adopted by local governments within all states.

National Earthquake Hazards Reduction Program

The National Earthquake Hazards Reduction Program (NEHRP) supports the development of seismic provisions in building codes. The NEHRP's "Recommended Provision for Seismic Regulations for New Buildings and Other Structures" presents state-of-the-art earthquake engineering research and practices in a form that is usable by the engineering community and provides a nationally applicable resource document for all model codes and standards. The 2015 NEHRP Provisions have adopted by reference the American Structural Engineers Association (ASCE) / Structural Engineering Institute (SEI) standard ASCE/SEI 7-10: Minimum Design Loads for New Buildings and Other Structures as the baseline.[6] A 2014 series of National Seismic Hazard Maps by the USGS shows the severity of expected earthquake shaking for a particular level of probability; for example, levels of earthquake shaking that have a 2-in-100 chance of being exceeded in a 50-year period. The time period of 50 years is commonly used because it represents a typical building lifetime, while the 2 percent probability level is usually considered an acceptable hazard level for the building codes. Maps also show seismic shaking levels using a number of different measures that apply to designing earthquake-resistant buildings of different heights, which respond to different frequencies of ground motion.

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[1] County of Los Angeles Department of Regional Planning. Adopted October 6, 2019. Los Angeles County General Plan 2035.

[2] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. Land Use Element. https://cityoflcf.org/planning/

[3] U.S. Geological Survey. 1995. 7.5-Minute Series Pasadena, California, Topographic Quadrangle.

[4] California Department of Conservation, California Division of Mines and Geology. 1962. Mines and Mineral Resources of Kern County California, County Report 1.

[5] California Geological Survey. Accessed November 12, 2019. Alquist-Priolo Earthquake Fault Zones.

[6] Federal Emergency Management Agency. 2015. 2015 NEHRP Provisions.

State

California Building Code

Development in the State of California is governed by the 2019 California Building Code (CBC). These regulations include provisions for site work, demolition, and construction, which include excavation and grading, as well as provisions for foundations, retaining walls, and expansive and compressible soils. The 2017 County of Los Angeles Building Code amendments are based on the 2016 CBC and the 2015 IBC. Building regulations are adopted by reference and incorporated into Title 26 of the Los Angeles County Code as Sections 119.1.2 through 119.1.14, respectively of Chapter 1 of Title 26 of the Los Angeles County Code. Standard residential, commercial, and light industrial construction is governed by the CBC, which the County may amend. The 2016 CBC (defined in CCR Part 2 of Title 24 of the California Administrative Code) includes additions to the previous building code that make it more stringent, particularly with regard to seismic and earthquake conditions for critical structures such as essential facilities, public schools, and hospitals.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Geologic Hazards Zone Act was enacted by the State of California in 1972 to address the hazard and damage caused by surface fault rupture during an earthquake. The act has been amended 10 times and renamed the Alquist-Priolo Earthquake Fault Zoning Act, effective January 1, 1994. The act, revised in 2007, defines an active fault as one that has had surface displacements within Holocene time (about the last 11,000 years). Initially, faults were defined in the Alquist-Priolo Act as "potentially active," and were zoned if they showed evidence of surface displacement during Quaternary time (last 1.6 million years). Beginning in 1977, evidence of Quaternary surface displacement was no longer used as a criterion for zoning. Since 1975, the State of California defined the terms "sufficiently active" and "well defined" for application in zoning faults. These two terms constitute the present criteria used by the State Geologist in determining if a given fault should be zoned under the Alquist-Priolo Act and are defined as follows:

> Sufficiently active – A fault is deemed sufficiently active if there is evidence of Holocene surface displacement along one or more of its segments or branches. Holocene surface displacement may be directly observable or inferred; it need not be present everywhere along a fault to qualify that fault for zoning.
>
> Well-defined – A fault is considered well-defined if its trace is clearly detectable by a trained geologist as a physical feature at or just below the ground surface. The fault may be identified by direct observation or by indirect methods (e.g., geomorphic evidence). The critical consideration is that the fault, or some part of it, can be located in the field with sufficient precision and confidence to indicate that the required site-specific investigations would meet with some success.

The act requires the State Geologist to establish earthquake fault zones (EFZs) along known active faults in the state. Cities and counties that include EFZs are responsible to regulate most development projects within the EFZs, as described in the act, but may enact regulations that are more stringent. Certain smaller residential developments can be exempt.

Seismic Hazards Mapping Act

The Seismic Hazard Mapping Act (SHMA) of 1990 was enacted, in part, to address seismic hazards not included in the Alquist-Priolo Act, including strong ground shaking, landslides, and liquefaction. Under this act, the State Geologist is assigned the responsibility of identifying and mapping seismic hazards zones.

The State of California Geologic Survey (CGS) has also adopted seismic design provisions in Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, on March 13, 1997 (revised 2008). The CGS provides guidance with regard to seismic hazards under the Seismic Hazards Mapping Act; seismic hazard zones are to be identified and mapped to assist local governments in planning and development purposes. The intent of this publication is to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, as well as other hazards caused by earthquakes. Lead agencies with the authority to approve development projects shall ensure the following:

> The geotechnical report shall be prepared by a registered civil engineer [practicing the in field of geotechnical engineering] or certified engineering geologist, having competence in the field of seismic hazard evaluation and mitigation. The geotechnical report shall contain site-specific evaluations of the seismic hazard affecting the project, and shall identify portions of the project site containing seismic hazards. The report shall also identify any known off-site seismic hazards that could adversely affect the site in the event of an earthquake.
>
> Prior to approving the project, the lead agency shall independently review the geotechnical report to determine the adequacy of the hazard evaluation and proposed mitigation measures and to determine the requirements of Section 3724(a) above, are satisfied. Such reviews shall be conducted by a certified engineering geologist or registered civil engineer, having competence in the field of seismic hazard evaluation and mitigation.

Natural Hazards Disclosure Act

The Natural Hazards Disclosure Act (effective June 1, 1998), requires "that sellers of real property and their agents provide prospective buyers with a 'Natural Hazard Disclosure Statement' when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone." The SHMA specifies two ways in which this disclosure can be made: "In all transactions that are subject to Section 1103 of the Civil Code, the disclosure required by subdivision (a) of this section shall be provided by either of the following means:

1. The Local Option Real Estate Transfer Disclosure Statement as provided in Section 1102.6a of the Civil Code
2. The Natural Hazard Disclosure Statement as provided in Section 1103.2 of the Civil Code"

The Local Option Real Estate Disclosure Statement can be substituted for the Natural Hazards Disclosure Statement if it contains substantially the same information and substantially the same warning as the Natural Hazards Disclosure Statement. Both the APEFZ Act and the SHMA require that real estate agents, or sellers of real estate acting without an agent, disclose to prospective buyers that the property is located in an APEFZ or SHMZ.

California Environmental Quality Act

CEQA ensures that local agencies consider and review the environmental impacts of projects within their jurisdictions. CEQA requires that an environmental document (e.g., Mitigated Negative Declaration) be prepared for projects that are judged in an Initial Study to have potentially significant effects on the environment and that these effects are disclosed to the public through an open public review process. Environmental documents must consider and analyze, as deemed appropriate, geologic, soil, and seismic hazards. If impacts are considered potentially significant, recommendations for mitigation measures/monitoring are made to prevent or minimize environmental damage by reducing geologic and seismic hazards to less than significant. This allows early public review of development projects and provides

lead agencies the authority to regulate development projects in the early stages of planning. CEQA provides guidance during issuance of permits and approval of projects and applies to all discretionary projects proposed to be conducted or approved by a California public agency, including private projects requiring discretionary government approval.

2015 California Supreme Court CEQA Ruling

In 2015, the California Supreme Court,[7] in *California Building Industry Association v. Bay Area Air Quality Management District*, held that "CEQA generally does not require an analysis of how existing environmental conditions would impact a project's future use of residents." The revised thresholds are intended to comply with this decision, which held that an impact from the existing environment to the project including future users and/or residents, is not an impact for the purposes for CEQA. However, if the project exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. This ruling provided for several exceptions to the general rule where an analysis of the project on the environment is warranted, including if the project would exacerbate existing environmental hazards (e.g., exposing hazardous waste that is currently buried).

Local

County General Plan 2035 – Safety Element

California State Law (Government Code 65300) requires that each city and county prepare and adopt a comprehensive, long-term general plan for its physical development. It must contain seven mandatory elements including land use, circulation, housing, conservation, open space, noise, and safety. California Government Code Section 65302.g requires that a general plan contain a "safety element for the protection of the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mud slides and landslides; subsidence and other geologic hazards known to the legislative body; flooding; and wild land and urban fires." In October 2015, the County updated its General Plan through 2035.

Los Angeles County General Plan Hillside Management Areas and Hillside Design Guidelines

The Hillside Management Areas (HMAs)[8] are defined in the HMA Ordinance in General Plan of areas within unincorporated parts of the county that have a slope of 25 percent or greater. Hillside Design Guidelines have been established that are divided into five major design categories containing a variety of sensitive hillside design measures and a corresponding checklist. One of the categories is Grading and Facilities, which has 12 items in the checklist (2.1 through 2.12). Most of these measures would apply more directly to developments with grading disturbance over a somewhat contiguous area (e.g., several acres for residential or commercial uses) and having facilities/buildings within the disturbed areas.

City of LCF General Plan

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The Safety Element of the General Plan provides goals, objectives, and policies related to the safety and protection of citizens, visitors, structures, infrastructure, and public facilities from natural and human-made hazards. The Safety Element also provides a summary of

[7] California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal. 4th 369, Case No. S213478 (2015).

[8] County of Los Angeles. 2015. Hillside Management. http://planning.lacounty.gov/assets/upl/project/gp_2035_2015-FIG_9-8_hillside_management_areas.pdf

technical information related to seismic and other geologic hazards, flooding and other hydrologic hazards, fires and fire-related hazards, hazardous material and sites, crime, and emergency preparedness.[9]

The City of LCF General Plan includes the following objectives and policies related to seismic and other geologic hazards.

SE Goal 1: Mitigate damage to life, property, infrastructure, and the environment, and economic and social displacement from natural and human-made hazards.

- SE Policy 1.1.1: Ensure proper implementation of the City's adopted building and development codes to provide safe construction (resistant to earthquake, wind, and other structural loading) and responsible building and site preparation practices.
- SE Policy 1.1.2: Require development to be planned and designed to avoid flood, mudslide, and subsidence hazards to structures on or near hillside areas, as well as downhill of any project.
- SE Policy 1.1.3: Require approval of preliminary soil reports and other engineering or technical documents prior to approval of hillside development proposals in order to ensure safe development.
- SE Policy 1.1.4: Development will only be allowed outside of areas of known slope instability and/or high landslide risk unless fully mitigated.
- SE Policy 1.1.5: Require assessment of landslide run-out risk for new development in rangefront areas.
- SE Policy 1.1.6: Improve knowledge of landslide hazard areas and understanding of vulnerability and risk to life and property in hazard-prone areas.
- SE Policy 1.1.7: Implement the City's regulatory responsibilities through the permit review process for projects that fall within seismic hazard zones on the Seismic Hazards Zones Map for the City, per Los Angeles County building codes.
- SE Policy 1.1.8: Implement the City's regulatory responsibilities through the permit review process under the Alquist-Priolo Earthquake Fault Zoning Act.
- SE Policy 1.1.16: Require the mandatory geotechnical reports prepared for all hillside development and other implementing ordinances to include a site- and project-specific assessment of ridge-top shattering risks. If appropriate in the professional judgment of the geotechnical engineer and/or certified engineering geologist of record, the report shall also identify geotechnical measures to mitigate the hazard to the extent feasible.

SE Goal 3: Ensure that the community is prepared for and able to respond to natural and human-made emergencies and disasters, such as earthquakes, wildfires, flooding, debris and mud flows, landslides, release of hazardous materials, civil disturbances, national security emergencies, technological incidents, and health-related epidemics or pandemics.

- SE Policy 3.1.1: Continue to implement the City's Hazard Mitigation Plan (HMP) and integrate the goals and action items into regulatory documents and programs, where appropriate.

[9] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

IMPACT ANALYSIS

	Potentially Significant Impact	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known active fault trace? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

The proposed project would result in less than significant impacts to geology and soils in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Based on a review of the CGS's Fault Rupture Hazard Zones in California Special Publication 42,[10] the Master Plan Area is not located within an "Earthquake Fault Zone," as defined by the State of California in the Alquist-Priolo Earthquake Zoning Act, and no known active faults are known to exist within the Master Plan Area (see Figure 2.7-1, *Earthquake Fault Zones*). The potential for fault surface rupture is generally considered to be significant along "active" faults and to a lesser degree along "potentially active" faults.[11] Mapped active or potentially active faults do not cross or project towards the Master Plan Area (see Appendix 10). Faults do exist within the County, and seismic events can impact the Master Plan Area due to ground shaking and/or vibration that are considered indirect impacts. The western coast of California lies within one of most seismically active regions on earth. The San Andreas Fault, located 40 miles to the northeast; the Sierra Madre Fault Zone, located 1.5 miles to the north; the Raymond Fault, located approximately 7 miles to the southeast; and the San Fernando Fault, located 20 miles to the northwest, are active faults near the Master Plan Area.[12] However, because these faults do not pass directly through the Master Plan Area, significant concerns attributable to them are limited to ground shaking and aftereffects.[13] Therefore, impacts related to the exposure of people or structures to potential substantial adverse effects involving rupture of a known earthquake fault would be less than significant. No further analysis is warranted.

[10] California Geological Survey. 1999. Fault-Rupture Hazard Zones in California. Special Publication 42.

[11] California Division of Mines and Geology. 1999. Seismic Hazard Zone Report for the Pasadena 7.5-Minute Quadrangle, Los Angeles County, California.

[12] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. Part 6: Environmental Resource Management. https://cityoflcf.org/planning/

[13] California Geological Survey. 1999. Fault-Rupture Hazard Zones in California. Special Publication 42.

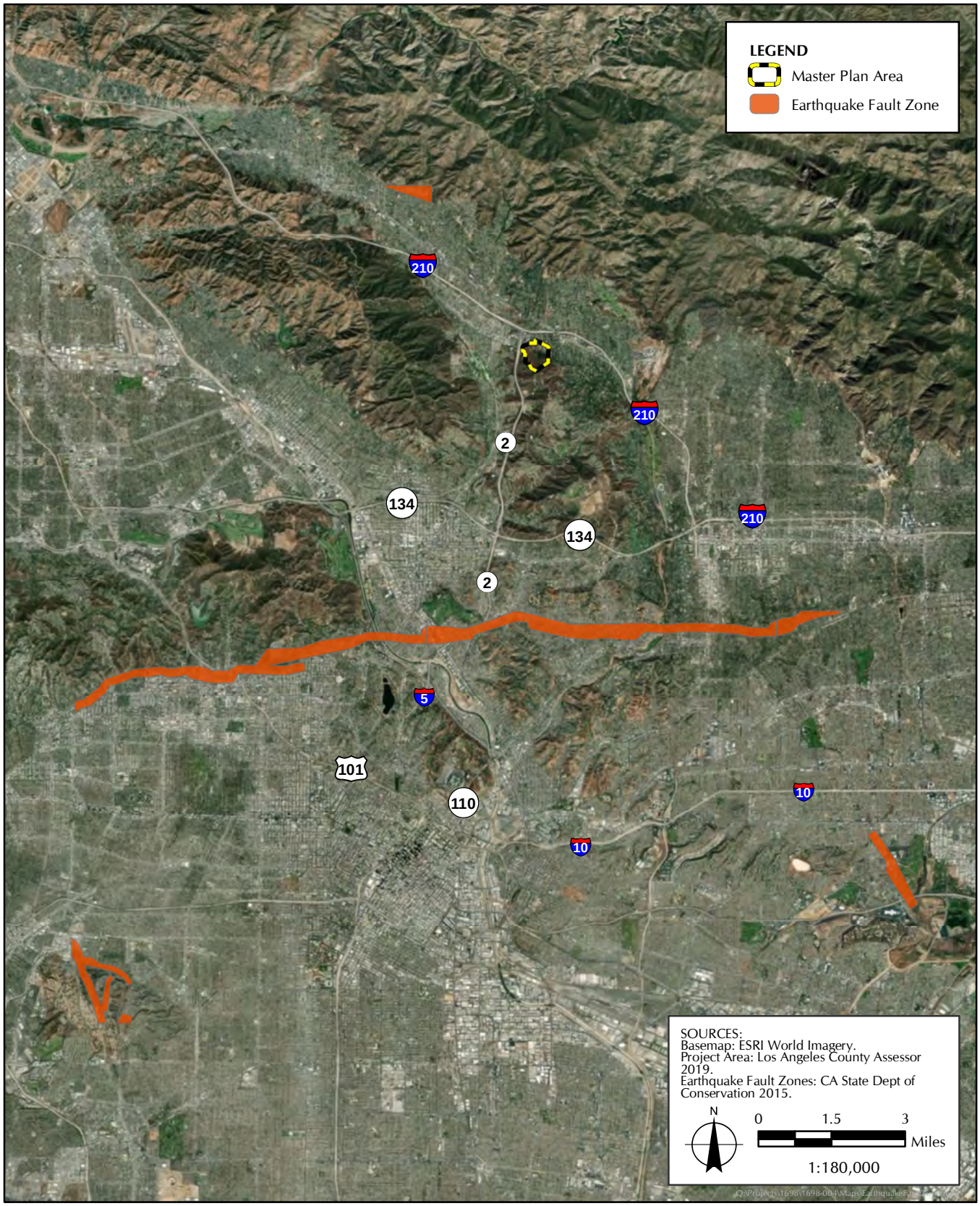

FIGURE 2.7-1

Earthquake Fault Zones

ii) Strong seismic ground shaking? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to geology and soils in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Ground shaking could occur at the proposed site if a seismic event occurred along the Sierra Madre Fault. However, there are numerous variables (depth and magnitude of seismic event, condition and structure of buildings being impacted, relevant radius of aftershocks and their magnitude, etc.) that determine the level of damage to a specific location. Although the Master Plan Area could be subjected to strong ground shaking in the event of a nearby or more distant regional earthquake, this hazard is common in Southern California, and the effects of ground shaking would be limited by proper engineering design and construction in conformance with current building codes and engineering practices (see Appendix 10). Compliance with existing standards and requirements would ensure an adequate level of protection from seismic hazards. Therefore, impacts would be less than significant. No further analysis is warranted.

iii) Seismic-related ground failure, including liquefaction and lateral spreading? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to geology and soils in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. The primary factors influencing liquefaction potential include groundwater, soil type, and intensity of ground shaking. Liquefaction potential is greatest in saturated, loose, and poorly graded sand. The Master Plan Area overlaps with an "Earthquake-Induced Liquefaction Zone," as shown on the Earthquake Zones of Required Investigation, Pasadena Quadrangle map[14] (see Figure 2.7-2, *Liquefaction and Landslide Zones*). However, prior to the issuance of building permits, a site-specific geotechnical study would be prepared by a licensed engineer to outline structural design elements that would maintain structural integrity to the maximum extent during seismic ground shaking (see Appendix 10). Furthermore, the design and construction of the proposed project would conform to CBC seismic standards, in addition to other applicable codes and standards. Therefore, impacts related to seismic-related liquefaction would be less than significant with the appropriate management strategies in place. Compliance with existing standards and requirements would ensure an adequate level of protection from seismic hazards. Therefore, impacts would be less than significant. No further analysis is warranted.

[14] California Division of Mines and Geology. 1999. Seismic Hazard Zone Report for the Pasadena 7.5-Minute Quadrangle, Los Angeles County, California.

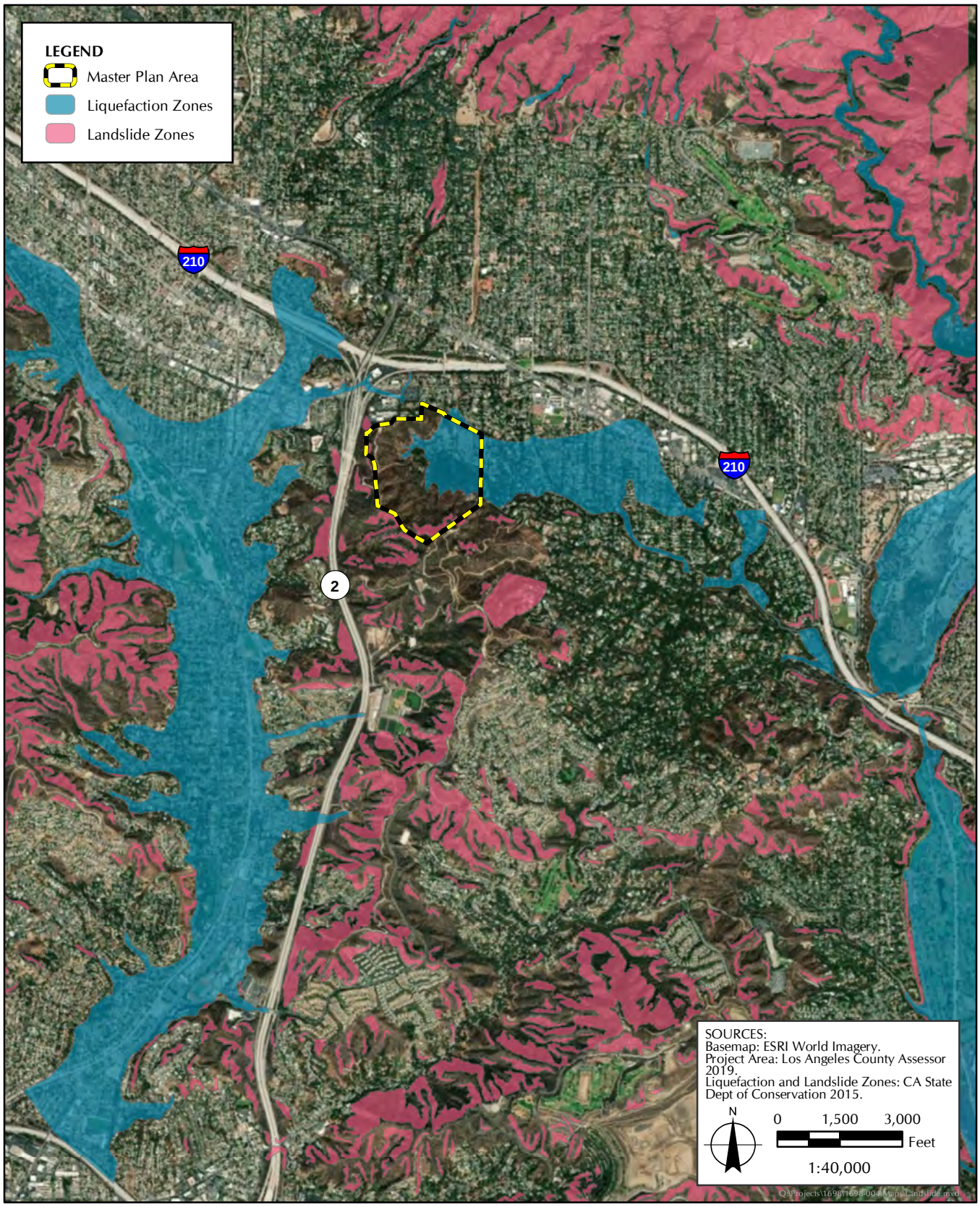

FIGURE 2.7-2

Liquefaction and Landslide Zones

iv) Landslides? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to geology and soils in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. The proposed project facility improvements are not located within an "Earthquake-Induced Landslide Zone," as shown on the Earthquake Zones of Required Investigation, Pasadena Quadrangle map.[15] Therefore, impacts related to slope instability or landslides would be less than significant at these locations (see Table 1.10.2-2, *New and Improved Facilities*, and Table 1.10.3-1, *New Buildings and Structures*, and Appendix 10). However, a portion of the upper hillslope in the southern part of the Master Plan Area is classified as a Landslide Hazard Zone (see Figure 2.7-2). The proposed project would include installation of trail paths within the mapped Landslide Hazard Zone. Final project design would be prepared for construction and operation of each proposed project element, including the installation of the trail paths, to avoid potential impacts related to landslides. Due to the presence of landslide hazard areas, as mapped by the State of California Division of Mines and Geology,[16] additional design-level analyses would be prepared for construction and operation of each proposed project element to evaluate potential presents of areas prone to landslides or rockfall and include applicable engineering practices and remedial recommendations to avoid potential impacts related to landslides. Therefore, impacts related to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides would be less than significant. No further analysis is warranted.

b) Result in substantial soil erosion or the loss of topsoil? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to geology and soils in relation to substantial soil erosion and loss of topsoil. The Master Plan Area is currently partially developed with existing paved roads, structures, buildings, and parking areas. The proposed project construction would temporarily expose on-site soils to surface stormwater runoff. As common with similar types of construction, any soils removed would be reintroduced to level the respective area. As required under the State Water Resources Control Board Construction General Permit, the proposed project requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) and would require implementation of construction-related BMPs to control and minimize erosion and siltation (see Section 2.10, *Hydrology and Water Quality*). Following construction activities, sediment and erosion controls, drainage conveyances, and monitoring and adaptive management would be implemented to manage soil erosion (see Appendix 10). The proposed project components and the overall Master Plan Area would be addressed for drainage and erosion in accordance with building code requirements and stormwater BMPs relative to potential on- and off-site effects. With the implementation of project design features including standard construction BMPs, project-specific SWPPP, and appropriate post-construction hydrologic management strategies, impacts related to soil erosion or loss of topsoil would be less than significant. No further analysis is warranted.

[15] California Division of Mines and Geology. 1999. Seismic Hazard Zone Report for the Pasadena 7.5-Minute Quadrangle, Los Angeles County, California.

[16] California Geological Survey. 1999. Earthquake Zones of Required Investigation – Pasadena Quadrangle.

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

The proposed project would result in less than significant impacts to geology and soils in relation to location on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. A geotechnical analysis for the Master Plan Area was conducted (see Appendix 10), evaluating geologic and soil conditions within the Master Plan Area. No mapped landslide deposits are not present within the Master Plan Area; however, a portion of the upper hillslope in the southern part of the Master Plan Area is classified as a Landslide Hazard Zone (see Appendix 10). Due to the presence of landslide hazard areas, as mapped by the State of California Division of Mines and Geology,[17] additional design-level analyses would be prepared for construction and operation of each proposed project element to evaluation potential presents of areas prone to landslides or rockfall and include applicable engineering practices and remedial recommendations to avoid potential impacts related to landslides. A large portion of the Master Plan Area is classified as a Liquefaction Hazard Zone by the CGS, based on the intersection of historic high groundwater levels of less than 50 feet below ground surface (ft bgs) and mapped Quaternary Alluvium (see Appendix 10). However, a final project design would be prepared for construction and operation of each proposed project element to evaluation liquefaction potential and incorporate applicable engineering practices, and remedial recommendations would be part of the design component to avoid potential impacts as necessary.

Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production with extraction of groundwater or petroleum from sedimentary source rocks causing permanent ground collapse and subsidence (see Appendix 10). Subsidence and ground collapse can also occur during dewatering activities; however, the proposed project would not involve the creation of new groundwater wells or include dewatering activities. The historic high groundwater levels reported by the CGS for the Master Plan Area range from approximately 50 (ft bgs) in the northern portion of the Master Plan Area to less than 20 ft bgs in the southwestern portion of the Master Plan Area.[18] California Department of Water Resources (DWR) observation Well 01N13W01E001S is located approximately 1,900 ft east of the Master Plan Area at an elevation of 1,240 ft above MSL, with groundwater measured at 162.5 ft bgs on April 9, 2019, and historic average of 149.4 ft bgs between April 2011 and April 2019 (see Appendix 10). Thus, based on the most current data from DWR, present-day water table within the Master Plan Area may be substantially deeper than the historic high groundwater levels reported by CGS (see Appendix 10). Further, the proposed project does not include substantial excavation or subterranean structures, and thus, groundwater is not expected to be encountered during construction. Project design features and construction would comply with all applicable building codes and standards. Construction would be in accordance with the identified engineering techniques and applicable CBC. Therefore, impacts related to geological failure, including lateral spreading, off-site landslides, liquefaction, or collapse, would be less than significant. No further analysis is warranted.

[17] California Geological Survey. 1999. Earthquake Zones of Required Investigation – Pasadena Quadrangle.

[18] California Division of Mines and Geology. 1999. Seismic Hazard Zone Report for the Pasadena 7.5-Minute Quadrangle, Los Angeles County, California.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? ☐ ☒ ☐ ☐

The proposed project would result in potentially significant impacts to geology and soils in relation to location on expansive soil creating substantial risks to life or property. Incorporation of mitigation measures would reduce these impacts to below the level of significance. Expansive soils have relatively high clay mineral content and are usually found in areas where underlying formations contain an abundance of clay minerals. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. Soils within the Master Plan Area are predominantly sands and gravels that are not subject to shrink and swell as a result of changes in the moisture content (see Appendix 10). In addition, a final project design would be prepared for construction and operation of each proposed project element. Project design features and construction would comply with all applicable building codes and standards. Construction would be in accordance with the identified engineering techniques and applicable CBC. In addition, Mitigation Measure GEO-1 would apply engineering practices to avoid potential impacts related to expansive soils if encountered during grading. Therefore, impacts related to expansive soils would be less than significant with incorporation of mitigation measures.

Mitigation Measure GEO-1

To mitigate potential impacts related to **expansive soils**:

- During construction of proposed project elements, and in the event expansive soils are encountered during construction activities such as proposed grading, soil materials shall be removed, mixed with nonexpansive soils, or segregated and stockpiled for potential use as low-permeable materials during grading.

e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to geology and soils in relation to having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The Master Plan Area is supported by an existing septic tank system. As discussed in Section 2.19, *Utilities and Service Systems*, the primary wastewater treatment system is located in the Van de Kamp area, adjacent to the main parking lot and main entry gate of the site. In early 2019, the County approved the installation of an upgraded wastewater system, including a new membrane bioreactor (MBR) and emergency electrical generator for the MBR to provide wastewater treatment on-site using the activated sludge process. The MBR would be installed near the existing septic tanks between the existing Van de Kamp Hall back-of-house area and the existing Harvest Garden. Installation of the previously approved MBR is outside the scope of the proposed project under evaluation, as it is currently under construction with installation anticipated by early 2020. Nevertheless, it should be noted that the proposed location of the MBR is located sufficiently far from surface water, and siting would be based on final design with input from geotechnical engineers (see Appendix 11, *Descanso Gardens Water Quality Technical Report*). The proposed project would involve the installation of connections to the MBR once completed, for all existing and new restrooms (see Table 1.10.3-1). In addition, all existing on-site septic systems would be decommissioned. In addition, installation of the MBR wastewater treatment system would upgrade the wastewater system within the Master Plan Area relative to water protection and efficiency over the current on-site septic systems. As such, the

proposed project would have a positive effect. Therefore, there would be no impact. No further analysis is warranted.

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?	☐	☐	☐	☒

The proposed project would not conflict with the County's HMA Ordinance. The proposed project would be designed consistent with the development standards articulated in the County's HMA Ordinance as well as the City of LCF's Hillside Development Ordinance (Title 11, Ch. 11.35), which includes hillside protection and standards and requirements for development within designated hillside areas. The proposed project would be developed to enhance circulation within the Master Plan Area and would involve improvements to existing garden and facility, development of new gardens and facilities, and supportive infrastructure upgrades for the continued operation and maintenance of open space to the public. Therefore, there would be no impact. No further analysis is warranted.

2.8. GREENHOUSE GAS EMISSIONS

This analysis is undertaken to determine if the proposed project may have a significant impact to greenhouse gas (GHG) emissions, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form.[1] GHG emission impacts associated with implementation of the proposed project were evaluated with regard to the County General Plan 2035,[2] the City of LCF General Plan,[3] and the SCAG 2016–2040 RTP/SCS.[4]

REGULATORY FRAMEWORK

Federal

Greenhouse Gas Reporting Program (GHGRP)

The EPA adopted the GHGRP (40 CFR Part 98), a mandatory GHG reporting rule, in September 2009. The rule requires suppliers of fossil fuels or entities that emit industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions to submit annual reports to the EPA beginning in 2011 (covering the 2010 calendar year emission). Vehicle and engine manufacturers were required to begin reporting GHG emissions for model year 2011. In January 2012, EPA made the first year of GHGRP reporting data available to the public through its interactive Data Publication Tool, called Facility Level Information on Greenhouse Gases Tool (FLIGHT). EPA will continue to update the tool and release additional data each reporting year.[5]

Paris Climate Agreement

On June 1, 2017, President Trump withdrew the United States from the Paris Climate Agreement (Paris Agreement).[6] The Paris Agreement was negotiated within the United Nations Framework Convention on Climate Change in 2015 to reduce GHG emissions internationally. The goal of the Paris Agreement was to keep the global temperature rise this century to below 2 degrees Celsius above preindustrial standards, with efforts to limit temperature increase even further to 1.5 degrees Celsius. The Paris Agreement became effective on November 4, 2016. As of October 5, 2016, 155 of 197 parties had ratified the Paris Agreement.

State

Global Warming Solutions Act of 2006

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32 (Núñez, Chapter 488, Statutes of 2006), into law. AB 32 focuses on reducing GHG emissions in California and requires the CARB to adopt rules and regulations that would achieve GHG

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[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387, Appendix G.

[2] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan

[3] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[4] Southern California Association of Governments. April 2016. 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx

[5] U.S. Environmental Protection Agency. Accessed November 12, 2019. Greenhouse Gas Reporting Program. http://www2.epa.gov/ghgreporting

[6] U.S. Environmental Protection Agency. June 1, 2017. Administrator Scott Pruitt Speech on Paris Accord, As Prepared. https://www.epa.gov/speeches/administrator-scott-pruitt-speech-paris-accord-prepared

emissions equivalent to statewide levels in 1990 by 2020. To achieve this goal, AB 32 mandates that the CARB establish a quantified emissions cap; institute a schedule to meet the cap; implement regulations to reduce statewide GHG emissions from stationary sources; and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Because the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990, it is expected that the regulations would affect many existing sources of GHG emissions and not just new general development projects. SB 1368, a companion bill to AB 32, requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions in order to reduce those emissions. On June 1, 2007, CARB adopted three discrete early action measures to reduce GHG emissions. These measures involved complying with a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[7] On October 25, 2007, CARB tripled the set of previously approved early action measures. The approved measures include improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emission from the non-electricity sector. CARB has determined that the total statewide aggregated GHG 1990 emissions level and 2020 emissions limit is 427 million metric tons of carbon dioxide equivalent ($MMTCO_2e$). The 2020 target reductions are currently estimated to be 174 $MMTCO_2e$.

The CARB AB 32 Scoping Plan contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by the CARB with input from the Climate Action Team (CAT) and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, and reduce oil dependency. The GHG reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and nonmonetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. Under cap-and-trade, an overall limit on GHG emissions from capped sectors was established and facilities subject to the cap are able to trade allowances to emit GHGs. Key approaches for reducing GHG emissions to 1990 levels by 2020 include

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards
- Achieving a statewide renewable electricity standard of 33 percent
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets
- Adopting and implementing measures to reduce transportation sector emissions

CARB has also developed the GHG mandatory reporting regulation, which required reporting beginning on January 1, 2008, pursuant to requirements of AB 32. The regulations require reporting for certain types of facilities that make up the bulk of the stationary source emissions in California. The regulation language identifies major facilities as those that generate more than 25,000 $MTCO_2e$ per year. AB 32 requires reporting of GHG emissions annually, and operators must provide allowances for GHG emissions over 25,000 MT/year of CO_2e. Cement plants, oil refineries, electric generating facilities/providers, co-generation facilities, and hydrogen plants and other stationary combustion sources that emit more than 25,000 $MTCO_2e$ per year make up 94 percent of the point source CO_2 emissions in California.

[7] California Air Resources Board. April 2007. Proposed Early Action Measures to Mitigate Climate Change in California.

Executive Order S-3-05 GHG Reduction Targets

Pursuant to AB 32, on June 1, 2005, EO S-3-05 set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The EO establishes state GHG emission targets of 1990 levels by 2020 (the same as AB 32) and 80 percent below 1990 levels by 2050. It calls for the Secretary of the California EPA to be responsible for coordination of state agencies and progress reporting. A recent CEC report concludes, however, that the primary strategies to achieve this target should be major "decarbonization" of electricity supplies and fuels, and major improvements in energy efficiency.[8]

SB 32 / AB 197

SB 32 was signed into law by Governor Jerry Brown on September 8, 2016. SB 32 requires California to reduce GHG emissions by 40 percent below 1990 levels by 2030. SB 32 is a continuation of AB 32, signed in 2006, which set a GHG reduction target of reducing GHG emissions to 1990 levels by 2020. The passing of SB 32 is tied to another bill, AB 197. AB 197 mandates the CARB to prioritize disadvantaged communities in climate change related regulations and to prepare a scoping plan that uses the maximum technologically feasible and cost-effective reductions in GHG emissions.

First Update to the Climate Change Scoping Plan

This First Update to California's Climate Change Scoping Plan was developed by the CARB in collaboration with the CAT and reflects the input and expertise of a range of state and local government agencies. The Update reflects public input and recommendations from business, environmental, environmental justice, and community-based organizations provided in response to the release of prior drafts of the Update, a Discussion Draft in October 2013 and a draft Proposed Update in February 2014.

This report highlights California's success to date in reducing its GHG emissions and lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050. The First Update includes recommendations for establishing a mid-term emissions limit that aligns with the State's long-term goal of an emissions limit 80 percent below 1990 levels by 2050 and sector-specific discussions covering issues, technologies, needs, and ongoing State activities to significantly reduce emissions throughout California's economy through 2050. The focus areas include energy, transportation, agriculture, water, waste management, and natural and working lands.[9] With respect to the transportation sector, California has outlined several steps in the state's ZEV Action Plan to further support the market and accelerate its growth. Committed implementation of the actions described in the plan will help meet Governor Brown's 2012 EO B-16-2012, which—in addition to establishing a more specific 2050 GHG target for the transportation sector of 80 percent from 1990 levels—called for 1.5 million zero-emission vehicles (ZEVs) on California's roadways by 2025.

Achieving such an aggressive 2050 target will require innovation and unprecedented advancements in energy demand and supply.[10] Emissions from 2020 to 2050 will have to decline at more than twice the rate of that needed to reach the 2020 statewide emissions limit. In addition to climate objectives, California also must meet federal clean air standards. Emissions of criteria air pollutants, including ozone precursors (primarily

[8] California Energy Commission. May 2011. California's Energy Future – The View to 2050.

[9] California Air Resources Board. May 2014. First Update to the Climate Change Scoping Plan. http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf

[10] California Air Resources Board. May 2014. First Update to the Climate Change Scoping Plan. http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf

oxides of nitrogen, or NOx) and particulate matter, must be reduced by, a currently estimated, 90 percent by 2032 to comply with federal air quality standards. The scope and scale of emission reductions necessary to improve air quality is similar to that needed to meet long-term climate targets. Achieving both objectives will align programs and investments to leverage limited resources for maximum benefit.

Sustainable Communities and Climate Protection Act of 2008 (SB 375, Chapter 728, Statutes of 2008)

The Sustainable Communities and Climate Protection Act of 2008 (SB 375, Steinberg, Chapter 728, Statutes of 2008), adopted in September 30, 2008, provides an additional means for achieving AB 32 GHG emissions reduction goals. As part of the state's overall strategy to reduce GHG emissions as set forth by EOs S-03-05 and B-30-15 and AB 52, SB 375 seeks to coordinate land use strategies with transportation planning. By coordinating these planning efforts, it is envisioned that vehicle congestion and travel can be reduced resulting in a corresponding reduction in passenger vehicle emissions. SB 375 directed CARB to set regional targets to reduce emissions; regional plans are required to identify how they will meet these targets.

SB 375 has three major components:

- Using the regional transportation planning process to achieve reductions in GHG emissions consistent with AB 32's goals
- Offering streamlined environmental review opportunities for eligible projects, should project proponents decide to pursue
- Coordinating the Regional Housing Needs Allocation Assessment (RHNA) process with the regional transportation process while maintaining local authority over land use decisions

An SCS is a required component of an RTP. The SCS outlines certain land use growth strategies that provide for more integrated land use and transportation planning, maximizes transportation investments, strives to reduce emissions and, if feasible, and helps meet CARB's targets for the region. An alternative planning strategy (APS) must be prepared if the SCS is unable to reduce emissions and achieve the emissions reduction targets established by CARB. EO B-16-2012, described further below, can help achieve these emissions reduction targets by encouraging ZEVs and related infrastructure.

SB 375 provides that the SCS developed as part of the RTP does not regulate the use of land or dictate local land use policies, and further expressly provides that a city's or county's land use policies and regulations, including its general plan, are not required to be consistent with the SCS. Rather, SB 375 is intended to provide a regional policy foundation that local government may build upon, if they so choose. CARB set the following reduction targets for SCAG: reduce per capita 8 percent of GHG emissions below 2005 levels by 2020 and 13 percent below 2005 levels by 2035.

The 2017 Climate Change Scoping Plan Update[11]

The 2017 Climate Change Scoping Plan Update establishes a framework for California to reduce GHGs by 40 percent by 2030 compared to 1990 levels. Continuing the efforts made since 2006 under AB 32, the plan focuses on programs including Cap-and-Trade Regulation, Low Carbon Fuel Standard, cleaner cars, trucks, and freight movement, renewable energy, and reducing methane emissions from agriculture and waste. While AB 32 justified the state's climate action until 2020, SB 32 extends those actions until 2030.

[11] California Air Resources Board. 20 January 2017. The 2017 Climate Change Scoping Plan Update. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf

U.S. Climate Alliance

In September 2017, the U.S. Climate Alliance was started by Governors Andrew Cuomo of New York, Jay Inslee of Washington, and Jerry Brown of California. This bipartisan coalition of governors have committed to reduce GHG emissions consistent with the goals of the Paris Climate Agreement. As of July 1, 2019, the 23 members of the Alliance at the time made up 50 percent of the U.S. population and over 50 percent of U.S. GDP as of 2016.[12,13] The Alliance's goal is a 26 to 28 percent reduction in GHG emissions below 2005 levels by 2025 by following three core principles: states can lead on climate change, state-level climate action benefits economies and strengthens communities, and to demonstrate that the GHG reduction is achievable. The Alliance States are currently on track for a 24 to 29 percent reduction to meet their share of the Paris Agreement target.

California Code of Regulations Title 24 Part 11 (CALGreen)

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. The 2008 edition, the first edition of the CALGreen Code, contained only voluntary standards. The 2010 CALGreen Code is a code with mandatory requirements for state-regulated buildings and structures throughout California beginning on January 1, 2011. The code requires building commissioning, which is a process for the verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

Regional

SCAG RTP/SCS[14]

The most recent (2016) Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) lays the framework for sustainable development within the region envisioning a region that grows by almost four million people by 2040. It encompasses many communities that are more compact and yet connected seamlessly by numerous public transportation options. Residents live closer to work, school, and shops, and neighborhoods are more conducive to active forms of transportation. A few key features are paramount to the success of the 2016 RTP/SCS, including high-quality transit areas, livable corridors, and neighborhood mobility areas. The plan serves to reduce GHG emission levels, improve regional air quality, and reduce VMT. Pursuant to SB 375, SCAG has a GHG target recommendation of 8 percent by 2020 and 18 percent by 2035.

SCAQMD Board Letter – Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans

The SCAQMD Board Letter – Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans provides guidance where the SCAQMD is the lead agency regarding the evaluation of GHGs. SCAQMD takes the following approach for GHG significance thresholds for stationary/industrial projects. The Board Letter states that GHG emissions from industrial project be less than 10,000 $MTCO_2e$/year, including construction emissions amortized over 30 years added to operational GHG emissions.

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12 U.S. Census Bureau. June 28, 2019. Annual Estimates of the Resident Population for the United States, Regions, States, and Puerto Rico: April 1, 2010 to July 1, 2018 (XLSX). https://www.bea.gov/data/gdp/gdp-state.

13 Bureau of Economic Analysis. July 25, 2019. Gross domestic product (GDP) by state (millions of current dollars). https://www.bea.gov/data/gdp/gdp-state.

14 Southern California Association of Governments. April 2016. 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. http://scagrtpscs.net/Pages/default.aspx

Local

Los Angeles County Community Climate Action Plan

The Los Angeles County Community Climate Action Plan (CCAP)[15] provides policy guidance for reducing GHG emissions generated within the unincorporated areas. The CCAP ensures that the County will be able to reduce its emissions to 1990 levels by 2020. The CCAP includes an emissions inventory for the unincorporated areas and an analysis of the reduction needed to achieve County goals. It analyzes specific actions that result in reduced emissions and lays out a plan for their use and implementation. It also provides a mechanism for tracking and evaluating the County's progress in achieving its climate change goals. The CCAP supports sustainable design and energy efficiency, as well as active and multimodal transportation strategies to reduce VMT.

The purpose of the CCAP is to (1) establish a baseline emissions inventory and reduction needed to meet County goals, (2) identify specific actions that will measurably reduce GHG emissions, (3) implement state and local level measures, and (4) provide a mechanism for ongoing tracking and updates to the CCAP.

City of LCF General Plan – Air Quality Element

Global warming is the result of an enhanced greenhouse effect, which is an increase in the concentration of GHGs in the atmosphere that results in an increase in the amount of heat reflecting potential of the atmosphere, leading to an increase in the planet's average temperature and a change in climate. GHGs are both naturally occurring and anthropogenic (human-made). Human produced GHGs considered by many scientists to be responsible for increasing the greenhouse effect and contributing to global warming include CO_2, methane (CH_4), near-surface ozone (O_3), nitrous oxide (N_2O), and chlorofluorocarbons (CFCs). Common sources of human-produced GHGs include burning fossil fuels, especially coal and petroleum, and deforestation. In California, the transportation sector is the largest contributor to GHG emissions (38 percent), followed by production of electricity (23 percent), industry (20 percent), and commercial and residential uses (9 percent).[16]

IMPACT ANALYSIS

	Potentially Significant Impact	***Less than Significant Impact with Mitigation Incorporated***	***Less than Significant Impact***	***No Impact***
Would the project:				
a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

The proposed project would result in less than significant impacts regarding generating GHG emissions, either directly or indirectly, that would have a significant impact on the environment. GHGs emitted from the

[15] County of Los Angeles Department of Regional Planning. August 2015. Unincorporated Los Angeles County Community Climate Action Plan 2020. http://planning.lacounty.gov/ccap

[16] California Air Resources Board. Accessed November 12, 2019. Greenhouse Gas Inventory. https://ww2.arb.ca.gov/our-work/programs/ghg-inventory-program

combustion of fuels such as natural gas consist of CO_2, CH_4, and N_2O, collectively reported as CO_2e. GHGs are also emitted from mobile sources such as on-road vehicles and construction equipment burning fuels such as gasoline, diesel, biodiesel, propane, or natural gas. Indirect GHG emissions result from electric power generated elsewhere (i.e., power plants) and used to operate process equipment, lighting, and utilities at a facility. The principal anthropogenic GHGs that enter the atmosphere are CO_2, CH_4, N_2O, CFCs, hydrofluorocarbons (HCFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Among these GHGs, CO_2 emissions are considered to be the most abundant type of GHG emissions contributing to global climate change. Existing sources of GHG emissions in the Master Plan Area include consumptive use of electricity at the facilities, non-potable and potable water use for irrigation and landscaping maintenance, and vehicular traffic by staff (parking lots and grounds) and visitors (parking lots only). The 2016 SCS recommendations associated with GHG emissions include identifying the transportation needs of the region and the general location of uses (in this case includes recreational access to trails and the gardens as well as the residential densities surrounding the Master Plan Area) to reduce GHG emissions from automobiles and light trucks to achieve reduction targets approved by the state board. The proposed project includes new gardens and improvements to existing landscaping and planted gardens, which would reduce daily GHG emissions.

Construction Phase

As discussed under Air Quality (Section 2.3), a reasonable "worst-case" scenario for the construction phase, 11 years with 5.5-year per phase over two phases, was developed. GHG emissions for each construction year were estimated with CalEEMod, Version 2016.3.2. Construction emission results, based on the annual emissions output from CalEEMod (Table 2.8-1 and 2.8-2, *Construction GHG Emissions in $MTCO_2e$ per Year: Phases 1 and 2*). The CalEEMod calculated emissions are based on a 11-year construction schedule. The amortized annual GHG emissions are 538 $MTCO_2e$ per year, which are below the SCAQMD threshold of 3,000.

TABLE 2.8-1
CONSTRUCTION GHG EMISSIONS IN $MTCO_2E$ PER YEAR: PHASE 1

	Construction Year						
	2021	**2022**	**2023**	**2024**	**2025**	**2026**	**Total**
Construction Annual Emissions	44.6	649.5	19.4	1.9	66.5	407.3	1189.2
Amortized Annual Emissions (over 30 years)	40.1	—	—	—	—	—	—
SCAQMD Threshold	3,000	3,000	3,000	3,000	3,000	3,000	3,000
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**	**No**

Note: Amortized annual emissions apply to the total emissions from 2021–2026.

TABLE 2.8-2
CONSTRUCTION GHG EMISSIONS IN $MTCO_2E$ PER YEAR: PHASE 2

	Construction Year						
	2027	**2028**	**2029**	**2030**	**2031**	**2032**	**Total**
Construction Annual Emissions	21.8	622.6	29.4	1.9	121.5	57.8	855
Amortized Annual Emissions (over 30 years)	27.8	—	—	—	—	—	—
SCAQMD Threshold	3,000	3,000	3,000	3,000	3,000	3,000	3,000
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**	**No**

Operation Phase

The proposed project includes improvement of ecological functions of existing gardens and facilities as well as the development of new and improved gardens, while establishing recycling practices and educational efforts that would encourage sustainability practices and reduce energy usage and GHG. More energy- and water-efficient buildings would reduce annual GHG emissions per square foot and per capita. Additionally,

the proposed project includes installation of permanent power hookups to support existing and future programming without temporary generators, as well as on-site energy production to expand Descanso Gardens' use of renewable energy sources. Therefore, there would be a positive effect.

Both construction and operation GHG emissions are well below the suggested GHG reporting thresholds. Therefore, the proposed project would result in less than significant impacts regarding generating GHG emissions. No further analysis is warranted.

b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to GHG emissions in relation to conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The primary applicable plans are the RTP/SCS[17] and CCAP.[18] The CARB has set GHG reduction targets for the SCAG region of reducing per capita GHG emissions 8 percent below 2005 levels by 2020 and 13 percent by 2035. The proposed project would retain or enhance the achievement of six goals established in SCAG's 2016 SCS. (Table 2.8-3, *SCAG 2016 SCS Goals in Relation to the Proposed Project*).[19]

TABLE 2.8-3
SCAG 2016 SCS GOALS IN RELATION TO THE PROPOSED PROJECT

SCS Goals	Proposed Master Plan
1. Focus housing and job growth within existing urbanized areas giving people greater accessibility to job opportunities, high quality transit and active transportation options, and amenities.	The proposed project does not introduce any housing or job opportunities. The proposed project would retain the existing opportunities.
2. Utilize infill opportunities to conserve natural resources and farmlands.	Natural resources would be conserved in the existing urban open space. The proposed project would contribute to the preservation of natural resources and habitat protection.
3. Invest in expanded transit networks and service frequency.	Transit networks and service frequency would remain the same.
4. Invest in biking and walking infrastructure to improve active transportation options.	Biking infrastructure would remain the same. Pedestrian access and entryways would be improved to provide more access.
5. Invest in transportation demand management programs such as carpool/vanpool, carshare, and parking supply management.	A drop-off area would be constructed to facilitate transportation congestion of visitors.
6. Plan for homes at a range of densities and affordability levels near job centers.	No new homes would be introduced.

The proposed project would help achieve these GHG reduction goals by bringing recreation closer to where people live, enhancing ecological functions, and improving existing facilities thereby reducing VMT and GHG emissions. Additionally, the proposed project includes installation of permanent power hookups to support existing and future programming without temporary generators, as well as on-site energy production to expand Descanso Gardens' use of renewable energy sources. The reasonable worst-case construction scenario analysis

[17] Southern California Association of Governments. April 2016. 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx

[18] County of Los Angeles Department of Regional Planning. August 2015. Unincorporated Los Angeles County Community Climate Action Plan 2020. http://planning.lacounty.gov/assets/upl/project/ccap_final-august2015.pdf

[19] California Air Resources Board. Accessed November 12, 2019. What Are Sustainable Communities Strategies? https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/what-are-sustainable-communities-strategies

of the proposed project is well below state thresholds and in alignment with the SCAG 2016–2040 RTP/SCS. The proposed project would fulfill the land use and transportation strategy area in the CCAP to reduce regionwide VMT and promote sustainability in land use design in the unincorporated areas of the County. Therefore, the proposed project would not conflict with any applicable plan, policy, or regulation related to reducing GHG emissions. No further analysis is required.

2.9. HAZARDS AND HAZARDOUS MATERIALS

This analysis is undertaken to determine if the proposed project may have a significant impact to hazards and hazardous materials, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. Hazards and hazardous materials at the Master Plan Area were evaluated based on expert opinion supported by facts, review of a Phase I Environmental Site Assessment (ESA) prepared for Descanso Gardens (Appendix 5, *Descanso Gardens Master Plan Phase I Environmental Site Assessment*), review of environmental databases by Environmental Data Resources (EDR; included in Appendix 5),[1] and the Safety Elements of the County General Plan 2035[2] and City of LCF General Plan.[3]

REGULATORY FRAMEWORK

Federal

Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act (29 CFR Parts 70–2400), which is implemented by the Federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. Federal OSHA requirements, as set forth in 29 CFR Section 1910 et seq., are designed to promote worker safety, worker training, and a worker's right-to-know. In California, OSHA has delegated the authority to administer OSHA regulations to the State of California.

Hazardous Materials Transportation Act of 1975

The Hazardous Materials Transportation Act (49 USC Sections 5101–5127) is the principal federal law regulating the transportation of hazardous materials. Its purpose is to "protect against the risks to life, property, and the environment that are inherent in the transportation of hazardous material in intrastate, interstate, and foreign commerce" under the authority of the U.S. Secretary of Transportation. Regulations implementing the Hazardous Materials Transportation Act of 1975 specify additional requirements and regulations with respect to the transport of hazardous materials. For example, the Act requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements.

Hazardous Materials Transportation Act

Enacted in 1975, the Hazards Materials Transportation Act (HMTA) (49 USC 51, Sections 5101 et seq.) is the principal federal law regulating the transportation of hazardous materials. Its purpose is to "protect against the risks to life, property, and the environment that are inherent in the transportation of hazardous material in intrastate, interstate, and foreign commerce" under the authority of the U.S. Secretary of Transportation.

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[1] Environmental Data Resources, Inc. January 2018. The EDR Aerial Photo Decade Package, The EDR Historical Topographic Map Report, and The EDR Radius Map. Inquiry Number 5153450.4. Prepared for Sapphos Environmental, Inc.
[2] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan/generalplan
[3] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030: Chapter 5 – Safety Element. https://cityoflcf.org/planning/

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 (42 USC 2) was the first major federal act regulating the potential health and environmental problems associated with hazardous and nonhazardous solid waste. RCRA and the implementation regulations developed by the EPA provide the general framework for the national hazardous and nonhazardous waste management systems. This framework includes the determination of whether hazardous wastes are being generated, techniques for tracking wastes to eventual disposal, and the design and permitting of hazardous waste management facilities. RCRA amendments enacted in 1984 and 1986 began the process of eliminating land disposal as the principal hazardous waste disposal method. Hazardous waste regulations promulgated in 1991 address site selection, design, construction, operation, monitoring, corrective action, and closure of disposal facilities. Additional regulations addressing solid waste issues are contained in 40 CFR, Part 258.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (1980; 42 USC Sections 1906 et seq.), also known as the Superfund Act, outlines the potential liability related to the cleanup of hazardous substances; available defenses to such liability; appropriate inquiry into site status under Superfund, which is the federal government's program to clean up the nation's uncontrolled hazardous waste sites; statutory definitions of hazardous substances and petroleum products; and the petroleum product exclusion under CERCLA. CERCLA provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also establishes the National Contingency Plan (NCP), which provides guidelines and procedures necessary to respond to releases and threatened releases of hazardous substances.

Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 (42 USC 116, Sections 9601 et seq.) was created to help communities plan for emergencies involving hazardous substances. EPCRA requires hazardous chemical emergency planning by federal, state, and local governments; Native American tribes; and industry. It also requires industry to report on the storage, use, and releases of hazardous chemicals to federal, state, and local governments.

Superfund Amendment and Reauthorization Act , Title III

The Superfund Amendment and Reauthorization Act (SARA), Title III, of 1986 is the Emergency Planning and Community Right-to-Know Act (40 CFR Parts 350–372). Facilities are required to report the following items on EPA Form R, the Toxic Chemical Release Inventory Reporting Form: facility identification, off-site locations where toxic chemicals are transferred in wastes, chemical-specific information, and supplemental information. Form R requires a facility to list the hazardous substances that are handled on-site and to account for the total aggregate releases of listed toxic chemicals for the calendar year. Releases to the environment include emissions to the air, discharges to surface water, and on-site releases to land and underground injection wells.

Title 40 - Protection of Environment, Chapter I - Environmental Protection Agency (Continued) CFR Part 68 - Chemical Accident Prevention Provisions

This part sets forth the list of regulated substances and thresholds, the petition process for adding or removing substances to the list of regulated substances, the requirements for owners or operators of stationary sources concerning the prevention of accidental releases, and the state accidental release prevention programs approved under Section 112(r).

Title 40, Code of Federal Regulations, Chapter 1, Part 261

Hazardous wastes are by-products of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. Hazardous wastes possess at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or appears on special EPA lists.[4]

State

2019 California Fire Code

The California Fire Code is Part 9 of the building regulations to the California Code of Regulations (CCR), Title 24, California Building Standards Code. The California Fire Code establishes minimum requirements to safeguard public health, safety, and generally welfare from fire hazards, explosions, or dangerous conditions in new and existing buildings, structures, and premises, as well as to provide safety and assistance to fire fighters and emergency responders. The code applies to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to building structures in California.

Hazardous Waste Control Law of 1972

The Hazardous Waste Control Act (Health and Safety Code Sections 25100 et seq.) created the state hazardous waste management program, which is similar to but more stringent than the federal RCRA program. The Act is implemented by regulations contained in Title 26 of the CCR, which describes the following required aspects for the proper management of hazardous waste: identification and classification; generation and transportation; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements. These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with the California Department of Toxic Substances Control (DTSC).

Hazardous Materials Release Response Plans and Inventory Law of 1986

The Hazardous Materials Release Response Plans and Inventory Law of 1986 (Business Plan Act; Health and Safety Code [HSC] Division 20 Chapter 6.95 [25500–25547.8]) governs hazardous materials handling, reporting requirements, and local agency surveillance programs.

[4] Title 40, Code of Federal Regulations, Chapter 1, Part 261.

California Vehicle Code

The California Vehicle Code (Title 13 of the CCR) establishes regulations for motor carrier transport of hazardous materials. For example, all motor carrier transporters of hazardous materials are required to have a Hazardous Materials Transportation license issued by the California Highway Patrol. In addition, placards identifying that hazardous materials are being transported must be displayed on the vehicle.

California Health and Safety Code

The transport of hazardous waste materials is further governed by California Health and Safety Code Section 25163 and Title 22, Chapter 13, of the CCR. Specifically, Section 25163 of the Health and Safety Code requires transporters of hazardous waste to hold a valid registration issued by the DTSC in his or her possession while transporting hazardous waste. Additionally, Title 22, Chapter 13, of the CCR includes a number of requirements, which include, but are not limited to, the following:

- Transporters shall not transport hazardous waste without first receiving an identification number and a registration certificate from DTSC;
- Registration as a hazardous waste transporter expires annually, on the last day of the month in which the registration was issued;
- To be registered as a hazardous waste transporter, an application must be submitted;
- Hazardous waste shall not be accepted for transport without a Uniform Hazardous Waste Manifest that has been properly completed and signed by generator and transporter; and
- Hazardous waste shall be delivered to authorized facilities only.

California Emergency Services Act (AB 38)

AB 38 gave the California Emergency Management Agency (Cal EMA) responsibility for overseeing and coordinating emergency preparedness, response, recovery, and homeland security activities in the state. The Governor's Office of Emergency Services (OES) mission statement is "Protect lives and property, build capabilities, and support our communities for a resilient California." OES goals include

Goal 1.	Anticipate and enhance prevention and detection capabilities to protect our State from all hazards and threats.
Goal 2.	Strengthen California's ability to plan, prepare for, and provide resources to mitigate the impacts of disasters, emergencies, crimes, and terrorist events.
Goal 3.	Effectively respond to and recover from both human-caused and natural disasters.
Goal 4.	Enhance the administration and delivery of all state and federal funding, and maintain fiscal and program integrity.
Goal 5.	Develop a united and innovative workforce that is trained, experienced, knowledgeable, and ready to adapt and respond.
Goal 6.	Strengthen capabilities in public safety communication services and technology enhancements.

2013 State Hazard Mitigation Plan (SHMP)

Approved by FEMA on September 30, 2013, as an Enhanced State Mitigation Plan, the 2013 SHMP update continues to build upon California's commitment to reduce or eliminate the impacts of disasters caused by natural, technological, accidental, and adversarial/human-caused hazards, and further identifies and documents progress made in hazard mitigation efforts, new or revised state and federal statutes and regulations, and emerging hazard conditions and risks that affect the State of California. Resilience depends

on the whole community and is a shared responsibility for all levels of government, private and nonprofit sectors, and individuals.

Hazardous Materials Release Cleanup (AB 440 Chapter 588)

AB 440 Chapter 588, passed into law in 2013, authorizes a local agency to take clean-up action similar to that under the Polanco Redevelopment Act that the local agency determines is necessary, consistent with other state and federal laws, to remedy or remove a release of hazardous substances within the boundaries of the local agency. AB 440 allows the local agency to designate another agency, in lieu of the department or the regional board, to review and approve a cleanup plan and to oversee the cleanup of hazardous material from a hazardous material release site, under certain conditions. It also provides immunity to the local agency as long as the action is in accordance with a cleanup plan prepared by a qualified independent contractor, and approved by the department, a regional board, or the designated agency, and the cleanup is undertaken and properly completed. Finally, AB 440 authorizes the local agency to recover cleanup costs from the responsible party.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) required the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a Certified Unified Program Agency (CUPA). The Program Elements consolidated under the Unified Program are Hazardous Waste Generator and On-Site Hazardous Waste Treatment Programs (aka Tiered Permitting); Aboveground Petroleum Storage Tank Spill Prevention Control and Countermeasure Plan (SPCC); Hazardous Materials Release Response Plans and Inventory Program (aka Hazardous Materials Disclosure or "Community-Right-To-Know"); California Accidental Release Prevention Program (Cal ARP); UST Program; and Uniform Fire Code Plans and Inventory Requirements. The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of formerly independently managed programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency, a participating agency, which implements one or more Program Elements in coordination with the CUPA.

California Accidental Release Prevention Program

The California Accidental Release Prevention Program (CalARP; CCR Title 19, Division 2, Chapter 4.5) was implemented on January 1, 1997, and replaced the California Risk Management and Prevention Program (RMPP). The CalARP program encompasses both the federal "Risk Management Program," established in the Code of Federal Regulations, Title 40, Part 68, and the State of California program, in accordance with the Title 19 of the California Code of Regulations, Division 2, Chapter 4.5. The main objective of the CalARP program is to prevent accidental releases of those substances determined to potentially pose the greatest risk of immediate harm to the public and the environment, and to minimize the consequences if releases do occur. These substances are called regulated substances and include both flammable and toxic hazardous materials listed on the Federal Regulated Substances for Accidental Release Prevention and on the State of California Regulated Substances lists. Businesses that handle regulated substances in industrial processes above threshold quantity levels are subject to CalARP program requirements. The CalARP program requires businesses to have planning activities that are intended to minimize the possibility of an accidental release by encouraging engineering and administrative controls. It is further intended to mitigate the consequences of an accidental release, by requiring owners or operators of facilities to develop and implement an accident prevention program.

Local

Certified Unified Program Agencies (Senate Bill 1082)

Californians are protected from hazardous waste and materials by a unified program that ensures consistency throughout the state regarding administrative requirements, permits, inspections, and enforcements. The goal of the CUPA is to create a more cohesive, effective, and efficient program. Under the CUPA, application and required submission forms are standardized and consolidated, inspections are combined where possible, annual fees for each program element are merged into a single fee system, and enforcement procedures are made more consistent. The program elements consolidated under the CUPA are

- Hazardous waste generator and onsite hazardous waste treatment programs (a.k.a. Tiered permitting);
- Aboveground petroleum storage tank spill prevention control and countermeasure plan (SPCC);
- Hazardous materials release response plans and inventory program (a.k.a. hazardous materials disclosure or community-right-to-know)
- California Accidental Release Prevention Program (Cal ARP);
- Underground storage tank program (UST); and
- Uniform fire code plans and inventory requirements

CalEPA oversees the program, and certifies 83 local government agencies, including 37 in the SCAG region. Local agencies administering one or more of the six program elements have the option to either apply for CUPA status within the CalEPA or retain their programs by becoming a participating agency under another CUPA's jurisdiction. Some examples of the agencies that are participating under the CUPA are fire departments, environmental and health branches, and departments of toxic substances control within city and municipal governments. The County Department of Public Works has underground storage tank jurisdiction for unincorporated territory and cities including the City of LCF.[5]

Los Angeles County, California Code of Ordinances – Title 32 – Fire Code

Title 32 of the Los Angeles County Code, also known as the Los Angeles County Fire Code, establishes regulations affecting or relating to structures, processes, premises, and safeguards regarding conditions affecting the safety of firefighters and emergency responders during emergency operations, fire hydrant systems, water supply, fire equipment access, posting of fire equipment access, parking, lot identification, weed abatement, and combustible brush and vegetation that represents an imminent fire hazard, debris abatement, combustible storage abatement including flammable liquid storage, hazardous material storage and use, open-flame and open-burning, and burglar bars at State-regulated mobile home and special occupancy parks within the jurisdiction of the County of Los Angeles Fire Department as per California Health and Safety Code Sections 18691 and 18873.5.[6] The purpose Title 32 is to establish the minimum requirements consistent with nationally recognized good practice for providing a reasonable level of life safety and property protection from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide a reasonable level of safety to firefighters and emergency responders during emergency operations.

[5] County of Los Angeles Department of Public Works. Accessed October 30, 2019. Underground Storage Tank Program. https://pw.lacounty.gov/epd/ust/jur.cfm

[6] Los Angeles County Code of Ordinances – Title 32 – Fire Code. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT32FICO

County General Plan 2035

The Safety Element of the County General Plan 2035, in conjunction with the All-Hazard Mitigation Plan prepared by the Chief Executive Office, Office of Emergency Management (CEO OEM), sets strategies for natural and human-made hazards in Los Angeles County.[7] The All-Hazard Mitigation Plan, which has been approved by FEMA and Cal EMA, includes a compilation of known and projected hazards in Los Angeles County. The Safety Element of the County General Plan 2035 establishes one goal and 10 policies relevant to Hazards and Hazardous Materials. These policies are detailed in Section 2.20, Wildfire.[8]

City of LCF General Plan

Although the County is not subject to city general plans, City of LCF General Plan information has been provided to inform the County's decision-making process. The Safety Element establishes policies and programs to protect the community from risks associated with seismic, geologic, flooding, and wildfire hazards. The Safety Element states that the "combination of southern California's Mediterranean climate, with its winter and spring rainfall and hot dry summers, a preponderance of highly flammable vegetation within and adjacent to the City of LCF, the steep topography within the City, and the frequency of high wind velocity from the Santa Ana winds creates optimum conditions for wildfires and debris flows."[9] The entire City of LCF is designated a Very High Fire Hazard Severity Zone by the City Council. During the development review process for projects, the City of LCF and the Los Angeles County Fire Department (LACFD) review water flow and distribution requirements for new development projects to ensure adequate water pressure for firefighting. The City of LCF also evaluates the adequacy of emergency water line capacity as it relates to fire flow requirements.

The City of LCF General Plan states that hazardous materials are used, stored, produced, and transported throughout Los Angeles County, including within the City. Hazardous materials are defined as those the pose a potential threat to human health, having the capacity to cause serious illness or death. These materials include chemicals, radioactive waste and explosives, natural gas and petroleum, pesticides, agricultural chemicals, and household cleaning products.

The National Incident Management System (NIMS) was established by the federal Department of Homeland Security as a unified approach to incident management. The intent is to improve the efficiency and effectiveness of responders from different jurisdictions and disciplines when jointly responding to natural disasters and emergencies. In California, NIMS is implemented at the State level through the Standardized Emergency Management System (SEMS). All agencies that participate in any emergency are required to have and maintain appropriate training and certification and operate under NIMS and SEMS. The City of LCF is compliant with NIMS and SEMS.

The City of LCF has prepared a Hazard Mitigation Plan (HMP) in collaboration and coordination with the La Cañada Unified School District (LCUSD) to serve as a mechanism for the community to promote sound public policy to reduce the risk and impact of disaster events. It identifies natural hazards to the community; determines likely impacts from those hazards; sets mitigation goals; and provides action items, including ideas for implementation, identification of the coordinating organization, and a proposed timeline. The HMP assists the community in allocating appropriate resources and setting priorities and standards to ensure the safety of people, property, infrastructure, and the environment. The City of LCF is also part of a Disaster Management

[7] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 12: Safety Element. http://planning.lacounty.gov/generalplan/generalplan
[8] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 12: Safety Element. http://planning.lacounty.gov/generalplan/generalplan
[9] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030: Chapter 5 – Safety Element. https://cityoflcf.org/planning/

Area (C) through a Joint Powers Agreement with the County. Disaster Management Area C also includes Monterey Park, Alhambra, Burbank, and Glendale. The goal of this program is to coordinate in planning for preparedness, mitigation, and recovery from emergencies or disasters.

The Land Use Element and Safety Element of the City of LCF General Plan established goals, objectives, and policies relevant to hazards and hazardous materials:

LUE Goal 3: Ensure that new and rehabilitated development is designed and constructed in an environmentally sustainable and sensitive manner and protects the safety of persons and property.

- LUE Objective 3.2: Continue to protect the public's safety by evaluating land and environmental constraints prior to development and requiring that projects mitigate potential negative environmental and safety impacts.
  - LUE Policy 3.2.4: Implement goals, objectives, and policies in the Safety Element to protect persons and property from potential safety hazards.

LUE Goal 4: Maintain hillside areas for the purpose of preserving the visual quality of the City, protecting the public from safety hazards, and conserving natural resources.

- LUE Objective 4.2: Ensure that hillside development will be designed, constructed, and maintained to minimize natural and human-made safety hazards to persons and property.
  - LUE Policy 4.2.6: Require property in hillside areas to be maintained in a manner to reduce risks associated with wildfires.

SE Goal 1: Mitigate damage to life, property, infrastructure, and the environment, and economic and social displacement from natural and human-made hazards.

- SE Objective 1.5: Develop and implement policies and programs that minimize the level of risk to public health, safety, and the environment associated with the use, transport, treatment, and disposal of hazardous materials and waste.
  - SE Policy 1.5.1: Cooperate with Los Angeles County to implement applicable portions of the County's Hazardous Waste Management Program.
  - SE Policy 1.5.2: Coordinate with Los Angeles County in the implementation of NPDES regulations.
  - SE Policy 1.5.3: Require development projects to conform to the regulations of the NPDES permits.
  - SE Policy 1.5.4: Continue to enforce the City's Stormwater Management and Discharge Ordinance.
  - SE Policy 1.5.5: Encourage safe disposal of household hazardous waste through Los Angeles County's Household Hazardous Waste Collection Program.
  - SE Policy 1.5.6: Require completion of a Phase I, II, or III Environmental Site Assessment (ESA), prepared by a Registered Environmental Assessor (REA), and remediation or further analysis, such as a Phase II or Phase III ESA, for any future project that would take place on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List), or on a site that was previously occupied by a land use that use or generated hazardous materials or wastes.

IMPACT ANALYSIS

Would the project:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	☐	☐	☒	☒

The proposed project would result in less than significant impacts to hazards and hazardous materials in relation to creating a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials. The proposed project would not increase the transportation, production, storage, or use of any hazardous materials through its construction activities or ongoing operation and maintenance activities. A Phase I ESA was prepared for Descanso Gardens in 2019 that also summarizes the results of prior investigations and identifies potential hazardous materials present at the Master Plan Area (Appendix 5). As stated in Section 1.11, *Construction Scenario*, of the Project Description, additional soil investigation and possibly remediation would be required at the following locations prior to soil disturbance construction activities:

- Promenade (Enchanted Railroad Building) and Auxiliary Parking Lot (southeastern area near Rose Garden) – evaluation for volatile organic compounds (VOCs)
- Camellia Forest East (driveways leading to Boddy House) – evaluation for polychlorinated biphenyls (PCBs)
- Boddy Lodge and Boddy House – evaluation for lead-based paints (LBPs) and asbestos
- Camellia Forest West, Camellia Forest East, and Rose Garden – evaluation for pesticide residue
- Developed gardens – evaluation for fertilizer residue
- Within 30-foot radius of Auxiliary Parking Lot, Main Parking Lot, maintenance areas of the staff carts, the Enchanted Railroad, and existing paths that served as parking/travel areas for gas-powered vehicles prior to 1991 – evaluation for aerially deposited lead (ADL)

A hazardous sites records search was compiled by EDR for the Master Plan Area on November 16, 2018 (see Appendix 5). The EDR report included two radius maps, one with concentric ellipses indicating the search distances of 0.25, 0.5, and 1 mile from the center of the Master Plan Area, and the other with search distances of 0.125, 0.25, and 0.5 mile from the center of the Master Plan Area. The EDR package included certified Sanborn Fire Insurance Maps, historical aerial photographs, historical topographic maps, high-risk historical records, and recovered government archives. A review of the EDR package indicated recognized environmental concerns (RECs) would not constrain the development of the Master Plan Area. There are a variety of RECs that were registered in the various environmental databases that were searched by EDR. A search of the respective environmental databases identified only 1 historic auto site within the 0.125- to 0.25-mile search radius, with no manufactured gas plant (MGP) and dry cleaner sites. It should be noted that many of the sites are listed in multiple databases. The RECs include auto fuels, lab waste, chemical waste, inorganic solid waste, pesticide/herbicide and asbestos. However, the review indicated that there were no active remediation sites within a 0.25-mile radius of the Master Plan Area, and the distance of the sites identified in Section 6.1 of the Phase I ESA (Appendix 5) would ensure that any historic contamination from these sites would not impact the Master Plan Area.

The assessment of hazardous materials in relation to the proposed project has been divided into Construction and Operations impacts.

Construction

The proposed project would not increase the transportation, production, storage, or use of any hazardous materials through its construction activities. The proposed project involves the removal of about 20,716 square feet of existing building, renovation of six existing buildings, and construction of about 35,563 square feet of new buildings, all of which would involve construction activities that would potentially transport hazardous materials to and through the Master Plan Area, as well as use and storage in the Master Plan Area. However, said transportation, storage, and use of the materials would not pose a significant risk once remediation is incorporated. As stated in Section 1, *Project Description*, the construction contractor would ensure that all construction and grading equipment is properly maintained, all vehicles and compressors shall utilize exhaust mufflers and engine enclosure covers, and all stockpiles shall be covered at all times when not in use. Both LBPs and ACMs can be removed safely using standard removal protocols that would not constrain the development of the Master Plan Area. Exposed soils that would be disturbed by project activities would be tested, and ADL would be addressed using standard protocols that would not constrain the development of the Master Plan Area. Although Descanso Gardens has phased out use of pesticides/herbicides starting in 2014, pesticide/herbicide residues may be present in the soil. Prior to the initiation of construction activities, surface and near-surface soil samples should be collected in excavation areas and analyzed for pesticide/herbicides. Although this is not anticipated to result in worker health and safety concerns, if pesticide/herbicides are detected, soil handling and disposal options would need to be evaluated. Pesticide/herbicide containing soil can be removed safely using standard removal protocols that would not constrain the development of the Master Plan Area.

Operations

The Master Plan Area currently involves the transport, storage, and use of hazardous materials for the operation and maintenance of the property. It does not produce any hazardous materials. The proposed project would not result in a change to current operation and maintenance with regard to the transport, storage, and use of hazardous materials. The Phase I ESA determined that several areas of the property were identified as potentially harboring hazardous chemicals and recorded 27 chemicals of concern (see Appendix 5). There were 21 storage sheds, about 10 of which store items with potentially hazardous chemicals of concern. The use and storage of these chemicals of concern at Descanso Gardens is characteristic of the materials used in routine operation and maintenance of regional parks or botanical gardens. The proposed project would not result in a change to current operation and maintenance with regard to the transport, storage, and use of hazardous materials.

The proposed project would involve the same transportation, storage, and use of these hazardous materials and chemicals of concern with minimal increase, as the proposed project remains consistent with the routine operation and maintenance of regional parks and botanical gardens. The proposed project would not increase the size of the developed area of Descanso Gardens, with the exception of one new trail, which would not increase use, transport, or storage of hazardous materials. The proposed project would use the same chemicals and store them in the same areas as the existing condition. Additionally, the Business Plan would be updated with each element of the proposed project to reflect any potential revisions. The transportation, storage, and use of hazardous materials would remain about the same as the existing transportation, storage, and use. However, the Phase I ESA recommended that additional safety requirements be undertaken in conjunction with construction and operation of proposed Master Plan facilities (Appendix 5).

The proposed project's construction activities would not increase the transportation, storage, production, use, or disposal of hazardous materials with remediation incorporated to properly maintain and cover hazardous materials (Section 1, *Project Description*). The proposed project's operations would not significantly differ from the existing condition with respect to the transportation, storage, production, use, or disposal of hazardous materials. Therefore, the proposed project would result in less than significant impacts in regard to creating a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials. No further analysis is warranted.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to hazards and hazardous materials in relation to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment. The Master Plan Area contains hazardous materials that could potentially be released through the construction activities; however, they would be safely removed using standard protocols with no constraints on the proposed project.

There are no existing natural gas transmission lines or high-pressure distribution lines crossing below ground in the Master Plan Area. The nearest high-pressure distribution lines are below Verdugo Boulevard, and the nearest natural gas transmission lines are in the City of Pasadena.[10]

LBPs may occur in pre-1970s buildings in the Master Plan Area, which could release lead into the environment if any of the structures planned for demolition contain LBPs. These buildings would first be inspected for LBPs and subsequently removed safely using standard removal protocols that would not constrain the development. Lead could also be released into the environment because of the proposed project activities through ADL in soils. Until 1991 in California, gasoline and other fuels contained lead as an additive, releasing vehicle exhaust emissions containing lead that was deposited next to freeways and roadways as ADL. The Master Plan Area is within 250 feet of the Glendale Freeway (SR-2) and approximately 800 feet away from I-210, which presents the potential for ADL-contaminated soils in the Master Plan Area. If these soils are disturbed by the proposed project activities, they could release hazardous lead materials. However, the exposed soils that might be disturbed by project activities would first be tested, and then the ADL would be addressed using standard protocols that would not constrain the development.

ACMs may also occur in pre-1970s buildings in the Master Plan Area, which could release asbestos hazards into the environment with demolition of structures containing ACMs. Structures have been surveyed for ACMs, and suspected ACMs were found in two locations: the Boddy House and the Boddy Lodge. In the Boddy House, two rooms had foam-sprayed acoustic ceiling, and the Boddy Lodge had vinyl floor tile. The proposed project would involve upgrades to the Boddy Lodge and the Boddy House. Prior to proposed project activities in these buildings, an assessment would be made as to whether ACMs would be disturbed, and any ACMs would be subsequently removed safely using standard removal protocols that would not constrain development. Additional structures surveyed for asbestos did not contain suspected ACMs; these are Van de Kamp Hall, the Horticultural Trailer & Public Programs/Harvest Garden, the Gift Shop/Information Center/Classrooms, the former Sycamore Science Center (now split into two sides: Rose Garden bridal dressing room and shop/tool area for maintenance staff), the Tool Shed, the Minka House, the Tea House, the Gift Shop Area, the restroom at the Rose Garden, and the Bird Observation Station (now

[10] Southern California Gas Company. Accessed November 11, 2019. Gas Transmission Pipeline Interactive Map – Los Angeles. http://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335.

Lakeside Lookout). If other pre-1970s structures apart from these are to be demolished, these buildings would first be inspected for ACMs, which would subsequently removed safely using standard removal protocols that would not constrain development.

Pesticides and herbicides where phased out of use beginning in 2014, but they may still be present in the soil. Prior to the initiation of construction activities, surface and near-surface soil samples would be collected in excavation areas and analyzed for pesticide/herbicides. If detected, pesticide- and herbicide-containing soil would be removed safely using standard removal protocols that would not constrain development.

There were no REC locations in or near the Master Plan Area that would constrain development. EDR searched applicable regulatory agency lists and standard environmental record sources (federal, state, local, and tribal databases) to identify locations of potential concern within the ASTM Standard Practice E 1527-13 (Standard) minimum search distances. EDR found a variety of RECs at various distances, but the review indicated that there were no active remediation sites within a 0.25-mile radius of the Master Plan Area. RECs were found within 0.25 miles including auto fuels, lab waste, pesticides, asbestos, and PCB. However, any historic contamination from these sites within 0.25 mile were found to be not significant and would not create a significant hazard. The search found that the RECs would not constrain the development of the Master Plan Area or create a significant hazard (Appendix 5).[11]

Although LBPs, ADL, ACMs, and pesticides/herbicides may be present in the Master Plan Area and can be released through disturbance caused by the proposed project, testing for these hazardous materials would take place prior to construction activities, and any materials found would be safely removed using standard protocols that would not constrain development. Therefore, the proposed project would result in less than significance impacts in regard to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment. No further analysis is warranted.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?	☐	☐	☐	☒

The proposed project would result in no impacts to hazards and hazardous materials in relation to emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses, such as a school. There are no schools located within 0.25 mile of the Master Plan Area (see Section 2.15, *Public Services*). The nearest schools are the Learning Castle, Inc., Crescenta-Canada Nursery School, and La Cañada Elementary School, all of which are approximately 0.3 mile away or more. Therefore, there would be no impact. No further analysis is warranted.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

The proposed project would result in no impacts to hazards and hazardous materials in relation to creating a significant hazard to the public or the environment due to its location on a site which is included on a list of hazardous material sites compiled pursuant to Government Code § 65962.5. A review of federal, state, and tribal databases indicated that there were no active remediation sites in the Master Plan Area. Five RECs were

[11] Environmental Data Resources, Inc. January 2018. The EDR Aerial Photo Decade Package, The EDR Historical Topographic Map Report, and The EDR Radius Map. Inquiry Number 5153450.4. Prepared for Sapphos Environmental, Inc.

found within 0.25 mile of the Master Plan Area;[12] however, the review indicated that there were no active remediation sites within a 0.25-mile radius of the Master Plan Area, and the distance of the sites identified would ensure that any historic contamination from these sites would not impact the Master Plan Area.[13] Therefore, there would be no impact. No further analysis is warranted.

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

The proposed project would result in no impacts resulting in a safety hazard or excessive noise for people residing or working in the project area due to its location within an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public airport or public use airport. The Master Plan Area is not located within 2 miles of a public airport or a public use airport. The nearest airport is Burbank Airport, which is a commercial airport located approximately 7.5 miles away.[14] Therefore, there would be no impact. No further analysis is warranted.

f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

The proposed project would result in no impact to hazards and hazardous materials in relation to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. The Master Plan Area is not included in any emergency response plan or any emergency evacuation plan. The nearest evacuation route to the Master Plan Area is Verdugo Boulevard (see Section 2.15, *Public Services*, for more details). Construction activities, including staging, would be limited to the Master Plan Area, except for vehicles traveling to and from the Master Plan Area. Therefore, there would no impact. No further analysis is warranted.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:

i) within a high fire hazard area with inadequate access?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to hazards and hazardous materials in relation to exposing people or structures to a significant risk of loss, injury, or death involving fires, because the project is located within a high fire hazard area with inadequate access. As stated in the City of LCF General Plan, the entire City of LCF is located within a Very High Fire Hazard Severity Zones (VHFHSZ) (Figure 2.9-1, *Fire Hazard Severity Zones*).

[12] Environmental Data Resources, Inc. January 2018. The EDR Aerial Photo Decade Package, The EDR Historical Topographic Map Report, and The EDR Radius Map. Inquiry Number 5153450.4. Prepared for Sapphos Environmental, Inc.

[13] Sapphos Environmental, Inc. December 7, 2018. Memorandum for the Record No. 3. Subject: Hazardous Sites Baseline Inventory for Descanso Gardens Master Plan.

[14] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Figure 7.4: Airports/Airfields Map. http://planning.lacounty.gov/generalplan/generalplan

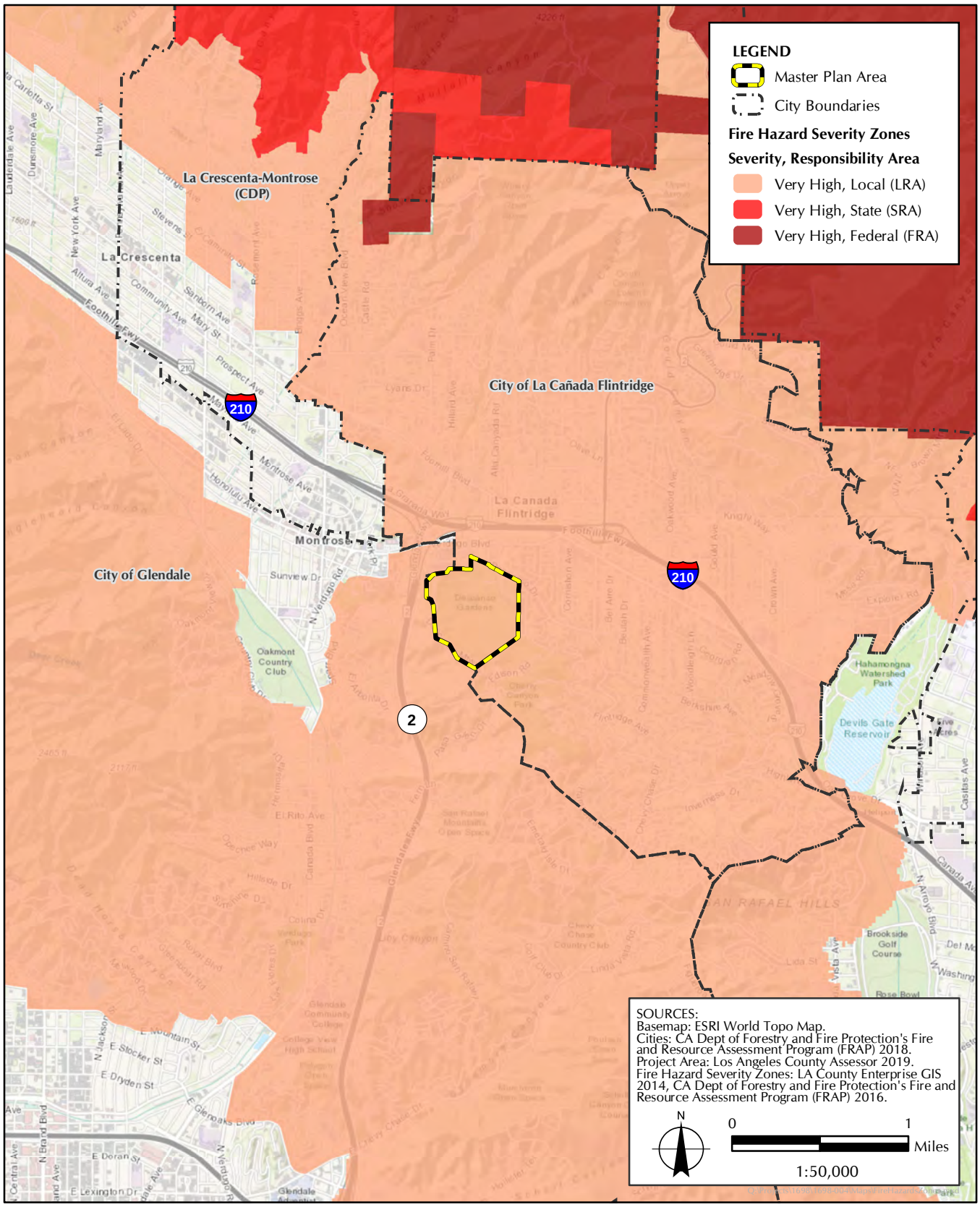


FIGURE 2.9-1

Fire Hazard Severity Zones

The proposed project would retain the three existing driveways providing access to the Master Plan Area from Descanso Drive to the north. From the west and south, the perimeter of the Master Plan is accessible from the unpaved Descanso Motorway/Descanso Trail, which connects along an unpaved road to the existing Oak Woodland through a gated fence in the southwestern portion of the developed gardens. The proposed project would retain the gated access road to Descanso Motorway. The proposed project would increase access to and from the Master Plan Area due to the reconfiguration of the parking areas and pedestrian access by enhancing the Auxiliary Parking Lot to accommodate bus and group parking, a designated drop-off/pick-up area, ingress and egress demarcations, and designated pedestrian walkways and access paths. In addition, the paved Service Route would be widened to 20 feet wide where it is not currently that width to accommodate emergency response vehicles such as fire trucks in a full loop through the developed portions of the gardens.

The proposed project would not restrict access to the SCE Utility Corridor. Consistent with California Public Utilities Commission regulations (General Order No. 69-C), access to SCE's right-of-way and facilities within the SCE electrical utility corridor that extends through the Master Plan Area is maintained 24/7 in order to ensure SCE's access for system operations, maintenance, and emergency response.[15] As SCE owns the corridor parcels through the Master Plan Area, all grading activities within the corridor require a clearance review by SCE to ensure compliance with all applicable federal, state, county, and local laws affecting use of SCE's land. Specific projects under the Master Plan would be required to obtain all permits and governmental approvals and maintain adequate clearances from SCE's facilities. Flammable or combustible materials are not allowed to be used or stored on SCE's property. The proposed project would involve clearance of the vegetation in the northern section of SCE's corridor between the two parking lots and resurfacing with decomposed granite to maintain a vegetation clearance that would maintain SCE access and reduce fire hazards north of the two electrical transmission towers. The proposed project would not be expected to affect the electrical distribution lines above the northwestern and eastern portions of the Master Plan Area. The proposed project would involve minor improvements to the landscaping between the transmission towers and Winery Canyon Channel, while maintaining SCE access within the picnic area next to Winery Canyon Channel. The improvements within SCE's corridor to the Promenade, Entry Court, Camellia Strolling Garden, and Oak Woodland restoration would be required to include only shrubs and trees that are slow growing and not exceed 15 feet in height to maintain access, in accordance with SCE license agreements for use of the SCE fee-owned property. Therefore, the proposed project would result in less than significant impacts regarding fire response access. No further analysis is required.

ii) within an area with inadequate water and pressure to meet fire flow standards?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to hazards and hazardous materials in relation to exposing people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located within an area with inadequate water and pressure to meet fire flow standards. The Master Plan Area is located within the City of LCF. Potable water is provided by the Valley Water Company (see Section 2.19, *Utilities*). There are two existing fire hydrants at the northern edge of the Master Plan Area along Descanso Drive and one existing fire hydrant in the southwestern portion of the Main Parking Lot and one existing fire hydrant along the eastern Boddy House driveway; all four have red tops and caps indicating a 500 gallon per minute (GPM) or less water supply. Additional fire hydrants are located approximately 220 feet east of the Master Plan Area at the intersection of Encinas Drive and Padres Trail, approximately 260 feet east of the Master Plan Area along Encinas Drive south of Padres Trail, approximately 275 feet northwest of the Master Plan Area at the intersection of Descanso Drive and Leycross Drive, and approximately 810 feet west of the Master Plan Area along Stancrest Drive immediately east of

[15] Public Utilities Commission of the State of California. Effective July 10, 1985. Easements on Property of Public Utilities Resolution No. L-230. Proposed General Order No. 69-C. http://docs.cpuc.ca.gov/PUBLISHED/Graphics/645.PDF

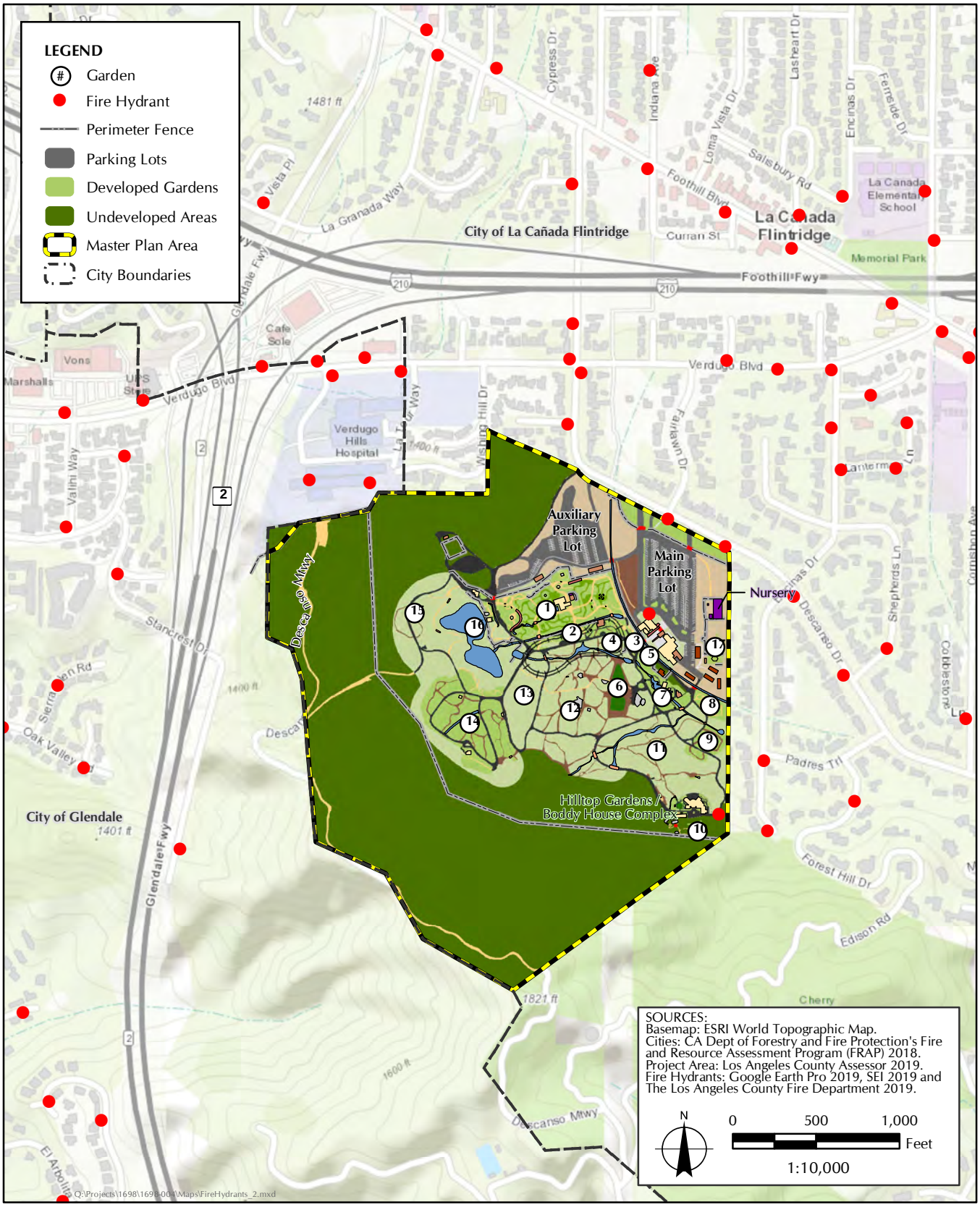
SR-2 (Figure 2.9-2, *Nearest Existing Fire Hydrants*).[16] The Master Plan Area is well served by fire hydrants. The proposed project would not affect these fire hydrants or reduce water pressure. The proposed project is intended to reduce the property's dependence on potable water with on-site treatment, a relined Lake (which provides emergency water), and bioswales to capture stormwater from the parking lots. Therefore, impacts would be less than significant. No further analysis is warranted.

iii) within proximity to land uses that have the potential for dangerous fire hazard?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to hazards and hazardous materials in relation to exposing people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located within proximity to land uses that have the potential for dangerous fire hazard. As stated in the Safety Element of the City of LCF General Plan, the entire City of LCF, including the Master Plan Area, is located within a designated VHFHSZ (Figure 2.9-1).[17] The Master Plan Area is an existing botanic garden. An existing electrical utility corridor owned and maintained by SCE extends from the San Gabriel Mountains south through the Master Plan Area and into the San Rafael Hills south of the Master Plan Area. SCE maintains this property so that, with the exception of the protected oak trees, a safe clearance is maintained between shrubs, trees, and the electrical towers. SCE's electrical transmission lines are high above the tree canopy. Flammable or combustible materials are not allowed to be used or stored on SCE's property. The proposed project would include two elements that would reduce potential fire hazard within the SCE electrical corridor in the Master Plan Area. First, the proposed project would involve clearance of the vegetation in the northern section of SCE's corridor between the two parking lots and resurfacing with decomposed granite to maintain a vegetation clearance that would maintain SCE access and reduce fire hazards north of the two electrical transmission towers. Second, the proposed project would relocate the Main Lawn that hosts gatherings below the electrical transmission lines northwest of the electrical corridor, in the existing Rose Garden as part of the proposed River of Roses. The relocated event lawn would be located outside of the Oak Woodland and outside of the electrical utility corridor. The proposed Wilds Loop, Elevated Oak Canopy, and other new features would be installed outside of SCE's electrical utility corridor. Consistent with SCE's landscaping requirements for licensees on SCE fee-owned property, camellias within the SCE corridor in the Camellia Strolling Garden would be required to be maintained at a height of 15 feet or less, similar to how they are maintained along the Promenade. The existing northern segment of the Main Lawn would remain as a clearing in the camellias, and the southern portion would be planted as a camellia grid grove, which would help clearly define the maintenance requirements for staff, volunteers, and Descanso-supervised outside contractors.

As with existing conditions, a brush clearance zone would be regularly maintained around existing and new structures in accordance with County Fuel Management Zone standards. New buildings would be designed and constructed in accordance with the most recent California Fire Code and Los Angeles County Fire Code, as updated during the 15-year master plan timeframe. The Master Plan Area would continue to be inspected annually from May 1 to August 1 (see Section 3.20, *Wildfire*). Therefore, impacts would be less than significant. No further analysis is warranted.

[16] Google Earth Pro. Accessed November 12, 2019. Aerial Imagery and Google Streetview.
[17] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030: Chapter 5 – Safety Element. https://cityoflcf.org/planning/



Please refer to Table 1.8.2-2 for garden descriptions.

FIGURE 2.9-2

Nearest Existing Fire Hydrants

h) Does the proposed use constitute a potentially dangerous fire hazard? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to hazards and hazardous materials in relation to constituting a potentially dangerous fire hazard. The last known wildland fire to affect the Master Plan Area was in 1878. An area to the west of the Master Plan Area was burned in 1945 in the Alpha No. 109 fire, and areas to the south of the project area were burned in 1999 in the Rafael fire.[18] The proposed project would include the construction of new buildings, which could constitute a new fire hazard such as in the construction of a new kitchen or other fire hazard. The proposed project would involve the expansion of structures, trails, and programming that would require additional fire protection services but not result in the requirement for additional or expanded fire protection facilities. While the proposed project would involve construction of new buildings and structures within the western fenced portion of the property, including two kitchens, which have the potential to become a new fuel source for increased fire risk, more maintenance would occur in the proposed Nature Discovery Garden to maintain the garden facilities that would reduce vegetation fuel loads. The proposed project is located in an a VHFHZ (Figure 2.9-1). Title 32 of the Los Angeles County Fire Code requires that an automatic sprinkler system be installed in every occupancy that is newly constructed, modified, reconstructed, or remodeled that is located in a Fire Hazard Severity Zone and within the San Gabriel Mountains Southface Areas.[19] The new kitchens would not be a fire hazard considering that Descanso Gardens would comply with all regulations related to fire safety in public spaces, including the California Fire Code and the Los Angeles County Fire Code.[20,21] Although the proposed Wilds Loop would extend south beyond the fenced area into the undeveloped portion of the property, which would not be easily accessible by fire response personnel, the new trail would be defensible from the Descanso Motorway above the trail and the widened driveway leading to the Boddy House from below. Furthermore, the proposed project would include widening of the entire service loop around the developed gardens to a 20-foot paved road to improve fire truck access from the existing condition. The Master Plan would regrade and widen the service route of the eastern driveway which would improve fire and emergency access (Section 1, *Project Description*). Therefore, the proposed project would result in less than significant impacts regarding constituting a potentially dangerous fire hazard. No further analysis is warranted.

[18] California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resource Assessment Program. Accessed May 2019. Fire Perimeter GIS Data and Fire Perimeters Map. https://frap.fire.ca.gov/frap-projects/fire-perimeters/
[19] Los Angeles County Code of Ordinances, Title 32. Los Angeles County Fire Code. Section 903.2.11.1.
[20] California Code of Regulations, Title 24, Part 9, California Fire Code. https://codes.iccsafe.org/content/CAFC2019/cover.
[21] Los Angeles County Code of Ordinances, Title 32. Los Angeles County Fire Code. Section 903.2.11.1.

2.10. HYDROLOGY AND WATER QUALITY

This analysis is undertaken to determine if the proposed project may have a significant impact to hydrology and water quality, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. Hydrology and water quality impacts associated with implementation of the proposed project were evaluated based on expert opinion supported by facts, review of a hydrology technical report prepared for Descanso Gardens (see Appendix 6, *Descanso Gardens Master Plan Hydrology Technical Report*; Hydrology Technical Report), review of a water quality technical report prepared for Descanso Gardens (see Appendix 11, *Descanso Gardens Master Plan Water Quality Technical Report*; Water Quality Technical Report), and review of the County General Plan 2035[1] and City of LCF General Plan.[2]

REGULATORY FRAMEWORK

Federal

Clean Water Act

The Clean Water Act (CWA) was enacted to restore and maintain the chemical, physical, and biological integrity of the nation's waters by regulating point and non-point pollution sources, providing assistance to publicly owned treatment works for the improvement of wastewater treatment, and maintaining the integrity of wetlands. This includes the creation of the National Pollutant Discharge Elimination System (NPDES), a program that requires states to establish discharge standards specific to water bodies.

Section 401 of the CWA established the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. Under the CWA, the EPA has implemented pollution control programs such as setting wastewater standards for surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit is obtained. The EPA's NPDES permit program controls these discharges. Point sources are discrete conveyances such as pipes or manmade ditches. In California, Section 401 of the CWA is administered and enforced by the State Water Resources Control Board (SWRCB), which develops regulations to implement water-quality control programs mandated at the federal and state levels. To implement these programs, California has nine Regional Water Quality Control Board (RWQCBs). The Master Plan Area is located within the jurisdiction of the LA-RWQCB.

Section 404 of the CWA establishes a program to regulate the discharge of dredged and fill material into waters of the United States, including wetlands. The U.S. Army Corps of Engineers (USACE) administers the day-to-day program, including individual permit decisions and jurisdictional determinations; develops policy and guidance; and enforces Section 404 provisions.

Section 303(d) of the CWA requires states to identify and establish a list of water bodies for which current pollution control technologies alone are not stringent enough to attain and maintain applicable water quality standards. Those water bodies on the 303(d) list are termed "impaired water bodies." For each impaired water body, states are required to develop a Total Maximum Daily Load (TMDL), which is the pollutant limit a water body can receive and still attain water quality standards. Any pollution above the maximum TMDL has to be "budgeted," meaning that the residual pollution is allocated for reduction among the various sources of the pollutant in order to regain the beneficial uses of the water body.

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[1] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan/generalplan

[2] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

FEMA National Flood Insurance Program

The National Flood Insurance Act of 1968 established the National Flood Insurance Program (NFIP), which allows property owners in participating communities to purchase insurance against flood losses. The National Flood Insurance Act includes development requirements for areas located within a floodplain, establishment of flood-risk zones and estimates of flood-caused losses. The act was reformed through a number of subsequent acts, including the Flood Insurance Protection Act of 1973, the National Flood Insurance Reform Act of 1994, the Flood Insurance Reform act of 2004, and the Biggert-Waters Flood Insurance Reform Act of 2012.

The National Flood Insurance Act and subsequent Reform Acts additionally promulgated guidance on floodplain development and flood insurance rating through the NFIP. The National Flood Insurance Act was one of many acts to contribute to the formation of the Federal Emergency Management Agency (FEMA), created in 1979. Within FEMA, the Federal Insurance and Mitigation Administration (FIMA) manages the NFIP. Communities participating in the NFIP, including Los Angeles County, have designated flood insurance zones determined through flood insurance studies, a Flood Insurance Rate Map (FIRM), and community-specific floodplain management regulations that meet or exceed the minimum NFIP standards and requirements. Los Angeles County has adopted the Floodplain Management Ordinance for this purpose, which is described in subsequent sections.

State

Section 1600 of the State Fish and Game Code

The CDFW is responsible for conserving, protecting, and managing California's fish, wildlife, and native plant resources. To meet this responsibility, the Fish and Game Code (Section 1602) requires an entity to notify CDFW of any proposed activity that may substantially modify a river, stream, or lake. Notification is required by any person, business, state, or local government agency, or public utility that proposes an activity that would

- Substantially divert or obstruct the natural flow of any river, stream or lake
- Substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake
- Deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake

The notification requirement applies to any work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel. This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. If CDFW determines that the activity may substantially adversely affect fish and wildlife resources, a Lake or Streambed Alteration Agreement is required. The Agreement includes reasonable conditions necessary to protect those resources and must comply with CEQA. The entity may proceed with the activity in accordance with the final Agreement.

California Porter-Cologne Water Quality Act

This state law provides a comprehensive water quality management system for the protection of California waters. Porter-Cologne designated the SWRCB as the ultimate authority over state water rights and water quality policy and also established the nine RWQCBs to oversee water quality on a day-to-day basis at the local/regional level, including preparation and implementation of Water Quality Control Plans (Basin Plans).

The Basin Plans contain water quality standards that are the basis for each RWQCB's regulatory programs. The water quality standards consist of up to 24 designated beneficial uses (e.g., municipal and domestic supply, wildlife habitat, recreation, and groundwater recharge) for individual surface water bodies and groundwater, as well as the water quality objectives to be maintained or attained to protect those beneficial uses. The Basin Plans also contain waste discharge prohibitions and other implementation measures to achieve water quality objectives. Water quality control measures include TMDLs required by the federal CWA.

California Sustainable Groundwater Management Act of 2014

The California Sustainable Groundwater Management Act (SGMA) consists of SB 1168 (Pavley), AB 1739 (Dickinson), and SB 1319 (Pavley). The SGMA aims to bring groundwater basins in the state into balance in twenty years by providing a framework for long-term sustainable groundwater management. Under the SGMA, local and regional authorities in medium and high priority groundwater basins have formed Groundwater Sustainability Agencies (GSAs) that prepare and implement local Groundwater Sustainability Plans. The content of the Groundwater Sustainability Plans is regulated by the California Department of Water Resources. Local agencies have until 2022 to develop, prepare, and implement their Groundwater Sustainability Plans and until 2040 to achieve groundwater sustainability.

Local

Water Quality Control Plan for the Los Angeles Region

The LA-RWQCB has prepared a Basin Plan for the Los Angeles Region, which includes the Coastal Watersheds of Los Angeles and Ventura Counties. The first essentially complete Basin Plan, which was established under the requirements of California's 1969 Porter-Cologne Water Quality Control Act (Section 13000 [Water Quality] et seq. of the California Water Code), was adopted in 1975 and revised in 1984. The latest version was adopted in 1994.

The LA-RWQCB is involved in the regulation of a number of activities that are relevant to the Master Plan:

- Prepares, monitors compliance with, and enforces Waste Discharge Requirements, including NPDES Permits
- Implements and enforces local storm water control efforts
- Enforces water quality laws, regulations, and waste discharge requirements

Storm water discharges that are composed entirely of runoff from qualifying construction activities may require regulation under the General Construction Activity Storm Water Permit issued by the SWRCB. Construction activities that qualify include clearing, grading, excavation, reconstruction, and dredge-and-fill activities that result in the disturbance of at least 1 acre and less than 5 acres of total land area.

County General Plan 2035

The Natural Resources element of the County General Plan 2035 contains three goals relevant to hydrology and water quality in relation to the proposed project:

Goal C/NR 5: Protected and useable local surface water resources.

- Policy C/NR 5.1**:** Support the LID [Low Impact Development] philosophy, which seeks to plan and design public and private development with hydrologic sensitivity, including limits to straightening and channelizing natural flow paths, removal of vegetative cover, compaction of soils, and distribution of naturalistic BMPs at regional, neighborhood, and parcel-level scales.
- Policy C/NR 5.2**:** Require compliance by all County departments with adopted Municipal Separate Storm Sewer System (MS4), General Construction, and point source NPDES permits.
- Policy C/NR 5.3**:** Actively engage with stakeholders in the formulation and implementation of surface water preservation and restoration plans, including plans to improve impaired surface water bodies by retrofitting tributary watersheds with LID types of BMPs.
- Policy C/NR 5.4**:** Actively engage in implementing all approved Enhanced Watershed Management Programs/Watershed Management Programs and Coordinated Integrated Monitoring Programs/Integrated Monitoring Programs or other County-involved TMDL implementation and monitoring plans.
- Policy C/NR 5.5**:** Manage the placement and use of septic systems in order to protect nearby surface water bodies.
- Policy C/NR 5.6**:** Minimize point and non-point source water pollution.
- Policy C/NR 5.7**:** Actively support the design of new and retrofit of existing infrastructure to accommodate watershed protection goals, such as roadway, railway, bridge, and other—particularly—tributary street and greenway interface points with channelized waterways.

Goal C/NR 6: Protected and usable local groundwater resources.

- Policy C/NR 6.1**:** Support the LID philosophy, which incorporates distributed, post-construction parcel-level stormwater infiltration as part of new development.
- Policy C/NR 6.2: Protect natural groundwater recharge areas and regional spreading grounds.
- Policy C/NR 6.3**:** Actively engage in stakeholder efforts to disperse rainwater and stormwater infiltration BMPs at regional, neighborhood, infrastructure, and parcel-level scales.
- Policy C/NR 6.4**:** Manage the placement and use of septic systems in order to protect high groundwater.
- Policy C/NR 6.5**:** Prevent stormwater infiltration where inappropriate and unsafe, such as in areas with high seasonal groundwater, on hazardous slopes, within 100 feet of drinking water wells, and in contaminated soils.

Goal C/NR 7: Protected and healthy watersheds.

- Policy C/NR 7.1**:** Support the LID philosophy, which mimics the natural hydrologic cycle using undeveloped conditions as a base, in public and private land use planning and development design.
- Policy C/NR 7.2**:** Support the preservation, restoration and strategic acquisition of available land for open space to preserve watershed uplands, natural streams, drainage paths, wetlands, and rivers, which are necessary for the healthy function of watersheds.
- Policy C/NR 7.3**:** Actively engage with stakeholders to incorporate the LID philosophy in the preparation and implementation of watershed and river master plans, ecosystem restoration projects, and other related natural resource conservation aims, and support the implementation of existing efforts, including Watershed Management Programs and Enhanced Watershed Management Programs.

- Policy C/NR 7.4**:** Promote the development of multi-use regional facilities for stormwater quality improvement, groundwater recharge, detention/attenuation, flood management, retaining non-stormwater runoff, and other compatible uses.

Los Angeles County Hydrology Manual

The County has established levels of flood protection for various conditions. These levels of flood protection are described in the County's Hydrology Manual. Flood control requirements relevant to the project are summarized below.

Capital Flood Protection

The capital flood represents the runoff produced by a 50-year frequency design storm falling on saturated soils. Effects of fires and erosion are also considered under certain conditions. Storm water conveyance facilities that should meet these criteria include

1. Natural Watercourses
2. Open channels, closed conduits, bridges and debris basins
3. Floodways
4. Natural depressions or sumps
5. Culverts under major or secondary highways
6. Tributary areas subject to burning

Urban Flood Protection

All drainage facilities in urban areas not covered by the Capital Flood Protection conditions must meet the Urban Flood level of protection. The Urban Flood is runoff from a 25-year frequency design storm falling on a saturated watershed.

Probable Maximum Flood Protection

The Probable Maximum Flood (PMF) results from the most severe combination of critical meteorological and hydrologic conditions that are reasonably possible in the region. The Probable Maximum Precipitation (PMP) represents the greatest depth of rainfall theoretically possible for a given duration over a given drainage basin. The PMF occurs when the PMP falls over watersheds that have reached field capacity (saturated) conditions. California's Division of Safety of Dams (DSOD) requires a PMF analysis for dams and debris basins that hold at least 1,000 acre-feet, are 50 feet or higher, would require at least 1,000 people to be evacuated, and have a damage potential of $25,000,000 or more.

Existing Level of Flood Protection

Replacing or modifying surface drainage systems requires maintaining or increasing the original level of flood protection. The total capacity must equal or exceed the original surface capacity.

Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)

The County LID Ordinance requires that projects

- Mimic undeveloped stormwater runoff rates and volumes in any storm event up to and including the "Capital Flood" event, as defined by the County of Los Angeles Department of Public Works (DPW);
- Prevent pollutants of concern from leaving the development site in stormwater as the result of storms, up to and including a Water Quality Design Storm Event; and
- Minimize hydromodification impacts to natural drainage systems.

Hydromodification is the change in runoff and in-stream processes caused by altered land development, which increase impervious surfaces and drainage infrastructure that can negatively affect runoff. Development can increase runoff volumes, frequency of runoff events, flow duration, and peak flows. Requirements for hydromodification management are established by the County LID Manual. Projects required to analyze for hydromodification impacts must conduct hydrology and hydraulic frequency analyses for LID, 2-, 5-, 10-, 25-, and 50-year storm events per the DPW Hydraulic and Hydrology manuals. The frequency analyses, which analyze changes in flow velocity, flow volume, and depth/width of flow for all natural drainage systems using HEC-RAS, are used to demonstrate compliance with hydromodification requirements and identify drainage impacts on off-site property. A sediment transport analysis is also required for any project tributary to a natural drainage system with a capital flood flow rate greater than 5,000 cubic feet per second. The sediment transport analyses should be conducted using HEC-RAS, SAMS, or HEC-6 to determine long-term impacts of streambed accretion and degradation of these natural drainage systems.

City of LCF General Plan

Although the County is not subject to city general plans, City of LCF General Plan information has been provided to inform the County's decision-making process:

> During the planning period, the City will undertake efforts to protect and enhance water resources through water conservation and water quality improvement efforts. The City will also address water quality issues and concerns during the planning period through efforts to manage stormwater runoff, reduce water pollution, and enhance groundwater recharge through public and private sector efforts.

Conservation Element (CNE) Goal 1: Preserve and conserve natural resources in the community.

- CNE Objective 1.2: Preserve and improve local water quality.
  - CNE Policy 1.2.1: Ensure that new projects are designed to preserve and protect the watershed in and near the City from pollutants, excessive changes in natural drainage courses, wildfires, and other natural or human-made detrimental effects on the watershed system. Where practical and feasible, the City may undertake programs to accomplish these ends.
  - CNE Policy 1.2.2: Require the implementation of Low Impact Development stormwater management techniques in new or rehabilitated commercial or residential projects. Actions include:
    a) Minimizing pollutant loading and changes in hydrology; ensuring that post-development runoff rates from a site do not negatively impact downstream erosion and stream habitat; minimizing the amount of stormwater guided to impermeable surfaces; and maximizing percolation of stormwater into the ground where appropriate.
    b) Preserving wetlands, riparian corridors, and buffer zones.

c) Establishing reasonable limits on the clearing of vegetation from a project site.
d) Requiring incorporation of structural and non-structural best management practices (BMPs) to mitigate projected increases in pollutant loads and flows, such as the use of tree boxes, retention basins, bioswales, rain gardens, and roof gardens; to minimize impacts on the groundwater basins; and to allow stormwater to percolate into the groundwater basins.

- CNE Policy 1.2.3: Work with governmental and environmental partners to improve water quality in the Arroyo Seco Watershed through support of water quality improvement programs.
- CNE Policy 1.2.4: Encourage the implementation of the Flint Wash Restoration Project.
- CNE Policy 1.2.5: Undertake environmental enhancement opportunities that were identified in the list of potential Link/West Gateway Corridor Improvement Recommendations (2004), during this planning period. Publicize these projects as demonstration projects for protection and enhancement of the watershed.
- CNE Policy 1.2.6: Develop best management practices for water quality and watershed enhancements and encourage their implementation voluntarily and through review of development applications.
- CNE Policy 1.2.7: Improve water quality through public education programs.
- CNE Policy 1.2.8: Continue to implement upgrades to the local drainage system, including storm water collection and curbs and gutters and other appropriate measures.
- CNE Policy 1.2.9: Require review of all development projects that have a potential for causing a deterioration of groundwater quality beyond standards imposed by the State Water Resources Control Board to assure compliance with State and federal standards. Methods should be developed to control activities that have detrimental impacts on groundwater quality.
- CNE Policy 1.2.10: Prior to issuance of permits on existing vacant lands designated for residential and mixed-use uses, require confirmation that a wastewater treatment facility (sewer or septic) will treat the wastewater generated by the new development and the development will connect to that facility.

IMPACT ANALYSIS

Would the project:	***Potentially Significant Impact***	***Less than Significant Impact with Mitigation Incorporated***	***Less than Significant Impact***	***No Impact***
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to hydrology and water quality in relation to violating water quality standards or waste discharge requirements or otherwise substantially degrading surface or groundwater quality. Water quality would be protected by the implementation of a project-specific Storm Water Pollution Prevention Plan (SWPPP) as required by the Construction General Permit (CGP). BMPs would be utilized according to the SWPPP and are considered a part of the proposed project for the impacts assessment. A hydrology analysis for the Master Plan Area was conducted (see Appendix 6). LID site design and treatment control BMPs would be used in the Master Plan Area (see Appendix 6). Some of these include, but are not limited to, selecting appropriate building materials, bioretention facilities, and a treatment wetland.

The Master Plan Area drains to the Devils Gate Reservoir via three channels: the Winery Canyon Channel, Flint Canyon Channel, and Hay Canyon Channel. The Devils Gate reservoir then drains to the Arroyo Seco Reach 2 Watershed roughly 2.2 miles away. This watershed is a tributary of the Upper Los Angeles River Watershed. The Arroyo Seco Reach 2 Watershed is on the CWA TMDL 303(d) list for Excess Algal Growth, Indicator Bacteria, and Trash.[3] Project-specific BMPs would be utilized accordingly to address these pollutants. BMPs would also be utilized to minimize the discharge of any pollutants from staging areas. Staging areas would be located away from water sources to minimize the potential of pollutant runoff. The types of BMPs that would be utilized to protect surface and groundwater quality include but are not limited to Erosion Controls, Sediment Controls, Waste and Materials Management, Non-Stormwater Management, and Training and Education as outlined in the CGP.

Water quality in the Master Plan Area was assessed with regard to the following pollutants of concern: Excess Algal Growth, Indicator Bacteria, and Trash. A Descanso Gardens Water Quality Technical Report was prepared to assess the potential impacts on water quality associated with the proposed project (Appendix 11). For sediments, the report found that in postdevelopment conditions, the project BMPs would reduce the release of sediment to receiving waters or reduce it such that sediments are considered less than significant. Nutrients, pathogens, trash and debris, trace metals, oil and grease, and pesticides would also have less than significant impacts postdevelopment. Using the variety of BMPs outlined in the Water Quality Technical Report (Appendix 11), the pollutants would not result in any TMDL exceedances, violate any water quality standards or requirements, or substantially degrade the water quality.

Therefore, the proposed project would result in less than significant impacts regarding violating water quality standards or waste discharge requirements or otherwise substantially degrading surface or groundwater quality. No further analysis is warranted.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts in regard to decreasing groundwater supplies or interference with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The Water Quality Technical Report (Appendix 11) found that the Master Plan would not deplete groundwater supplies or interfere with recharge, as it would not increase water consumption, and it includes objectives to reduce water consumption and improve infiltration within pervious areas.

The impervious surface area of the Master Plan Area is approximately 15.1 acres (or 11.3 percent of the total; see Table 2.10-1, *Existing Land Uses*). The current pervious surface area is 133.6 acres (or 88.7 percent). The proposed project would increase the total impervious surface area to 19.5 acres for a net increase of 4.4 acres (see Table 2.10-2, *Proposed Project Land Uses*). Overall, the Master Plan Area has more than enough pervious surfaces to accommodate the ~3 percent increase in impervious surface, as a net impervious increase of 4.4 acres is not a significant portion of the total 148.7 acres in the Master Plan Area. Hydromodification is the change in runoff and in-stream processes caused by altered land development that increases impervious surfaces and drainage infrastructure. The County has developed LID standards that require hydrology and hydraulic frequency analyses to regulate hydromodification. The Water Quality Technical Report (Appendix 11) performed these analyses and found that there were no hydrologic conditions of concern with hydrologic

[3] State Water Resources Control Board. Accessed November 12, 2019. Impaired Water Bodies. https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml.

management strategies in place such as prioritization of soils for infiltration, improved lake operations, retention basins, drainage conveyances, and more. Hydrologic management strategies to address hydromodification would be incorporated into the proposed project. Furthermore, there is no sustainable groundwater management plan in the Master Plan Area; therefore, the proposed project would not impede any sustainable groundwater management implementation.[4]

TABLE 2.10-1
EXISTING LAND USES

Land Use	Impervious (acres)	Pervious (acres)
Buildings	1.4	
Paved Surfaces	13.3	
Channels	0.4	
Developed Pervious Surfaces (Gardens and Landscaping)		50.9
Undeveloped Lands		82.7
Total Acres	15.1	133.6
Approximate Percentage of Total	10%	90%

Source: Appendix 11.

TABLE 2.10-2
PROPOSED PROJECT LAND USES

Land Use	Impervious (acres)	Pervious (acres)
Buildings	0.9	
Paved Surfaces	18.2	
Channels	0.4	
Developed Pervious Surfaces (Gardens and Landscaping)		46.9
Undeveloped Lands		82.3
Total Acres	19.5	129.2
Approximate Percentage of Total	13%	87%

Source: Appendix 11.

Therefore, the proposed project would result in less than significant impacts regarding decreasing groundwater supplies or interference with groundwater recharge such that the project may impede sustainable groundwater management of the basin. No further analysis is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:

(i) Result in substantial erosion or siltation on- or off-site? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to hydrology and water quality in relation to a substantial erosion or siltation on- or -off site. Three Hydrologic Management Strategies would be implemented to reduce on-site erosion or siltation: Drainage Conveyances, Sediment and Erosion Controls, and Monitoring and Adaptive Management. Drainage Conveyances would limit erosion on-site in

[4] California Department of Water Resources. Accessed November 12, 2019. Sustainable Groundwater Management Act Portal. All Posted GSA Notices. Available at https://sgma.water.ca.gov/portal/gsa/all.

concentrated flow paths to less than substantial levels. Sediment and Erosion Controls, particularly check dams on natural drainages tributary to the Lake, would be designed and maintained to reduce siltation on-site to less than substantial levels. Monitoring and Adaptive Management would be implemented to evaluate whether the drainage system is effective in managing on-site erosion and siltation and to remedy those areas where erosion and siltation is observed. Three more Hydrologic Management Strategies would be implemented to reduce off-site erosion or siltation: Lake Operations, Distributed Volume and Flow Management, and Regional Detention/Retention Basins, which would be implemented with sufficient storage volume and attenuation to meet the frequency analysis standards, per the project criteria for hydromodification control. Further descriptions of impact assessments and Hydrologic Management Strategies associated with the proposed alterations of existing drainage pattern and increases in impervious surfaces are detailed in the Hydrological Technical Report (Appendix 6). These management strategies would ensure that impacts remain below the level of significance. No further analysis is warranted.

(ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to hydrology and water quality in relation to substantially increasing the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or -off site. Two Hydrologic Management Strategies would be implemented to reduce surface runoff leading to flooding on-site: Drainage Conveyances and Monitoring and Adaptive Management. Drainage Conveyances would be designed to convey on-site stormwater flows associated with capital or urban flood protection, per the project criteria for flood control, to limit flooding on-site to less than substantial levels. Monitoring and Adaptive Management would be implemented to evaluate whether the proposed project drainage system is effective in managing on-site flooding and to remedy those areas where excess flooding is observed. Four more Hydrologic Management Strategies would be implemented to surface runoff leading to flooding off-site: Lake Operations, Distributed Volume and Flow Management, Regional Detention/Retention Basins, and Drainage Conveyances. These methods would be implemented with sufficient storage volume and attenuation to meet the frequency analysis standards, per the project criteria for hydromodification control, to prevent stormwater from discharging offsite onto neighboring property. Further descriptions of impact assessments and Hydrologic Management Strategies associated with the proposed Master Plan alterations of existing drainage pattern and increases in impervious surfaces are detailed in the Hydrological Technical Report (Appendix 6). These management strategies would ensure that impacts remain below the level of significance. No further analysis is warranted.

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to hydrology and water quality in relation to creating or contributing runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Two Hydrologic Management Strategies would be implemented to reduce excess or polluted runoff on-site: Drainage Conveyances and Monitoring and Adaptive Management. Drainage Conveyances would be designed to convey on-site stormwater flows associated with capital or urban flood protection, per the Project criteria for flood control, to prevent capacity exceedances of existing or planned stormwater drainage systems to less than substantial levels on-site. Monitoring and Adaptive Management would be implemented to evaluate whether the drainage system is effective in managing on-site capacity exceedances of existing or planned stormwater drainage systems on-site and to remedy those areas where capacity exceedance is observed. Three more Hydrologic

Management Strategies would be implemented to reduce excess or polluted runoff off-site: Lake Operations, Distributed Volume and Flow Management, and Regional Detention/Retention Basins. These methods would be implemented with sufficient storage volume and attenuation to meet the peak flow matching standards, per the Project criteria for flood control. Further descriptions of impact assessments and Hydrologic Management Strategies associated with the proposed Master Plan alterations of existing drainage pattern and increases in impervious surfaces are detailed in the Hydrology Technical Report (Appendix 6). These management strategies would ensure that impacts remain below the level of significance. No further analysis is warranted.

(iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?	☐	☐	☐	☒

The proposed project would result in no impacts to hydrology and water quality in relation to impeding or redirecting flood flows which would expose existing housing or other insurable structures in a Federal or County flood hazard areas to a significant risk of loss or damage involving flooding. The Hydrological Technical Report (Appendix 6) found that areas tributary to the Zone X shaded areas of the FEMA Flood Insurance Rate Maps (FEMA FIRM) would have negligible increases in impervious cover associated with paved paths and would not alter the existing drainage pattern of areas tributary to the Zone X shaded areas. The increases in impervious cover changes would not affect flood hydrology significantly enough to change the extent of Zone X shaded areas. Furthermore, the Master Plan Area is not located within the County Capital Flood floodplain mapping area; therefore, the proposed alterations would not expose housing or structures to risk of loss or damage involving flooding (Appendix 6). Therefore, there would be no impact. No further analysis is warranted.

d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?	☐	☐	☐	☒

The proposed project would result in no impacts to hydrology and water quality in relation to placing structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements. The Hydrological Technical Report (Appendix 6) found that the Master Plan would not place structures in the Federal 100-year flood hazard areas, including Zone X shaped areas of FEMA FIRM. Moreover, the Master Plan Area is not located within the County Capital Flood floodplain area. Therefore, there would be no impact. No further analysis is warranted.

e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to hydrology and water quality in relation to conflicting with the County LID Ordinance (L.A. County Code, Title 12, Ch. 12.84). The Hydrological Technical Report (Appendix 6) found that the Master Plan would not conflict with the hydromodification control requirements of the County LID Ordinance with the implementation of three Hydrologic Management Strategies: Lake Operations, Distributed Volume and Flow Management, and Regional Detention/Retention Basins. These measures would be implemented with sufficient storage volume and attenuation to meet the frequency analysis standards, per the Project criteria for hydromodification control,

and these criteria are consistent with the County LID Standards Manual and County LID Ordinance (Appendix 6).[5,6]

Furthermore, as described in the Water Quality Technical Report (Appendix 11), LID site design and treatment control BMPs would be incorporated into the proposed project to mimic the predeveloped hydrologic regime, as feasible, and to capture and treat stormwater quality design volume ($SWQD_V$). LID site design BMPs include minimizing impervious and maximizing permeability, minimizing directly connected impervious areas (DCIAs), conserving natural areas, selecting appropriate building materials, and protecting slopes and channels. The LID treatment control BMPs would be installed in accordance with both the County MS4 Permit and County LID Ordinance and Manual. Proposed LID treatment control BMPs include bioretention facilities to capture runoff, new buildings to drain rainwater harvesting tanks for storage and use, retrofitting and lining the Lake to capture and use stormwater for irrigation, a treatment wetland to treat onsite runoff and harvested water, and expansion of the downgradient re-circulation pool (Appendix 11). As these strategies and BMPs would meet LID Ordinance and MS4 requirements, impacts would be less than significant. No further analysis is warranted.

f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to hydrology and water quality in relation to using on-site wastewater treatment systems in areas with known geological limitations or in close proximity to surface water. The County has authorized an on-site wastewater and septic improvements project, in progress as of summer 2019, which includes the installation of an upgraded wastewater treatment system, including a new MBR and emergency electrical generator for the MBR to provide wastewater treatment on-site using the activated sludge process. While not part of the proposed project, it may be noted that the MBR is being installed near the existing septic tanks between the existing Van de Kamp Hall back-of-house area and the existing Harvest Garden and is planned to be active by the end of 2019. While the Master Plan Area contains surface water features (the Lake and two recirculating streams), the Water Quality Technical Report (Appendix 11) has found that the proposed location of the MBR is sufficiently far from surface water, and siting would be based on input from geotechnical engineers. The MBR would also comply with wastewater discharge effluent limitations and would not impair surface or groundwater quality. Therefore, the proposed project would result in no impacts in regard to onsite wastewater treatment systems in areas with known geological limitations or in close proximity to surface water. No further analysis is warranted.

g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to hydrology and water quality in relation to risking release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. As described in the Hydrological Technical Report (Appendix 6), although the proposed project would not place homes and structures at risk in flood hazard zones, flood hazard zones mapped within the Master Plan Area include Zone X shaded areas of the FEMA FIRM. The primary pollutant of concern associated with these areas would be sediment eroded and transported from the ground surface during heavy storm events. The

[5] Los Angeles Department of Public Works. February 2014. Low Impact Development Standards Manual. https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf.

[6] Los Angeles County Code of Ordinances, Title 12 Environmental Protection, Ch. 12.84 Low Impact Development Standards.

risks from the pollutants due to flooding would be reduced through three Hydrologic Management Strategies: Drainage Conveyances, Sediment and Erosion Controls, and Monitoring and Adaptive Management (Appendix 6). The nearest 1 percent AE Flood Hazard Zone is located roughly 7 miles to the south of the proposed project.[7] The closest significant water body is Devils Gate Reservoir, which is located roughly 2.08 miles to the east of the Master Plan Area. The nearest tsunami zone is located in Playa Vista, roughly 23.1 miles south of the Master Plan Area.[8]

The Master Plan Area is not located within a tsunami zone and is not at risk for tsunami inundation.[9] The Master Plan Area is also not located within a mapped seiche zone, although the Hydrological Technical Report (Appendix 6) found that the Lake could be considered susceptible to a temporary disturbance or oscillation in its water level caused by earthquake or change in atmospheric pressure. While the risk of seiche activity appears to be low—because the Lake is a relatively small water body—the Drainage Conveyance would address overflow conditions associated with a seiche (Appendix 6). Therefore the proposed project would result in less than significant impacts in regards to flood hazard, tsunami, or seiche zones risking the release of pollutants due to project inundation. No further analysis is warranted.

h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

The proposed project would result in no impacts to hydrology and water quality in relation to conflict with or obstructing implementation of a water quality control plan or sustainable groundwater management plan. The City of LCF is located in the Los Angeles River Watershed, specifically within the Enhanced Watershed Management Program (EWMP) for the Upper Los Angeles River Watershed. The EWMP determines the BMPs that would meet required pollutant reductions while also benefitting the community and using green infrastructure. The EWMP covers topics for the watershed like water quality and TMDL, watershed control methods like LID, adaptive management, stormwater and groundwater management, and more.[10] Regardless of the EWMP, the proposed project would implement LID BMPs to improve water quality and mitigate other effects. Their goals are aligned, and the proposed project would not interfere with the implementation of the EWMP, but rather is considered consistent with the water quality control plan. The underlying groundwater basin, the Raymond Basin, does not have its own sustainable groundwater management plan; therefore, the proposed project would not obstruct any sustainable groundwater management plan implementation (Appendix 11). Additionally, the Master Plan Area does not fall within one of the seven Groundwater Sustainability Agencies (GSAs) in Los Angeles County in compliance with the California Sustainable Groundwater Management Act.[11] Therefore, there would be no impact. No further analysis is warranted.

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[7] Federal Emergency Management Agency. Accessed November 12, 2019. FEMA Flood Map Service Center: Search by Address. https://msc.fema.gov/portal/search?AddressQuery=descanso gardens#searchresultsanchor

[8] California Department of Conservation. Accessed November 12, 2019. Los Angeles County Tsunami Inundation Maps. https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles

[9] California Department of Conservation. Accessed November 12, 2019. Los Angeles County Tsunami Inundation Maps. https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles

[10] Upper Los Angeles River Watershed Management Group. January 2016. Enhanced Watershed Management Program (EWMP) for the Upper Los Angeles River Watershed. https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/los_angeles/upper_losangeles/20160127/UpperLARiver_mainbody_revEWMP_Jan2016.pdf

[11] California Department of Water Resources. Accessed November 12, 2019. Sustainable Groundwater Management Act Portal. All Posted GSA Notices. Available at https://sgma.water.ca.gov/portal/gsa/all

2.11. LAND USE AND PLANNING

This analysis was undertaken to determine if the proposed project may have a significant impact to land use and planning, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. Land use and planning impacts associated with implementation of the proposed project were evaluated with regard to the County General Plan 2035,[1] the City of LCF General Plan,[2] and the City of LCF Zoning Code.[3]

REGULATORY SETTING

Federal

There are no federal policies and regulations that supersede state and local policies and regulations for land use, planning, and zoning within the project area.

State

California Planning and Zoning Law requires each city to prepare and adopt "a comprehensive, long term general plan for the physical development of the … city, and of any land outside its boundaries" (Gov. Code Section 65300). Under Gov. Code Section 65302, each General Plan must include the following elements:

1. Land Use Element
2. Circulation Element
3. Housing Element
4. Conservation Element
5. Open Space Element
6. Noise Element
7. Safety Element

Government Code section 65300.5 requires a General Plan to be "integrated and internally consistent and compatible state of policies." Additionally, a General Plan must not only be internally consistent but vertically consistent with other land use and development approvals such as Specific Plans and the agency's zoning and development regulations.[4]

Local

SCAG 2016-2040 RTP/SCS

SCAG developed a land use distribution pattern supported by land use strategies that are included in the SCS portion of the 2016-2040 RTP/SCS. This plan is updated to respond to updated land use and reflect changes in the transportation network. The SCS outlines a plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The SCS focuses the majority of new housing and job growth in

[1] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan

[2] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[3] City of La Cañada Flintridge Community Development Department. Updated April 2016. Zoning Map. http://www.lcf.ca.gov/planning

[4] California Code of Regulations, Title 7. Planning and Land Use [65000 - 66499.58], Chapter 1. § 65000 (through 2012 Leg Sess).

high quality transit areas (HQTAs) and other opportunity areas in existing urbanized areas and suburban town centers and opportunity areas, resulting in an improved jobs-housing balance and more opportunity for infill, mixed-used, and/or transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

County General Plan 2035

The Land Use Element of the County General Plan 2035 provides strategies and planning tools to facilitate and guide future development and revitalization efforts. In accordance with the California Government Code, the Land Use Element designates the proposed general distribution and general location and extent of uses. The General Plan Land Use Policy Map and Land Use Legend serve as the "blueprint" for how land will be used to accommodate growth and change in the unincorporated areas. The Land Use Element contains two goals and 11 policies related to the Master Plan:

Goal LU 10: Well-designed and healthy places that support a diversity of built environments.

Topic – Community Design

- Policy LU 10.1: Encourage community outreach and stakeholder agency input early and often in the design of projects.
- Policy LU 10.2: Design development adjacent to natural features in a sensitive manner to complement the natural environment.
  Policy LU 10.3: Consider the built environment of the surrounding area and location in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament.
- Policy LU 10.4: Promote environmentally-sensitive and sustainable design.
- Policy LU 10.5: Encourage the use of distinctive landscaping, signage and other features to define the unique character of districts, neighborhoods or communities, and engender community identity, pride and community interaction.
  Policy LU 10.7: Promote public spaces, such as plazas that enhance the pedestrian environment, and, where appropriate, continuity along commercial corridors with active transportation activities.
- Policy LU 10.8: Promote public art and cultural amenities that support community values and enhance community context.
- Policy LU 10.9: Encourage land uses and design that stimulate positive and productive human relations and foster the achievement of community goals.
- Policy LU 10.10: Promote architecturally distinctive buildings and focal points at prominent locations, such as major commercial intersections and near transit stations or open spaces.
- Policy LU 10.11: Facilitate the use of streets as public space for activities that promote civic engagement, such as farmers markets, parades, etc.

Goal LU 11: Development that utilize sustainable design techniques.

Topic – Energy Efficient Development

- Policy LU 11.1: Encourage new development to employ sustainable energy practices, such as utilizing passive solar techniques and/or active solar technologies.

- Policy LU 11.2: Support the design of developments that provide substantial tree canopy cover, and utilize light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect.
- Policy LU 11.3: Encourage development to optimize the solar orientation of buildings to maximize passive and active solar design techniques.[5]

Subdivision and Zoning Codes (Title 21 and 22) The County's Zoning Code, Subdivision Code, and zoning map are implementation tools of the County General Plan 2035 that provide details on specific allowable uses, design and development standards, and procedures. Zoning and subdivision regulations govern the division, design and use of individual parcels of land, including minimum lot size, lot configuration, access, height restrictions, and yard setbacks standards for structures.[6,7]

The Conservation and Natural Resources Element of the County General Plan 2035 has established Goal C/NR 13: Protected visual and scenic resources, supported by two policies relevant to Hillside Management Areas (HMAs) in consideration of the proposed project:

- Policy C/NR 13.8: Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.
- Policy C/NR 13.9: Consider the following in the design of a project that is located within an HMA, to the greatest extent feasible:
  - Public safety and the protection of hillside resources through the application of safety and conservation design standards;
  - Maintenance of large contiguous open areas that limit exposure to landslide, liquefaction and fire hazard and protect natural features, such as significant ridgelines, watercourses, and significant ecological areas (SEAs).

HMA Ordinance

The HMA Ordinance is a component of the County General Plan 2035, which was adopted by the Los Angeles County Board of Supervisors on October 6, 2015, "to ensure that development preserved and enhances the physical integrity and scenic value of Hillside Management Areas ('HMAs'), to provide open space, and to be compatible with and enhance community character."[8] The HMA Ordinance states that these goals are to be accomplished by (1) locating development outside of HMAs to the extent feasible; (2) locating development in the portions of HMAs with the fewest hillside constraints; and (3) using sensitive hillside design techniques tailored to the unique site characteristics. The HMA Ordinance defines HMAs as areas with 25 percent or greater natural slopes. The HMA Ordinance defines "development" as seven on-site or off-site activities:[9]

1. Construction or expansion of any structure or impervious surface, such as hardscape;
2. Construction or expansion of any street, highway, or other access road;

[5] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Land Use Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch6.pdf

[6] Los Angeles County Code of Ordinances Title 21, Subdivisions. http://lacounty-ca.elaws.us/code/coor_title21

[7] Los Angeles County Code of Ordinances Title 22, Planning and Zoning. http://lacounty-ca.elaws.us/code/coor_title22

[8] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Hillside Management Area (HMA) Ordinance. http://planning.lacounty.gov/hma

[9] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Hillside Management Area (HMA) Ordinance. HOA.117.245.6. http://planning.lacounty.gov/assets/upl/project/hma_adopted-ordinance.pdf

3. Construction or expansion of any infrastructure, such as water and sewerage lines, drainage facilities, telephone lines, and electrical power transmission and distribution lines;
4. Grading, such as cut, fill, or combination thereof, including off-site grading;
5. Removal of any vegetation, including fuel modification;
6. A subdivision; or
7. A lot line adjustment

A conditional use permit is required for any development located wholly or partially in an HMA, except for 10 exemptions, including

1. Development on a single lot or parcel of land where grading in connection does not exceed 15,000 cubic yards of total cut plus total fill material
2. Activities undertaken as on-site or off-site mitigation for biota impacts from another development (such as restoration of natural habitat or planting of oak trees)
3. Development in one contiguous HMA in a rural land use designation and one-half acre or less
4. Development designed such that HMAs on the development site remain in a natural state or are restored to a natural state to the satisfaction of the Director, and are designated as Open Space – Restricted Use Areas on a recorded final map or parcel map waiver, or on a recorded covenant if not associated with a land division
5. Development to be undertaken by or for the County, or a special district, provided that such development complies with subsection G (prepare a written report documenting substantial compliance with the Hillside Design Guidelines)
6. Development where the project's fuel modification affects slopes of 25 percent or greater to satisfy Los Angeles County Fire Department requirements. For this exemption to apply, there must be no accompanying grading activities, and only minimal disturbance to plant roots is allowed.
7. Any of the following activities required, requested, authorized, or performed by a government agency:
    a. Vegetation removal or thinning
    b. Operations and maintenance of flood, water supply, water conservation, and roadway infrastructure
    c. Hazard management activities in response to an emergency or other public safety concerns including maintenance, preservation, or restoration of existing roadways or trails, bridges, soil erosion, or flood protection facilities involving adjacent slopes, drains, and appurtenant structures located near or within dedicated public right-of-way or associated easements

Section E, *Conditions of Approval*, of the HMA Ordinance establishes that at least 25 percent of the net area of the development site shall be provided as required open space. At least 51 percent of required natural open space shall be configured into one contiguous area. A street may be placed in the contiguous natural open space area if necessary, to ensure adequate circulation or access. Community gardens and golf courses are an allowable use for the required open space areas.

City of LCF General Plan

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The Land Use Element of the General Plan functions as a guide to policy makers, decision makers, the general public, and planners in the City of LCF regarding the desired pattern of development through the 2030 planning period. The City of LCF General Plan land use designation of the Master Plan Area is Open Space, Private (Figure 1.6-1).[10]

[10] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

The City of LCF General Plan includes the following objectives and policies related to open space, recreation, trails, and areas designated for public and institutional uses.

LUE Objective 1.3: Preserve and protect the areas designated for open space, recreation, and trails.

- LUE Policy 1.3.1: Endeavor to increase the amount and network of public and private open space, recreational facilities, and trails for active and/or passive recreation activities.
- LUE Policy 1.3.2: Facilitate the access to public and private open space, recreational facilities, and trails.
- LUE Policy 1.3.3: Land use proposals involving trails will comply with the Trails Master Plan.
- LUE Policy 1.3.4: Support the goals, objectives, and policies in the Open Space and Recreation and Conservation elements when evaluating development proposals and making land use decisions.
- LUE Policy 1.3.5: Encourage opportunities for additional joint-use facilities for future parks and schools, when feasible.

LUE Objective 1.4: Preserve and protect the areas designated for public and institutional uses.

- LUE Policy 1.4.1: Provide opportunities for development of high quality educational facilities in the community.
- LUE Policy 1.4.2: Provide information to local school districts when considering any land use policy decisions that could affect local school populations, thereby allowing those school districts to assess whether the land use decision would have an impact on the adequacy of school facilities.[11]

IMPACT ANALYSIS

	Potentially Significant Impact	***Less than Significant Impact with Mitigation Incorporated***	***Less than Significant Impact***	***No Impact***
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒

The proposed project would not physically divide the established community in the City of LCF, as all proposed improvements would be within the limits of the existing property administered by the Guild on behalf of the County Department of Parks and Recreation. Since there would not be new development of highways, commercial centers, or walled projects within the Master Plan Area or surrounding area, there would be no interruption of existing vehicular and pedestrian connections with the City of LCF. The adjacent land uses consist of low- to very-low-density residential areas to the east and north of the Master Plan Area. The improvements and modifications to the existing site would be compatible with the existing community and would not cause a physical division within the community. Therefore, there would be no impacts to land use and planning resulting in a physical division of an established community. No further analysis is warranted.

[11] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. Land Use Element. https://cityoflcf.org/planning/

b) Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

The proposed project would not conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Parks and Recreation Element of the County General Plan 2035 classifies arboreta and botanical gardens such as Descanso Gardens as Special Use Facilities that serve greater regional recreational or cultural needs and have no defined size criteria or service radius areas.[12] A Special Use Facility is generally a single-purpose facility that typically includes passive features such as wilderness parks, nature preserves, botanical gardens, and nature centers; or active uses such as performing arts, water parks, gold driving ranges, and golf courses. The Master Plan Area is located within the West San Gabriel Valley Planning Area.

A County land use and zoning designation has not been assigned to the County-owned Master Plan Area and vicinity due to its location within an incorporated city. Although the County is not subject to city zoning, the City of LCF's zoning designation of PS for County-owned parcels and O-S for SCE-owned parcels are described here to inform the County's decision-making process.

As with the existing condition, Descanso Garden would continue to be administered by the Descanso Gardens Guild, Inc. on behalf of the County. The primary purpose of the facility would remain as a public garden, consistent with the Parks and Recreation Element of the County General Plan 2035 that classifies Descanso Gardens as Special Use Facilities that serve greater regional recreational or cultural needs of County residents and visitors.[13] Under the proposed Master Plan, Descanso Gardens would remain a Special Use Facility including conserved natural open space, botanical collections, and other cultural uses such as the Boddy House and support of the performing arts. There would also be no change in ownership or operation of the SCE utility corridor as a result of the Master Plan.

Similarly, although not subject to the City of LCF General Plan, the proposed Master Plan facilities and programs would be consistent with the City of LCF's O-S land use designation and related open space goals to preserve, protect, and enhance open space areas.[14] The Land Use Element of the City of LCF General Plan designates the Master Plan Area, as well as the properties southeast of Descanso Gardens and the SCE utility corridor that extends north into the Angeles National Forest, as an Open Space land use (see Figure 1.6-1).[15] The proposed project is compatible with the zoning designations and the open space objectives. Therefore, there would be no impacts to land use and planning related to a conflict with adopted or proposed land use plans, policies, or regulations. No further analysis is warranted.

[12] County of Los Angeles Department of Regional Planning. Adopted 6 October 2015. Los Angeles County General Plan 2035. Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/generalplan

[13] County of Los Angeles Department of Regional Planning. Adopted 6 October 2015. Los Angeles County General Plan 2035. Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/generalplan

[14] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. Chapter 3: Open Space and Recreation Element. https://cityoflcf.org/planning/

[15] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. Chapter 2. Land Use Element. Figure LUE-1: Land Use Policy Map. https://cityoflcf.org/planning/

c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to land use and planning in relation to a conflict with the General Plan related to HMAs or SEAs. In areas under County jurisdiction, HMAs are defined as areas with 25 percent or greater natural slopes.[16] Portions of Descanso Gardens have a 25 percent or greater natural slope.[17] The Master Plan does not propose construction of new buildings within areas with a 25 percent or greater slope. The proposed project would involve development of new paths in areas with 25 percent or greater slope, including the Wilds Loop and portions of the Nature Path (Figure 2.11-1, *Areas with 25 Percent Slope or Greater*). The proposed project would involve widening of portions of the existing paved path that would become the Service Route in areas with 25 percent or greater slope. The Oak Canopy Walk would be elevated over two areas with 25 percent or greater slope.

The proposed elements of the Master Plan that would be located within areas with 25 percent slope or greater, including new unpaved paths, widened paved paths, and landscaping, would be consistent with at least the 15 following sensitive hillside design measures of the HMA Ordinance:

1. Locate 50 percent or more of the project's buildings and developable lots within 500 feet of existing sewer, water, and roadway infrastructure
2. Locate at least 50 percent of the development portion on the flattest portions of the site where the flat area does not contain rare, sensitive, or threatened or endangered species
3. Utilize all previously graded or disturbed areas on the site for new development to the greatest extent possible before developing new areas, so that new development within undisturbed areas is reduced
4. Preserve the most prominent and unique slopes, hilltops, and ridgelines on the site for recreational uses within dedicated (or common) open space areas
5. Exceed the minimum Ordinance open space acreage requirements by 10 percent or more
6. Preserve contiguous undisturbed open space throughout the site, utilizing segments of land that are at least 150 feet wide
7. Utilize at least 25 percent of the overall project's disturbed (improved) open space for recreational purposes
8. Create scenic vista points at prominent locations such as hilltops and ridgelines, providing amenities at the points and making them accessible to the public. When provided, this shall count as open space.
9. Provide private (connector) trails or pedestrian paseos that link together all of the project's open space areas (one acre or larger) and connect to any onsite or offsite public trails
10. Use contoured grading lines that match or closely match the topography, generally avoiding lines that trace 45 to 90 degrees against the natural contour
11. Retain and incorporate 50 percent or more of existing on-site trees and woodlands (particularly native and drought-tolerant species, and oak woodlands) to the overall project landscaping plan
12. Avoid all health oak tree encroachments and removals through the sensitive location and design of development
13. Landscape all graded slopes and improved open spaces in an attractive manner that restores habitat, conserves water or improves water quality, provides shade for pedestrians/bicyclists, enhances slope stability, increases fire protection, and/or provides recreational opportunities

[16] County of Los Angeles. November 5, 2015. Hillside Management Areas Ordinance. http://planning.lacounty.gov/assets/upl/project/hma_adopted-ordinance.pdf

[17] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 10: Parks and Recreation Element. Figure 9.8, Hillside Management Areas and Ridgeline Management Map. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-8_hillside_management_areas.pdf

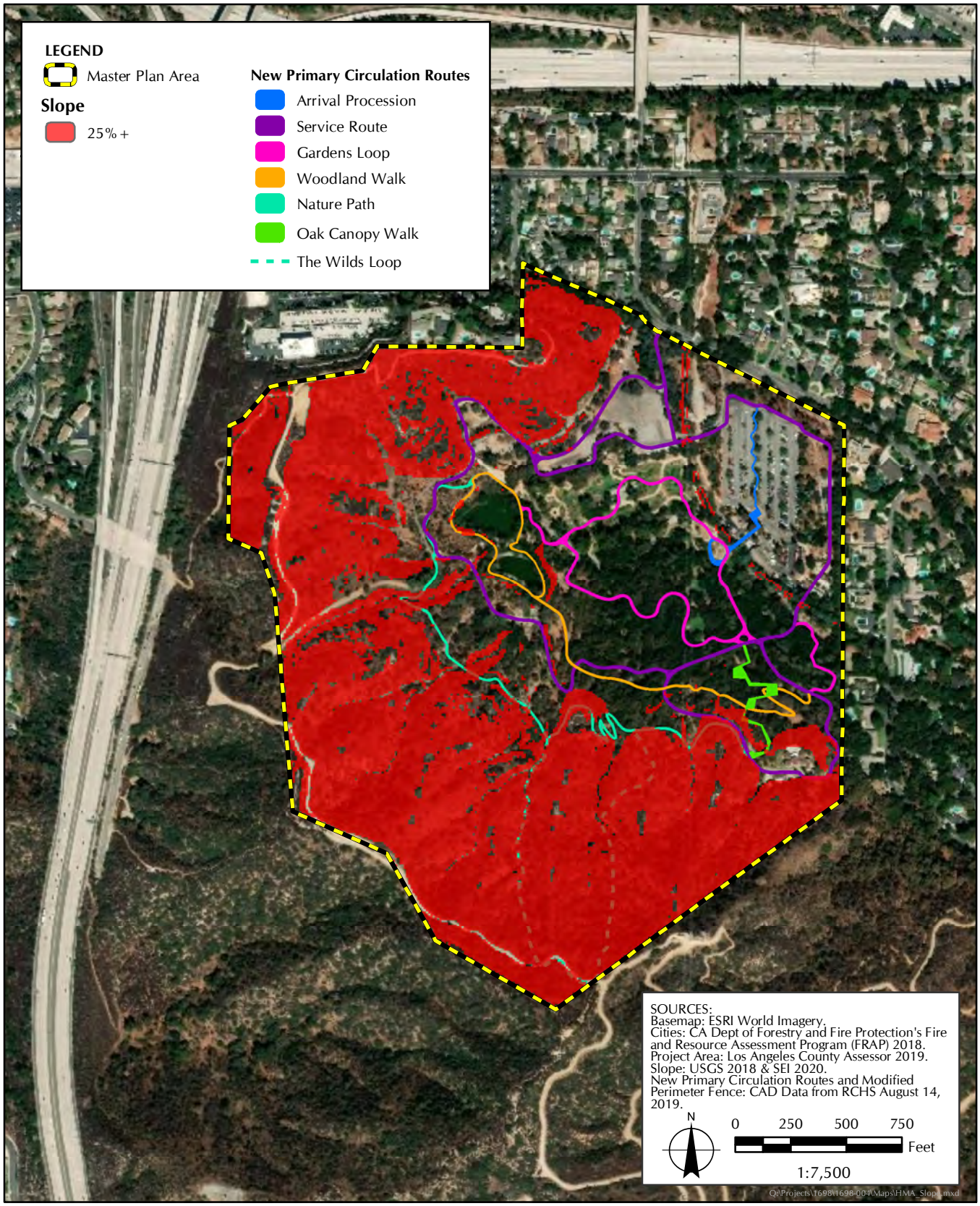

FIGURE 2.11-1

Areas with 25 Percent Slope or Greater

14. Utilize native and drought tolerant trees, shrubs, and ground cover overall exposed graded areas
15. Use a wide variety of local and non-invasive plant species within the project's improved open space areas, matching or exceeding the variety found onsite and listed in the project's plant surveys and biota reports

Furthermore, the proposed project would concentrate improvements within the developed 66 acres of the Master Plan Area, preserving the majority of the approximately 83 acres (55.7 percent of the Master Plan Area) as undeveloped open space. Therefore, as the proposed project would be consistent with several sensitive hillside design measures of the HMA Ordinance and retain at least 50 percent of the property as undeveloped open space, the proposed project would not conflict with the goals and policies the General Plan related to HMAs.

SEAs are areas in Los Angeles County with irreplaceable biological resources. The SEA Program was established in order to conserve the County's biodiversity through the identification and protection of important habitats, as well as the creation of new protected spaces within urban areas.[18] The nearest SEAs to the Master Plan Area are the Verdugo Mountains, located approximately 1.4 miles west, and Altadena Foothills and Arroyos, located approximately 1.8 miles east (see Figure 5-4 in Appendix 8).[19] Therefore, there would be no impacts to land use and planning related to a conflict with the goals and policies of the County General Plan 2035 related to HMAs or SEAs. No further analysis is warranted.

[18] County of Los Angeles. Accessed May 28, 2019. Significant Ecological Areas Program. http://planning.lacounty.gov/site/sea/

[19] County of Los Angeles. Accessed May 28, 2019. Significant Ecological Areas Program. http://planning.lacounty.gov/site/sea/

2.12. MINERAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to mineral resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. Mineral resources in the Master Plan Area were evaluated with regard to California Geological Survey publications (previously known as the California Division of Mines and Geology);[1,2,3,4,5] California Division of Oil, Gas, and Geothermal Resources data;[6] County General Plan 2035;[7] and City of LCF General Plan.[8]

REGULATORY FRAMEWORK

Federal

There are no federal policies and regulations that supersede state and local policies and regulations for mineral resources within the Master Plan Area.

State

Surface Mining and Reclamation Act (SMARA) of 1975

The SMARA (PRC 2710–2796) requires that the State Department of Mines and Geology Board map areas throughout the state that contain regionally significant mineral resources. Construction aggregate resources (sand and gravel) deposits were the first commodity selected for classification by the Board. Once mapped, the Mines and Geology Board is required to designate for future use those areas that contain aggregate deposits that are of prime importance in meeting the region's future need for construction-quality aggregates. The primary objective of SMARA is for each jurisdiction to develop policies that would conserve important mineral resources, where feasible, that might otherwise be unavailable when needed. SMARA requires that once policies are adopted, local agency land use decisions must be in accordance with its mineral resource management policies. These decisions must also balance the mineral value of the resource to the market region as a whole, not just their importance to the local jurisdiction. The federal Surface Mining Control and Reclamation Act of 1977 is less comprehensive and less restrictive than the state act. Therefore, the California act is the primary regulator of surface mining within the state.

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[1] California Department of Conservation, Division of Mines and Geology. 1990. Mines and Mineral Producers Active in California (1988–1989). Special Publication 103.

[2] California Department of Conservation, Division of Mines and Geology. 1982. Special Report 143: Mineral Land Classification of the Greater Los Angeles Area, Part IV: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region.

[3] California Department of Conservation, Division of Mines and Geology. 1994. Open-File Report 94-14: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part II: Los Angeles County.

[4] California Department of Conservation, Division of Mines and Geology. 2010. Special Report 209: Update of Mineral Land Classification of Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California.

[5] California Department of Conservation, Division of Mines and Geology. n.d. Special Report 143: Mineral Land Classification of the Greater Los Angeles Area, Part II: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region.

[6] California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). Accessed September 13, 2019. Well Finder DOGGR GIS. https://www.conservation.ca.gov/dog/Pages/WellFinder.aspx.

[7] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 9: Conservation and Natural Resources Element.

[8] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

Division of Oil, Gas, and Geothermal Resources (DOGGR)

The California Department of Conservation, DOGGR, regulates the oil production that occurs in many unincorporated areas of the County. DOGGR retains exclusive jurisdiction over all subsurface oil and gas activities in California including well stimulation techniques such as hydraulic fracturing (fracking). The County may regulate zoning and land use to mitigate impacts from surface operations on surrounding communities. Jurisdiction for offshore oil and gas production falls to the State Lands Commission and the DOGGR for near-shore facilities on state leases and to the federal government for facilities farther offshore on federal leases. Adherence to the standards for the installation, operation, and abandonment of oil and gas production and storage facilities is important to protect public health and safety.

Local

County General Plan 2035

The County General Plan 2035 defines mineral resources as areas appropriate for mineral extraction and processing as well as activities related to the drilling for and production of oil and gas. Mineral Resource Zones (MRZs) as commercially viable mineral or aggregate deposits, such as sand, gravel, and other construction aggregate.

Goal Land Use 7: Compatible land uses that complement neighborhood character and the natural environment.

- Policy LU 7.5: Ensure land use compatibility in areas adjacent to mineral resources where mineral extraction and production, as well as activities related to the drilling for and production of oil and gas, may occur.

The Mineral and Energy Resources section of the Conservation and Natural Resources Element addresses the use and management of valuable energy and mineral resources specifically in the unincorporated areas, and the importance of sustaining and maintaining these resources for future users. The County depends on the California Geological Survey to identify deposits of regionally-significant aggregate resources. These clusters or belts of mineral deposits are designated as MRZ-2s. Four major MRZ-2s are identified in, or partially within, the unincorporated areas: Little Rock Creek Fan, Soledad Production Area, Sun Valley Production Area, and Irwindale Production Area.

Goal Conservation/Natural Resources 10: Locally available mineral resources to meet the needs of construction, transportation, and industry.

- Policy C/NR 10.1: Protect MRZ-2s and access to MRZ-2s from development and discourage incompatible adjacent land uses.
- Policy C/NR 10.2: Prior to permitting a use that threatens the potential to extract minerals in an identified Mineral Resource Zone, the County shall prepare a statement specifying its reasons for permitting the proposed use, and shall forward a copy to the State Geologist and the State Mining and Geology Board for review, in accordance with the Public Resources Code, as applicable.
- Policy C/NR 10.5: Manage mineral resources in a manner that effectively plans for access to, development and conservation of, mineral resources for existing and future generations.
- Policy C/NR 10.6: Require that new non-mining land uses adjacent to existing mining operations be designed to provide a buffer between the new development and the mining operations. The buffer distance shall be based on an evaluation of noise, aesthetics, drainage, operating conditions, biological resources, topography, lighting, traffic, operating hours, and air quality.

City of LCF General Plan

Although the County is not subject to the city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The City of LCF General Plan does not specifically identify or address mineral resources, and they are therefore not considered an important factor in the City of LCF's planning.

IMPACT ANALYSIS

	Potentially Significant Impact	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

The proposed project would result in no impacts to mineral resources in relation to the loss of availability of a known mineral resource of value to the region and the residents of the state. The proposed project area is situated in the central portion of the Los Angeles Basin and is underlain by several thousand feet of alluvial sediments associated with the San Gabriel River drainage.[9] The alluvium is underlain at a depth of several thousand feet by marine and nonmarine sedimentary rocks of Tertiary age. Soils underlying the Master Plan Area are classified as Hanford-Greenfield association, which generally occurs between 2,600 and 3,500 feet above MSL.[10,11]

MRZs are classified according to the existence or nonexistence of significant mineral deposits. Chapter 9: Conservation and Natural Resources Element of the County General Plan 2035 addresses the importance of managing mineral resources specifically in the unincorporated areas of Los Angeles County in Section VI, Mineral and Energy Resources. The Master Plan Area is not located within an unincorporated area of the County; however, Descanso Gardens is owned by the County. The County relies on the California Geological Survey (previously known as the California Division of Mines and Geology) to identify deposits of significant resources of mineral deposits designated as MRZ-2.[12] A review of Mineral Land Classifications of the Greater Los Angeles Area shows that the City of LCF is not classified as land which contains significant mineral deposits, a high likelihood for their presence, or active mines (MRZ-2). The City of LCF also has no land

[9] California Department of Conservation, Division of Mines and Geology. 1990. Mines and Mineral Producers Active in California (1988–1989). Special Publication 103.

[10] United States Department of Agriculture Soil Conservation Service. 1969. Report and General Soil Map: Los Angeles County, California.

[11] California Department of Conservation, Division of Mines and Geology. 1990. Mines and Mineral Producers Active in California (1988–1989). Special Publication 103.

[12] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 9: Conservation and Natural Resources Element.

classified as having active aggregate operations or Aggregate Resource Sectors.[13,14,15] One California Geological Survey/Division of Mines and Geology publication found that the City of LCF is underlain by potential crushed rock resources.[16] However, despite potential resources, the Master Plan Area has not been classified as MRZ-2, and the proposed project would not cause loss of availability of a known mineral resource that would be of state-wide or regional importance.

The Master Plan Area boundary is on the eastern border of the City of Glendale, and the City of Glendale General Plan provides a map of MRZs created by the California Geological Survey.[17] The boundary of the map excludes the Master Plan Area; however, its border is directly the same as the border of the proposed project, and the MRZ given at the border can be assumed to be the same as the Master Plan Area. It is designated as MRZ-3, or an area containing mineral deposits the significance of which cannot be evaluated from available data. The City of Glendale General Plan has evaluated this MRZ and concluded that there are no MRZs of statewide or regional significance in the City of Glendale.[18]

Based on a review of data from DOGGR, there are no known oil, gas, or geothermal active or inactive wells or resources located within the Master Plan Area.[19] Therefore, the proposed project would have no impact on mineral resources regarding the loss of availability of a known mineral resource of value to the region and the state. No further analysis is warranted.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to mineral resources in relation to the loss of availability of a locally-important mineral resource recovery site delineated within a local general plan, specific plan, or other land use plan. Chapter 9: Conservation and Natural Resources Element of the County General Plan 2035 addresses the importance of managing mineral resources specifically in the unincorporated areas of Los Angeles County in Section VI, Mineral and Energy Resources. The Master Plan Area is not located within an unincorporated area of the County; however, Descanso Gardens is owned by the County. The County relies on the California Geological Survey to identify deposits of significant resources of mineral deposits designated as MRZ-2,[20] and a review of California Geological Survey/Division of Mines and Geology publications has

[13] California Department of Conservation, Division of Mines and Geology. 1982. Special Report 143: Mineral Land Classification of the Greater Los Angeles Area, Part IV: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region.

[14] California Department of Conservation, Division of Mines and Geology. 1994. Open-File Report 94-14: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part II: Los Angeles County.

[15] California Department of Conservation, California Geological Survey. 2010. Special Report 209: Update of Mineral Land Classification of Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California.

[16] California Department of Conservation, Division of Mines and Geology. n.d. Special Report 143: Mineral Land Classification of the Greater Los Angeles Area, Part II: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region.

[17] California Department of Conservation, Division of Mines and Geology. 1979. Special Report 143, Mineral Land Classification of the Greater Los Angeles Area: Map of Glendale Mineral Resource Zones.

[18] City of Glendale Planning Division. January 1993. City of Glendale Open Space and Conservation Element of the General Plan.

[19] California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). Accessed September 13, 2019. Well Finder DOGGR GIS. https://www.conservation.ca.gov/dog/Pages/WellFinder.aspx.

[20] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 9: Conservation and Natural Resources Element.

found that the City of LCF is not classified as MRZ-2.[21,22,23] The City of LCF General Plan does not specifically identify or address mineral resources, and they are therefore not considered an important factor in the City of LCF's planning.

The Master Plan Area lies adjacent to the eastern border of the City of Glendale. The City of Glendale General Plan discusses mineral and aggregate resources in its Open Space and Conservation Element Chapter. There are no significant mineral resources, and aggregate resource development in nonurbanized areas, such as the Master Plan Area, is visually detrimental and incompatible with the open space and land use goals of the City of Glendale General Plan.[24]

Therefore, the proposed project would result in no impacts regarding the loss of availability of a locally-important mineral resource recovery site as delineated on a local general plan, specific plan, or other land use plan. No further analysis is warranted.

[21] California Department of Conservation, Division of Mines and Geology. 1982. Special Report 143: Mineral Land Classification of the Greater Los Angeles Area, Part IV: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region.

[22] California Department of Conservation, Division of Mines and Geology. 1994. Open-File Report 94-14: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part II: Los Angeles County.

[23] California Department of Conservation, California Geological Survey. 2010. Special Report 209: Update of Mineral Land Classification of Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California.

[24] City of Glendale Planning Division. January 1993. City of Glendale Open Space and Conservation Element of the General Plan.

2.13. NOISE

This analysis is undertaken to determine if the proposed project would have a significant impact to noise, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. Noise at the Master Plan Area was evaluated with regard to County and City of LCF noise standards.

REGULATORY FRAMEWORK

Federal

Noise Control Act of 1972

The adverse impacts of noise were officially recognized by the federal government in the Noise Control Act of 1972, which serves three purposes:

- Promulgating noise emission standards for interstate commerce
- Assisting state and local abatement efforts
- Promoting noise education and research

The Office of Noise Abatement and Control was initially tasked with implementing the Noise Control Act. However, the Office of Noise Abatement and Control has since been eliminated, leaving the development of federal noise policies and programs to other federal agencies and inter-agency committees. For example, Occupational Safety and Health Administration (OSHA) prohibits exposure of workers to excessive sound levels. The U.S. Department of Transportation (DOT) assumed a significant role in noise control through its various operating agencies, such as with the Federal Aviation Administration (FAA), which regulates noise generated by aircraft and airports. Transit noise is regulated by the Federal Transit Administration (FTA), while freeways that are part of the interstate highway system are regulated by the Federal Highway Administration (FHWA). The FHWA has adopted and promulgated noise abatement criteria for highway construction projects. The federal government encourages local jurisdictions to use their land use regulatory authority to site new development to minimize potential noise impacts.

Occupational Safety and Health Act of 1970

Under the Occupational Safety and Health Act of 1970 (29 USC Section 651 et seq.), OSHA has adopted regulations (29 CFR Section 1910.95) designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise exposure levels as a function of the amount of time to which the worker is exposed (Table 2.13-1, *Maximum Continuous Sound Levels*). The regulations further specify a hearing conservation program that involves monitoring the noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.

TABLE 2.13-1
MAXIMUM CONTINUOUS SOUND LEVELS

Duration of Noise (hours/day)	A-Weighted Decibels (dBA)
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105
0.5	110
0.25	115

State

California Government Code Section 65300

California Government Code Section 65300 et seq. requires cities and counties to prepare and adopt a comprehensive, long-term general plan for the physical development of the county or the city. Section 65302 of this code requires cities and counties to include a variety of elements in their general plan, each of which must describe policies to guide development relative to the issue area characterized in the element. One of the required elements is the "noise element." Section 65302 requires this element to recognize noise guidelines established by the Office of Noise Control and to analyze the current and projected noise levels from a variety of sources (Government Code Section 65302(f)(1)). As comprehensive planning documents, the general plans recognize construction noise and noise between property boundaries as important planning issues; however, these general plans refer to their respective city or county municipal code noise ordinance as the relevant source for specific noise standards or limitations. In addition, the OPR has published guidelines for preparing noise elements, which include recommendations for evaluating the compatibility of various land uses as a function of community noise exposure (Table 2.13-2, *Land Use Compatibility for Community Noise Environments*).

TABLE 2.13-2
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS

Land Use Category	Community Noise Exposure (L_{dn} or CNEL, dB)						
	55	60	65	70	75	80	
Residential - Low Density Single-Family, Duplex, Mobile Homes							
Residential - Multi-Family							
Transient Lodging - Motels Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.

Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: Adapted from: Governor's Office of Planning and Research. 2003. State of California General Plan Guidelines. Appendix C, Noise Element Guidelines. Figure 2.

Regional

County General Plan 2035 – Noise Element

The purpose of the Noise Element is to reduce and limit the exposure of the general public to excessive noise levels. The Noise Element sets the goals and policy direction for the management of noise in the unincorporated areas. The County maintains the health and welfare of its residents with respect to noise through nuisance abatement ordinances and land use planning. The County Noise Control Ordinance, Title

12 of the County Code, was adopted by the Los Angeles County Board of Supervisors in 1977 "to control unnecessary, excessive, and annoying noise and vibration." It declares that the purpose of the County policy is to "maintain quiet in those areas which exhibit low noise levels and to implement programs aimed at reducing noise in those areas within the county where noise levels are above acceptable values" (Section 12.08.010).

On August 14, 2001, the Board of Supervisors approved an ordinance amending Title 12 of the County Code to prohibit loud, unnecessary, and unusual noise that disturbs the peace and/or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitivity residing in the area. Regulations can include requirements for sound barriers, mitigation measures to reduce excessive noise, or the placement and orientation of buildings, and can specify the compatibility of different uses with varying noise levels (Table 2.13-3, *Los Angeles County Community Noise Criteria [dBA]).*

TABLE 2.13-3
LOS ANGELES COUNTY COMMUNITY NOISE CRITERIA (dBA)

Noise Zone	Land Use of Receptor Property	Time	Std 1L5030 min/hr	Std 2L2515 min/hr	Std SL8.35 min/hr	Std 4L1.71 min/hr	Std 5L0 at no time
I	Noise Sensitive	Anytime	45	50	55	60	65
II	Residential	10 p.m. to 7 a.m.; 7 a.m. to 10 p.m.	45; 50	50; 55	55; 60	60; 65	65; 70
III	Commercial	10 p.m. to 7 a.m.; 7 a.m. to 10 p.m.	55; 60	60; 65	65; 70	70; 75	75; 80
IV	Industrial	Anytime	70	75	80	85	90

According to the County Municipal Code, mobile equipment shall not generate noise levels above 75 A-weighted decibels (dBA) for single-family residences, and stationary equipment shall not generate noise levels above 60 dBA for single-family residences during weekdays from 7:00 a.m. to 8:00 p.m. Furthermore, construction equipment may not operate between the hours of 7:00 p.m. and 7:00 a.m., Monday through Saturday, or at any time on Sunday or holidays. The County has interior and exterior noise standards and curfews (Table 2.13-4, *Interior Noise Standards*; Table 2.13-5, *Exterior Noise Standards*; Table 2.13-6, *County of Los Angeles Construction Noise Restrictions*).

TABLE 2.13-4
INTERIOR NOISE STANDARDS[1]

Noise Zone	Designated Land Use	Time Interval	Allowable Interior Noise Level (dBA)
All	Multifamily	10 p.m. to 7 a.m.	40 dBA
	Residential	7 a.m. to 10 p.m.	45 dBA

TABLE 2.13-5
EXTERIOR NOISE STANDARDS[2]

Noise Zone	Designated Noise Zone Land Use (Receptor Property)	Time Interval	Exterior Noise Level (dBA)
I	Noise-sensitive area	Anytime	45 dBA
II	Residential properties	10:00 p.m. to 7:00 a.m. (nighttime)	45 dBA

[1] County of Los Angeles Municipal Code, Chapter 12.08 Noise Control.
https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO_PT1GEPR

[2] County of Los Angeles Municipal Code, Chapter 12.08 Noise Control.
https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO_PT1GEPR

TABLE 2.13-6
COUNTY OF LOS ANGELES CONSTRUCTION NOISE RESTRICTIONS

Time Frame	Single-Family Residential	Multifamily Residential	Semiresidential/ Commercial
Mobile equipment*			
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m. (daytime)	75 dBA	80 dBA	85 dBA
Daily, 8:00 p.m. to 7:00 a.m. (nighttime) and all day Sunday and legal holidays	60 dBA	64 dBA	70 dBA
Stationary equipment**			
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m. (daytime)	60 dBA	65 dBA	70 dBA
Daily, 8:00 p.m. to 7:00 a.m. (nighttime) and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA

Source: County of Los Angeles Municipal Code, Title 12, Chapter 8, Noise Control.
* Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment.
** Maximum noise levels for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment.

Local

City of LCF General Plan Noise Element

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The Noise Element of the City of LCF's General Plan is intended to identify noise-sensitive land uses and noise sources, define areas of noise impacts, and establish policies and programs to protect the community from excessive noise and to reduce negative impacts from those noise sources. Predominant land uses in LCF include varying densities of residential development (primarily low-density single-family), varying intensities and types of businesses and commercial development (primarily low-scale retail, service, and office), public and private schools and academies, churches, government facilities, open space, trails, recreation venues, and the NASA Jet Propulsion Laboratory (JPL). Traffic noise from the I-210 Freeway, which traverses the City of LCF, has the largest noise impact on the community, although SR-2 and Foothill Boulevard also contribute to the noise environment of LCF.

City of LCF Municipal Code Chapter 5.02 Regulation of Community Noise

Where technically and economically feasible, temporary construction activities shall be conducted in such a manner that the one-hour average sound levels at affected properties shall not exceed the following noise (dBA) levels (Table 2.13-7, *Temporary Construction Activities Noise Criteria [dBA]*).

TABLE 2.13-7
TEMPORARY CONSTRUCTION ACTIVITIES NOISE CRITERIA (dBA)

	R-1 Zone (Single-Family Residential)	R-3, RPD, Mixed Use Zones (Multifamily Residential)	CPD, FCD, Public/Semi-Public, Open Space Zones (Commercial)
Weekdays: 7.00 a.m. to 6:00 p.m.	75 dBA	80 dBA	85 dBA
Saturdays: 9:00 a.m.	60 dBA	65 dBA	70 dBA

Note: During Daylight Saving Time, weekday hours shall be from 7:00 a.m. to 7:00 p.m. On Sundays or holidays, construction is not permitted, except emergency work (Ord. 450 Section 2, 2016).

5.02.060 Persistent Noises

Failure to comply with the following provisions shall constitute a nuisance and violation of this chapter:

A. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.
B. Unnecessary idling of internal combustion engines is prohibited.
C. All stationary noise-generating construction equipment such as tree grinders and air compressors are to be located as far as is practical from existing residences.
D. Quiet construction equipment, particularly air compressors, are to be selected whenever possible. (Ord. 450 Section 2, 2016)

5.02.080 Noise—Exceptions

K. Any activity preempted by county, state or federal law or regulation. (Ord. 450 § 2, 2016)

The City's Municipal Code[3] aims to provide specific regulations for various noise sources and to protect the community from excessive noise. La Cañada Flintridge enforces a curfew at 10:00 p.m. for all events.

5.02.040 General prohibition

It is unlawful for any person, corporation, organization, partnership, firm or association, either directly or indirectly, to make, create or continue, or cause, permit, maintain, or suffer to be made or continued, any loud, raucous, unnecessary, or unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area or that exceeds the maximum dBA levels set forth herein or that violates any provision of this chapter. The standard for determining whether a violation of the provisions of this chapter exists may include, but is not limited to, the following:

A. The volume, level and intensity of the noise;
B. Whether the nature of the noise is usual or unusual;
C. Whether the origin of the noise is natural or unnatural;
D. The level and intensity of the background noise, if any;
E. The proximity of the noise to residential dwellings;
F. The proximity of the noise to residential sleeping facilities;
G. The nature and zoning of the area within which the noise emanates;
H. The density of the inhabitation of the area within which the noise emanates;
I. The time of day or night the noise occurs;
J. The duration of the noise;
K. Whether the noise is recurrent, intermittent, a cumulative period, or constant;
L. Whether the noise is produced by a commercial or non-commercial activity;
M. Whether the noise can be heard more than twenty-five (25) feet away from any adjoining property boundary line in a residential district;
N. The intrusiveness of the noise;
O. Whether it is a mobile noise source;
P. The number of persons affected by the noise;
Q. Whether noise exceeds the maximum dBA levels set forth in Sections 5.02.100 and 5.02.110. (Ord. 450 Section 2, 2016)

[3] City of La Cañada Flintridge Municipal Code, Chapter 5.02 Regulation of Community Noise. https://qcode.us/codes/lacanadaflintridge/

5.02.050 Specific prohibitions

In addition to and separate from any provision of this code, the following acts, and the causing, suffering or permitting thereof, shall be considered intrusive, excessive and annoying noises creating a nuisance and disturbing the peace and shall constitute a violation of this code. The listing of the following specific prohibited acts is not intended to limit the city's authority to regulate any and all loud, unnecessary and unusual noises and even if not included herein, such noise disturbances shall be subject to regulation pursuant to Section 5.02.040:

A. Mechanical or Electronic Devices. Using any mechanical or electronic device for the intensification of any sound or noise into the public streets that produces excessive or annoying noise;

G. Loading and Unloading. Loading, unloading, opening, closing, or other handling of boxes, crates, containers, building materials, refuse, or similar objects between the hours of ten p.m. and seven a.m. in such a manner as to cause a noise disturbance across a residential real property line or at any time to violate the applicable noise provisions of the city's municipal code. This subsection shall not apply to the collection and disposal of garbage and recyclable materials by the city's franchises or with a franchise agreement with the city;

H. Noise Sensitive Uses. Creation of any noise disturbance adjacent to or within one thousand (1,000) feet of a hospital or medical care facility, nursing home, school during school hours, day care during hours of operation, religious assembly use during hours of worship services, or similar facility, so as to interfere with the functions of such activity.

1. Where construction activities on a construction project which is adjacent to any noise sensitive use(s) are anticipated to last for a year or more, temporary noise barriers shall be constructed that break the line of sight between the noise-sensitive use(s) and the construction project, and that minimize noise impacts;

I. Noise resulting from construction and demolition activities, the operation of commercial refrigeration units, air conditioning systems, compressors, exhaust systems, ventilation units, use of any instrumentality that results in impulsive sound, and other commercial or industrial noises associated with land use activities, shall be regulated pursuant to standards contained within the noise regulations of the city's municipal code;

J. Vehicular Attachments. Attaching any accessory or device to any vehicle that results in the creation of unnecessary noise;

K. Radios, Television Sets, Musical Instruments or Similar Devices. Operating, playing, or permitting the operation or playing of any radio, television set, compact disc player, stereo, drum, musical instrument or similar device which reproduces sound so as to create a noise disturbance or cause any violation of this chapter;

L. Sound Amplifier. Using or operating or permitting or allowing the using or operating, for any purpose, a sound amplifier except in compliance with and under a sound amplifier permit issued pursuant to Chapter 11.46 of this code is prohibited. Provided, however, that the use of amplification as part of an official school event at a properly permitted and operating school in the city shall not be subject to this subsection, including noise reasonably related to official and/or authorized school activities or events, such as: (1) bands, (2) athletic activities, and (3) entertainment events;

M. Places of Public Entertainment. Operating or permitting or allowing the operation or playing of any loudspeaker, musical instrument, motorized racing vehicle, or other source of sound in any place of public entertainment as to create a noise disturbance or which can be heard more than five hundred (500) feet from the property line of the property on which the public entertainment is located after eight p.m. or before eight a.m., except if the public entertainment is permitted or occurs on property that is not located within one thousand (1,000) feet of residential dwellings;

N. Tampering. The removal or rendering inoperative, other than for purposes of maintenance, repair or replacement, of any noise control device, muffler, or other sound dissipative device or element thereof; as required under federal, state or local law, and the use of said product after its noise control device has been removed or rendered inoperable, other than for purpose of maintenance, repair or replacement. (Ord. 450 Section 2, 2016)

5.02.100 Alternative use of maximum noise limits by dBA levels

In addition to determining noise violations under the standard set forth elsewhere in this chapter, the enforcing officer may alternatively use the one-hour average decibel ("dBA") levels to determine a violation of this chapter. The one-hour average sound level is measured at the property line of the property on which the noise is produced or at any location on a property that is receiving the noise. The standard chosen by the enforcing officer for the specific incident shall be the sole means used to determine if a violation has occurred. Neither standard shall be considered superior, nor controlling, nor preempt the other.

A. It is unlawful to maintain, permit, allow or suffer any use or activity that creates noise levels which exceed the following standards:

Zoning District	One Hour Average Noise Level in dBA Between 7:00 a.m. and 7:00 p.m. Measured at Property Line or District Boundary	One Hour Average Noise Level in dBA Between 7:00 p.m. and 7:00 a.m. Measured at Any Boundary of a Residential Zone
Single-Family Residential (R-1)	60	50
Multifamily Residential (R-3 & RPD)	65	55
Public/Semi Public and Open Space	65	55

B. Restricted hours may be modified through a condition of an approved conditional use permit or temporary use permit. Sections and subsections of this chapter also provide for additional restricted hours and the most restrictive hours shall be controlling.
C. The sound level limit at a location on a boundary between two zones is the most restrictive of the respective limits for the two zones.
D. If the measured ambient noise level exceeds the applicable limit in the above, the allowable one-hour average sound level shall be the one-hour average ambient noise level, plus three decibels. The ambient noise level shall be measured when the alleged noise violation source is not operating.
E. In determining whether any noise exceeds the exterior noise limits set forth in this section, measurements shall be taken at the property line of the property from which the noise emanates.
F. No person shall operate or cause to be operated within a dwelling unit, any source of sound that causes the sound level when measured inside a neighboring receiving dwelling unit to exceed the allowable noise level, for any period of time.
G. In the event the noise, as judged by the enforcing authority, contains a steady, pure tone such as a whine, screech or hum, or is an impulsive sound such as hammering or riveting, or contains music or speech, the standard limits set forth above shall be reduced by five decibels. (Ord. 450 § 2, 2016)

IMPACT ANALYSIS

	Potentially Significant Impact	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?	☐	☒	☐	☐

The proposed project would result in potentially significant impacts to noise regarding a substantial permanent increase in ambient noise levels in the vicinity of the project above levels existing without the project. Incorporation of mitigation would reduce these impacts to below the level of significance.

Noise measurements were taken in the morning of September 18, 2019, at two characteristic locations adjacent to Descanso Gardens: (1) Stancrest Frontage Road and (2) the northeast boundary of Descanso Gardens adjacent to the residences off Descanso Drive in the City of LCF (Figure 2.13-1, *Noise Monitoring Locations*). Measurements were taken during peak AM hours to represent peak levels of noise generated from traffic when construction is also anticipated to occur. Measurements were also taken at (3) the entrance on Descanso Drive between November 5, 7, and 15–18, 2019, to assess the ambient noise levels during operation. Ambient noise levels conform to the County Noise Ordinance (see Table 2.13-7, *Ambient Noise Levels*). The highest L_{eq} (level of continuously equivalent continuous sound) recorded was 83 dBA at the northeast boundary near the entrance on Descanso Drive due to visitor traffic.

TABLE 2.13-8
AMBIENT NOISE LEVELS

Monitoring Location	Monitoring Period	Average L_{eq} (dBA)	Maximum L_{eq} (dBA)	Minimum L_{eq} (dBA)
A1: Strancrest Frontage Road	6:30 a.m.–9:30 a.m. Wednesday, September 18, 2019	72.5	83	63.5
A2: Northeast Boundary Near Residences on Descanso Drive	6:34 a.m.–9:34 a.m. Friday, October 25, 2019	61.4	79.4	47.4
A3: Northeast Boundary near entrance on Descanso Drive	54 hours, 50 minutes (10:06 a.m. Tuesday, November 5, 2019 – 4:56 p.m. Thursday, November 7, 2019	59.1	82.9	46.1
A4: Northwest Boundary along Descanso Drive*	Friday, November 15, 2019 – Monday, November 18, 2019	61.3	66.0	59.1

* Location A4 is less than 20 feet east of the SCE overhead electrical transmission lines, which produce a consistent buzzing sound emanating from the wires, a phenomenon called corona discharge.

FIGURE 2.13-1

Noise Measurement Locations

Construction

Noise impacts from construction of the proposed project would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise sensitive receptors. Construction activities would generally include ground clearing, site grading, and building construction. Each phase of construction would involve the use of various types of construction equipment and would, therefore, have its own distinct noise characteristics. For example, site grading typically requires the use of earth-moving equipment, such as excavators, front-end loaders, and heavy-duty trucks. Noise from construction equipment generate both steady-state and episodic noise that could be heard within and adjacent to the Master Plan Area.

Individual pieces of construction equipment that would be used during construction of the proposed project could potentially generate maximum noise levels ranging from 74 dBA to 90 dBA at the Federal Highway Administration's reference distance of 50 feet from the noise source (Table 2.13-9, *Noise Levels for Typical Construction Equipment*). These maximum noise levels would occur when equipment is operating under full power conditions (i.e., with the equipment engine at maximum speed). However, equipment on construction sites often operates under less than full power.

TABLE 2.13-9
NOISE LEVELS FOR TYPICAL CONSTRUCTION EQUIPMENT

Equipment	Estimated Usage Factor* (%)	Typical Noise Level at 50 feet from Source (dBA)
Air Compressors	5	80
Cement and mortar mixer	50	80
Concrete saw	20	90
Crane	16	81
Dozer	20	82
Forklift	10	75
Grader	40	85
Dump / haul truck (light)	40	76
Excavator	40	81
Roller	20	80
Rubber tired loader	40	79
Tractor / loader / backhoe	40	80
Welders	10	73

Note: * Usage factor represents the percentage of time the equipment would be operating at full speed.
Source: U.S Environmental Protection Agency. October 1974. Background Document for Interstate Motor Carrier Noise Emission Regulations.
Federal Highway Administration. January 2006. FHWA Roadway Construction Noise Model User's Guide. Prepared by U.S. Department of Transportation, Research and Innovative Technology Administration, John A. Volpe National Transportation Systems Center Acoustics Facility.

The ambient noise levels with construction have the potential to exceed the noise level thresholds for single-family residences that are directly adjacent to the Master Plan Area. According to the County Municipal Codes, mobile equipment shall not generate noise levels above 75 dBA for single-family residences, and stationary equipment shall not generate noise levels above 60 dBA for single-family residences during weekdays from 7:00 a.m. to 8:00 p.m. Furthermore, daily construction activities would be subject to County noise regulations, which state that construction equipment may not operate between the hours of 7:00 p.m. and 7:00 a.m., Monday through Saturday, or at any time on Sunday or holidays. Construction activities are not expected to occur outside of this time frame. Maximum noise levels would occur when equipment is operating under full power conditions (i.e., with the equipment engine at maximum speed). However, equipment on construction sites often operates under less than full power conditions.

Construction noise levels were then calculated based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance. Based on these noise levels, and the fact that noise attenuates at a rate of approximately 6.0 dBA per doubling of distance from a point source, the noise impacts on sensitive receptors can be determined by Equation 1 for noise attenuation over distance:

(1) $L_2 = L_1 - 20\ log_{10}\left(\frac{d_1}{d_2}\right)$

where

L_1 = known sound level at d_1
L_2 = desired sound level at d_2
d_1 = distance of known sound level from the noise source
d_2 = distance of the sensitive receptor from the noise source

To more accurately characterize construction-phase noise levels, the average noise level associated with each phase of construction is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction phase. These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

During each phase of construction, there would be a different mix of equipment operating, and noise levels would vary based on the amount of equipment in operation and the location of the activity. The EPA has compiled data regarding the noise-generating characteristics of specific types of construction equipment during typical construction phases (see Table 2.13-10, *Typical Outdoor Construction Noise Levels*, for a reference distance of 50 feet). These noise levels would attenuate with distance from the construction site at a rate of approximately 6.0 dB per doubling of distance.

TABLE 2.13-10
TYPICAL OUTDOOR CONSTRUCTION NOISE LEVELS

Construction Phase	Noise Level (dBA L_{eq})	
	50 Feet	50 Feet with Mufflers
Ground clearing	84	82
Excavation, grading	89	86
Foundations	78	77
Structural, paving	85	83
Finishing	89	86

Source: U.S. Environmental Protection Agency. 1971. Noise from Construction Equipment and Operation, Building Equipment and Home Appliances. PB 206717.

By assigning the highest potential noise level during construction with incorporation of equipment mufflers at 86 dBA (L_1) at a distance of 50 feet (d_1) and assuming a construction staging area that is 21 feet (d_2) away from the property line, the sound level at the facility property line would be 93.54 dBA (L_2) from construction. A temporary noise barrier would reduce the sound level by up to 20 dBA. Implementation of Mitigation Measure NOISE-1 to install the temporary sound barrier would reduce the sound level experienced at the property line to 73.54 dBA, which would bring construction noise levels into compliance with the 75-dBA requirement for sound levels at the nearest sensitive receptors abutting the northeast edge of the Master Plan Area.[4]

[4] U.S. Environmental Protection Agency. 1971. Noise from Construction Equipment and Operation, Building Equipment and Home Appliances. PB 206717.

Thus, construction activities associated with the proposed project would result in less than significant impacts after mitigation in relation to exposing sensitive receptors to noise levels in excess of the standards established by the City of LCF or County Municipal Codes. The proposed project would comply with all applicable construction standards an requirements including limiting construction and maintenance activities to 7:00 a.m. to 7:00 p.m. on weekdays and Saturdays, and prohibiting work on federal holidays and Sundays, along with limiting noise levels to below 75 dBA for mobile equipment and 60 dBA for stationary equipment at sensitive receptor locations.

The proposed demolition and construction of two buildings (Meeting Pavilion and Administrative Headquarters) would occur within 1,000 feet of sensitive receptors. Sensitive receptors surrounding the Master Plan Area include 1,378 single-family residential parcels, 76 multi-family residential parcels, and the USC Verdugo Hills Hospital (see Figure 1.11-1, *Sensitive Receptors within ½ Mile of Construction Activities*). Noise from these activities would have the potential to result in exceedance of the County Ordinance. Implementation of Mitigation Measure NOISE-1 would reduce impacts to below the level of significance.

Mitigation Measure NOISE-1: To mitigate noise levels during construction activities at sensitive receptors located within 21 feet of construction, sound walls shall be installed at the construction barrier by the contractor during the construction phase for the demolition of the two buildings and construction projects on the northeast edge of the Master Plan Area along the property boundary facing the existing residents. Mufflers, blankets, and baffles shall also be implemented to ensure the reduction of noise levels. The noise barriers shall provide noise level reductions up to 20 dBA depending upon the placement and structure of the sound wall to bring construction noise levels below 75 dBA, which is the requirement for sound levels at the nearest sensitive receptors.

Operations

The proposed project would not be anticipated to change operational noise levels. Although the parking lot would expand to the east near the existing residences, there would also be a berm constructed between the parking lot and the residences, which would reduce noise levels to sensitive receptors during operation. As with existing conditions, operation of the proposed project would comply with County regulations and the City of LCF's 10:00 p.m. curfew for nighttime events adjacent to residential properties. The proposed project would be consistent with the interior and exterior noise standards (see Tables 2.13-4 and 2.13-5).

Therefore, the proposed project would result in less than significant impacts to noise after implementation of mitigation regarding exposure of persons to, or generation of, noise levels in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies.

b) Generation of excessive groundborne vibration or groundborne noise levels? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to noise regarding exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. Ground-borne vibration in the Master Plan Area is limited to minor traffic-induced vibrations from nearby streets, highways, and freeway vehicular traffic. At the time of the characterization of the baseline conditions in 2019, there were no construction projects within or adjacent to Descanso Gardens, oil fields, mining operations, blasting, or other activities resulting in ground-borne vibrations in the Master Plan Area.

The construction equipment and associated industrial machinery would produce vibration. Construction of the proposed project would not require blasting, drilling, or other activities that would result in excessive

ground-borne vibrations. Groundborne vibration can travel from 5 to 250 feet from the vibration sources. Grading equipment during construction would produce vibration but would not reach past the boundaries of the Master Plan Area. Construction equipment would be operated over 250 feet from the residential parcels surrounding the Master Plan Area.

Operational sources of vibration would include visitor transit and events hosted at the Master Plan Area with loud music; however, the proposed project would not increase these uses of the Master Plan Area over the existing condition. Therefore, there would be no impact. No further analysis is warranted.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The proposed project would result in no impacts to noise regarding exposing people residing or working in the project area to excessive noise levels, for a project located within an airport land use plan or where such a plan has not been adopted, within two miles of an airport. The nearest airstrip to the Master Plan Area is Hollywood Burbank Airport, approximately 8 miles west of the Master Plan Area. Therefore, there would be no impact. No further analysis is warranted.

2.14. POPULATION AND HOUSING

This analysis is undertaken to determine if the proposed project may have a significant impact to population and housing, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. Population and housing impacts associated with implementation of the proposed project were evaluated with regard to state, regional, and local data and forecasts for population and housing; the County General Plan 2035;[1] the City of LCF General Plan;[2] and SCAG population and housing data and forecasts for the Master Plan Area.[3]

REGULATORY FRAMEWORK

Federal

There are no federal policies and regulations that supersede state and local policies and regulations for population and housing within the Master Plan Area.

State

1969 California Housing Element Law

The California Housing Element Law (California Government Code Section 65300) requires SCAG and other regional councils of government in California to determine the existing and projected regional housing needs for persons at all income levels. Each governing body of a local government in California is required to adopt a comprehensive, long-term general plan for the physical development of the city, city and county, or county. The California Housing Element Law, enacted in 1969, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community as part of the housing element, one of the seven mandated elements of the local general plan. The California Housing Element Law is implemented by the California Department of Housing and Community Development (HCD), which is responsible for reviewing local governments' housing elements for compliance with state law and providing written comments to the local governments. Using the information provided by local governments in its Housing Element, the HCD determines the regional housing need for each county and allocates funding to meet this need to the council of governments for distribution to its jurisdictions. The HCD also oversees distribution of funding related to the regional housing need by the council of governments to the local governments to ensure that funds are appropriately allocated. The requirements for the Housing Element are delineated in California Government Code Section 65580–65589.9.

Regional Housing Needs Assessment (RHNA)

California Government Code Sections 65583(a)(1) and 65584 require that each Council of Governments consult with the HPD and determine each region's existing and projected housing need through preparation of an RHNA that allocates a share of the regional housing need to each city, county, or city and county based on an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected housing needs for all income levels, including extremely low income households, as defined in subdivision (b) of Sections 50105 and 50106 of the Health and Safety Code. The

[1] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan

[2] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[3] Southern California Association of Governments. May 2019. Profile of the City of La Canada Flintridge. http://www.scag.ca.gov/Documents/LaCanadaFlintridge.pdf

RHNA is a key tool for SCAG and its member governments to plan for this growth. The RHNA quantifies the regional need for housing that is allocated to each jurisdiction for a certain planning period (e.g., in the next RHNA cycle, the period is from 2014 to 2021). This region's RHNA is produced periodically by SCAG, as mandated by state law, to coincide with the region's schedule for preparing Housing Elements. It consists of two measurements of housing need: (1) existing need and (2) future need for very-low income, low-income, moderate, and above-moderate income categories.

California Relocation Assistance Act

The California Relocation Assistance Act (Government Code Section 7260 et seq.) establishes uniform policies to provide for the fair and equitable treatment of people displaced from their homes or businesses as a direct result of state and/or local government projects or programs. The California Relocation Assistance Act requires that comparable replacement housing be made available to displaced persons within a reasonable period of time prior to the displacement. Displaced persons or businesses are assured payment for their acquired property at fair market value. Relocation assistance in the form of advisory assistance and financial benefits would be provided at the local level. This includes aid in finding a new home location, payments to help cover moving costs, and additional payments for certain other costs.

Homeowners and Private Property Protection Act

In 2008, California voters approved Proposition 99, the Homeowners and Private Property Protection Act, which amended Section 19 of Article 1 of the California Constitution so that local governments are prohibited from using eminent domain authority to acquire an owner-occupied residence for the purposes of conveying it to a private recipient, with limited exceptions. Proposition 99 applies only to owner-occupied residences. Cities may still use eminent domain authority to convey multifamily and nonresidential property to other private parties.

California Government Code Section 65583

Section 65583 of the Government Code sets forth the specific components to be contained in a housing element of a General Plan. The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. Section 65583 provides further specific criteria that the housing element must discuss.

Local

County General Plan 2035

The Housing Element of the County General Plan 2035 defines the County's policies and goals related to housing and population, as it analyzes and plans for existing and future housing needs. The Housing Element addresses the housing needs of all income levels and accommodates a diversity of housing types and special needs. It lists nine goals related to housing strategy.

Housing Availability

- Goal 1: A wide range of housing types in sufficient supply to meet the needs of current and future residents, particularly for persons with special needs, including but not limited to low income households, seniors, persons with disabilities, large households, single-parent households, the homeless and at risk of homelessness, and farmworkers.
- Goal 2: Sustainable communities with access to employment opportunities, community facilities and services, and amenities.

Housing Affordability

- Goal 3: A housing supply that ranges broadly in housing costs to enable all households, regardless of income, to secure adequate housing.
- Goal 4: A housing delivery system that provides assistance to low and moderate income households and those with special needs.

Neighborhood and Housing Preservation

- Goal 5: Neighborhoods that protect the health, safety, and welfare of the community, and enhance public and private efforts to maintain, reinvest in, and upgrade the existing housing supply.
- Goal 6: An adequate supply of housing preserved and maintained in sound condition, and located within safe and decent neighborhoods.
- Goal 7: An affordable housing stock that is maintained for its long-term availability to low and moderate income households and those with special needs.

Equal Housing Opportunity

- Goal 8: Accessibility to adequate housing for all persons without discrimination in accordance with state and federal fair housing laws.

Implementation and Monitoring

- Goal 9: Planning for and monitoring the long-term affordability of adequate housing.

City of LCF General Plan

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The Housing Element of the City of LCF General Plan identifies strategies and programs that focus on conserving and improving existing affordable housing, providing adequate housing sites, assisting in the development of affordable housing, removing governmental and other constraints to housing development, and promoting equal housing opportunities. It consists of these major components: an analysis of the City of LCF's demographic and housing characteristics and trends; a review of potential market, governmental, and infrastructure constraints to meeting the City of LCF's identified housing needs; an evaluation of land, financial, and administrative resources available to address the City of LCF's housing goals; and the Housing Plan, which addresses the City of LCF's identified housing needs, including housing goals, policies, and programs. The Housing Element lists five goals related to housing strategy.

- HE Goal 1: Facilitate the provision of a variety of types and adequate supply of housing to meet the existing and future needs of City residents.
- HE Goal 2: Maintain and enhance the quality of existing residential neighborhoods in the City.
- HE Goal 3: Address the housing needs of lower and moderate-income households and those households with special needs.
- HE Goal 4: Ensure that housing is sensitive to the existing natural and built environment.
- HE Goal 5: Promote equal housing opportunities for all persons in accordance with fair housing laws.

IMPACT ANALYSIS

	Potentially Significant Impact	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

The proposed project would result in no impacts to population and housing in relation to inducing substantial direct or indirect population growth. As of 2018, the total population of the City of LCF was 20,683 within a greater Los Angeles County population of 10,283,729. The City of LCF has a population density of 2,937 persons per square mile. Between 2000 and 2018, the total population of the City of LCF increased by 365 persons with a growth rate of 1.8 percent, compared to the County rate of 8 percent.[4] The City of LCF has experienced limited housing growth between 2000 and 2010, in which households increased by 0.4 percent.[5] Descanso Gardens and the City of LCF are served by public roads that provide access from the nearby Interstate 210 and State Route 2 freeways, and the community has existing telecommunication, gas, water, and electricity infrastructure and resources.[6,7] The proposed project would not include the development of new homes, businesses, roads, or utilities to serve Descanso Gardens and would therefore not induce substantial unplanned population growth, directly or indirectly, in the City of LCF. Furthermore, the proposed project uses and programming are consistent with the County General Plan 2035 goals to protect county parks and open space resources, such as the Master Plan Area, from increased population growth and ongoing development.[8,9]

There is sufficient labor supply within the County to support construction, operation, and maintenance of the facilities and programs contemplated by the proposed project; therefore, the proposed project would not be

[4] Southern California Association of Governments. May 2019. Profile of the City of La Canada Flintridge. http://www.scag.ca.gov/Documents/LaCanadaFlintridge.pdf.

[5] City of La Cañada Flintridge. Adopted February 10, 2014. City of La Cañada Flintridge General Plan 2030. Chapter 9: Housing Element. https://cityoflcf.org/planning/

[6] MyUtilities. 1418 Descanso Dr., La Cañada Flintridge, CA, 91011. Accessed 23 October 2019. https://myutilities.com/checkout/quote?hj=1&order_token=2a0ba03bfb190cd061d209aa96cf0e5f351b965862ffd986.

[7] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. Chapter 4: Conservation Element and Chapter 6: Circulation Element. https://cityoflcf.org/planning/

[8] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 9: Conservation and Natural Resources Element. http://planning.lacounty.gov/generalplan

[9] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/generalplan

expected to induce population growth or the demand for housing. As of September 2019, the labor force of the County accounted for approximately 5,140,600 people, with an unemployment rate of 4.5 percent.[10] The base year employment estimate in 2016 for the construction industry in the Los Angeles-Long Beach-Glendale Metropolitan District was at 133,900, with a projected 2026 employment estimate of 158,100, or an 18.1 percent increase.[11] Current 2019 construction industry data in the District starts at 158,300 employed, with more in specific areas such as building, non-residential, residential, and heavy and civil engineering construction.[12] The current employment in the construction industry is larger than the projected employment for 2026, indicating a readily available labor force in the County to construct the facilities. As of September 2019, Descanso Gardens employs 60 full-time employees, 18 part-time employees, and 11 seasonal employees for most programs; 45 full-time administrative staff; and 250 volunteers. The Guild anticipates a future staff increase of less than 10 percent to provide support for most programs, a maximum increase of 13 percent for additional full-time administrative staff, and no anticipated increase in volunteerism, an increase of up to 9 staff and up to 5 administrative staff. Thus, staffing increase would not induce population growth or demand for housing above planned levels in the City of LCF or County.

The proposed project would not include the development of new homes or businesses, and it would not require the construction of new roads or utilities. Therefore, there would be no impacts to population and housing related to inducing substantial direct or indirect population growth. No further analysis is warranted.

b) Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to population and housing in relation to the displacement of substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere. The proposed project would not require vacating existing residences, as no people reside in Boddy House or other structures within Descanso Gardens. There is no affordable housing located or planned for the Master Plan Area in the County General Plan 2035 or the City of LCF General Plan. Therefore, there would be no impacts to population and housing related to the displacement of substantial amounts of existing people or housing. No further analysis is warranted.

[10] State of California Employment Development Department. Accessed October 23, 2019. Los Angeles County Profile: Unemployment Rates and Labor Force Data. Labor Market Information Resources and Data. https://www.labormarketinfo.edd.ca.gov/geography/losangeles-county.html

[11] State of California Employment Development Department. Accessed October 23, 2019. Longer-Term Industry Employment Projections Data. Labor Market Information Resources and Data. U.S. Bureau of Labor Statistics. https://data.edd.ca.gov/Employment-Projections/Long-Term-Industry-Employment-Projections/sp6i-jezb.

[12] State of California Employment Development Department. Accessed October 23, 2019. Industry Employment Official Monthly Estimates (CES): Los Angeles-Long Beach-Glendale Metropolitan District Construction Industry Number of Employed Data. Labor Market Information Resources and Data. https://www.labormarketinfo.edd.ca.gov/cgi/dataanalysis/areaselection.asp?tablename=ces.

2.15. PUBLIC SERVICES

This analysis is undertaken to determine if the proposed project may have a significant impact to public services, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. Public services at the project study area were evaluated with regard to the County General Plan 2035;[1] the City of LCF General Plan;[2] and data available on the Los Angeles County Fire Department (LACFD), Los Angeles County Sheriff Department, La Cañada Unified School District, County Library, and other public service provider websites. Coordination was undertaken with the LACFD.

REGULATORY FRAMEWORK

Federal

There are no federal fire, police, school, park, library, and emergency services regulations applicable to the proposed project.

State

California Education Code

School facilities and services are subject to the rules and regulations of the California Education Code and governance of the State Board of Education (SBE). The SBE is the 11-member governing and policy making body of the California Department of Education (CDE) that sets K–12 education policy in the areas of standards, instructional materials, assessment, and accountability.[3]

California Fire Code

Title 24, Part 9 of the California Code of Regulations is the California Fire Code. Title 24, Part 9 of the CCR sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. The 2019 California Fire Code is the incorporation of the 2018 International Fire Code of the International Code Council with necessary California amendments.[4] Development under the proposed project would be subject to applicable regulations of the California Fire Code.

Local

County General Plan 2035

Chapter 12 – Safety Element of the County General Plan 2035 establishes that the Los Angeles County Sheriff Department requires a staff level of one deputy sheriff per each 1,000 population to effectively and efficiently fulfill all of its functions.[5] The County has adopted a regional park service standard of 6 acres per 1,000 County

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[1] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan

[2] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[3] California State Board of Education. Accessed November 4, 2019. Role and Responsibilities. http://www.cde.ca.gov/eo/mn/rr/

[4] California Building Standards Commission. July 2019. 2019 California Fire Code. https://codes.iccsafe.org/content/CAFC2019/cover

[5] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County 2035 General Plan. Chapter 12: Safety Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch12.pdf

residents and a local park services standard of 4 acres per 1,000 County residents. Los Angeles County also treats trails as linear parks that provide community access to increased health and fitness activities in the increasingly urbanized region.

County Ordinance Code Section 7.16.050 (Ord. 2011-0031 Section 6, 2011)

The standard ambulance response times are identified in the County Ordinance Code Section 7.16.050. While this section refers to Ambulance Operator License Applications, it does reference the response times that any contracting Ambulance Contractor must adhere to as part of the County's standards. In an urban setting with a population density of 100 or more persons per square mile such as the City of LCF, the maximum response time for County ambulance response to emergency calls is 8 minutes and 59 seconds.[6]

City of LCF Safety Element

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. Chapter 5 – Safety Element of the City General Plan states that the City of LCF's Public Safety Commission evaluates the community's safety needs, provides direction for emergency preparedness, and makes recommendations to the City Council. An Emergency Operations Center is operated by trained City of LCF staff and the Volunteer Emergency Response Team.

The City has prepared a Hazard Mitigation Plan (HMP) in collaboration and coordination with La Cañada Unified School District (LCUSD). The HMP is intended to serve as a mechanism for the community to promote sound public policy to reduce the risk and impact of disaster events. It identifies natural hazards to the community; determines likely impacts from those hazards; sets mitigation goals; and provides action items, including ideas for implementation, identification of the coordinating organization, and a proposed timeline. The HMP will assist the community in allocating appropriate resources and setting priorities and standards to ensure the safety of people, property, infrastructure, and the environment.

The City of LCF is also part of a Disaster Management Area through a Joint Powers Agreement with the County. It is part of Disaster Management Area C that also includes Monterey Park, Alhambra, Burbank, and Glendale. The goal of this program is to coordinate in planning for preparedness, mitigation, and recovery from emergencies or disasters.

The County Department of Public Works provides Disaster Routes within the Los Angeles County Operational Area by city.[7] The City of LCF is one of the cities listed under the Los Angeles County Operational Area and is provided with a designated Disaster Route Map in the County's All-Hazard Mitigation Plan. Disaster routes for the City of LCF consist of SR-210 (Foothill Freeway) east and west directions, SR-2 south of Foothill Blvd., the Angeles Crest Highway to the north, and from the corner of La Crescenta Avenue/Foothill Boulevard to the south on La Crescenta Avenue and to the north on Foothill Boulevard. The nearest designated evacuation route to the Master Plan Area is Verdugo Boulevard, which intersects with Descanso Drive.

The City of LCF operates five public schools in the LCUSD: La Cañada Elementary, Palm Crest Elementary, Paradise Canyon Elementary, La Cañada High School 7/8, and La Cañada High School 9-12. These five

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[6] County of Los Angeles Code of Ordinances, Title 7, Division 2, Chapter 7.16 Ambulances. Section 7.16.050 - Ambulance operator license - Application.
https://library.municode.com/CA/Los_Angeles_County/codes/code_of_ordinances?nodeId=TIT7BULI_DIV2SPBU_CH7.16AM_7.16.126PRACIOCHADFI

[7] County of Los Angeles Department of Public Works. Accessed November 6, 2019. Disaster Routes – Los Angeles County Operational Area.
https://dpw.lacounty.gov/dsg/DisasterRoutes/

public school sites serve as the evacuation centers for the City of LCF in the event of an emergency. In addition, the City of LCF has various water reservoirs which are critical during hazard events as well as 23 miles of interconnection trails that are utilized by the County Fire Department for a fire break.[8.]

There are six relevant goals, objectives, and policies to public services identified in the City of LCF General Plan:

LUE Goal 3: Ensure that new and rehabilitated development is designed and constructed in an environmentally sustainable and sensitive manner and protects the safety of persons and property.

LUE Objective 3.2: Continue to protect the public's safety by evaluating land and environmental constraints prior to development and requiring that projects mitigate potential negative environmental and safety impacts.

- LUE Policy 3.2.1: Ensure that future hillside development does not detrimentally impact environmental and recreational resources; is coordinated with available and potential circulation capacities; and is planned, designed, and implemented with regard for natural environmental hazards and constraints.
- LUE Policy 3.2.2: Conduct appropriate environmental reviews for all projects affecting land use.
- LUE Policy 3.2.3: Provide a wide range of accessible public facilities and community services, including fire and police protection; flood control and drainage; educational, cultural, and recreational opportunities; and other governmental and municipal services.
- LUE Policy 3.2.4: Implement goals, objectives, and policies in the Safety Element to protect persons and property from potential safety hazards.

	Potentially Significant Impact	***Less than Significant Impact with Mitigation Incorporated***	***Less than Significant Impact***	***No Impact***
a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to public services regarding creating capacity or service level problems, or resulting in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. As described in Chapter 5 – Safety Element Section 5.4, *Planning to Address Safety Issues*, of the City of LCF General Plan, the entire City of LCF, including the Master Plan Area, is situated in a Very High Fire Hazard Severity Zone (see Figure 2.9-1, *Fire Hazard Severity Zones*). The LACFD provides Emergency Medical Services (EMS), fire and rescue services, and safe haven services for the unincorporated County and for contract cities.[9] The City of LCF and LACFD have a

[8] City of La Cañada Flintridge. Accessed November 7, 2019. Local Hazard Mitigation Plan. Schools. https://cityoflcf.org/wp-content/uploads/2019/08/LHMP_Final_8-7-19.pdf

[9] Los Angeles County Fire Department. Accessed November 6, 2019. Fire Station Search. https://locator.lacounty.gov/fire

joint agreement for assistance in relation to fire and emergency response services. The three nearest County Fire and Rescue stations that would respond to the Master Plan Area during wildfires, in order of shortest distances, are Station 19, Station 82, and Station 63 (Table 2.15-1, *Los Angeles County Fire Service Resources*; Figure 2.15-1, *Public Service Facilities*).

TABLE 2.15-1
LOS ANGELES COUNTY FIRE SERVICE RESOURCES

Station	Address	Service Staff	Equipment	Distance from Master Plan Area Entrance (Miles/Minutes)
19	1729 Foothill Blvd. La Cañada Flintridge, CA 91011 (818) 249-1562	5 personnel	1 fire engine 1 paramedic squad	0.6 mile/2 minutes
82	352 Foothill Blvd. La Cañada Flintridge, CA 91011 (818) 790-4686	1 battalion chief 10 personnel	1 quint/fire truck 2 fire engines 1 patrol (4-wheel drive vehicle for fire roads)	2.7 miles/7 minutes
63	4526 Ramsdell Ave. La Crescenta-Montrose, CA 91214 (818) 248-2741	3 personnel	1 fire engine	2.7 miles/8 minutes

Source: Hogelund, Heather, Los Angeles County Fire Department Station 19. October 24, 2019. Telephone to Laura Razo and Laura Male, Sapphos Environmental, Inc. Subject: Fire Service Resources for Station 19 and Station 82
Pugh, Scotty, Los Angeles County Fire Department Station #19. November 11, 2019. Telephone to Laura Razo, Sapphos Environmental, Inc. Subject: Fire Service Resources for Station 63.

The typical response times for some of the resources such as the Los Angeles County Fire and Ambulance vary depending on the location. Response times are separated by urban, rural or wilderness areas per the LACFD[10] and the Los Angeles County Ordinance Code Section 7.16.050 (Ord. 2011-0031 Section 6, 2011), except for Critical Care and nonemergency calls (Table 2.15-2, *Los Angeles County Response Times*).

[10] City of Los Angeles Office of City Clerk. Accessed October 24, 2019. Los Angeles Fire Department Response Time Lag: 2012-2013 Los Angeles County Civil Grand Jury Report. http://clkrep.lacity.org/onlinedocs/2015/15-0719_pc_4_8-10-15.pdf

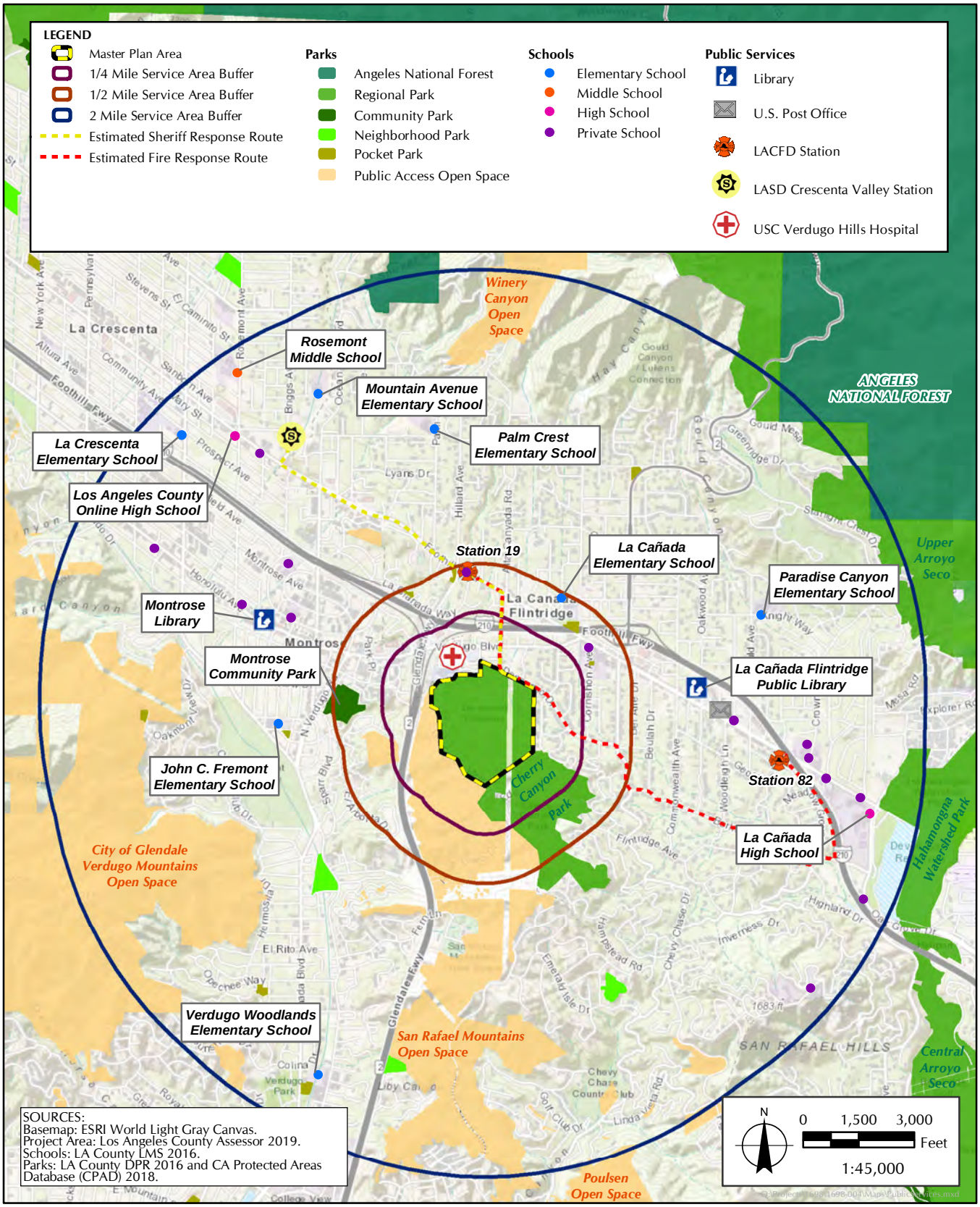

FIGURE 2.15-1

Public Service Facilities

TABLE 2.15-2
LOS ANGELES COUNTY RESPONSE TIMES

Service	Service Area	Service Standards	Total Time
Fire	Urban	2012-2013 Los Angeles County Civil Grand Jury Report; Urban areas; Patients transported through private contractors	6 minutes, 5 seconds
Ambulance	Urban	Los Angeles County Ordinance Code Section 7.16.050; • areas with census tracts (100 or more persons/sq. mi.) • areas and enumeration districts without census tracts (100 or more persons/sq. mi.)	8 minutes, 59 seconds
	Rural	Los Angeles County Ordinance Code Section 7.16.050; • Areas with census tracts (10–99 persons/sq. mi.) • Areas and enumeration districts without census tracts (10–99 persons/sq. mi.)	20 minutes, 59 seconds
	Wilderness	Los Angeles County Ordinance Code Section 7.16.050; • Areas with census tracts (less than 10 persons/sq. mi.) • Areas and enumeration districts without census tracts (less than 10 persons/sq. mi.)	As quickly as possible
Critical Care & Nonemergency Calls	—	Los Angeles County Ordinance Code Section 7.16.050	90 minutes

Source: City of Los Angeles Office of City Clerk. Accessed October 24, 2019. Los Angeles Fire Department Response Time Lag: 2012-2013 Los Angeles County Civil Grand Jury Report. http://clkrep.lacity.org/onlinedocs/2015/15-0719_pc_4_8-10-15.pdf; County of Los Angeles, CA, Los Angeles County Ordinance Code Section 7.16.050 (Ord. 2011-0031 Section 6, 2011).

Furthermore, the City of LCF participates in the Standardized Emergency Management System (SEMS), the state level system, for improving the efficiency and effectiveness of responders from varying jurisdiction in response to natural disasters and emergencies. As described above, the City of LCF is one of the cities listed under the Los Angeles County Operational Area and is provided with a designated Disaster Route Map. In addition, the City of LCF prepared an HMP. Aside from the HMP, which is meant for allocating resources and setting standards for ensuring the safety of the community against natural hazards, the City is also part of a joint agreement with the Cities of Monterey Park, Alhambra, Burbank, and Glendale under the Disaster Management Area C, which coordinates the planning of preparedness, mitigation, and recovery efforts under emergency or disaster events.[11] Moreover, the City of LCF has joint effort in terms of preparedness and volunteer programs with the County and other cities in the area such as the Community Emergency Response Team (CERT), plus guidance and a series of checklists as well as an emergency notification system, Alert LCF, for notifying and helping the community and individuals prepare themselves. There are existing fire access roads around the southern and western sides of the Master Plan Area (Descanso Motorway / Descanso Trail) and within the majority of the paved roads in the developed gardens. One fire road provides access from Descanso Motorway to the existing Oak Woodland (and proposed Nature Discovery Gardens) near the Lake that can supply emergency fire response water on-site. Two fire hydrants are on-site, within the Main Parking Lot near Van de Kamp Hall and near the Boddy House complex. Two fire hydrants are also available on Descanso Drive: (1) between the entry and exit driveways and (2) at the northeastern corner of the Master Plan Area, to facilitate fire response.

The proposed project would involve the expansion of structures, trails, and programming that would require additional fire protection services but not result in the requirement for additional or expanded fire protection facilities. The proposed project involves the removal of about 20,716 square feet of existing building, renovation of six existing buildings, and construction of about 35,563 square feet of new buildings. The proposed project would result in a net increase of approximately 35 percent (14,847 square feet) of buildings and structures in the Master Plan Area (see Section 1, *Project Description*). The proposed project would not

[11] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

directly or indirectly induce population growth because it involves no new homes or businesses, and it does not propose the extension of roads or other infrastructure beyond the Master Plan Area. As there would be no net increase in population, there would be no need for additional firefighting personnel or new or expanded fire stations as a result of improvements made to this existing recreational facility. The Master Plan Area would continue to serve as a regional recreation facility in the County that would accommodate day use from local residents and from throughout the area, which has the potential to result in a very minor increase in emergency response, search and rescue, and other fire protection services if any injuries, missing persons, or fire incidents occur as a result of expanding a trail beyond the developed portion of the gardens. Although the proposed Wilds Loop would extend south beyond the fenced area into the undeveloped portion of the property, which would not be easily accessible by fire response personnel, the new trail would be defensible from the Descanso Motorway above the Wilds Loop trail and the widened driveway leading to the Boddy House from below. Furthermore, the proposed project would include widening of the entire service loop around the developed gardens to a 20-foot paved road to improve fire truck access from the existing condition. Structures and parking lots would be constructed in accordance with the requirements of the County of Los Angeles Fire Code (Title 32).[12] Fire prevention requirements would include provision of access roads, adequate road width, and clearance of brush around structures located in hillside areas. Therefore, the proposed project would result in less than significant impacts regarding creating capacity or service level problems, or resulting in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. No further analysis is warranted.

Sheriff protection? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to public services regarding creating capacity or service level problems, or resulting in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for sheriff protection services. The proposed project would not directly or indirectly induce population growth because it involves no new homes or businesses, and it does not propose the extension of roads or other infrastructure beyond the property boundary. Sheriff protection services in unincorporated Los Angeles County are provided by the County Sheriff's Department Crescenta Valley Station, at 4554 Briggs Avenue, La Crescenta, California 91214, approximately 1.9 miles northwest of the Master Plan Area (Figure 2.15-1). According to the City of LCF General Plan, the Crescenta Valley Station serves the LCF community, as well as the unincorporated areas of Montrose, La Crescenta, Lopez Canyon, Kagel Canyon, Little Tujunga Canyon, Big Tujunga Canyon, Angeles National Forest, and Mount Wilson. The Safety Element of the County General Plan 2035 establishes that the Los Angeles County Sheriff Department requires a staff level of one deputy sheriff per each 1,000 population to effectively and efficiently fulfill all of its functions. In addition, emergency services are provided through a mutual aid agreement that has been established among cross-jurisdictional emergency responders to lend assistance across jurisdictional boundaries. This aid may occur upon the need for emergency response that exceeds local resources. Implementation of the proposed project would not result in the need to build new sheriff's stations. The proposed project would retain the Master Plan Area's current use as a botanic garden. There would be no net increase of population; therefore, there would be no need for additional sheriff personnel, or new or expanded sheriff stations. Therefore, there would be no impact. No further analysis is warranted.

[12] County of Los Angeles Code of Ordinances, Title 32 – Fire Code.
https://www.municode.com/library/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT32FICO

Schools ☐ ☐ ☐ ☒

The proposed project would result in no impacts to public services in relation to schools. As stated in Section 2.14, *Population and Housing*, the proposed project would not induce growth or concentration of population. There are public schools located within a 1-mile radius of the Master Plan Area: La Cañada Elementary School, a public school located at 4540 Encinas Drive, La Cañada Flintridge, California, approximately 0.42 northeast of the Master Plan Area; and Flintridge Montessori School, a private school located at 1739 Foothill Blvd, La Cañada Flintridge, CA 91011, approximately 0.63 mile north of the Master Plan Area (Figure 2.15-1). The proposed project would not be expected to induce population growth and would not be expected to affect the population of school age children in the City of LCF. Therefore, there would be no impact. No further analysis is warranted.

Parks? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to public services in relation to parks. Descanso Gardens is one of the County's several special use facilities that provides recreational opportunities in the County. The proposed project would guide the development of an existing special use facility to preserve and enhance the facility's current use as a botanical garden over the next 15 years. As stated in Section 2.14, *Population and Housing*, the proposed project would not induce growth or concentration of population. The proposed project would not include the development of new homes, businesses, roads, or utilities to serve Descanso Gardens and would therefore not induce substantial unplanned population growth, directly or indirectly, in the City. As Descanso Gardens is owned by the County, this analysis uses the County's park terminology for neighborhood, community, and regional parks pursuant to the Parks and Recreation Element of the County General Plan 2035 (Table 2.15-3, *Los Angeles County Park Service Area Definitions*). The County has adopted a regional park service standard of 6 acres per 1,000 County residents and a local park services standard of 4 acres per 1,000 County residents. The County also treats trails as linear parks that provide community access to increased health and fitness activities in the increasingly urbanized region.

TABLE 2.15-3
LOS ANGELES COUNTY PARK SERVICE AREA DEFINITIONS

Regional/ Local	Service Standards	Recreational Facility	Suggested Park Size	Service Area
Regional	6 acres per 1,000 County residents	Regional Park	Greater than 100 acres	25+ miles
		Community Regional Park	20 to 100 acres	Up to 20 miles
		Special Use Facility	No size criteria	None
Local	4 acres per 1,000 County residents	Community Park	10 to 20 acres	1 to 2 miles
		Neighborhood Park	3 to 10 acres	1/2 mile
		Pocket Park	1/4 to 3 acres	1/4 mile
		Park Node	0 to 1/4 acre	None

Source: Los Angeles County Department of Regional Planning. Adopted October 6, 2015. Los Angeles County 2035 General Plan: Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch10.pdf

The proposed project would improve resilience against deterioration of an existing recreational facility in an area that has a very low to low local park need compared to the County as a whole and a deficiency in regional parks and recreational facilities.[13] The Master Plan Area is located within the West San Gabriel Valley Planning Area. According to the County General Plan 2035, in July 2013 there were 56 acres of local parkland and

[13] County of Los Angeles Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of La Cañada Flintridge (Study Area 66). https://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_066.pdf

3,465 acres of regional parkland in the West San Gabriel Valley Planning Area.[14] Based on 2010 Census data, the County General Plan 2035 identified a local parkland deficit of 435 acres and a regional parkland deficit of 2,026 acres for residents in the West San Gabriel Valley Planning Area. In 2016, the Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment (Park Needs Assessment) quantified the need for parks and recreation resources in Los Angeles County (cities and unincorporated areas) to estimate the potential cost of meeting that need.[15] The Park Needs Assessment divided the assessment into 188 study areas to determine the need for each community. The Master Plan Area is located within the City of LCF (Study Area #66), which has a very low park need, surrounded by communities with a low park need (#29) and moderate park need (#173) to the north, moderate park need (#173) and low park need (#47) to the east, moderate park need (#173) and low park need (#180) to the south, and low park need (#180) and very low park need (#14) to the west.[16] The proposed project would not be expected to induce population growth and would not increase the level of demand on existing parks or recreation facilities in the City of LCF. Therefore, there would be no impact. No further analysis is warranted.

Libraries? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to public services in relation to libraries. Libraries within an approximate 1-mile radius of the Master Plan Area include the La Cañada Flintridge Public Library located at 4545 N. Oakwood Avenue, approximately 0.4 mile east,[17] and the Montrose Library located at 2465 Honolulu Ave, approximately 1.3 miles west of the Master Plan Area (Figure 2.15-1). The proposed project would not induce population growth and would not increase the level of demand on existing libraries in the City of LCF. Therefore, there would be no impact. No further analysis is warranted.

Other public facilities? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to public services in relation to other public facilities. The Master Plan Area is adequately served by public facilities, including a U.S. Post Office[18] located at 607 Foothill Boulevard, approximately 1.1 miles east of the Master Plan Area, and the USC Verdugo Hills Hospital approximately 0.1 mile northwest (Figure 2.15-1).[19] The proposed project would not induce population growth and would not require construction of new public facilities. Therefore, there would be no impact. No further analysis is warranted.

[14] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County 2035 General Plan. Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch10.pdf

[15] County of Los Angeles Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. https://lacountyparkneeds.org/

[16] County of Los Angeles Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of La Cañada Flintridge (Study Area 66). https://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_066.pdf

[17] County of Los Angeles Public Library. Accessed October 8, 2019. La Cañada Flintridge Library. https://lacountylibrary.org/la-Cañada-flintridge-library/

[18] U.S. Postal Service. Accessed October 8, 2019. Locator. https://www.whitepages.com/business/CA/La-Cañada-Flintridge/Post-Office

[19] USC Verdugo Hills Hospital. Accessed October 8, 2019. USC University of Southern California. https://uscvhh.org/

2.16. RECREATION

This analysis is undertaken to determine if the proposed project may have a significant impact to recreation, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form.[1] Recreation in the vicinity of the Master Plan Area was evaluated with regard to the Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment,[2] the Parks and Recreation Element of the County General Plan 2035,[3] the City of LCF General Plan,[4] and the consideration of the potential for growth-inducing impacts evaluated in Section 2.14, *Population and Housing*.

REGULATORY FRAMEWORK

Federal

There are no federal regulations, programs, policies, or guidelines applicable to recreation for the proposed project.

State

California Public Park Preservation Act of 1971

The California Public Park Preservation Act of 1971 (PRC Section 5400–5409) states that any public agency that acquires public parkland must either continue to operate the property as a public park, or must pay compensation or land that is sufficient to acquire substantially equivalent substitute parkland and facilities or provide substitute parkland of comparable characteristics.[5] The Act is the primary legislation for protecting and preserving public parkland.

Local

County General Plan 2035

The Parks and Recreation Element of the County General Plan 2035 classifies arboreta and botanical gardens such as Descanso Gardens as Special Use Facilities that serve greater regional recreational or cultural needs and have no defined size criteria or service radius areas.[6] A Special Use Facility is generally a single-purpose facility that typically includes passive features such as wilderness parks, nature preserves, botanical gardens, and nature centers; or active uses such as performing arts, water parks, gold driving ranges, and golf courses. As Descanso Gardens is owned by the County, this analysis uses the County's park terminology for neighborhood, community, and regional parks pursuant to the Parks and Recreation Element of the County

[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387, Appendix G.

[2] County of Los Angeles Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. https://lacountyparkneeds.org/

[3] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County 2035 General Plan. Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch10.pdf

[4] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[5] California Public Resources Code, Division 5, Chapter 2.5: Preservation of Public Parks. https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=5.&title=&part=&chapter=2.5.&article=

[6] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/generalplan

General Plan 2035.[7] The County has adopted a regional park service standard of 6 acres per 1,000 County residents and a local park services standard of 4 acres per 1,000 County residents. The County also treats trails as linear parks that provide community access to increased health and fitness activities in the increasingly urbanized region. The Master Plan Area is located within the West San Gabriel Valley Planning Area.

County Trails Manual

In June 2013, the DPR published the *County of Los Angeles Trails Manual* (County Trails Manual) as a manual to provide guidelines for trail planning, design, development, and maintenance of DPR trails.[8] The purpose of the County Trails Manual is to provide guidance to DPR that interfaces with trail planning, design, development, and maintenance of hiking, equestrian, and mountain biking recreational trails, while addressing physical and social constraints and opportunities associated with the diverse topographic and social conditions that occur in the unincorporated territory of the County. The County uses the planning process delineated in the County Trails Manual in considering the development of future trails. It is the policy of DPR that all trails in the County are multi-use (hiking, mountain biking, equestrian). The County Trails Manual serves as a procedural document. Section 2.2.3 of the County Trails Manual establishes (through the 2004–2020 Strategic Asset Management Plan) the goal of providing one mile per 1,000 population (approximately 50 feet of trail for each trail user), with an assumption that approximately 11 percent of the population will engage in trail use, as specified by the National Recreation and Park Association.[9]

City of LCF General Plan

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The goals, objectives, and policies in the Open Space and Recreation Element and the Land Use Element of the City of LCF General Plan promote the preservation and enhancement of LCF open space, recreation, and trails resources. It emphasizes and supports the interrelationship between all the LCF General Plan elements to achieve a community whose parkland resources also support land use, circulation, conservation, and safety goals, objectives, and policies. The General Plan establishes four goals, three objectives, and 22 policies related to recreation.[10]

OSRE Goal 1: Create an integrated park, recreation, open space, and trail (parkland) system within the City that meets the needs of a full range of community interests.

- OSRE Policy 1.1.3: Continue to work with citizens, organizations, volunteer groups, and other community partners to identify and acquire land and provide needed active and passive park, recreation, and open space lands.
- OSRE Policy 1.1.4: Encourage and, where appropriate, require the inclusion of recreation facilities, permanently dedicated open space, and/or trails within new residential land divisions and residential and commercial developments.
- OSRE Policy 1.1.5: Coordinate the parkland plan and bikeway and trails plans with regional facilities of the County and nearby cities.

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[7] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County 2035 General Plan. Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch10.pdf

[8] County of Los Angeles Department of Parks and Recreation. June 2013. County of Los Angeles Trails Manual. https://trails.lacounty.gov/Files/Documents/69/LA%20County%20Trails%20Manual%20%28Revised%2006-20-13%29.compressed.pdf

[9] County of Los Angeles Department of Parks and Recreation. June 2013. County of Los Angeles Trails Manual. http://file.lacounty.gov/SDSInter/dpr/208899_TrailsManual.pdf

[10] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. Segment 3; Open Space and Recreation. Segment 4; Conservation Element. https://cityoflcf.org/planning/

OSRE Goal 2: Preserve, protect, and enhance open space areas within and adjacent to the City.

OSRE Objective 2.1: Preserve or enhance open space for preservation of natural resources.

- OSRE Policy 2.1.1: All publicly owned open space committed to open space land or utility right-of-way should be preserved and designated Open Space on the Land Use Policy Map.
- OSRE Policy 2.1.2: Reasonable efforts should be made to acquire from willing sellers undeveloped properties that contain significant community features and resources, such as natural chaparral and wildlife habitat, watersheds, areas of passive recreation, settings for riding and hiking trails and outdoor education, and other community-wide hillside amenities. Open space areas of particular value include Cherry Canyon, Webber Canyon, Gould Canyon, Winery Canyon, Hall Beckley Canyon, Snover Canyon, Hay Canyon, and their surrounding hillsides.
- OSRE Policy 2.1.4: Privately owned recreational and open space areas designed as an integral part of a land use development will be designated Open Space on the Land Use Policy Map.
- OSRE Policy 2.1.7: Encourage the dedication of additional lands to public open space, in cooperation with the Santa Monica Mountains Conservancy, Rim of the Valley Corridor Special Resource Study, and other partners and open space conservation efforts.
- OSRE Policy 2.1.8: Cooperate regionally with other municipalities and Los Angeles County to preserve natural open space corridors for wildlife.
- OSRE Policy 2.1.9: Consider the enhancement of the property currently used for utility transmission lines for use as community gardens or other complementary open space uses, within the constraints of the utility's requirements.

OSRE Goal 3: Provide and enhance park and recreation opportunities within the City.

OSRE Objective 3.1: Encourage continued cooperation between public and private recreational service providers to assure a wide variety of recreational, educational, and cultural programs for all segments of the community.

- OSRE Policy 3.1.1: Consider the National Recreation and Park Association Guidelines when evaluating and planning for specific activities and facilities, such as sports fields, courts, and rinks; tracks; trails; pools; and golf driving ranges and courses.
- OSRE Policy 3.1.2: Consider the community's changing demographics as the City identifies future recreational needs.
- OSRE Policy 3.1.3: Consider the acquisition and/or development of playfields (e.g., softball and soccer), picnic grounds, and other similar recreation facilities and maintain the ones the City has.
- OSRE Policy 3.1.5: Cooperate with public agencies, public utilities, and private organizations, including the Los Angeles County Flood Control District, the Los Angeles County Fire Department, Los Angeles County Department of Parks and Recreation, LCUSD, and SCE to promote the use and development of public recreation uses on their land. Such facilities are important to the City's efforts in providing a balanced recreation program.
- OSRE Policy 3.1.8: Encourage the preservation, expansion, and development of new privately owned recreation facilities.

OSRE Goal 4: Preserve, improve, and expand existing trails and promote coordinated and comprehensive trail systems for hikers, bicyclists, and equestrians.

- OSRE Policy 4.1.1: The Trails Master Plan is the implementation document for the General Plan regarding trails and trail-related issues.

- OSRE Policy 4.1.4: Use the Community Development Department Project Review Procedure: Trails (Appendix 7 in the Trails Master Plan, or as modified by the Community Development Director) when reviewing proposed development that is located adjacent to or within current trails, existing trail easement (s or proposed trail location(s), to evaluate and require mitigation of potential impacts on the trail system.
- OSRE Policy 4.1.5: Implement the Trails ordinance (Chapter 4.64 of the La Cañada Flintridge Municipal Code) to regulate conduct on a City-owned trail, on a non-City-owned trail, and on property adjoining and abutting all trails.

LUE Objective 1.3: Preserve and protect the areas designated for open space, recreation, and trails.

- LUE Policy 1.3.1: Endeavor to increase the amount and network of public and private open space, recreational facilities, and trails for active and/or passive recreation activities.
- LUE Policy 1.3.2: Facilitate the access to public and private open space, recreational facilities, and trails.
- LUE Policy 1.3.3: Land use proposals involving trails will comply with the Trails Master Plan.
- LUE Policy 1.3.4: Support the goals, objectives, and policies in the Open Space and Recreation and Conservation elements when evaluating development proposals and making land use decisions.
- LUE Policy 1.3.5: Encourage opportunities for additional joint-use facilities for future parks and schools, when feasible.

The Circulation Element of the City of LCF General Plan states that an extensive trails network is important to the City's recreation planning efforts:

> The City provides access to open space via a network of multi-use trails that enhances the quality of life for the community. The trails network is incomplete at this time, and several projects are planned to link trails in the northern and southern portions of the City, with enhanced connections to the regional trail network. The La Cañada Flintridge Trails Master Plan was adopted on March 6, 2006 by the City Council. According to the Trails Master Plan's trails inventory, there are approximately 24 miles of existing hiking and riding trails. Approximately 4 miles of trails are maintained by the City; these trails are currently on City-owned, Southern California Edison (SCE) right-of-way, or Caltrans property. The remaining 20 miles of trails are on County, SCE, federal, and privately owned property; these trails are maintained by the County. Figure CE-4 shows the active trail system in the City of LCF. The City also adopted a Trails Ordinance in 2006, which outlines conduct on City and non-City owned trails and on property adjoining and abutting trails.

Since the City's Trails Master Plan was adopted in 2006, the trail network in the City of LCF has expanded in collaboration with the County and SCE (see Figure 1.8.2-5, *Existing Trails).*

IMPACT ANALYSIS

	Potentially Significant Impact	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒

The proposed project would result in no impacts to recreation in relation to increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The proposed project would guide the development of an existing Special Use Facility, a recreational facility defined in the County General Plan 2035 as a single-purpose facility that serves greater regional recreational or cultural needs in Los Angeles County,[11] to preserve and enhance the facility's current use as a botanical garden over the next 15 years. The proposed project would improve resilience against deterioration of an existing recreational facility in an area that has a very low to low local park need compared to the County as a whole and a deficiency in regional parks and recreational facilities.[12]

Descanso Gardens is a special use facility that is operated by not-for-profit Guild on behalf of the County DPR. Descanso Gardens is an urban retreat offering programs, event spaces, and high-quality gardens to members and the public alike. This public botanic garden is open 364 days a year (closed December 25) from 9:00 a.m. to 5:00 p.m. daily. Members of the garden have 8:00 a.m. early admission. Descanso Gardens is open after hours until as late as 10:00 p.m. for scheduled ticketed evening events such as Enchanted: Forest of Light, as well as rental fee special events such as weddings.

At the time of the preparation of this analysis, in 2019, Descanso Gardens is being operated as part of the County DPR facilities that include four botanic gardens/arboreta, 174 parks, 344 miles of horse and hiking trails, 19 golf courses, and 31 public swimming pools (Figure 2.16-1, *Recreation Facilities and Open Space near Master Plan Area*).[13] Descanso Gardens is located in the City of LCF, which operates its own park facilities. As stated in Section 2.15, *Public Services*, the County General Plan 2035 identified a local and regional parkland deficit for the West San Gabriel Valley Planning Area. However, in 2016, the Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment (Park Needs Assessment) quantified the need for parks and recreation resources in Los Angeles County as very low, low, and moderate in the City of LCF and the study areas near Descanso Gardens.[14,15]

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[11] County of Los Angeles Department of Regional Planning. October 6, 2015. Los Angeles County 2035 General Plan. Chapter 10: Parks and Recreation Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch10.pdf

[12] County of Los Angeles Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of La Cañada Flintridge (Study Area 66). https://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_066.pdf

[13] County of Los Angeles. Accessed November 11, 2019. Parks & Recreation. https://www.lacounty.gov/things-to-do/parks-and-recreation/

[14] County of Los Angeles Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. https://lacountyparkneeds.org/

[15] County of Los Angeles Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of La Cañada Flintridge (Study Area 66). https://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_066.pdf

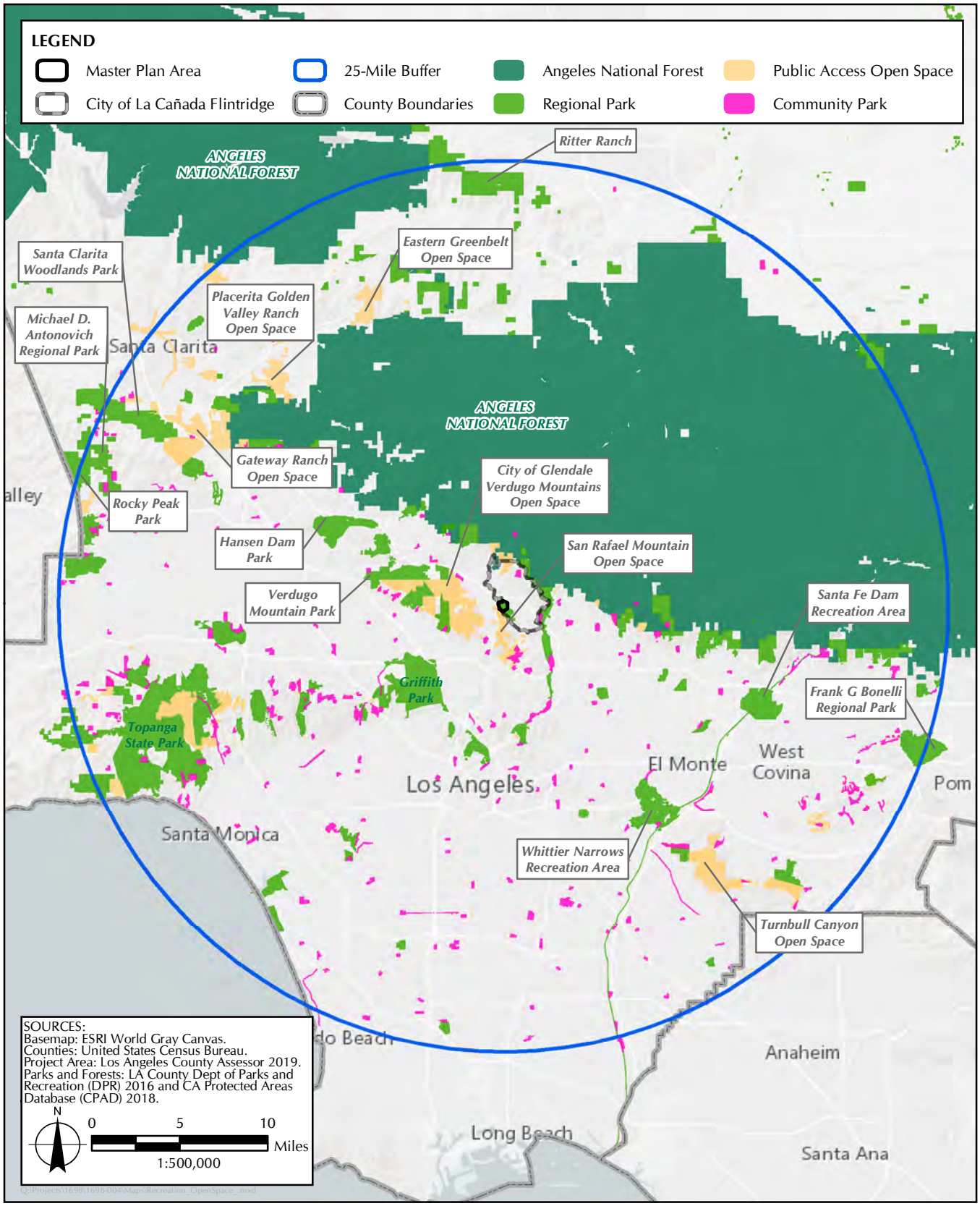

FIGURE 2.16-1

Recreation Facilities and Open Space near Master Plan Area

The Master Plan Area is located within a 30-minute drive of approximately 2.9 million people[16] and currently receives approximately 550,000 visitors per year.[17] General admissions visitation is predominantly from nearby communities (with approximately 59 percent of visitors traveling from 5 miles or less), except during the winter Enchanted: Forest of Light event that draws an increase in regional visitation. Approximately 82 percent of visitors[18] are local, traveling 10 miles or less to visit Descanso Gardens, except during Enchanted, when approximately 55 percent of visitors travel over 10 miles.[19] Between 2012 and 2019, visitor attendance has increased dramatically. From 2012 to 2017, on-site paid admissions increased by 335 percent (from 61,626 to 268,214), visits by members increased 243 percent (from 71,103 to 243,746), and school field trips expanded 253 percent (from 3,997 to 14,106) Annual membership has more than doubled since 2012, from approximately 8,500 member households in 2012 to over 17,000 member households in 2018.[20] Recently, Descanso Gardens has implemented measures to manage peak attendance periods such as creating a timed-ticket entry requirement for visitors attending special events and using a parking attendant crew for events.

Neighborhood Parks and Recreation Facilities

Descanso Gardens is located in the City of LCF, which owns and manages five developed parks totaling 4.4 acres.[21] There are seven existing parks located within an approximate 1-mile radius of the Master Plan Area (Table 2.16-1, *Existing Local Parks and Recreational Facilities within Two Miles of Master Plan Area*; see Figure 2.15-1). Recreational facilities within an approximate 2-mile radius of the Master Plan Area include Oakmont Country Club (0.9 mile southwest), La Cañada Flintridge Country Club (1.7 miles northeast), and the Chevy Chase Country Club (2.1 miles south). As stated in the Open Space and Recreation Element of the City of LCF General Plan, the City has approximately 983 acres of public and private land devoted to parkland; contains a trail system that connects to an extensive network of trails in the surrounding cities of Pasadena, Glendale, and South Pasadena as well as the unincorporated community of Altadena and the Angeles National Forest; and is immediately adjacent to the Angeles National Forest to the north and Hahamongna Watershed Park to the east.[22] The publicly owned open space includes approximately 211 acres of City-owned property (Cherry Canyon, Rockridge Conservation Area, and 69.7 acres of undeveloped land north of the A/B Development line including property in Gould Canyon, Flint Canyon, and Hall-Beckley Canyon), approximately 297 acres of County-owned property (Descanso Gardens and undeveloped land north of the A/B Development line), approximately 88 acres owned by the Los Angeles County Flood Control District, approximately 44 acres owned by the federal government (north of the A/B Development line, adjacent to the Angeles National Forest), and approximately 109.7 acres owned by SCE (including 1.7 acres designated Parks and Recreation). The privately owned open space includes La Cañada Flintridge County Club, located approximately 1.3 miles northeast of the Master Plan Area. Additionally, there is a 23-mile trail network in the City of LCF providing linear recreation opportunities for the community.[23] Non–City of LCF organizations including the Community Center of La Cañada Flintridge (0.3 mile northeast) and the Crescenta-Cañada YMCA (0.6 mile northwest) provide organized recreation facilities. Private recreational facilities include the Flintridge Riding Club (1.8 miles east) and Flint Canyon Tennis Club (1.6 miles southeast). School playgrounds within the City of LCF provide public recreation access during non-school hours pursuant to a joint-use

[16] HR&A Advisors, Inc. February 21, 2019. Descanso Gardens Master Plan Needs Assessment Report. Competitive Market Scan.

[17] Rios Clementi Hale Studios. July 9, 2019. Descanso Gardens Master Plan: Task 4 – Draft Master Plan. Stakeholder Presentation.

[18] Based on zip code from credit card transaction data. Does not account for visitors who paid admission in cash.

[19] HR&A Advisors, Inc. February 21, 2019. Descanso Gardens Master Plan Needs Assessment Report. Garden Performance and Operations.

[20] Rios Clementi Hale Studios. July 9, 2019. Descanso Gardens Master Plan: Task 4 – Draft Master Plan. Stakeholder Presentation.

[21] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[22] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[23] La Cañada Flintridge Trails Council. Accessed July 25, 2019. La Cañada Flintridge Trails Council. https://www.lcftrails.org/

agreement with the La Cañada Unified School District (see Figure 2.15-1).[24] These parks and facilities serve the recreational needs of the surrounding community.

TABLE 2.16-1
EXISTING LOCAL PARKS AND RECREATIONAL FACILITIES
WITHIN TWO MILES OF MASTER PLAN AREA

Type of Local Recreation Facility	Name of Facility	Distance from Master Plan Area	Facility Size (acres)	Management Agency
Pocket Park	Skate Park	0.3 mile east-northeast	0.3	City of LCF
Pocket Park	Memorial Park	0.4 mile northeast	1.7	City of LCF
Pocket Park	Unnamed – the greenway east of Indiana Avenue and north of Foothill Boulevard	0.4 mile north	1.7	SCE
Pocket Park	Mayor's Discovery Park	0.4 mile north	0.9	City of LCF
Pocket Park	Glenhaven Park	0.5 mile northwest)	0.5	City of LCF
Community Park	Montrose Community Park	0.5 mile west in the City of Glendale	15.1	City of Glendale
Pocket Park	Olberz Park	0.6 mile east	0.6	City of LCF
Pocket Park	Glenola Park	1.2 miles north	1.1	City of LCF
Total Acres			21.9	

Source: County of Los Angeles Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of La Cañada Flintridge (Study Area 66).
https://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_066.pdf
City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030.
https://sites.google.com/a/lcf.ca.gov/city-of-la-canada-flintridge-site/planning/general-plan
GreenInfo Network. Accessed October 24, 2019. California Protected Areas Database. https://www.calands.org

Regional Parks and Recreational Facilities

The nearest regional parks and recreational facilities to the Master Plan Area include Cherry Canyon Park (immediately southeast of Descanso Gardens), Gould Canyon / Lukens Connection (1.5 miles northeast), Angeles National Forest (1.9 miles northeast), Upper Arroyo Seco (1.9 miles northeast), Hahamongna Watershed Park (1.8 miles east), and Deukmejian Wilderness (3.7 miles northwest).[25]

As stated in Section 2.14, *Population and Housing*, the proposed project would not induce growth or concentration of population. The proposed project would not include the development of new homes, businesses, roads, or utilities to serve Descanso Gardens and would therefore not induce substantial unplanned population growth, directly or indirectly, in the City. The proposed project would entail improvements to an existing recreational facility and would not be expected to result in a significant increase in the number of people, residents, or visitors to existing park facilities. Therefore, there would be no impact. No further analysis is warranted.

[24] City of La Cañada Flintridge. Accessed October 24, 2019. Recreation & Facilities. https://cityoflcf.org/parks-and-recreation/recreation-facilities/

[25] County of Los Angeles Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of La Cañada Flintridge (Study Area 66). https://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_066.pdf

b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to recreation regarding including neighborhood and regional parks or other recreational facilities or requiring the construction or expansion of such facilities which might have an adverse physical effect on the environment. The proposed project involves planning for the construction and maintenance of improvements to an existing recreational facility, which has the potential to result in adverse physical effects on the environment as a result of grading for the new buildings, expanded parking lots, and expanded paths and gardens. During construction activities, small portions of Descanso Gardens and the parking lot staging areas would not be available for public use; however, garden obstructions would be temporary and would only constrain visitor use during short-term construction on each phase and project group identified in Table 1.11-1, *Project Phasing*. This is not considered a significant impact to recreation. In the long term, the proposed project would provide improved recreational access to existing and new gardens and sustain operations at Descanso Gardens. The proposed project would not require the construction or expansion of recreational facilities because it would not directly result in population growth. Therefore, the proposed project would result in less than significant impacts regarding having adverse physical effects on the environment as a result of construction or expansion of recreational facilities. No further analysis is warranted.

c) Would the project interfere with regional open space connectivity? ☐ ☐ ☐ ☒

The proposed project would result in no impacts to recreation regarding interfering with regional open space connectivity. The proposed project would be limited to the Master Plan Area and not involve expansion into any protected public access open space.

Descanso Gardens is in an area served by a variety of federal, state, County, and city regional parks and open space areas. The nearest open spaces to the Master Plan Area include San Rafael Mountains Open Space (immediately southwest of Descanso Gardens), La Cañada Flintridge Open Space (0.76 mile northwest), City of Glendale Verdugo Mountains Open Space (1.1 miles southwest), Verdugo Mountains Open Space (1.2 miles west), Angeles National Forest (1.9 miles northeast), Winery Canyon Open Space (1.5 miles north), and La Cañada Irrigation District Open Space (2.6 miles northwest).[26]

The Wilds Loop, which would be the only element extending beyond the developed portions of the gardens, would be a trail up to 6 feet in width. The remainder of the undeveloped portions of the Master Plan Area would remain as undeveloped open space. The proposed modifications to the perimeter fence would include removal of the existing fence in the northwestern portion of the Master Plan Area beyond the public/gated entry boundary to benefit open space connectivity. Therefore, there would be no impact. No further analysis is warranted.

[26] County of Los Angeles Department of Parks and Recreation. May 9, 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of La Cañada Flintridge (Study Area 66). https://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_066.pdf

2.17. TRANSPORTATION

This analysis is undertaken to determine if the proposed project may have a significant impact to transportation, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form.[1] Transportation in the vicinity of the Master Plan Area was evaluated based on expert opinion supported by facts, review of an access management plan prepared for Descanso Gardens, review of the County General Plan 2035,[2] and review of the City General Plan.[3]

REGULATORY FRAMEWORK

Federal

Americans with Disabilities Act

Title III of the Americans with Disabilities Act (ADA; codified in 42 USC), prohibits discrimination on the basis of disability in places of public accommodation (i.e., businesses and nonprofit agencies that serve the public) and commercial facilities (i.e., other businesses). This regulation includes Appendix A to Part 36, Standards for Accessible Design, which establishes minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. These accessibility requirements also apply to transportation facilities and their components (including sidewalks, crosswalks, etc.) and the interface between these facilities and the land uses they serve (such as accessibility between sidewalk and on-site pedestrian circulation features like walkways).

State

Senate Bill 743

In 2013, Governor Brown signed SB 743, which creates a process to change the way that transportation impacts are analyzed under CEQA.[4] Specifically, SB 743 requires the OPR to amend the CEQA Guidelines to provide an alternative to Level of Service (LOS) for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (PRC Section 21099(b)(1)). Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." The County of Los Angeles and all cities, including the City of LCF, have until July 1, 2020 to update their transportation analysis guidelines to reflect the OPR's guidance. Transportation impacts related to air quality, noise and safety must still be analyzed under CEQA where appropriate. Since the proposed project is not anticipated to increase peak day attendance, a formal transportation impact analysis is not required. However, an access management plan would be prepared.

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[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

[2] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan/generalplan

[3] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[4] Governor's Office of Planning and Research. Accessed October 2019. Transportation Impacts (SB 743); CEQA Guidelines Update and Technical Advisory. http://opr.ca.gov/ceqa/updates/sb-743/

Senate Bill 32

SB 32 requires California to reduce GHG emissions 40 percent below 1990 levels by 2030, and Executive Order B16-12 provides a target of 80 percent below 1990 emissions levels for the transportation sector by 2050.[5] The transportation sector has three major means of reducing GHG emissions: increasing vehicle efficiency, reducing fuel carbon content, and reducing the amount of vehicle travel. CARB has provided a path forward for achieving these emissions reductions from the transportation sector in its 2016 Mobile Source Strategy. CARB determined that it will not be possible to achieve the State's 2030 and post-2030 emissions goals without reducing VMT growth.

California Vehicle Code

The California Vehicle Code includes regulations pertaining to licensing, size, weight, and load of vehicles operated on State Routes; safe operation of vehicles; and the transportation of hazardous materials.

California Streets and State Route Code

The California Streets and State Route Code regulate the care and protection of state and county State Routes and have provisions for the issuance of permits.

California Public Utilities Commission (CPUC)

In California, on non-federal and non-tribal lands, the CPUC has jurisdiction over the siting and design of the project because the CPUC regulates and authorizes the construction of investor-owned public utility (IOU) facilities. Although such projects are exempt from local land use and zoning regulations and permitting, General Order (GO) No. 131-D, Section III.C requires "the utility to communicate with, and obtain the input of, local authorities regarding land-use matters and obtain any nondiscretionary local permits."

Regional

SCAG Regional Transportation Plan (RTP)

The RTP is prepared by SCAG every four years as mandated by the federal government. The RTP includes a collective vision for the SCAG region and provides a guide for the future development of the regional transportation system. The projects addressed in the RTP become eligible for State and federal funding once the Plan is adopted.

Regional Transportation Improvement Program (RTIP)

The Regional Transportation Improvement Program (RTIP) is a compilation of State, federal, and locally funded transportation projects provided by SCAG. The RTIP includes federal Congestion Mitigation Air Quality (CMAQ) and Surface Transportation Program (STP) funds, other federal funds, and projects entirely funded by local and private means.

[5] Governor's Office of Planning and Research. Accessed November 12, 2019. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA; CEQA Guidelines Update and Technical Advisory. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Congestion Management Program (CMP)

The CMP is a State-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990 to address the impact of local growth on the regional transportation system. On October 28, 2010, Metro adopted the 2010 CMP for Los Angeles County which includes Traffic Impact Analysis (TIA) guidelines. The 2010 CMP summarized the results from 18 years of highway and transit monitoring and 15 years of monitoring local growth outlining key trends.

Local

County General Plan 2035 – Mobility Element

The Mobility Element provides an overview of the transportation infrastructure and strategies for developing an efficient and multimodal transportation network. The Mobility Element analyzes the challenges and constraints of the County transportation system and provides policy guidance to reach the County's long-term mobility goals. The Highway Plan and Bicycle Master Plan supplement the Mobility Element to establish policies for the roadway and bikeway systems in the unincorporated areas, which are coordinated with the networks in the 88 cities in the County. The General Plan also establishes a program to prepare community pedestrian plans, with guidelines and standards to promote walkability and connectivity throughout the unincorporated areas.

City of LCF General Plan – Transportation Element

Although the County is not subject to city general plans, the City General Plan information has been provided to inform the County's decision-making process. The Circulation Element of the City's General Plan provides the City's adopted specific goals, objectives, and policies that guide the development of the City's circulation system in a manner that is compatible with the Land Use Element. The Circulation Element consists of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, and other local public utilities and facilities, all correlated with the land use.

IMPACT ANALYSIS

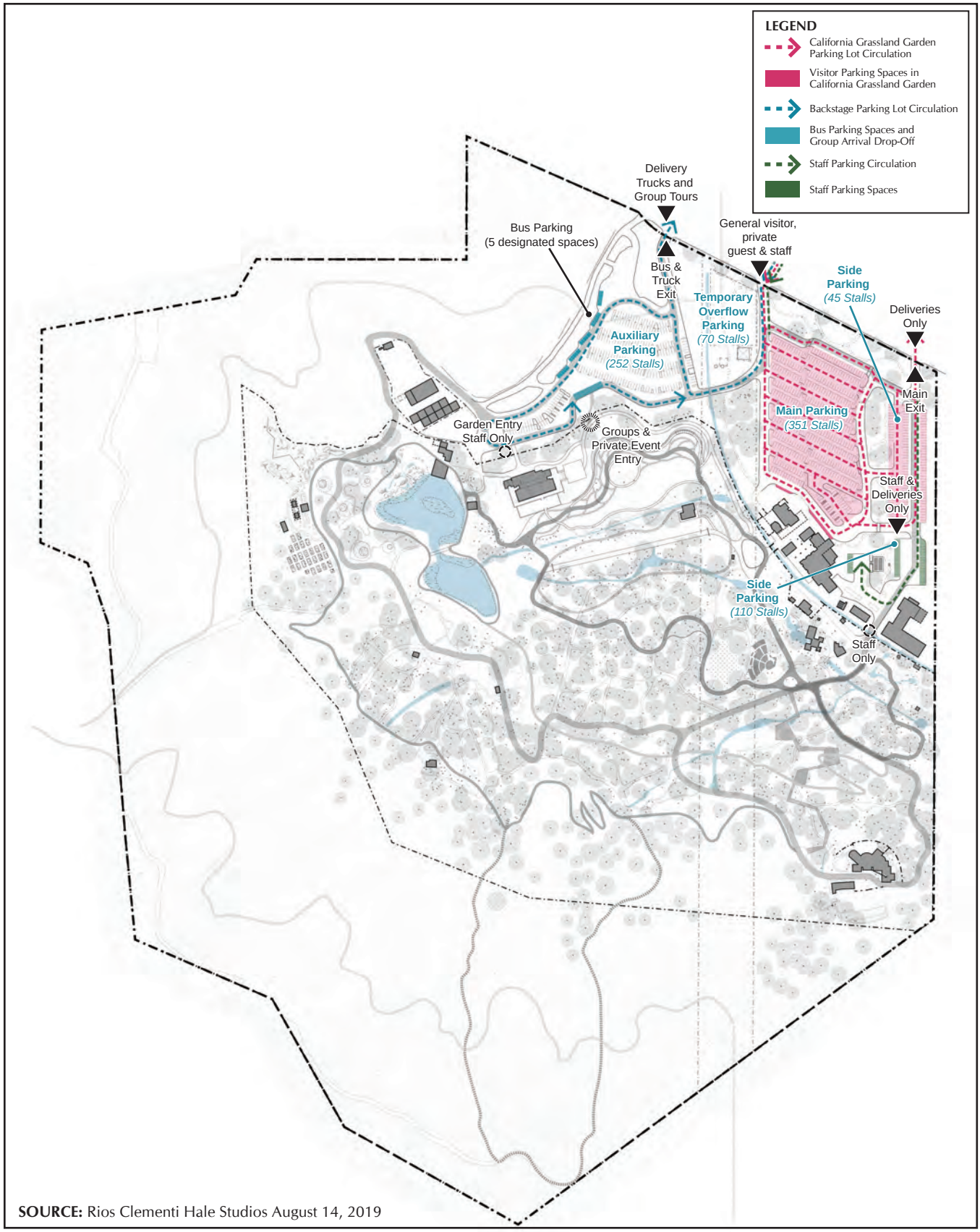
	Potentially Significant Impact	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
Would the project:				
a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to transportation in relation to conflicting with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation systems. The current roadway network in the vicinity of Descanso Gardens consists of a broad regional highway, subregional arterial and local residential-oriented road network. The Master Plan Area is accessible by vehicles and local residents via Descanso Drive. Regional access to the Master Plan Area is available from Angeles Crest Highway (SR-2), Foothill Boulevard, and Verdugo Boulevard via the I-210 (Foothill) Freeway, which is oriented in an east-west direction north of the Master Plan Area; and Verdugo

Boulevard via SR-2 (Glendale) Freeway, which runs north-south direction west of the Master Plan Area (see Figure 1.3-4, *Local Vicinity Map*). Existing visitor vehicular access to Descanso Gardens is currently provided via one entry driveway in the northwestern corner of the Main Parking Lot. Two exit driveways are available: the main exit is located in the northeastern corner of the Main Parking Lot and a secondary exit is available in the northwestern corner of the Auxiliary Parking Lot (mainly used for special events for overflow purposes). One additional driveway is located west of the main visitor entrance near the switchbacks of the Descanso Trail and is used only for maintenance. Transit service is provided in the vicinity of Descanso Gardens but not immediately adjacent to the Master Plan Area because Descanso Drive is primarily a residential street. Bus lines are operated by the Los Angeles County Metropolitan Transportation Authority (Metro), the Los Angeles Department of Transportation (LADOT), Pasadena Transit, Glendale Beeline, and the City along the following roadways: Foothill Boulevard, Verdugo Boulevard, La Cañada Boulevard, and Angeles Crest Highway. There is also an existing bicycle network in the vicinity of Descanso Gardens, with bicycle routes sharing the roadway along Descanso Drive and bicycle racks in front of the ticketing office. There is also an existing Auxiliary Parking Lot with parking and one-way drive aisles oriented in a north-south direction. Staff parking is designated in the southeastern corner of the Main Parking Lot near Van de Kamp Hall. ADA-accessible parking is provided near the main visitor entrance and staff parking, and the main service vehicle loading and unloading occurs at the Entrance Courtyard near the southeastern corner of the Main Parking Lot.

The Mobility Element of the County General Plan 2035, Mobility Element of the City of LCF General Plan, SCAG RTP, RTIP, and CMP were referred to assess potential impacts associated with traffic for the proposed project. The RTP's goals include providing adequate levels of accessibility and mobility for the efficient movement of people, goods, and services within the region. The RTP aims to improve transportation system safety through design, operations and maintenance, system improvements, support facilities, public information and law enforcement efforts. The 2016 RTIP shows that there are no projects within the City planned for construction concurrently during the construction of the proposed project. The proposed project would provide additional parking spaces and a drop-off location to facilitate and further prevent traffic congestion (Figure 2.17-1, *Proposed Parking Lot Circulation*). The Master Plan proposes to restructure existing paths within the Master Plan Area and provide additional paths to help improve visitor orientation and better showcase the gardens (refer to Figure 1.10.1-1, *New Primary Circulation Routes* and Table 1.10.1-1, *New Primary Circulation Routes*). Approximately 85 percent of the existing path network at Descanso Gardens would remain as-is or be resurfaced for ADA accessibilities. The improvements would include the development of paths to enhance internal circulation with the gardens and a service/emergency route. These improvements are consistent with the RTP goals to enhance the transportation safety through design and provide adequate levels of accessibility.

During project construction phases, use of construction equipment is anticipated to add trips for full-time construction workers, but the additional trips would be temporary and not result in degradation of existing capacity of the roads. The effects from construction would be temporary and contained on-site. All heavy equipment would be mobilized at night and would have no conflicts with circulation. Road closures or the reengineering of public roads surrounding the Master Plan area are not expected to occur. It is not anticipated that closures or the relocation of bus stops would occur (if moved, there would be no disruption of service). Bike lanes would not be obstructed, and all construction activities for the proposed project would be conducted within the Master Plan Area boundaries. Sidewalk closures are also not anticipated to occur during construction, and the Master Plan proposes to enhance pedestrian circulation within the Master Plan Area.



SOURCE: Rios Clementi Hale Studios August 14, 2019

FIGURE 2.17-1
Proposed Parking Lot Circulation

During operations, the proposed project is not anticipated to add additional traffic by motorized and nonmotorized transport to existing circulation system, given that the Master Plan involves improvements and upgrades at the same site. Currently, 60 full-time employees, 18 part-time employees and 11 seasonal employees support Descanso Gardens. It is anticipated that the proposed project would allow for 10 additional full-time administrative staff (an approximately 17 percent increase). Therefore, staffing would remain relatively unchanged and not substantially increase. Due to the minimal increase of employees as a result of the proposed project, the VMT and LOS at all intersections would continue to operate at LOS B or better during peak hours from weekday AM and PM. The street capacity would be maintained at existing LOS and VMT since the proposed project would not increase peak day patronage or add additional traffic to the street system. The proposed programming would use the existing Traffic Control Programs and enhance the bus drop-off within the Master Plan Area to facilitate groups. A less than significant impact is expected during normal and peak hours at intersections near Descanso Drive and Verdugo Boulevard since there would be a minimal increase to employees and no change to the existing LOS. The Master Plan Area is well served with paved roads and direct access from SR-2 via Verdugo Road. Additionally, pedestrian accessibility improvements would be implemented to provide more accessibility to the Master Plan Area and would be consistent with the SCAG 2016 RTP/SCS. Therefore, impacts would be less than significant. No further analysis is warranted.

b) Conflict with an applicable congestion management program (CMP), including, but not limited to, level of service standards and travel demand measures, or other standards established by the CMP for designated roads or highways?	☐	☐	☒	☐

The proposed project is expected to result in less than significant impacts to transportation in relation to conflicting with an applicable congestion management program.

The CMP is part of SCAG's integrated approach to improving and optimizing the transportation system to provide for safe and effective management of the regional transportation system using monitoring and maintenance, demand reduction, land-use, operational management strategies and strategic capacity enhancement. Descanso Gardens is well-served by regional and local access and circulation facilities including I-210, SR-2, and County and City streets (see Figure 1.4-3, *Local Vicinity Map*):

- I-210 is a Major Interstate Highway that runs northwest-southeast. The roadway generally offers eight travel lanes, four in each direction. Descanso Gardens can be reached from the east- or west-bound I-210 via Exit 20 and travelling west on Foothill Boulevard and Verdugo Boulevard to Descanso Drive.
- SR-2 is a north-south state highway that generally provides four to five travel lanes in each direction. The highway provides regional access to the Master Plan Area with an exit at Foothill Boulevard and Verdugo Boulevard. Descanso Gardens can be reached from the SR-2 North via Exit 20 and travelling east on Verdugo Boulevard to Descanso Drive.
- Verdugo Boulevard east of Alta Canyada Road is classified as a major roadway in the City General Plan and runs in the east-west direction. The roadway generally offers four travel lanes, two in each direction.
- Descanso Drive is classified as a major roadway in the City General Plan that runs east-west access southwest of the downtown area to Descanso Gardens south of Verdugo Boulevard.
- Alta Canyada Road south of Foothill Boulevard provides north-south access to the west of the downtown area toward Descanso Gardens south of Verdugo Boulevard. It is classified as a major roadway in the City General Plan.

- Foothill Boulevard east of the I-210 interchange is classified as a primary roadway to its terminus at Oak Grove Drive.
- Gould Avenue north of Foothill Boulevard provides north-south access to the east of the downtown area with one travel lane in each direction. It has a half-interchange with the I-210 and is divided by painted median.
- Oak Grove Drive provides north-south access along the eastern edge of the City. It has two travel lanes in each direction with raised and painted medians.
- Berkshire Place between Berkshire Avenue and Oak Grove Drive provides east-west access to the I-210 via a full interchange west of Oak Grove Drive.

The proposed project is not anticipated to add more than 150 trips to a freeway segment during peak hours or 50 trips to CMP intersections because the proposed project would not require substantially more personnel to operate than the existing conditions, and no increase in peak day attendance is planned. Therefore, impacts would be less than significant. No further analysis is warranted.

c) Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)? ☐ ☐ ☐ ☒

The proposed project would result in no impact to transportation in relation to substantially increasing hazards due to a design feature or incompatible use. There are currently two main driveways that provide access to the Master Plan Area to/from Descanso Drive. There would be no compatibility issues with proposed updates to the existing botanic gardens and two parking lots that would require traffic engineering design features or incompatible uses. The proposed project would not change the land use at or surrounding the Master Plan Area; therefore, no hazards related to land use would occur. The proposed project does not include any changes to roads outside of the Master Plan Area. A traffic control plan would be prepared prior to construction as required. Work would occur within the existing facility (see Figure 1.4-3). Therefore, there would be no changes to the existing roadway system and no impact. No further analysis is warranted.

d) Result in inadequate emergency access? ☐ ☐ ☐ ☒

The proposed project would result in no impact to transportation in relation to conflicting with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Existing visitor vehicular access to Descanso Gardens is currently provided via two main access points: the main westerly visitor driveway used for entry and the main easterly driveway used for the exit. Two additional driveways are located west of the main visitor entrance and are used only for maintenance as well as special events for overflow purposes. An enhancement to the existing auxiliary parking lot driveway is proposed that would better serve existing bus access and result in improved circulation. Descanso Drive and Verdugo Boulevard are not included as any major County or City evacuation routes. The Master Plan Area does have an emergency evacuation preparedness plan that was revised in 2018 and would be updated to include the proposed Master Plan elements. Additionally, a traffic control plan would be prepared prior to construction as required, and construction would not impede any emergency response vehicles. The proposed project is anticipated to improve nonmotorized, public, bicycle, and pedestrian facilities by improving pedestrian accessibility. There would be no change to capacity and service related to the public transit routes and capacity as a result of the proposed project. No increase in peak day attendance is planned. Therefore, there would be no impact. No further analysis is warranted.

2.18. TRIBAL CULTURAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to tribal cultural resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. Tribal cultural resources at the Master Plan Area were evaluated with regard to a query of the South Central Coastal Information Center and the Native American Heritage Commission (NAHC) for the USGS 7.5-minute series, Pasadena, topographic quadrangle in which the proposed project is located; review of published and unpublished literature; County General Plan 2035;[1] tribal consultation; and a pedestrian survey, as documented in the *Descanso Gardens Master Plan Cultural Resources Technical Report* (Appendix 9, on file with the County, available on a need-to-know basis only).

REGULATORY FRAMEWORK

Federal

National Historic Preservation Act of 1966

Enacted in 1966, the NHPA (Public Law 89-665; 16 USC 470 et seq.) declared a national policy of historic preservation and instituted a multifaceted program, administered by the National Park Service (NPS), to encourage the achievement of preservation goals at the federal, state, and local levels. The NHPA authorized the expansion and maintenance of the NRHP, established the position of State Historic Preservation Officer (SHPO), provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assisted Native American tribes to preserve their cultural heritage, and created the Advisory Council. Section 106 of the NHPA states that federal agencies with direct or indirect jurisdiction over federally funded, assisted, or licensed undertakings must take into account the effect of the undertaking on any historic property that is included in, or eligible for inclusion in, the NRHP, and that the Advisory Council must be afforded an opportunity to comment, through a process outlined in 36 CFR Part 800 on such undertakings.

The NPS administers two Federal recognition programs, the NRHP and the National Historic Landmarks (NHL) Program.

National Register of Historic Places

Working with State Historic Preservation Offices, Tribal Historic Preservation Offices, and Federal Preservation Offices, the NPS maintains the NRHP. This is the official list of properties that are deemed worthy of preservation. Properties listed in the NRHP tell stories that are important to a local community, the citizens of a specific state, or all Americans. Properties listed in the NRHP may be owned by private individuals, universities, nonprofits, governments, and/or corporations.

The NRHP was established by the NHPA of 1966 as "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design,

[1] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan

setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

Criterion A:	It is associated with events that have made a significant contribution to the broad patterns of our history.
Criterion B:	It is associated with the lives of persons who are significant in our past.
Criterion C:	It embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.
Criterion D:	It has yielded, or may be likely to yield, information important in prehistory or history.

Cemeteries, birthplaces, or graves of historic figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; and properties that are primarily commemorative in nature are not considered eligible for the NRHP unless they satisfy certain conditions. In general, a resource must be at least 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance.

National Historic Landmarks Program

The NPS also administers the NHL Program. Properties designated as NHLs tell important stories related to the history of the nation overall. These properties must also possess a high level of historic integrity. All properties designated NHLs are automatically included in the NRHP.

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act (NAGPRA; Public Law 101-601; 25 USC 3001–3013) also applies if human remains of Native American origin are discovered on federal land. NAGPRA requires federal agencies and federally assisted museums to return "Native American cultural items" to the federally recognized Indian tribes or Native Hawaiian groups with which they are associated. Regulations (43 CFR Part 10) stipulate the following procedures be followed. If Native American human remains are discovered, the following provisions would be followed to comply with regulations:

- Notify, in writing, the responsible federal agency.
- Cease activity in the area of discovery and protect the human remains.
- Certify receipt of the notification.
- Take steps to secure and protect the remains.
- Notify the Native American tribes or tribes likely to be culturally affiliated with the discovered human remains within one working day.
- Initiate consultation with the Native American tribe or tribes in accordance with regulations described in 43 CFR, Part 10, Subpart B, Section 10.5.

STATE

California Health and Safety Code, Section 7050 and Sections 18950 through 18961

Consistent with the provisions of Section 50907.9 of the PRC, Section 7050 of the Health and Safety Code authorizes the NAHC to regulate Native American concerns regarding the excavation and disposition of Native American cultural resources. Among its duties, the NAHC is authorized to resolve disputes relating to the treatment and disposition of Native American human remains and items associated with burials. Upon

notification of the discovery of human remains by a county coroner, the NAHC notifies the Native American group or individual most likely descended from the deceased.

Senate Bill 18 – Traditional Tribal Cultural Places

SB 18, enacted in 2004, requires local governments to consult with Native American groups at the earliest point in the local government land use planning process. The consultation intends to establish a meaningful dialogue regarding potential means to preserve Native American places of prehistoric, archaeological, cultural, spiritual, and ceremonial importance. It allows for tribes to hold conservation easements and for tribal cultural places to be included in open space planning.

Assembly Bill 52

AB 52 creates a new category of environmental resources that must be considered under CEQA: "tribal cultural resources." AB 52 is applicable to a project for which a Notice of Preparation is filed on or after July 2015.

Recognizing that tribes may have expertise with regard to their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. If the tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. Consultation may include discussing the type of environmental review necessary, the significance of tribal cultural resources, the significance of the project's impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe.

The parties must consult in good faith, and consultation is deemed concluded when either the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource (if such a significant effect exists) or when a party concludes that mutual agreement cannot be reached.

LOCAL

Los Angeles County General Plan 2035

The County's cultural resources objective, found in the Conservation and Natural Resources Element of the County General Plan 2035, is to preserve and protect cultural resources including historic, archaeological, and paleontological resources.[2] Under this objective, the County has established the following policies:[3]

Policy C/NR 14.1:	Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
Policy C/NR 14.2:	Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural and paleontological resources.
Policy C/NR 14.4:	Ensure proper notification procedures to Native American tribes in accordance with SB 18 (2004).
Policy C/NR 14.6:	Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

[2] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County 2035 General Plan: Chapter 9: Conservation and Natural Resources Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch9.pdf

[3] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County 2035 General Plan: Chapter 9: Conservation and Natural Resources Element. http://planning.lacounty.gov/assets/upl/project/gp_2035_Chapter9_2014.pdf

City of LCF General Plan

Although the County is not subject to city general plans, City of LCG General Plan information has been provided to inform the County's decision-making process.[4] The Land Use Element and Conservation Element establish two goals, one objective, and seven policies related to tribal cultural resources:

LUE Goal 1: Provide an appropriate mix and balance of land uses that retain and enhance the community's distinctive character and preserve its valuable resources.

- LUE Policy 1.1.7: Foster the preservation, rehabilitation, and maintenance of landmark and historic properties in the City, such as through implementation of the Mills Act.

CNE Goal 3: Encourage the preservation of significant historical resources within the City.

CNE Objective 3.1: Mitigate the loss or compromise of significant archaeological, historical, and other cultural resources within the City.

- CNE Policy 3.1.1: Encourage designation and preservation of local historical resources.
- CNE Policy 3.1.2: Encourage use of the Mills Act as economically feasible.
- CNE Policy 3.1.3: Encourage public awareness of the significance of the area's cultural resources and historic features.
- CNE Policy 3.1.5: Require that archaeological reports (prepared by a certified archaeologist and including a literature search and a site survey) be completed for large, undeveloped parcels for which development is proposed, consistent with CEQA.
- CNE Policy 3.1.6: If any archaeological excavations are recommended on a project site, require that such investigations include Native American consultation prior to project approval.
- CNE Policy 3.1.7: If any significant archaeological sites or artifacts are discovered on a site, require coordination with professional archaeologists, relevant State agencies, and concerned Native American tribes regarding preservation of sites or professional retrieval and preservation of artifacts prior to development of the site.

[4] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

IMPACT ANALYSIS

	Potentially Significant Impact	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or	☐	☒	☐	☐

The proposed project would result in potentially significant impacts to tribal cultural resources regarding causing a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k). Incorporation of mitigation measures would reduce impacts to below the level of significance. The results of the Sacred Lands file search conducted at the NAHC used in conjunction with AB 52 consultation efforts indicate that the Master Plan Area is sensitive for Tribal Cultural Resources (TCR) as defined in PRC Section 21074. Tribal affiliation with the lands on which the proposed project is located derives from an ancestral degree of kinship and, as such, areas of sensitivity within these ancestral lands are of particular significance to the California Native American Tribe. Impacts would be reduced to below the level of significance with implementation of mitigation measure TRIBAL-1.

Mitigation Measure TRIBAL-1: *Tribal Resources – Avoidance and Monitoring.* Prior to the initiation of ground-disturbing activities, DPR shall review the construction plans to ensure that any known TCRs that are required to be avoided have been marked as "off-limits" areas for construction and construction staging. DPR shall require monitoring of all ground-disturbing activities by a Native American monitor within 60 feet of a known TCR. In addition, consultation shall be undertaken with the Native American local Tribal contacts designated by the NAHC and the Tribe to determine if a Native American monitor shall be present during all or a portion of the ground-disturbing activities within additional areas that are sensitive for TCRs.

In the event that previously unknown TCRs are encountered during construction, the resources shall either be left *in situ* and avoided through redesign, or the resources shall be salvaged, recorded, and reposited at the Natural History Museum of Los Angeles County (NHM) or other repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan.[5] The cultural resource management plan will include further consultation with the Tribe. Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate adverse

[5] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated, and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

effects to cultural resources eligible or listed under Section 106 Criterion D/CRHR Criterion 4, as it preserves important information that will otherwise be lost.

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

The proposed project would result in potentially significant impacts to tribal cultural resources regarding causing a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Incorporation of mitigation measures would reduce impacts to below the level of significance. In accordance with AB 52, invitations to consult for the project were sent to the California Native American tribes traditionally or culturally affiliated with the geographic area of the proposed project as listed with the NAHC. Subsequent attempts were made to notify the tribes who had not responded within a reasonable length of time. One affirmative response to consult was received by the Gabrieleño Band of Mission Indians - Kizh Nation, and consultation with the Tribe is ongoing. The Master Plan Area, in consultation with the Tribe, has been determined to be sensitive for TCRs as defined in PRC Section 21074. Tribal affiliation with the lands on which the project is located derives from an ancestral degree of kinship, which is a higher degree of association than a group traditionally or culturally linked. Additionally, the Master Plan Area is located in close proximity to other sensitive areas that may hold significance for the tribe as indicated by the results of the Sacred Lands File search. In accordance with PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. Impacts would be reduced to below the level of significance with implementation of mitigation measures TRIBAL-1, TRIBAL-2, AND TRIBAL-3 for projects carried out under the Master Plan.

Mitigation Measure TRIBAL-2: *Pre-Construction Surveys.* At the time that any construction activity is proposed for development that would require ground-disturbing activities in soils that have been predominantly *in situ* during the past 50 years, records and archival information shall be reviewed to determine if there are any recorded TCRs as defined by AB 52 in the project footprint.[6] At a minimum, the records and archival review shall include a search of the South Central Coastal Information Center if more than five years have passed since the previous records search, a request for Sacred Lands File from the NAHC, and a request for information regarding TCRs from the Native American local Tribal contacts designated by NAHC and the Tribe. The appropriate course of action shall be undertaken in light of the results of the records search:

(A) Where the project study area has been subject to a Phase I Walkover Survey within two years of the proposed activity and no TCRs are known within the project footprint, work shall proceed per the provision of Mitigation Measure TRIBAL-1.

(B) Where all or a portion of the project footprint has not been surveyed for cultural resources within two years of a proposed ground-disturbing activity, a qualified archaeologist who meets the Secretary of the Interior's *Professional Qualification Standards* for Archaeology and shall conduct a Phase I Walkover

[6] Fifty years or older is the standard cutoff age for "historic" age resources.

Survey to ascertain the presence or absence of TCRs, as defined in Section 15064.5(a) of the CEQA Guidelines.

a. If the survey and record searches determine no potential TCRs, then the work shall proceed consistent with the provisions of Mitigation Measure TRIBAL-1.

b. If the survey determines potential TCRs, then one of two courses of action shall be employed:

   i. Where avoidance is feasible, the construction shall avoid the potentially significant TCRs, and the work shall then proceed consistent with the provisions of Mitigation Measure TRIBAL-1. The project area shall be surveyed by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior. DPR shall require monitoring of all ground-disturbing activities by a Native American monitor within 60 feet of a known TCR.[7] In addition, consultation shall be undertaken with the Native American local Tribal contacts designated by the Native American Heritage Commission and the Tribe to determine if a Native American monitor shall be present during all or a portion of the ground-disturbing activities within additional areas that are sensitive for TCRs.

   ii. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior to determine the significance of the cultural resource. If the Phase II investigation identifies a unique/eligible TCR within the area proposed for ground-disturbing work, the County shall in consultation with the Tribe, determine whether to avoid the resource through redesign or to proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of Mitigation Measure TRIBAL-1.

Mitigation Measure TRIBAL-3: *Regulatory Requirements – Human Remains*. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

If the County Coroner determines that the remains are or are believed to be Native American, s/he shall notify the NAHC in Sacramento within 24 hours. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC shall immediately notify the person(s) it believes to be the most likely descendant (MLD) of the deceased Native American. The descendants shall complete their inspection and make a recommendation within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with DPR, the disposition of the human remains. The MLD's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If DPR rejects the MLD's recommendations, the agency shall rebury the remains with appropriate dignity on the property within a time frame agreed upon between the County and the MLD's in a location that will not be subject to further subsurface disturbance (14 California Code of Regulations §15064.5(e)).

[7] County of Los Angeles Department of Parks and Recreation. 2018. Parks and Recreation Facilities Project Cultural Resources Management Plan.

2.19. UTILITIES AND SERVICE SYSTEMS

This analysis is undertaken to determine if the proposed project may have a significant impact to utilities and service systems, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. A water quality technical report was prepared evaluating the proposed project (Appendix 11, *Descanso Gardens Water Quality Technical Report*). Utilities and service systems were evaluated with regard to the County General Plan 2035[1] and the City of LCF General Plan.[2]

REGULATORY FRAMEWORK

Federal

Safe Drinking Water Act (SDWA)

The SDWA (Public Law 93–523) regulates the quality of drinking water in the United States. The law requires actions to protect drinking water and its sources—rivers, lakes, reservoirs, springs, and groundwater wells—and applies to public water systems serving 25 or more people. It authorizes the EPA to set national health-based standards for drinking water to protect against both naturally occurring and man-made contaminants. In addition, it oversees the states, municipalities, and water suppliers that implement the standards.

EPA standards are developed as a Maximum Contaminant Level (MCL) for each chemical or microbe. The MCL is the concentration that is not anticipated to produce adverse health effects after a lifetime of exposure, based upon toxicity data and risk assessment principles. The EPA's goal in setting MCLs is to assure that even small violations for a period of time do not pose significant risk to the public's health over the long run. National Primary Drinking Water Regulations (NPDWRs, or primary standards) are legally enforceable standards that limit the levels of contaminants in drinking water supplied by public water systems.

Secondary standards are nonenforceable guidelines regulating contaminants that may cause cosmetic effects (such as skin or tooth discoloration) or aesthetic effects (such as taste, odor, or color) in drinking water. The U.S. EPA recommends secondary standards to water systems but does not require systems to comply. However, states may choose to adopt them as enforceable standards.

In July 2014, implementation of the SDWA was transferred from the California Department of Public Health (DPH) to State Water Resources Control Board, Division of Drinking Water (DDW). DDW now oversees the operational permitting and regulatory oversight of public water systems. DDW requires public water systems to perform routine monitoring for regulated contaminants that may be present in their drinking water supply. To meet water quality standards and comply with regulations, a water system with a contaminant exceeding an MCL must notify the public and remove the source from service or initiate a process and schedule to install treatment for removing the contaminant. Health violations occur when the contaminant amount exceeds the MCL or when water is not treated properly. In California, compliance is usually determined at the wellhead or the surface water intake. Monitoring violations involve failure to conduct or to report in a timely fashion the results of required monitoring.

[1] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035.

[2] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

In addition, DDW conducts water source assessments, oversees water recycling projects, permits water treatment devices, certifies water system employees, promotes water system security, and administers grants under the State Revolving Fund and State bonds for water system improvements.[3]

Resource Conservation and Recovery Act (RCRA)

The RCRA gives EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.[4]

State

Construction General Permit (CGP) for Stormwater Discharges

Pursuant to the CWA Section 402(p), requiring regulations for permitting certain stormwater discharges, the SWRCB issued a statewide general permit for stormwater discharges from construction sites (Water Quality Order 2009-0009-DWQ, SWRCB NPDES General Permit for Stormwater Discharges Associated with Construction Activity [NPDES No. CAR000002]; adopted by the SWRCB on September 2, 2009).

Under the CGP, discharges of stormwater from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for stormwater discharges or to be covered by the Construction General Permit. Coverage under the CGP is accomplished by completing a construction site risk assessment to determine appropriate coverage level; preparing a SWPPP, including site maps, a Construction Site Monitoring Program, and sediment basin design calculations; for projects located outside of a Phase I or Phase II permit area, completing a postconstruction water balance calculation for hydromodification controls; and completing a Notice of Intent. All of these documents must be electronically submitted to the SWRCB for General Permit coverage. The primary objective of the SWPPP is to identify and apply proper construction, implementation, and maintenance of BMPs to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site during construction. The SWPPP also outlines the monitoring and sampling program required for the construction site to verify compliance with discharge Numeric Action Levels (NALs) set by the Construction General Permit.[5]

MS4 Permit Planning and Land Development Program Requirements

In 2012, the LA-RWQCB issued a revised NPDES Permit and Waste Discharge Requirements (Order No. R4-2012-0175; NPDES Permit No. CAS004001) under the CWA and the Porter-Cologne Act for discharges of urban runoff in public storm drains in Los Angeles County. The Permittees are the County Flood Control District, the County, and 84 incorporated cities within the coastal watersheds of the County. This permit regulates stormwater discharges from municipal separate storm sewer systems (MS4s) in the project area. The MS4 Permit details specific requirements for new development and significant redevelopment projects, including selection, sizing, and design criteria for LID, treatment control, and hydromodification control BMPs.[6]

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[3] State Water Resources Control Board (SWRCB). Adopted December 6, 2017. Frequently Asked Questions: Public Water System Data on the Human Right to Water Portal. http://www.waterboards.ca.gov/water_is sues/programs/hr2w/docs/general/faqs.pdf

[4] U.S. Environmental Protection Agency. Adopted August 15, 2019. Summary of the Resource Conservation and Recovery Act, 42 U.S.C. §6901 et seq. (1976)

[5] U.S. Environmental Protection Agency. Adopted 21 January 2005. NPDES General Permit for Storm Water Discharges from Construction Activities - Fact Sheet. https://www3.epa.gov/npdes/pubs/cgp2003_fs.pdf

[6] State Water Resources Control Board. Adopted April 4, 2012. Waste Discharge Requirements for Municipal Separate Storm Sewer System

SB X7-6, Groundwater

Passed into law in November 2009, SB X7-6, Groundwater (Section 12924 of the Water Code) required statewide collection and publication of groundwater elevations for the first time in California's history. SB X7-6 directs local agencies, with the assistance of DWR, to monitor and report the elevation of their groundwater basins to help manage the resource better during both average water years and drought conditions. As of December 2, 2013, DWR received monitoring notifications for more than 395 basins and subbasins. DWR has designated 124 monitoring entities who are now monitoring and reporting groundwater elevations for 152 basins and subbasins.[7]

Solid Waste: Diversion Rule (AB 341)

Under commercial recycling law (Chapter 476, Statutes of 2011), AB 341 directed the California Department of Resources Recycling and Recovery (CalRecycle) to develop and adopt regulations for mandatory commercial recycling. CalRecycle initiated formal rulemaking with a 45-day comment period beginning October 28, 2011. The final regulation was approved by the Office of Administrative Law on May 7, 2012. AB 341 declared a policy goal of the state that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020.[8]

California Water Action Plan

The California Water Action Plan—released by Governor Brown in January 2014—is a roadmap for the first five years, 2014 to 2019, of the state's journey toward sustainable water management. The California Water Action Plan has been developed to meet three broad objectives: more reliable water supplies; the restoration of important species and habitat; and a more resilient, sustainably managed water resources system (water supply, water quality, flood protection, and environment) that can better withstand inevitable and unforeseen pressures in the coming decades.

The California Water Plan, last updated in 2013, provides a collaborative planning framework for elected officials, agencies, tribes, water and resource managers, businesses, academia, stakeholders, and the public to develop findings and recommendations and make informed decisions for California's water future. The plan, updated every five years, presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental water demands for a range of plausible future scenarios. The California Water Plan also evaluates different combinations of regional and statewide resource management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. The evaluations and assessments performed for the plan help identify effective actions and policies for meeting California's resource management objectives in the near term and for several decades to come.[9]

(MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4. http://www.waterboards.ca.gov/

[7] California Department of Water Resources. Accessed November 8, 2019. California Water Today, Volume 1 – The Strategic Plan. http://www.waterplan.water.ca.gov/docs/cwpu2013/Final/04_Vol1_Ch03_Ca_Water_Today.pdf

[8] California Legislative Information. Accessed November 8, 2019. AB341 Solid Waste Diversion. http://www.leginfo.ca.gov/pub/11-12/bill/asm/ab_0301-0350/ab_341_bill_20111006_chaptered.html

[9] California Department of Water Resources. Accessed November 8, 2019. California Water Today, Volume 1 – The Strategic Plan. http://www.waterplan.water.ca.gov/docs/cwpu2013/Final/04_Vol1_Ch03_Ca_Water_Today.pdf

California Integrated Waste Management Act

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible. Specifically, the act requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000. The act also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to maintain the 50 percent diversion specified by AB 939 by the year 2000.

AB 939 further requires each city to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element (SRRE) to describe how it would reach the goals. The SRRE contains programs and policies for fulfillment of the goals of the act, include the above-noted diversion goals, and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristic of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to the County Integrated Waste Management Board to update it on their progress toward the AB 939 goals.[10]

California Solid Waste Reuse and Recycling Act

The California Solid Waste Reuse and Recycling Act of 1991 (AB 2176) was enacted to assist local jurisdictions with accomplishing the goals of AB 939. In accordance with AB 2176, any development project that has submitted an application for a building permit must include adequate, accessible areas for the collection and loading of recyclable materials. Furthermore, the areas to be utilized must be adequate in capacity, number, and distribution to serve the proposed project. Moreover, the collection areas are to be located as close to existing exterior refuse collection areas as possible.[11]

Local

In 2008, Los Angeles County adopted the Green Building Program, which included the Drought-Tolerant Landscaping, Green Building, and Low Impact Development Ordinances and created an Implementation Task Force and Technical Manual. In 2010, in response to the mandates set forth in CALGreen, the County Board of Supervisors adopted the Los Angeles County Green Building Standards Code (Title 31).[12]

Los Angeles County LID Ordinance and Manual

Chapter 12.84 of the Los Angeles County Municipal Code[13] requires the use of LID BMPs in development projects. This chapter applies to all development within the unincorporated area of the County after January 1, 2009, except for those developments that filed a complete discretionary or nondiscretionary permit application with the County Department of Regional Planning, Public Works, or any County-controlled design control board, prior to January 1, 2009. Although this ordinance does not apply directly to the Project, the City of LCF Municipal Code has adopted the County's code by reference.

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[10] California Legislative Information. Accessed November 8, 2019. AB-939 Administrative Procedure Act: Major Regulations. https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB939

[11] California Legislative Information. Accessed November 8, 2019. California Solid Waste Reuse and Recycling Access Act of 1991 (PRC 42900-42901). https://leginfo.legislature.ca.gov/faces/codes_displayexpan dedbranch.xhtml?tocCode=PRC&division=30.&title=&part=3.&chapter=18.&article=

[12] County of Los Angeles Regional Planning. Assessed November 8, 2019. Green Building Program. http://planning.lacounty.gov/green

[13] Chapter 12.84 was amended in September 2013 to conform to the requirements of the revised Los Angeles County MS4 Permit (Order No. R4-2012-0175).

Chapter 12.84 requires that applicable development projects

- Mimic undeveloped stormwater runoff rates and volumes in any storm event up to and including the "Capital Flood" event, as defined by the County of Los Angeles Department of Public Works (DPW);
- Prevent pollutants of concern from leaving the development site in stormwater as the result of storms, up to and including a Water Quality Design Storm Event; and
- Minimize hydromodification impacts to natural drainage systems.

To meet these standards, applicable development projects shall comply with the following:

1. The project shall retain one hundred percent of the Stormwater Quality Design Volume ("SWQDV")[14] on-site, through infiltration, evapotranspiration, rainfall harvest and use, or a combination thereof, unless the Director of Public Works determines that it would be technically infeasible to do so;
2. If the Director determines that it would be technically infeasible to retain one hundred percent of the SWQDV on-site, the project shall comply with one of the following alternative compliance measures:
   a. The project shall provide for on-site biofiltration of one and one-half (1.5) times the portion of the SWQDV that is not retained on-site;
   b. The project shall include infiltration or bioretention BMPs to intercept the portion of the SWQDV that is not retained on-site at an offsite location, as approved by the Director of Public Works. The project shall also provide for treatment of the portion of the SWQDV discharged from the project site, as approved by the Director of Public Works;
   c. The project shall provide for the replenishment of groundwater supplies that have a designated beneficial use in the Basin Plan;
      i. Groundwater replenishment projects shall include infiltration or bioretention BMPs to intercept the portion of the SWQDV that is not retained on-site at an offsite location, as approved by the Director of Public Works;
      ii. Groundwater replenishment projects shall also provide for treatment of the portion of the SWQDV discharged from the project site, as approved by the Director of Public Works;
   d. The project shall include infiltration, bioretention, or rainfall harvest and use BMPs to retrofit an existing development with similar land uses as the project to intercept the portion of the SWQDV that is not retained on-site; or
   e. The County, independently or in conjunction with one or more cities, may apply to the Regional Water Board for approval of a regional or sub-regional stormwater mitigation program to substitute in part or wholly for the provisions of this chapter for the area covered by the regional or sub-regional stormwater mitigation program. If the Regional Water Board approves the program, provisions of the program shall apply in lieu of any conflicting provisions of this chapter.

In addition, development projects that consist of five or more residential units, or nonresidential development projects, shall comply with the following:

- The excess volume (ΔV, defined as the post-developed runoff volume minus the pre-developed runoff volume for the 85th percentile storm event) from each lot upon which such development is occurring shall be infiltrated at the lot level, or in the alternative, the excess volume from the entire development site, including streets and public right-of-way, shall be infiltrated in sub-regional facilities. The tributary area of a sub-regional facility shall be limited to five acres but may be exceeded with approval of the

[14] The County's HydroCalc Calculator calculates runoff rates and volumes from the water quality storm. See County of Los Angeles Department of Public Works Low Impact Development (LID). http://dpw.lacounty.gov/wmd/dsp_LowImpactDevelopment.cfm.

Director of Public Works. When the Director of Public Works determines that infiltration of all excess volume is not technically feasible, on-site storage, reuse, or other water conservation uses of the excess volume is required and shall be implemented as authorized by the Director of Public Works and the runoff from the SWQDV must be treated to the satisfaction of the Director of Public Works before discharge.

DPW prepared the 2014 LID Standards Manual to comply with the revised Los Angeles County MS4 Permit (Order No. R4-2012-0175).[15] The LID Standards Manual outlines stormwater runoff quantity and quality control development principles, technologies, and design standards for achieving the LID Standards of Chapter 12.84. The LID Standards Manual requires that Designated Projects prioritize the selection of BMPs to retain 100 percent of the SWQDV on-site through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof, unless it is demonstrated that it is technically infeasible to do so. The Manual states that BMPs should be implemented in the following order of preference:

- Infiltration and/or bioretention
- Stormwater runoff harvest and use

Designated projects that are unable to fully retain the SWQDV on-site through retention-based stormwater quality control measures must implement alternative compliance measures (e.g., on-site biofiltration, off-site groundwater replenishment, off-site infiltration and/or bioretention, and off-site retrofit). Prior to off-site mitigation, the portion of the SWQDV that cannot be reliably retained on-site must be treated to meet effluent quality standards.

The LID Standards Manual outlines site conditions where infiltration may be technically infeasible:

- Locations where the corrected in-situ infiltration rate is less than 0.3 inches per hour, as determined according to the most recent Geotechnical and Materials Engineering Division (GMED) Policy GS 200.1, and it is not technically feasible to amend the in-situ soils to attain an infiltration rate necessary to achieve reliable performance of retention-based stormwater quality control measures for the SWQDV on-site.
- Locations where seasonal high groundwater is within 10 feet of the surface.
- Within 100 feet of a groundwater well used for drinking water.
- Brownfield development sites or other locations where pollutant mobilization is a documented concern.
- Locations with potential geotechnical hazards.
- Smart growth and infill or redevelopment locations where the density and/or nature of the project would create significant difficulty for compliance with the onsite retention requirement;
- Locations where infiltration may cause adverse impacts to biological resources.
- Locations where infiltration may cause health and safety concerns.

[15] The LID Standards Manual is an update to and compilation of the following documents: (1) Development Planning for Storm Water Management: A Manual for the Standard Urban Storm Water Mitigation Plan (SUSMP Manual, September 2002); (2) Technical Manual for Stormwater Best Management Practices in the County of Los Angeles (2004 Design Manual, February 2004); (3) Stormwater Best Management Practice Design and Maintenance Manual (2010) Design Manual, August 2010); and (4) Low Impact Development Standards Manual (2009 LID Manual, January 2009). Additionally, the LID Standards Manual supersedes the water quality portions of the following ordinances and policies: (1) Water Quality section of the Los Angeles County Hydrology Manual; (2) Interim Drainage Policy for Quartz Hill; (3) Acton Interim Drainage Policy and Guidelines; (4) Antelope Valley Interim Drainage Policy; (5) Financing the Cost to Maintain Standard Urban Stormwater Mitigation Plan Devices/Systems; (6) Permanent Standard Urban Storm Mitigation Plan Devices for No Fee Miscellaneous Transfer Drains, Small Drainage Systems, and Storm Drain Connection Permits; (7) Interim Peak Flow Runoff Criteria for New Development; 8) Policy for New Percolation Basin Testing, Design, and Maintenance; and (8) Clarification on the Policy for Financing the Cost to Maintain Standard Urban Stormwater Mitigation Plan (SUSMP) Devices/Systems Constructed by New Development or Other Agencies.

The LID Standards Manual also outlines site conditions where stormwater runoff harvest and use may be technically infeasible:

- Projects that would not provide sufficient irrigation or (where permitted) domestic grey water demand for use of stored stormwater runoff due to limited landscaping or extensive use of low water use plant palettes in landscaped areas.
- Projects that are required to use recycled water for landscape irrigation.
- Projects in which the harvest and use of stormwater runoff would conflict with local, state, or federal ordinances or building codes.
- Locations where storage facilities may cause potential geotechnical hazards as outlined in the geotechnical report.
- Locations where storage facilities may cause health and safety concerns.

Water Quality Control Plan for the Los Angeles Region

The LA-RWQCB has prepared a Water Quality Control Plan for the Los Angeles Region (Basin Plan), which encompasses all coastal drainages flowing to the Pacific Ocean between Rincon Point (on the coast of western Ventura County) and the eastern Los Angeles County line, as well as the drainages of five coastal islands (Anacapa, San Nicolas, Santa Barbara, Santa Catalina, and San Clemente). In addition, the Los Angeles region includes all coastal waters within three miles of the continental and island coastlines. As the eastern boundary, formed by the Los Angeles County line, departs somewhat from the hydrologic divide, the Los Angeles and Santa Ana regions share jurisdiction over watersheds along their common border. The first essentially complete Basin Plan, which was established under the requirements of California's 1969 Porter-Cologne Water Quality Control Act (Section 13000 [Water Quality] *et seq*. of the California Water Code), was adopted in 1975 and revised in 1984. The latest version was adopted in 1994.

The Basin Plan assigned beneficial uses to surface and groundwater such as municipal water supply and water-contact recreation to all waters in the basin. It also set water quality objectives, subject to approval by the EPA, intended to protect designated beneficial uses. These objectives apply to specific parameters (numeric objectives) and general characteristics of the water body (narrative objectives). An example of a narrative objective is the requirement that all waters must remain free of toxic substances in concentrations producing detrimental effects upon aquatic organisms. Numeric objectives specify concentrations of pollutants that are not to be exceeded in ambient waters of the basin.

The LA-RWQCB is involved is the regulation of a number of activities that are relevant to the consideration of the proposed project:

- Prepares, monitors compliance with, and enforces Waste Discharge Requirements, including NPDES permits.
- Implements and enforces local stormwater control efforts.
- Enforces water quality laws, regulations, and waste discharge requirements.
- General Construction Activity Stormwater Discharges.
- Stormwater discharges that are composed entirely of runoff from qualifying construction activities may require regulation under the General Construction Activity Storm Water Permit issued by the SWRCB. Construction activities that qualify include clearing, grading, excavation, reconstruction, and

dredge-and-fill activities that result in the disturbance of at least one acre and less than five acres of total land area.[16]

City of LCF Municipal Code

The City of LCF has adopted Chapter 12.84 of the Los Angeles County Code (LID Standards) as part of their Municipal Code 9.20.

City of LCF Municipal Code 9.21, "Stormwater Management," includes the following requirements that are applicable to the proposed project:

- Any person engaged in activities which will or may result in pollutants entering the city's MS4 shall undertake all practicable measures to eliminate such pollutants.
- Sidewalks shall be maintained free of dirt or litter to the maximum extent practicable. Sweepings from the sidewalk shall not be swept or otherwise made or allowed to go into the gutter or roadway but shall be disposed of in receptacles maintained on the property as required for the disposal of refuse.
- Persons owning or operating a parking lot, automotive service facility, paved private street or road or similar structure, shall clean these structures as frequently and thoroughly as practicable in a manner that eliminates the discharge of pollutants to the MS4 to the maximum extent practicable.

Code 9.21 also defines prohibited discharges as any material other than stormwater, with exemptions including but not limited to water line flushing subject to a written agreement with the city; landscape irrigation and lawn watering using potable water; noncommercial washing of vehicles by a non-profit organization, which has provided written notice to the city at least five business days prior to the event, with application of appropriate BMPs; flows from riparian habitats and wetlands; and other sources.

Additionally, Code 9.21 requires compliance with the following:

- Runoff of water used for irrigation purposes shall be minimized to the maximum extent practicable. Runoff of water from the permitted washing down of paved areas shall be minimized to the maximum extent practicable.
- Storage of Materials, Machinery and Equipment:
- Objects, such as motor vehicle parts, containing grease, oil or other hazardous substances, and unsealed receptacles containing hazardous materials, shall not be stored in areas susceptible to runoff.
- Any machinery or equipment which is to be repaired or maintained in areas susceptible to runoff shall be placed on a pad of absorbent material to contain leaks, spills or small discharges.
- The discharge of graywater to street or storm drain is prohibited.

Code 9.21 requires maintenance of structural BMPs, stating that structural BMPs required by the city, county of Los Angeles, or state or federal agency shall be properly operated and maintained, consistent with the approved Standard Urban Stormwater Mitigation Plan (SUSMP), low impact development plan, or other equivalent plan or program, or otherwise determined by the director. Records and documentation of such maintenance shall be provided to the director upon reasonable request.

The code also describes stormwater inspections, which may occur by the director upon seventy-two hour written notice.

[16] State Water Resource Control Board. Adopted January 23, 2013. 2009-0009-DWQ Construction General Permit. https://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/constpermits/wqo_2009_0009_complete.pdf

Chapter 4.23 of the City of LCF Municipal Code covers water efficient landscaping. This chapter requires that applicant shall hire a landscape architect to prepare and self-certify landscaping plans. Additionally, project applicants must complete a water efficient landscape worksheet to identify the maximum applied water allowance for the project, and conduct water budget calculations. Code 4.23 also requires an irrigation design plan certified by licensed landscape architect, certified irrigation designer, licensed landscape contractor, or any other person authorized to design an irrigation system. Code 4.23 specifies that recycled water systems shall be designed and operated in accordance with all applicable local and state laws.[17]

City of LCF General Plan

Although the County is not subject to city general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process.

CNE GOAL 1: Preserve and conserve natural resources in the community.

- CNE Policy 1.2.2: Require the implementation of Low Impact Development stormwater management techniques in new or rehabilitated commercial or residential projects. Actions include:
  a) Minimizing pollutant loading and changes in hydrology; ensuring that post-development runoff rates from a site do not negatively impact downstream erosion and stream habitat; minimizing the amount of stormwater guided to impermeable surfaces; and maximizing percolation of stormwater into the ground where appropriate.
  b) Preserving wetlands, riparian corridors, and buffer zones.
  c) Establishing reasonable limits on the clearing of vegetation from a project site.
  d) Requiring incorporation of structural and non-structural best management practices (BMPs) to mitigate projected increases in pollutant loads and flows, such as the use of tree boxes, retention basins, bioswales, rain gardens, and roof gardens; to minimize impacts on the groundwater basins; and to allow stormwater to percolate into the groundwater basins.
- CNE Policy 1.2.6: Develop best management practices for water quality and watershed enhancements and encourage their implementation voluntarily and through review of development applications.
- CNE Policy 1.2.7: Improve water quality through public education programs.
- CNE Policy 1.2.8: Continue to implement upgrades to the local drainage system, including storm water collection and curbs and gutters and other appropriate measures.
- CNE Policy 1.2.9: Require review of all development projects that have a potential for causing a deterioration of groundwater quality beyond standards imposed by the State Water Resources Control Board to assure compliance with State and federal standards. Methods should be developed to control activities that have detrimental impacts on groundwater quality.
- CNE Policy 1.2.10: Prior to issuance of permits on existing vacant lands designated for residential and mixed-use uses, require confirmation that a wastewater treatment facility (sewer or septic) will treat the wastewater generated by the new development and the development will connect to that facility.
- CNE Policy 1.4.1: Comply with the Integrated Waste Management Act by maintaining an up-to-date Source Reduction and Recycling Element and Non-Disposal Facility Element.
- CNE Policy 1.4.3: Consider creating a mandatory green waste collection and recycling program for multi-family residences and commercial and retail operations.[18]

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[17] City of La Cañada Flintridge. Assessed November 8, 2019. Local Hazard Mitigation Plan. https://cityoflcf.org/wp-content/uploads/2019/08/LHMP_Final_8-7-19.pdf

[18] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. Chapter 2: Land Use Element. https://cityoflcf.org/planning/

City of Glendale Ordinance No. 4780

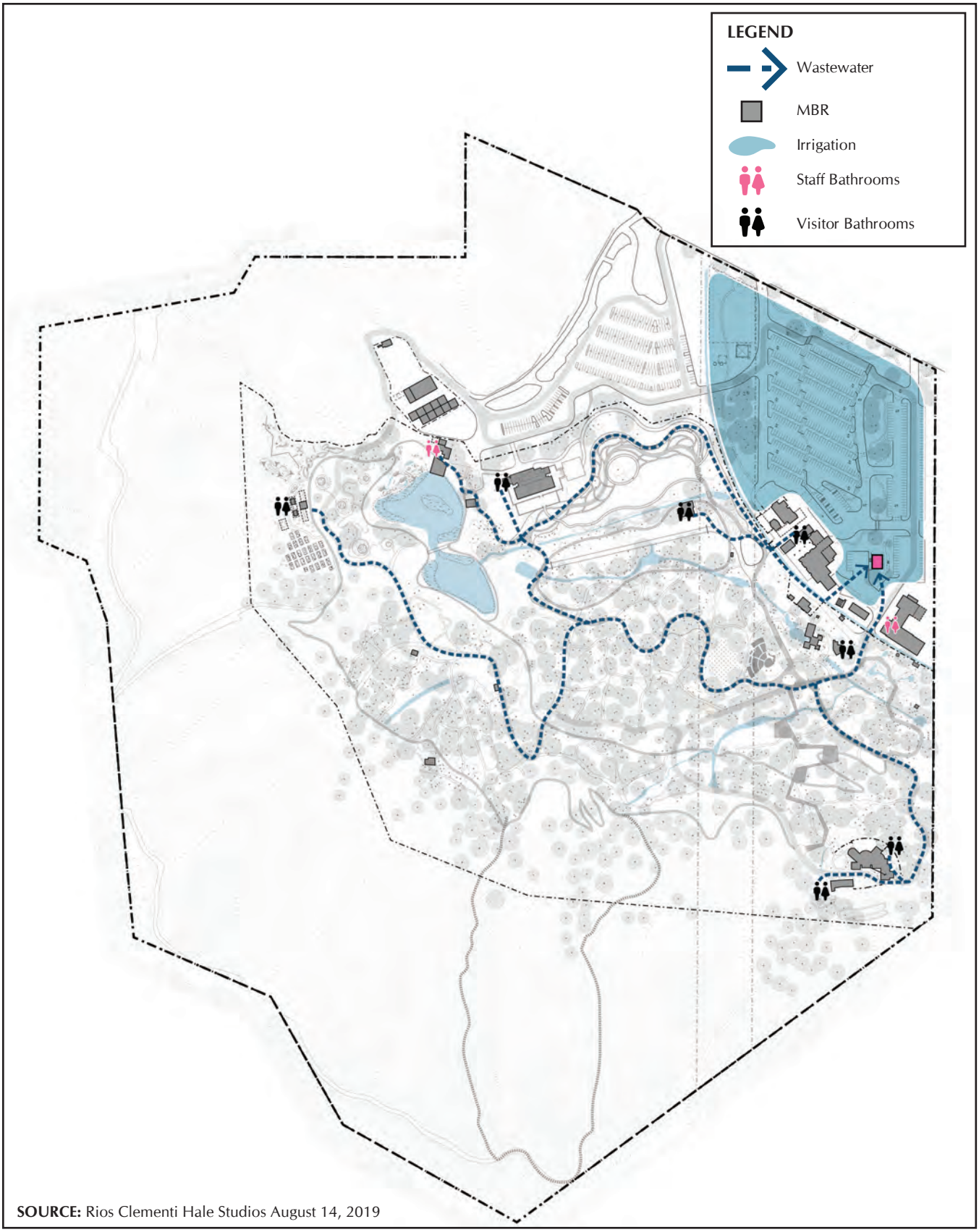
Scholl Canyon Landfill is co-owned by the City of Glendale and the County. Ordinance No. 4780 passed by the City of Glendale limits disposal at the Scholl Canyon Landfill to solid wastes generated within the incorporated cities of Glendale, LCF, Pasadena, South Pasadena, San Marino, Sierra Madre; the Los Angeles County unincorporated communities known as Altadena, La Crescenta, Montrose; the unincorporated area bordered by the cities of San Gabriel, Rosemead, Temple City, Arcadia, and Pasadena; the unincorporated area immediately to the north of Arcadia and Pasadena; and the unincorporated area immediately to the north of the City of San Marino bordered by the City of Pasadena on the west, north and east sides.[19]

IMPACT ANALYSIS

	Potentially Significant Impact	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water draining, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to utilities and service systems in relation to construction of new water or wastewater treatment facilities or expansion of facilities, causing significant environmental effects. The wastewater generated at the proposed project property is serviced by a contractor for the Guild, a nonprofit agency that maintains four separate wastewater treatment systems that service the Master Plan Area. The primary wastewater treatment system is located to the east of the Van de Kamp area, adjacent to the main parking lot and main entry gate of the site. In early 2019, the County of Los Angeles approved the installation of an upgraded wastewater system, including an MBR and emergency electrical generator for the MBR to provide wastewater treatment on-site using the activated sludge process. The MBR is being installed near the existing septic tanks between the existing Van de Kamp Hall back-of-house area and the existing Harvest Garden. The previously approved MBR is not included in the scope of the proposed project, but it may be noted that the proposed location of the MBR is located sufficiently far from surface water, and siting would be based on final design with input from geotechnical engineers (see Appendix 11; Figure 2.19-1, *Master Plan Diagram: Wastewater*). The proposed project would involve the installation of connections to the MBR once completed, for all existing and new restrooms as part of the proposed project (see Table 1.10.3-1, *New Buildings and Structures*).

[19] Sanitation Districts of Los Angeles County. Accessed November 13, 2019. Scholl Canyon Landfill. https://www.lacsd.org/services/solidwaste/landfills/schollcanyon.asp



SOURCE: Rios Clementi Hale Studios August 14, 2019

FIGURE 2.19-1
Master Plan Diagram: Wastewater

All existing restrooms would be improved for function and aesthetics, and new restrooms would be installed in the developed portions of the gardens, including staff restrooms at the Administrative Headquarters and Boddy House and public restrooms at Nature Discovery Zone, Rose Garden, and Minka. In addition, all existing on-site septic systems would be decommissioned. Installation of the previously approved MBR and installation of all connections and septic system decommission would comply with wastewater discharge effluent limitations that are protective of water quality and beneficial uses in the proposed project's receiving waters and would not result in the impairment of surface or groundwater quality. In addition, installation of the MBR wastewater treatment system would upgrade the wastewater system within the Master Plan Area relative to water protection and efficiency over the current on-site septic systems, which rely on vadose zone treatment to remove constituents. The MBR wastewater treatment system would provide biological treatment prior to discharge. Furthermore, while the installation of the MBR would upgrade wastewater treatment within the Master Plan Area, it would not result in an expansion of use. The quantity of wastewater produced is not anticipated to increase due to the proposed project. On this basis, the impact from on-site wastewater treatment systems would be less than significant.

The proposed project would involve construction of replacement irrigation lines and expanded electric lines, including permanent power hookups below the Gardens Loop to support existing and future programming without temporary generators, expanding on-site energy production to expand Descanso Gardens' use of renewable energy sources, new lighting along pathways and in event areas to support and enable nighttime programming, and consideration of flexible lighting design for installations (such as Enchanted) and programmable lighting elements that can be used by lighting designers to create special effects (see Figure 1.10.1-1, *New Primary Circulation Routes*). The proposed Master Plan would include stormwater capture and treatment improvements to enhance the ecological performance of main water features and optimize the lake for stormwater capture for non-potable use. These features include harvesting stormwater from Winery Creek Channel for treatment in the Marsh Garden, installed wetlands around the Lake edge, a bioswale in the picnic grove, and recirculation of water using pumps from the Marsh Garden to the Lake in the winter. The proposed project would involve installation of a treatment wetland in the new Marsh Garden that would function as a stormwater detention garden. Natural gas connections may be required to support the new outdoor prep kitchen behind Boddy Lodge, the new Meeting Pavilion in the Rose Garden, and the outdoor kitchen in the Nature Discovery Garden (west of the existing Oak Woodland). As the construction of the Gardens Loop would provide support for the utility expansions, the facilities would be installed underground, and the footprint of the facilities would be limited to the Gardens Loop and connections to the new buildings.

The NPDES General Construction Permit (CGP) requires that all developers of land where construction activities will occur over more than one (1) acre develop and implement a project-specific Storm Water Pollution Prevention Plan SWPPP, which specifies Best Management Practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards and (2) eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation. Implementation of a project specific SWPPP as required by the CGP would incorporate BMPs developed to support the construction of each element of the proposed project. A hydrology analysis for the Master Plan Area was conducted (see Appendix 6, *Descanso Gardens Hydrology Report*). Low Impact Development (LID) site design and treatment control BMPs would be used in the Master Plan Area (see Appendix 6). Some of these include, but are not limited to, selecting appropriate building materials, bioretention facilities, and a treatment wetland and include Hydrological Management Strategies (see Section 3.10, *Hydrology and Water Quality* and Appendix 6).

The proposed project would not create the need nor induce substantial population growth directly or indirectly and any accompanying requirements for the relocation or construction of new or expanded water, wastewater treatment, storm water draining, electric power, natural gas, or telecommunication facilities. The population served by Master Plan Area is expected to increase based on the anticipated growth projections discussed in

the County's General Plan (see Section 3.14, *Population and Housing*). The proposed project is intended to serve existing and anticipated visitors and would not result in an expansion of use.

In addition, all utility improvements and connections would be constructed and installed on-site. No off-site utility connections would be required for the proposed project. Two sets of electrical transmission lines and three electrical distribution lines are located within or cross through the Master Plan Area (Figure 2.19-2, *SCE Electrical Transmission and Distribution Lines*). No transmission or high-pressure distribution pipelines cross under the Master Plan Area. The nearest pipelines cross under Verdugo Boulevard located approximately 0.1 mile north of the Master Plan Area.[20]

Therefore, impacts related to the relocation or construction of new or expanded water, wastewater treatment, storm water draining, electric power, natural gas, or telecommunication facilities, would be less than significant. No further analysis is warranted.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to utilities and service systems in relation to sufficient water supplies available to serve the proposed project in the reasonably foreseeable future development during normal, dry and multiple dry years. The Master Plan Area's water supply is provided through the Valley Water Company, which is a member of the Foothill Municipal Water District (FMWD).[21] Valley Water Company has pumping rights to the Raymond Basin. In addition to this, 70 percent of the water in the city is obtained from the Northern California. According to the FMWD 2018 Management Report, FMWD's total demand for water has decreased from 11,000 acre-feet in 2008 to 9,000 acre-feet in 2018.[22] In addition, as stated in the City of LCF General Plan, storage capacity for the Basin is 1,450,000 acre-feet, and in 1998 approximately 40,900 acre-feet of water was extracted for urban use. The Raymond Basin's water levels are managed to stay within the limit of long-time mean evaluation.

Specifically, Valley Water Company supplies 43 to 70 acre-feet per year of water to the Master Plan Area. The proposed project would not induce substantial population growth directly or indirectly that would result in an increase in water demand. The population served by Master Plan Area is expected to increase based on the anticipated growth projections discussed in the County's General Plan (see Section 3.14, *Population and Housing*). The proposed project is intended to serve existing and anticipated visitors and would not result in an expansion of use. The proposed project would result in no direct impacts in regard to population growth because it would not involve the construction of new housing units or businesses. The proposed project would not involve major infrastructure system extensions (such as roads, highways, bridges, utility lines, major drainage improvements, or grading) that would make accessible a previously inaccessible area to support population growth and accompanying need for large quantities of water.

[20] County of Los Angeles. Accessed November 7, 2019. Gas Transmission Pipeline Interactive Map - Los Angeles. http://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335

[21] Foothill Municipal Water District. Assessed November 8, 2019. Foothill Municipal Water District. https://www.fmwd.com/

[22] Foothill Municipal Water District. Adopted November 2018. Foothill Municipal Water District Management Report.

FIGURE 2.19-2

SCE Electrical Transmission and Distribution Lines

Proposed water supply improvements are intended to greatly reduce or eliminate the use of Hall Beckley Canyon water per request from Los Angeles County. To replace this supply, the Lake would be lined, and stormwater currently captured in the Lake would be used as irrigation water. Additionally, stormwater captured elsewhere on the site, along with recycled wastewater and "fugitive" water harvested seasonally from Winery Canyon Channel, would be directed through a treatment wetland to a recirculation pond, where it would be pumped to the Lake for use as irrigation water (see Appendix 6). It is anticipated that additional municipal water supply may be needed in dry years to supplement on-site water recycling.

The proposed project is not expected to involve a heavy usage of water compared to the existing condition Based on current water supply provided by Valley Water Company and no anticipated expansion of use under the proposed project, impacts related to sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years would be less than significant. No further analysis is warranted.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to utilities and service systems resulting in a determination by the wastewater treatment provider which serves or may serve the proposed project that it has adequate capacity to serve the project's demand, in addition to the providers existing commitments. Wastewater is currently managed through septic systems.

While the previously approved MBR is not included in the scope of the proposed project, the County has authorized this on-site wastewater and septic improvements project, which is in progress as of summer 2019. The wastewater project will decommission all existing septic systems and connect existing restrooms to the MBR. The on-site MBR will treat and recycle site wastewater for use as irrigation. The proposed project would include improvements to all existing restrooms for improved function and aesthetics. Additionally, recycled wastewater and "fugitive" water harvested seasonally from Winery Canyon Channel would be directed through a treatment wetland to a recirculation pond, where it would be pumped to the Lake for use as irrigation water. The proposed project would not induce substantial population growth directly or indirectly that would result in an increase in solid waste because it would not involve the construction of new housing units or businesses; nor would there be any major infrastructure system extensions (such as roads, highways, bridges, utility lines, or major drainage improvements) that would make accessible a previously inaccessible area to support population growth and the accompanying need for additional solid waste handling. Therefore, the proposed project would not exceed the capacity limits of the Master Plan Area, and impacts would be less than significant. No further analysis is warranted.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts to utilities and service systems in relation to exceeding the capacity of state or local standards and/or impairing the attainment of solid waste goals. The County has the largest solid waste management system in the country. Scholl Canyon Landfill, which serves the City of LCF, accepts construction and demolition, green materials, household trash, industrial

nonhazardous waste, inert waste, and tires.[23] The maximum daily capacity for the landfill is 3,400 tons. As of August 2019, an average of 1,622.61 tons of waste are disposed per day at the landfill. The County's Solid Waste Information Management System (SWIMS) estimates that operations at the landfill will end in December 2024. The City of Glendale has adopted a Zero Waste Policy and is investigating technology for clean, high-tech waste to energy conversion that could extend operations at the landfill through the 15-year Master Plan timeline (please see Related Project L in Section 1.13).[24] Solid waste would be generated from the proposed project as a result of demolition and construction activities. The proposed project involves the removal of about 20,716 square feet of existing building, renovation of six existing buildings, and construction of about 35,563 square feet of new buildings. The proposed project would result in a net increase of approximately 35 percent (14,847 square feet) of buildings and structures in the Master Plan Area (see Section 1, *Project Description*). Additionally, the two parking lots in the Master Plan Area would be reconfigured, which would involve removal of existing asphalt to install bioswales. The Main Parking Lot would be expanded towards the east, which would require grading activities; it is anticipated that cut and fill from the parking lots would be approximately balanced to provide fill for the berm along the eastern edge of the parking lot expansion. The proposed project would comply with all state and local management and reductions statues and regulations related to solid waste, such as The County of Los Angeles Construction and Demolition Debris Recycling and Reuse Ordinance (Chapter 20.87 of the Los Angeles County Code)[25] requires that a least 50 percent of all construction and demolition (C&D) debris, soil, rock, and gravel removed from a project site be recycled or reused unless a lower percentage is approved by the County of Los Angeles Director of Public Works. The County's Green Building Standards Code (Title 31 of the Los Angeles County Code)[26] was amended in 2013 to require at least 65 percent of nonhazardous construction and demolition debris be recycled or salvaged.

The County of Los Angeles Construction & Demolition Debris Recycling and Reuse Ordinance outlines procedures for preparation and implementation, including reporting and documentation, of a Recycling and Reuse Plan (RRP) for recycling and reuse of project construction and demolition debris in order to minimize disposal in landfills. In addition, Title 31 of the Los Angeles County Green Building Standards Code outlines the construction waste management recycle and/or salvage goal of a minimum of 65 percent per all newly constructed projects, additions and alterations to existing buildings. The proposed project would comply with the County of Los Angeles Construction and Demolition Debris Recycling and Reuse Ordinance as well as the County's Green Building Standards Code. Construction and demolition waste and debris shall be recycled to the maximum extent feasible meeting the County's solid waste diversion, reduction and minimum recycle and/or salvage mandates.

In addition, the proposed project would comply with waste reduction and recycling measures in accordance to the California Integrated Waste Management Act of 1989 and the California Solid Waste Reused and Recycling Access Act of 1991. By adhering to the County of Los Angeles Construction and Demolition Debris Recycling and Reuse Ordinance, the proposed project would result in less than significant impacts in regard to being served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs during demolition and construction activities. No expansion of use is expected within the Master Plan Area as a result of operations of the proposed project. As a result, the solid waste facility that services the site would continue to have adequate capacity. Therefore, the proposed project would comply

[23] County of Los Angeles Department of Public Works. Accessed November 13, 2019. Solid Waste Management System. Fact Sheet: Scholl Canyon Landfill. https://pw.lacounty.gov/epd/swims/site/factsheet-esri.aspx?id=19&action=2

[24] City of Glendale. Accessed 13 November 13, 2019. Scholl Canyon Landfill. History. https://www.schollcanyonlandfill.org/history

[25] County of Los Angeles Department of Public Works. Accessed November 13, 2019. Construction and Demolition Debris Recycling and Reuse Program. Construction and Demolition. https://dpw.lacounty.gov/epd/CD/cd_attachments/CD_ordinance.pdf

[26] County of Los Angeles. Accessed November 14, 2019. Title 31- Green Building Standards Code. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT31GRBUSTCO

with state, and local statues and regulations to reduce the amount of solid waste. No further analysis is warranted.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

The proposed project would result no impacts to utilities and service systems in relation to complying with federal, state, and local management and reduction statues and regulations related to solid waste. Solid waste would be generated from the proposed project as a result of demolition and construction activities. The proposed project involves the removal of about 20,716 square feet of existing building, renovation of six existing buildings, and construction of about 35,563 square feet of new buildings. The proposed project would result in a net increase of approximately 35 percent (14,847 square feet) of buildings and structures in the Master Plan Area (see Section 1, *Project Description*). Additionally, the two parking lots in the Master Plan Area would be reconfigured, which would involve removal of existing asphalt to install bioswales. The Main Parking Lot would be expanded towards the east, which would require grading activities; it is anticipated that cut and fill from the parking lots would be approximately balanced to provide fill for the berm along the eastern edge of the parking lot expansion. The proposed project would comply with all state and local management and reductions statues and regulations related to solid waste, such as The County of Los Angeles Construction & Demolition Debris Recycling and Reuse Ordinance outlines procedures for preparation and implementation, including reporting and documentation, of an RRP for recycling and reuse of project construction and demolition debris in order to minimize disposal in landfills. In addition, Title 31 of the Los Angeles County Green Building Standards Code outlines the construction waste management recycle and/or salvage goal of a minimum of 65 percent per all newly constructed projects, additions and alterations to existing buildings. The proposed project would comply with the County of Los Angeles Construction and Demolition Debris Recycling and Reuse Ordinance as well as the County Green Building Standards Code. Construction and demolition waste and debris shall be recycled to the maximum extent feasible meeting the County's solid waste diversion, reduction and minimum recycle and/or salvage mandates. In addition, the proposed project would comply with waste reduction and recycling measures in accordance to the California Integrated Waste Management Act of 1989 and the California Solid Waste Reused and Recycling Access Act of 1991.

During operations, the proposed project would not increase the population and would not lead to an increase in solid waste; nor would it increase solid waste, or how solid waste is currently disposed of or handled. Consistent with the provisions of AB 341, each element of the proposed project would provide for trash and recycling bins for use by the public. As population would not increase as a result of the proposed project, no modifications would need to be made to current solid waste disposal practices or municipal solid waste landfills. The proposed project is intended to serve existing and anticipated visitors and would not result in an expansion of use. The proposed project would be required to comply with federal, state, and local statues and regulations to reduce the amount of solid waste. Therefore, there would be no impact. No further analysis is warranted.

2.20. WILDFIRE

This analysis is undertaken to determine if the proposed project may have a significant impact to wildfires, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines and the County of Los Angeles Department of Parks and Recreation's Environmental Checklist Form. Wildfire at the Master Plan Area was evaluated with regard to the Safety Element of the County General Plan 2035;[1] the City of LCF General Plan;[2] data available on the County Fire Department and the California Department of Forestry and Fire Protection (CAL FIRE) FRAP websites;[3] and review of the proposed project. Coordination was undertaken with the Los Angeles County Fire Department (LACFD), Descanso Gardens, and the City of LCF.

REGULATORY FRAMEWORK

Federal

Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 100-707), signed into law on November 23, 1988, amended the Disaster Relief Act of 1974 (Public Law 93-288). The Stafford Act constitutes the statutory authority for most federal disaster response activities especially as they pertain to FEMA and FEMA programs.

Federal Emergency Management Agency (FEMA) Regulation

In March 2003, FEMA became a department of the U.S. Department of Homeland Security (DHS), pursuant to 44 CFR, Chapter 1 Part 201. The primary mission of FEMA is to reduce the loss of life and property and protect the nation from all hazards, including natural disasters, acts of terrorism, and other human-made disasters, by leading and supporting the nation in a risk-based, comprehensive emergency management system of preparedness, protection, response, recovery, and mitigation. FEMA Region 9 covers Arizona, California, Hawaii, Nevada, Guam, American Samoa, Commonwealth of Northern Mariana Islands, Republic of Marshall Islands, Federated State of Micronesia, and more than 150 sovereign tribal entities. In Southern California, FEMA Region 9 specifically plans for hazards such as major earthquakes and wildfires. A catastrophic earthquake could result in 1,800 fatalities, 9 million people displaced, and $200 billion in losses.[4]

Disaster Mitigation Act of 2000 (DMA)

The DMA (Public Law 106-390) provides the legal basis for FEMA mitigation planning requirements for state, local and Indian Tribal governments as a condition of mitigation grant assistance. DMA amended the Stafford Act by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need for state, local, and Indian Tribal entities to closely coordinate mitigation planning and implementation efforts. The requirement for a state mitigation plan is continued as a condition of disaster assistance, adding incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two different levels of state plans.

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[1] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/generalplan/generalplan

[2] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[3] California Department of Forestry and Fire Protection (CAL FIRE). Accessed October 18, 2019. Fire and Resource Assessment Program (FRAP). https://frap.fire.ca.gov/

[4] Federal Emergency Management Agency. Accessed November 5, 2019. Disaster Mitigation Act of 2000. https://www.fema.gov/media-library/assets/documents/4596

DMA also established a new requirement for local mitigation plans and authorized up to 7 percent of Hazard Mitigation Grand Program funds available to a state for development of state, local, and Indian Tribal mitigation plans.[5]

State

The Master Plan Area is located within the incorporated City of LCF, and emergency services are provided by the County. However, the California Governor's Office of Emergency Services (Cal OES) and CAL FIRE are also applicable to the Master Plan Area as they provide local governments with support and assistance in relation to wildfires.

California Emergency Services Act (AB 38)

AB 38 gave California Emergency Management Agency (Cal EMA) responsibility for overseeing and coordinating emergency preparedness, response, recovery, and homeland security activities in the state. Cal EMA was then restructured in 2013, rolled into the state Governor's Office and was renamed as the Cal OES. The Cal OES mission statement is, "Protect lives and property, build capabilities, and support our communities for a resilient California."[6] Cal OES goals include

Goal 1.	Anticipate and enhance prevention and detection capabilities to protect our State from all hazards and threats.
Goal 2.	Strengthen California's ability to plan, prepare for, and provide resources to mitigate the impacts of disasters, emergencies, crimes, and terrorist events.
Goal 3.	Effectively respond to and recover from both human-caused and natural disasters.
Goal 4.	Enhance the administration and delivery of all state and federal funding, and maintain fiscal and program integrity.
Goal 5.	Develop a united and innovative workforce that is trained, experienced, knowledgeable, and ready to adapt and respond.
Goal 6.	Strengthen capabilities in public safety communication services and technology enhancements.

2018 State Hazard Mitigation Plan (SHMP)

Approved by FEMA on September 28, 2018, as an Enhanced State Mitigation Plan and the state's primary comprehensive hazard mitigation guidance document, the SHMP update continues to build upon California's commitment to reduce or eliminate the impacts of disasters caused by natural, technological, accidental, and adversarial/human-caused hazards, and further identifies and documents progress made in hazard mitigation efforts, new or revised state and federal statutes and regulations, and emerging hazard conditions and risks that affect the State of California. Resilience depends on the whole community and is a shared responsibility for all levels of government, private and nonprofit sectors, and individuals.[7]

[5] Federal Emergency Management Agency. Accessed November 5, 2019. Disaster Mitigation Act of 2000. https://www.fema.gov/media-library/assets/documents/4596

[6] State of California Governor's Office of Emergency Services. Accessed November 13, 2019. California Office of Emergency Services (Cal OES) website. https://www.caloes.ca.gov/cal-oes-divisions/about-cal-oes

[7] California Governor's Office of Emergency Services (Cal OES). Accessed November 7, 2019. 2018 California State Hazard Mitigation Plan. https://www.caloes.ca.gov/cal-oes-divisions/hazard-mitigation/hazard-mitigation-planning/state-hazard-mitigation-plan

Assembly Bill 337 (AB 337 – Bates Bill)

AB 337, also known as the Bates Bill, was signed in 1992 after the Oakland Hills fire that caused substantial damages and losses (2,500 structures, $2 million in damages, and 25 fatalities).[8] Code Sections 51175-51188 relevant to Very High Fire Hazard Severity Zones (VHFHSZ) were then added requiring CAL FIRE, in cooperation with local fire authorities, to identify and map VHFHSZ areas within California's Local Responsibility Areas (LRA).[9] CAL FIRE provides fire protection and stewardship to over 31 acres of state privately-owned wildlands as well as varied emergency assistance services to 36 of the 58 counties through contract with local governments.[10] Los Angeles County, which provides fire response services in a services contract with LCF, is one of the 36 local governments in contract with CAL FIRE. Several subsequent amendments have been included (AB 3819, AB 1216, SB 1369) that provide additional regulatory requirements relevant to wildfire hazards and the identification of VHFHSZ areas within LRAs. The City of LCF is designated as VHFHSZ within an LRA.[11]

Senate Bill 901 – Wildfires

Under SB 901, the law authorizes CPUC, which regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies, "to require every public utility to construct, maintain, and operate its line, plant, system, equipment, apparatus, tracks, and premises in a manner so as to promote and safeguard the health and safety of its employees, passengers, customers, and the public. The 2018 act requires electrical corporations to annually prepare and submit a wildfire mitigation plan to the PUC for review."[12] The Wildfire Mitigation Plans for SCE, PG&E, and SDG&E were submitted, reviewed and final approval granted on May 30, 2019. SCE is the electric utility purveyor for the utility corridor within the Master Plan Area, and compliant pursuant to General Order No. 69-C.[13]

Assembly Bill 1054

On July 12, 2019, Governor Gavin Newsom signed AB 1054 (Holden) requiring CPUC to take a number of wildfire-related actions. AB 1054 provides for a Wildfire Fund, which electrical corporations may access upon meeting specified requirements. Electrical corporations must opt into the fund, make financial commitments, and maintain a safety certificate from the CPUC, among meeting other conditions required by AB 1054. SCE, PG&E, and SDG&E have all opted into the fund.[14] On July 26, 2019, the CPUC initiated Rulemaking 19-07-017 as required by Section 3289(a)(1), by use of its authority to require each electrical corporation, except a regional electrical corporation that chooses not to participate in any fund, to collect a non-bypassable charge from ratepayers of the electrical corporation to support the Wildfire Fund established pursuant to Public

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[8] California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resources Assessment Program (FRAP). Accessed November 4, 2019. Very High Fire Severity Zones (VHFSZ) in Local Responsibility Areas. https://frap.fire.ca.gov/frap-projects/wildfire-hazard-real-estate-disclosure/

[9] California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resources Assessment Program (FRAP). Accessed November 4, 2019. Very High Fire Severity Zones (VHFSZ) in Local Responsibility Areas. https://frap.fire.ca.gov/frap-projects/wildfire-hazard-real-estate-disclosure/

[10] California Department of Forestry and Fire Protection (CAL FIRE). Accessed November 1, 2019. Cal Fire About Us. https://www.fire.ca.gov/about-us/

[11] California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resources Assessment Program (FRAP). Accessed November 4, 2019. FHSZ Online Viewer. https://egis.fire.ca.gov/FHSZ/

[12] California Legislative Information. Accessed November 7, 2019. Senate Bill No. 901. https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB901

[13] California Public Utilities Commission. Accessed November 7, 2019. General Order No. 69-C: Easement on Property of Public Utilities Resolution No. L-230. https://www.cpuc.ca.gov/generalorders/

[14] California Public Utilities Commission. Accessed November 7, 2019. Wildfires: Implementation of Assembly 1054. https://www.cpuc.ca.gov/wildfires/

Utilities Code section 3284. The ruling was passed on September 23, 2019 with the condition that an electrical corporation must also annually provide the Executive Director of the CPUC documentation of meeting the requirements of Public Utilities Code Section 8389(e)(1)-(4) prior to accessing the funds in which case the CPUC's Executive Director issues a safety certification.[15] As of August 2019, SCE, PG&E, and SDG&E have been issued safety certificates, with SCE being the purveyor for Descanso Gardens.

Regional

Utility Corridor Secondary Land Use Requirements (SCE Fee-Owned Property)

SCE is the electric corporation that owns and manages the utility corridor running north/south along the eastern side of the Master Plan Area. Descanso Gardens is a licensee of SCE. Aside from the Hazard Mitigation Plan, SCE provides a list of secondary land use requirements on SCE fee-owned property as they pertain to utilities and wildfires to their licensees (Table 2.20-1, *SCE Utility Corridor Secondary Land Use Requirements for Wildfire*).[16]

TABLE 2.20-1
SCE UTILITY CORRIDOR SECONDARY LAND USE REQUIREMENTS FOR WILDFIRES

Requirements
• All projects are unique and will be reviewed on a case by case basis. • SCE's access to its ROW and facilities must be maintained 24/7 and cannot be encumbered in order to ensure SCE's access for system operations, maintenance, and emergency response. • All proposed grading requires a clearance review. Costs for engineered conductor clearance reviews required by SCE are to be paid for by the requestor. • Please see the attached constraints and guidelines for SCE ROWs and SCE licensees. • SCE's access to its land (including fee-owned and easements) and facilities must be maintained at all times. • All users of SCE's land shall be responsible for compliance with all applicable federal, state, county and local laws affecting use of SCE's land. The user must obtain all permits and other governmental approvals required for the proposed use. • All third-party proposed uses must maintain adequate clearances from SCE's facilities. • No plant species protected by federal or state law shall be planted within SCE's property and easements. • All new trees and shrubs proposed on SCE land rights shall be slow growing and not exceed 15 feet in height. • No wetlands, other sensitive natural habitat, vegetation related natural plant areas, or environmental mitigation on SCE land will be permitted. • Groundwater or storm water infiltration or recharge and water basins will not be allowed on SCE property. • Flammable or combustible materials are not allowed to be used or stored on SCE's property. • SCE may require a third-party user of SCE land to implement certain safety measures or mitigations as a condition to approval of the third-party use. Users of SCE land must adhere to minimum grounding standards dictated by SCE. • Uses on SCE land will not be approved if said use is deemed unsafe.
Maintenance
• Licensees are required to maintain licensed property per the terms of the license agreement • SCE needs 24-hour access to the property at all times, along with access for maintenance and in cases of emergencies.
Allowable Uses
• Guidelines approved by SCE in advance: o Shade structures o Shadehouses/hothouses o Greenhouses

[15] Public Utilities Code – PUC, Division 4.1, Chapter 6, Wildfire Mitigation. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8389.&lawCode=PUC

[16] Southern California Edison. Accessed November 4, 2019. Using SCE Fee-Owned Property. https://www.sce.com/partners/real-estate-and-locations/secondary-land-use

TABLE 2.20-1
SCE UTILITY CORRIDOR SECONDARY LAND USE REQUIREMENTS FOR WILDFIRES

○ Irrigation systems ○ Landscaping ○ Trailers ○ Parking areas ○ Material storage • SCE may consider the following low-intensity uses on their property: ○ Greenbelts (grass, shrubs, and trees with a maximum height and mature growth limitation based upon the Operational Criteria) ○ Trails for walking, hiking, horseback riding, and non-motorized biking ○ Horticulture (i.e., nurseries) and agriculture ○ Wireless communication facilities within the footprint of the tower or removable shelters/equipment (refer to Carrier Solutions Process) ○ Temporary activities, such as TV filming (refer to the Filming Process)
Restricted Uses
• All new trees and shrubs proposed on SCE's ROW shall be slow growing and not exceed 15 feet in height. • SCE may require a third-party user to implement certain safety measures or mitigations as a condition to approval of the third-party use. Users of SCE's ROW must adhere to minimum grounding standards dictated by SCE. • Horizontal Clearance and Vertical Clearance requirements must be met. • Roads constructed on SCE ROW or where a third party's access road coincides with SCE's access to SCE ROW or facilities must comply with SCE's engineering standards: ○ The drivable road surface shall be constructed to provide a dense, smooth and uniform riding surface. The minimum drivable road surface shall be 14 feet wide with an additional 2 feet of swale/berm on each side as required. ○ The minimum centerline radius on all road curves shall be 50 feet measured at the centerline of the drivable road surface. The minimum drivable width of all roads shall be increased on curves by a distance equal to 400/Radius of curvature. ○ The road shall be sloped in a manner to prevent standing water or damage from undirected water flow. Maximum cross slope shall not exceed 2%, maximum grade not to exceed 12%.
Prohibited Uses
• Buildings and other permanent structures, such as pipelines, concrete slabs, foundations, vaults, decks, detention basins, pools, and anything else that is not portable and easily moveable, are prohibited within SCE's ROW. • No parallel or longitudinal encroachments will be permitted. All improvements crossing in the ROW must do so perpendicular to the centerline of the ROW. • No plant species protected by federal or state law shall be planted within SCE's ROW. • No wetlands, other sensitive natural habitat, vegetation related natural plant areas, or environmental mitigation on SCE's ROW will be permitted as it creates interference with SCE's ability to access its facilities and to add future facilities. • Groundwater or storm water infiltration or recharge will not be allowed. • Flammable or combustible materials are not allowed to be used or stored on SCE's ROW. • Uses on SCE's ROW will not be approved if deemed unsafe. An example of an unsafe condition includes (but is not limited to) instances where the proposed use may create levels of induced voltage that are unsafe to SCE employees or the public that cannot be mitigated to safe levels.

Furthermore, SCE also provides their licensees with more detailed Allowable Uses Guidelines for Standard Improvements in relation to wildfire risk areas.[17] The guidelines delineated are five categories relevant to the proposed project (Table 2.20-2, *Guidelines for Standard Licensee Improvements*).

[17] Southern California Edison. Accessed November 7, 2019. Guidelines for Standard Licensee Improvements. https://www.sce.com/partners/real-estate-and-locations/secondary-land-use

TABLE 2.20-2
GUIDELINES FOR STANDARD LICENSEE IMPROVEMENTS

Shade Structures:
(Definition: A non-flammable frame covered on the top with a material designed to provide shade to aid in growing plants)

1. Shade structures must maintain minimum spacing of 50 feet between shade structure locations, should be placed perpendicular to Licensor's overhead electrical conductors (wires) unless otherwise approved in writing by Licensor, and should not exceed maximum dimensions of:
   a. 100 feet in length
   b. 50 feet in width
   c. 15 feet in height
2. Shade structures will not be permitted within the following areas reserved for Licensor's access:
   a. Within 2 feet from edge of 16-foot wide access roads
   b. 50 foot radius around suspension tower legs
   c. 100 foot radius around dead end tower legs
   d. 10 foot radius around anchors/guy wires, tubular steel poles and wood poles
3. Shade structures must utilize the following design:
   a. Temporary/slip joint construction only
   b. Non-flammable frame only
   c. Adequately grounded
   d. Shade covering must be non-flammable and manufactured with non-hydrocarbon materials

Greenhouses:
(Definition: An enclosed structure designed to control temperature and/or humidity by the use of heating and/or air conditioning units to aid in propagating and/or growing plants)

Greenhouses will be considered on a case-by-case basis.

Irrigation Systems:

1. Maximum diameter of pipe: 3 inches
2. All pipe must be plastic Schedule 40 or better
3. No irrigation system will be permitted within the following areas reserved for Licensor's access:
   a. Within 2 feet from edge of 16-foot wide access roads
   b. 50 foot radius around suspension tower legs
   c. 100 foot radius around dead end tower legs
4. Sprinkler controllers must be located at the edge of the right of way
5. Suitable identification markers will be required on main controllers and valves
6. Locations of main shut off valve will be provided and shown on a plot plan
7. Underground facilities must have a minimum cover of three feet
8. Earth disturbed must be compacted to ninety percent (90%)

Landscaping:
(Parkways, setbacks, etc.)

1. No trees will be permitted under the overhead electrical conductors or within 10 feet of the "drip line" of the conductors
2. Trees must have slow to moderate growth, and must be of a variety that grows to a maximum height of no more than 40 feet and must be maintained by the Licensee at a height not to exceed 15 feet
3. Placement of large rocks (boulders) must be approved in writing by Licensor
4. Any mounds or change of grade must be approved in writing by Licensor
5. No cactus or thorny shrubs will be permitted
6. Retaining walls, planters, etc., must be approved in writing by Licensor

Trailers:

1. Trailers must meet the following criteria:
   a. Must have axles and wheel and be able to be moved at any time
   b. Maximum length: 40 feet
   c. Maximum height: 15 feet
2. No trailers will be permitted within the following areas reserved for Licensor's access:
   a. Within 2 feet from edge of 16-foot wide access roads
   b. 50 foot radius around suspension tower legs
   c. 100 foot radius around dead end tower legs
   d. 10 foot radius around anchors/guy wires, tubular steel poles and wood poles
   e. Under or within 10 feet of the conductor "drip lines"
3. Sewer or gas lines to trailers must be approved in writing by Licensor

TABLE 2.20-2
GUIDELINES FOR STANDARD LICENSEE IMPROVEMENTS

4. Location of all electrical and telephone lines must be approved in writing by Licensor 5. Trailers shall not be used for residential purposes 6. Toxic or flammable materials will not be permitted in trailers
Parking Areas:
Parking areas should not be designed under the overhead electrical conductors or within 10 feet of the "drip lines" without Licensor's prior written approval.
Material Storage:
1. In the event of an emergency, Licensee must, within a four-hour period, relocate all materials specified by Licensor in order to provide Licensor clear access to its facilities. 2. Licensee must provide Licensor with a list of material stored on the right of way 3. No toxic or flammable materials will be permitted 4. No materials shall be stored within the following areas reserved for Licensor's access: a. Within 2 feet from edge of 16-foot wide access roads b. 50 foot radius around suspension tower legs c. 100 foot radius around dead end tower legs d. 10 feet from anchors/guy wires, tubular steel poles and wood poles 5. Maximum height: 15 feet 6. No storage of gasoline will be permitted 7. Storage of diesel fuel on the property may be permitted with Licensor's prior written approval. The following are guidelines: a. Maximum 200 gallon tank (temporary) b. Only above-ground tanks will be permitted c. Tank (with containment basin) must include a 10' x 10' cement pad 8. Any fencing around the storage areas must have Licensor's prior written approval

Local

In addition to federal, state, and regional requirements, general plans and municipal codes of counties and cities in the region may include safety or other elements that contain goals and policies related to protecting people and property from risks from hazards such as wildfires.

County General Plan 2035

The Safety Element of the County General Plan addresses community protection from high potential hazard risk due to seismic, geotechnical, flooding, slope failure and Fire. The Safety Element establishes two goals and 18 policies relevant to Wildfires (Table 2.20-3, *Los Angeles County General Plan Safety Element Goal and Policies for Wildfires*).[18]

[18] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 12: Safety Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch12.pdf

TABLE 2.20-3
LOS ANGELES COUNTY GENERAL PLAN SAFETY ELEMENT GOAL AND POLICIES FOR WILDFIRES

Goal S3:	
An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards.	
Policy No.	**Policy Descriptions**
Policy S 3.1	Discourage high density and intensity development in VHFHSZs.
Policy S 3.2	Consider climate change implications in fire hazard reduction planning for FHSZs.
Policy S 3.3	Ensure that the mitigation of fire related property damage and loss in FHSZs limits impacts to biological and other resources.
Policy S 3.4	Reduce the risk of wildland fire hazards through the use of regulations and performance standards, such as fire-resistant building materials, vegetation management, fuel modification and other fire hazard reduction programs.
Policy S 3.5	Encourage the use of low-volume and well-maintained vegetation that is compatible with the area's natural vegetative habitats.
Policy S 3.6	Ensure adequate infrastructure, including ingress, egress, and peak load water supply availability for all projects located in FHSZs.
Policy S 3.7	Site and design developments located within FHSZs, such as in areas located near ridgelines and on hilltops, in a sensitive manner to reduce the wildfire risk.
Policy S 3.8	Support the retrofitting of existing structures in FHSZs to help reduce the risk of structural and human loss due to wildfire.
Policy S 3.9	Adopt by reference the County of Los Angeles Fire Department Strategic Fire Plan, as amended.
Policy S 3.10	Map oak woodlands in Los Angeles County as part of implementation of the Oak Woodlands Conservation Management Plan.
Policy S 3.11	Support efforts to address unique pest, disease, exotic species and other forest health issues in open space areas to reduce fire hazards and support ecological integrity.
Policy S 3.12	Support efforts to incorporate systematic fire protection improvements for open space, including facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with landowners and other stakeholders, and water sources for fire suppression.
Goal S4	
Effective County emergency response management capabilities.	
Policy No.	**Policy Descriptions**
Policy S 4.1	Ensure that residents are protected from the public health consequences of natural or man-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
Policy S 4.2	Support County emergency providers in reaching their response time goals.
Policy S 4.3	Coordinate with other County and public agencies, such as transportation agencies, and health care providers on emergency planning and response activities, and evacuation planning.
Policy S 4.4	Encourage the improvement of hazard prediction and early warning capabilities.
Policy S 4.5	Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.
Policy S 4.6	Ensure that essential public facilities are maintained during natural disasters, such as flooding.

Los Angeles County Operational Area Emergency Response Plan

The Los Angeles County Operational Area Emergency Response Plan (OAERP) helps minimize losses by ensuring "the most effective preparedness, response and recovery efforts for the maximum benefit and protection of the public in time of emergency." The OAEEP establishes the identification of organizational and departmental responsibilities, policies and procedures plus the coordination of emergency operation plans, that impact operational areas, by agencies and jurisdictions.[19] Furthermore, the OAERP conforms to

[19] County of Los Angeles Chief Executive Office. Accessed November 1, 2019. Operational Area Emergency Response Plan Letter of Approval. https://ceo.lacounty.gov/emergencydisaster-plans-and-annexes/

the National Incident Management System (NIMS) and the California Standardized Emergency Management System (SEMS).[20]

Los Angeles County 2019 All-Hazard Mitigation Plan (2019 AHMP)

The 2019 AHMP, in conjunction with the and the OAERP prepared by the Chief Executive Office, Office of Emergency Management (CEO OEM), sets planning strategies for natural and human-made hazards in Los Angeles County.[21] The 2019 AHMP, which has been approved by FEMA and Cal OES, meets the DMA 2000 requirements and includes a compilation of known and projected hazards in Los Angeles County with sections for assessing risk posed by natural hazards. The sections of the 2019 AHMP include Planning Process; Community Profile; Hazard Identification and Risk Assessment; Mitigation Strategies; plan review, evaluation, and implementation; and plan adoption.[22] While the 2019 AHMP identifies its planning area as unincorporated Los Angeles County, the plan's risk assessment within the Community Profile section, clarifies that it includes incorporated and unincorporated Los Angeles County, and Supervisorial Districts 1–5. The City of LCF is part of Supervisorial District 5 consisting of 2,807 square miles of land area, including 164.9 square miles (5.9 percent) of LRA VHFHSZ.

Los Angeles County Ordinance Code Section 7.16.050 (Ord. 2011-0031 Section 6, 2011)

The standard ambulance response times are identified in the Los Angeles County Ordinance Code Section 7.16.050. While this section refers to Ambulance Operator License Applications, it does reference the response times that any contracting Ambulance Contractor must adhere to as part of the County's standards.[23] In an urban setting with a population density of 100 or more persons per square mile such as the City of LCF, the maximum response time for County ambulance response to emergency calls is 8 minutes and 59 seconds.[24] The County provides emergency medical services (EMS), fire and rescue services, and safe haven services for unincorporated Los Angeles County and for contract cities including the City of LCF.[25] The County and City of LCF have coordinated efforts that address the emergency response and evacuation plans through the Disaster Management Area C, a joint powers agreement.[26]

City of LCF General Plan

Although the County is not subject to city general plans, City of LCF General Plan information has been provided to inform the County's decision-making process. The City LCF General Plan is a comprehensive long-term plan with the purpose of guiding the physical development and vision of the city and provide the

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[20] County of Los Angeles Chief Executive Office. Accessed November 1, 2019. Operational Area Emergency Response Plan Letter of Approval. https://ceo.lacounty.gov/emergencydisaster-plans-and-annexes/

[21] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. Chapter 12: Safety Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch12.pdf

[22] County of Los Angeles. Accessed November 1, 2019. 2019 County of Los Angeles All-Hazard Mitigation Plan. https://www.lacounty.gov/emergency/county-of-los-angeles-all-hazards-mitigation-plan/

[23] Los Angeles County Municode Library Website. Accessed October 24, 2019. Code of Ordinance. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT7BULI_DIV2SPBU_CH7.16AM_7.16.050AMOPLIPP

[24] Los Angeles County Code of Ordinances, Title 7, Division 2, Chapter 7.16 Ambulances. Section 7.16.050 - Ambulance operator license - Application. https://library.municode.com/CA/Los_Angeles_County/codes/code_of_ordinances?nodeId=TIT7BULI_DIV2SPBU_CH7.16AM_7.16.126PRACIOCHADFI

[25] Los Angeles County Fire Department. Accessed November 8, 2019. Fire Station Search. https://locator.lacounty.gov/fire/Location/3034444/los-angeles-county-fire-department-station-19

[26] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030: Chapter 5 – Safety Element. https://cityoflcf.org/planning/

foundational components by way of goals, objectives and policy for local land use planning and "reflect the changing characteristics and growth of the community."[27] In essence, "it is the blueprint for future growth and development"[28] of the city. The Safety Element, Land Use Element, and Open Space and Recreation Element have particular relevance to wildfire.

Safety Element

The Safety Element establishes policies and programs to protect the community from risks associated with seismic, geologic, flooding, and wildfire hazards. The Safety Element states that the "combination of southern California's Mediterranean climate, with its winter and spring rainfall and hot dry summers, a preponderance of highly flammable vegetation within and adjacent to the City of LCF, the steep topography within the City, and the frequency of high wind velocity from the Santa Ana winds creates optimum conditions for wildfires and debris flows." The entire City of LCF is designated as a VHFHSZ by the City Council (see Figure 2.9-1, *Fire Hazard Severity Zones*). During the development review process for projects, the City of LCF and the Los Angeles County Fire Department (LACFD) review water flow and distribution requirements for new development projects to ensure adequate water pressure for firefighting. The City of LCF also evaluates the adequacy of emergency water line capacity as it relates to fire flow requirements.

The NIMS was established by the DHS as a unified approach to incident management. The intent is to improve the efficiency and effectiveness of responders from different jurisdictions and disciplines when jointly responding to natural disasters and emergencies. In California, NIMS is implemented at the State level through the SEMS. All agencies that participate in any emergency are required to have and maintain appropriate training and certification and operate under NIMS and SEMS. The City of LCF is compliant with NIMS and SEMS.

The City has prepared a Hazard Mitigation Plan (HMP) in collaboration and coordination with the La Cañada Unified School District (LCUSD) to serve as a mechanism for the community to promote sound public policy to reduce the risk and impact of disaster events. It identifies natural hazards to the community; determines likely impacts from those hazards; sets mitigation goals; and provides action items, including ideas for implementation, identification of the coordinating organization, and a proposed time line. The HMP assists the community in allocating appropriate resources and setting priorities and standards to ensure the safety of people, property, infrastructure, and the environment. The City of LCF is also part of a Disaster Management Area (C) through a Joint Powers Agreement with the County. Disaster Management Area C also includes Monterey Park, Alhambra, Burbank, and Glendale. The goal of this program is to coordinate in planning for preparedness, mitigation, and recovery from emergencies or disasters.

The Safety Element establishes two goals, two objectives, and 24 policies relevant to wildfires (Table 2.20-4, *La Cañada-Flintridge General Plan Safety Element Goal, Objectives and Policies for Wildfires*).[29]

[27] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[28] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[29] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030: Chapter 5 – Safety Element. https://cityoflcf.org/planning/

TABLE 2.20-4
LA CAÑADA-FLINTRIDGE GENERAL PLAN SAFETY ELEMENT GOAL, OBJECTIVES AND POLICIES FOR WILDFIRES

SE Goal 1:	
Mitigate damage to life, property, infrastructure, and the environment, and economic and social displacement from natural and human-made hazards	
SE Objective 1.4:	
Develop and implement policies and programs that reduce the risk to the community from fires and fire-related hazards.	
Policy No.	**Policy Descriptions**
SE Policy 1.4.1	Ensure that the City's contractual arrangement with LACFD provides an adequate level of fire protection to provide reasonable security of persons and property throughout the community.
SE Policy 1.4.2	Work with Los Angeles County to review and update its building and/or fire codes to address construction in the wildland-urban interface (WUI), including requirements of the California Building Commission's adopted WUI codes.
SE Policy 1.4.3	Work with CAL-FIRE regarding updates to the Very High Fire Hazard Severity Zone in Local Responsibility Areas.
SE Policy 1.4.4	Encourage implementation of wildfire mitigation activities in a manner consistent with the goal of promoting sustainable ecological management.
SE Policy 1.4.5	Require property owners to create and maintain defensible space around their buildings and structures in those portions of the City that are adjacent to the WUI interface as mapped.
SE Policy 1.4.6	Require the use of fire-retardant roofing material for all new construction and major remodels involving roof additions. Encourage property owners with shake shingle roofs to upgrade to fire-retardant materials.
SE Policy 1.4.7	Continue to enforce the brush clearance/weed abatement program.
SE Policy 1.4.8	To the extent of the City's authority, strongly encourage water providers to conduct an evaluation of the water infrastructure based on current code standards with special emphasis on the upslope WUI area. Results of the evaluation should disclose deficiencies (differences between current code and existing conditions). During the planning period, a method should be developed and initiated to correct identified deficiencies.
SE Policy 1.4.9	Coordinate with LACFD to operate an education program regarding fire hazards and strategies to minimize risk for residential, commercial, and institutional uses.
SE Policy 1.4.10	Increase communication, coordination, and collaboration between WUI property owners, the City, and fire prevention crews and officials to address risks and implement mitigation measures.
SE Goal 3	
Ensure that the community is prepared for and able to respond to natural and human-made emergencies and disasters, such as earthquakes, wildfires, flooding, debris and mud flows, landslides, release of hazardous materials, civil disturbances, national security emergencies, technological incidents, and health-related epidemics or pandemics.	
SE Objective 3.1:	
Develop plans and programs to prepare for and provide rapid and effective response to disasters and threats of danger to life and property.	
Policy No.	**Policy Descriptions**
SE Policy 3.1.1	Continue to implement the City's Hazard Mitigation Plan (HMP) and integrate the goals and action items into regulatory documents and programs, where appropriate.
SE Policy 3.1.2	Maintain and periodically update the City's Hazard Inventory.
SE Policy 3.1.3	Coordinate with appropriate public and private agencies and organizations, citizens, and businesses to implement the City's HMP.
SE Policy 3.1.4	Evaluate the City's roadways regarding access, alignments, two routes for egress, etc., to facilitate fire, police, and ambulance access and resident egress in case of an emergency.
SE Policy 3.1.5	Continue to utilize and support the City's Public Safety Commission and Public Safety Coordinator, and the La Cañada Flintridge Volunteer Emergency Response Team.
SE Policy 3.1.6	Establish a formal role for the City's Hazards Mitigation Committee to develop a sustainable process for implementing, monitoring, and evaluating city-wide mitigation activities.
SE Policy 3.1.7	Continue to participate in Disaster Management Area C through a Joint Powers Agreement with Los Angeles County.
SE Policy 3.1.8	Maintain compliance with the federal National Incident Management System (NIMS) and the State Standardized Emergency Management System (SEMS).

TABLE 2.20-4
LA CAÑADA-FLINTRIDGE GENERAL PLAN SAFETY ELEMENT GOAL, OBJECTIVES AND POLICIES FOR WILDFIRES

SE Policy 3.1.9	Develop and implement education and outreach programs to increase public awareness of the risks associated with natural and human made hazards, and to assist the public in being prepared for emergencies or disasters. Involve all sectors of the community, including the real estate and insurance industries, schools, public and private sector organizations, the business community, and residents.
SE Policy 3.1.10	Identify and pursue funding opportunities to develop and implement mitigation activities.
SE Policy 3.1.11	Encourage critical City facilities to purchase and/or test back-up power facilities for use during a power failure.
SE Policy 3.1.12	Refine the existing warning system to alert residents of potential hazards as well as provide post-disaster information.
SE Policy 3.1.13	Mobilize a core group of volunteer professionals to render prompt structural evaluation of sites potentially used for emergency mass shelters.
SE Policy 3.1.14	Ensure adequate seismic performance of emergency shelter facilities.

Land Use Element

The Land Use Element's primary function is to describe the land use plan, associated land use designations, and goals, objectives, and policies. As it pertains to wildfires, the City of LCF has established a hillside management line that defines and preserves the City's hillsides to ensure public safety. The line is referred to as A/B Line, applicable to northern hillside residential properties, where "A" is urban development and "B" is rural development on steeply sloping hillsides. The A/B Line separates the "A" and "B" with the purpose of minimizing negative impacts of hillside development and preserving the city's viewscapes, open space and environmental and recreational resources.[30] The Land Use Element establishes one goal, one objective, and two policies relevant to wildfires (Table 2.20-5, *La Cañada-Flintridge General Plan Land Use Element Goal, Objective and Policies for Wildfires*).[31]

TABLE 2.20-5
LA CAÑADA-FLINTRIDGE GENERAL PLAN LAND USE ELEMENT GOAL, OBJECTIVE AND POLICIES FOR WILDFIRES

LUE Goal 4:	
Maintain hillside areas for the purpose of preserving the visual quality of the City, protecting the public from safety hazards, and conserving natural resources.	
LUE Objective 4.2:	
Ensure that hillside development will be designed, constructed, and maintained to minimize natural and human-made safety hazards to persons and property.	
Policy No.	**Policy Descriptions**
LUE Policy 4.2.5	Require new development in hillside areas to use building techniques that minimize fire hazards and reduce risks associated with wildfires.
LUE Policy 4.2.6	Require property in hillside areas to be maintained in a manner to reduce risks associated with wildfires.

Open Space and Recreation Element

The Open Space and Recreation Element places an emphasis on the residents' value on the preservation of the city's natural open spaces, recreation areas, trails, and the contributions of these resources to the City of LCF's quality of life, recreation opportunities and desirability as a place to live. This element also reflects the

[30] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030: Chapter 2 – Land Use Element. https://cityoflcf.org/planning/

[31] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030: Chapter 2 – Land Use Element. https://cityoflcf.org/planning/

interrelationship with the Land Use and Safety Elements in relation to areas prone to hazards, land north of the "A/B Development Line" and that includes County-owned property such as Descanso Gardens.[32] The City's Open Space and Recreation Element establishes 1 goal, 1 objective, and 3 policies relevant to Wildfires (Table 2.20-6, *La Cañada-Flintridge General Plan Open Space and Recreation Element Goal, Objective and Policies for Wildfires*).[33]

TABLE 2.20-6
LA CAÑADA-FLINTRIDGE GENERAL PLAN OPEN SPACE AND RECREATON ELEMENT GOAL, OBJECTIVE AND POLICIES FOR WILDFIRES

OSRE Goal 2:	
Preserve, protect, and enhance open space areas within and adjacent to the City.	
OSRE Objective 2.2:	
Provide and preserve open space areas for the protection of public health and safety.	
Policy No.	**Policy Descriptions**
OSRE Policy 2.2.1	Identify potential public safety hazards, such as earthquake fault zones, earthquake-induced landslides, wildfires, debris and mudflows, and unstable slopes, and designate undeveloped areas subject to such hazards as open space areas to minimize potential impacts on people and property.
OSRE Policy 2.2.2	Discourage development within open space areas identified for the protection of public safety.
OSRE Policy 2.2.3	Provide a combination of brush clearance, irrigated areas, and fire-resistant planting adjacent to large areas of native vegetation to serve as a buffer between highly hazardous natural fuels and developed areas. Ensure that the buffers will be completed in a manner that is sensitive to plant and animal habitats and will promote erosion control.

City of LCF Local Hazard Mitigation Plan

The City of LCF developed a local hazard mitigation plan (LHMP) that was approved by FEMA in July 2019, ensuring the City's continued eligibility for project grants under FEMA's Hazard Mitigation Assistance programs through July 9, 2024.[34] The LHMP is an educational and planning document, not a regulatory document. The LHMP includes resources and information to assist City of LCF residents, public and private sector organizations, and others interested in participating in planning for natural and man-made hazards. The LHMP provides a list of activities that may assist in reducing risk and preventing loss from future disaster events. The action items address multi-hazard issues, as well as specific activities for earthquakes, floods, windstorms, landslides, wildfires, and man-made hazards. The primary objective of the LHMP is to reduce the negative impacts of future disasters: to save lives and reduce injuries, minimize damage to buildings and infrastructure (especially critical facilities), and minimize economic losses. The mitigation plan meets FEMA's planning requirements by addressing hazards, vulnerability, and risk.

The entire City of LCF is designated as VHFHSZ, and the LHMP identifies the City of LCF's wildfire hazard risk as high (see Figure 2.9-1) but also includes a wildfire hazard ranking of 1 out of 8 hazards (rank of the risk they pose to the overall community based on its likelihood to occur and past events) and a magnitude or severity of wildfires as catastrophic (more than 50 percent of property severely damaged; shutdown of facilities for more than 30 days; and/or multiple deaths).[35] In addition, the LHMP identifies

[32] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030: Chapter 3 – Open Space and Recreation Element. https://cityoflcf.org/planning/

[33] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030: Chapter 3 – Open Space and Recreation Element. https://cityoflcf.org/planning/

[34] City of La Cañada Flintridge. Approved July 9, 2019. Local Hazard Mitigation Plan: City of La Cañada Flintridge. https://cityoflcf.org/wp-content/uploads/2019/08/LHMP_Final_8-7-19.pdf

[35] City of La Cañada Flintridge. Approved July 9, 2019. Local Hazard Mitigation Plan: City of La Cañada Flintridge. https://cityoflcf.org/wp-content/uploads/2019/08/LHMP_Final_8-7-19.pdf

mitigation strategies for implementation with a timeframe of short term activity (1-3 years), long term activity (up to 5 years), and ongoing (currently being funded and implemented).

The LHMP also addressed road access and "the major issues for all emergency service providers."[36] In many areas, there is not adequate space for emergency vehicle turnarounds in single-family residential neighborhoods, causing emergency workers to have difficulty doing their jobs because they cannot access houses. As fire trucks are large, firefighters are challenged by narrow roads and limited access, when there is an inadequate turn around space, the firefighters can only work to remove the occupants, but cannot safely remain to save the threatened structures.

IMPACT ANALYSIS

	Potentially Significant Impact	***Less than Significant Impact with Mitigation Incorporated***	***Less than Significant Impact***	***No Impact***
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to wildfire related to the impairment of adopted emergency response and emergency evacuation plans in or near state responsibility areas (SRA) or lands classified as VHFHSZ. The entire City of LCF, including the Master Plan Area, is designated a VHFHSZ by the City Council (see Figure 2.9-1). Section V (Emergency Response) of the Safety Element of the County General Plan 2035 states the provision of disaster routes through the OAERP. In addition, the County provides EMS, fire and rescue services, and safe haven services for the unincorporated County and for contract cities including the City of LCF.[37] The County and City of LCF have coordinated efforts that address the emergency response and evacuation plans through the Disaster Management Area C, a joint powers agreement.[38] When emergency response or evacuation orders are issued, evacuation routes, temporary shelter facilities, public alerts and warnings plus procedures would be provided by County Sheriff and Fire personnel based on the disaster to facilitate the evacuation process.[39] The County Department of Public Works maintains a list of disaster routes in the Los Angeles County Operational Area by city that have been preidentified for use during times of crisis.[40] The Master Plan Area is not included as part of a disaster route or evacuation center in any emergency response plan or any emergency evacuation plan.[41]

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[36] City of La Cañada Flintridge. Approved July 9, 2019. Local Hazard Mitigation Plan: City of La Cañada Flintridge. https://cityoflcf.org/wp-content/uploads/2019/08/LHMP_Final_8-7-19.pdf

[37] Los Angeles County Fire Department. Accessed November 8, 2019. Fire Station Search. https://locator.lacounty.gov/fire/Location/3034444/los-angeles-county-fire-department-station-19

[38] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030: Chapter 5 – Safety Element. https://cityoflcf.org/planning/

[39] County of Los Angeles Department of Regional Planning. Adopted October 6, 2015. Los Angeles County General Plan 2035. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch12.pdf

[40] County of Los Angeles Department of Public Works. Accessed November 6, 2019. Disaster Routes by City. https://dpw.lacounty.gov/dsg/DisasterRoutes/

[41] County of Los Angeles. Accessed November 12, 2019. GIS Data Portal. https://egis3.lacounty.gov/dataportal/2016/01/19/disaster-routes/

Disaster routes mapped by the Los Angeles County for LCF consist of the 210 Freeway (Foothill Freeway) east and west directions, SR-2 south of Foothill Boulevard, the Angeles Crest Highway to the north, and from the corner of La Crescenta Avenue/Foothill Boulevard to the south on La Crescenta Avenue and to the north on Foothill Boulevard. Construction activities, including staging, would be limited to the Master Plan Area, except for vehicles traveling to and from the Master Plan Area. Furthermore, the proposed project would have a net benefit in relation to access and circulation (see Section, 3.17 *Transportation*, and Table 1.10.1-1, *New Preliminary Circulation Routes*). The proposed project would improve vehicular and pedestrian access to and from the Master Plan Area due to the reconfiguration of the parking area and pedestrian access by adding an auxiliary parking lot to accommodate bus and group parking, a designated drop-off/pick-up area, ingress and egress demarcations, designated pedestrian walkways, and access paths. In addition, the existing asphalt road (proposed Service Route) that currently provides staff with a vehicular access loop through the developed gardens would be widened to 20 feet wide to accommodate emergency response vehicles such as fire trucks (see Table 1.10.1-1, and proposed new impervious surfaces in Figure 1.10.3-1, *Proposed Impervious Surfaces*). The proposed project would decrease impairment to adopted emergency response plans or emergency evacuation plans. Therefore, the proposed project would result in less than significant impacts to wildfire in relation to the substantial impairment of adopted emergency response and emergency evacuation plans in or near SRA or lands classified as VHFHSZ. No further analysis is warranted.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to wildfire in relation to exacerbated wildfire risk due to slope, prevailing winds, and other factors and thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire in or near SRAs or lands classified as VHFHSZs. As stated in the Safety Elements of both the City of LCF General Plan and the County General Plan 2035, the Master Plan Area is located in a VHFHSZ within an LRA (see Figure 2.9-1). The Safety Element of the City of LCF General Plan describes how the "combination of southern California's Mediterranean climate, with its winter and spring rainfall and hot dry summers, a preponderance of highly flammable vegetation within and adjacent to the City of LCF, the steep topography within the City, and the frequency of high wind velocity from the Santa Ana winds creates optimum conditions for wildfires and debris flows." As stated in Section 2.9, *Hazards*, the most recent wildfire recorded by CAL FIRE that burned the Master Plan Area was in 1878.

Slope

The Master Plan Area is nestled in a concave basin containing a reduced project footprint in steeper slope areas that would alleviate the impact to slopes over 25 to 50 percent incline, within a designated VHFHSZ of an LRA as noted in the Safety Element of both the LCF General Plan and the County General Plan (see Figure 1.4-2 *Topographic Map with USGS 7.5-Minute Quadrangle Index*, Figure 1.8.2-2 *Existing Conditions*; Figure 2.9-1). The City of LCF is located in the east end of the Crescenta Valley, a medium-sized northwest-southeast trending basin, nestled between the San Gabriel Mountains (peak elevations in the area rise above 4,000 feet above MSL) to the north and the San Rafael Hills (highest elevation 1,788 feet above MSL) to the south and southwest. The Crescenta Valley is bounded by the San Gabriel Mountains to the north and northeast, the Angeles National Forest to the north, the San Rafael Hills to the south-southwest, and the Verdugo Mountains to the west. The north face of the San Rafael Hills frames the Master Plan Area's southern border, gradually increasing the relief of the Gardens as the Descanso Gardens property lines the northern portion of the San Rafael Hills. The elevation of the Master Plan Area ranges from 1,820 feet above MSL at the southern property boundary near the Descanso Motorway trail to 1,251 feet above MSL at the eastern property boundary near

Winery Canyon Channel. In general, the Master Plan Area is concave, with topography slopes to the southeast towards Pasadena. According to Figure 9.8, *Hillside Management Areas and Ridgeline Management Map*, of the County General Plan 2035, the Master Plan Area contains areas with over 25 percent slope and over 50 percent slope. Master Plan projects in the steeper areas would have a limited footprint affecting the slopes because they would be composed of predominantly trails (such as the Wilds Loop), oak woodland restoration, the Elevated Canopy Walk, and widening of the existing service road to facilitate fire truck access.

Prevailing Winds

In the Crescenta Valley and vicinity, the southeasterly or northern winds prevail for a significant portion of the year. Similar to other areas of the Los Angeles Basin, the two most climatic influences are the onshore marine layer from the Pacific and the offshore Santa Ana winds. The area experiences a persistent temperature inversion (increasing air temperature with increasing altitude) because of the Pacific high. Like other areas of the Los Angeles Basin, the two most climatic influences are the onshore marine layer from the Pacific and the offshore Santa Ana winds. Meteorological data from a weather station located in La Crescenta has indicated that the average high of 90 degrees Fahrenheit occurs during the summer months and a low of 32 degrees Fahrenheit occurs during the winter months. Very little rainfall or no rainfall at all occurs during the summer months. In addition, the steep topography and the high frequency of high wind velocity from the Santa Ana winds, in the fall, decreases precipitation and "create optimum [dry] conditions for wildfires."[42]

Fuel Load Management

The County General Plan 2035, City of LCF General Plan, and SCE identify goals, objectives, and policies that provide guidance towards management in wildfire areas such as the location of the Master Plan Area and the ranking of VHFHSZ within an LRA.[43] As stated in the Descanso Gardens Long Range Conceptual Plan, the LACFD assisted with fuel management efforts 10 years ago: "Los Angeles County Fire Department (LACFD) has employed varying strategies and methods to reduce vegetative fuel build up on the hillside above the developed portion of the Gardens. To the northeast and north, adjacent to Verdugo Hills Hospital, the LACFD employed manual cutting and hauling of the dead fuel. To the northwest of the existing ponds, manual clearing, density reduction and burning were used to reduce fuel. In one particular area west of the ponds, tractors were used to strip away all vegetation. This area requires the greatest remediation efforts."[44] Vegetation management helps in the reduction of fuel and in preparation for future wildfire events. The Master Plan Area, owned by the County and in coordination with the City of LCF, currently has ongoing fuel vegetation maintenance, brush clearances, and inspection efforts on an annual basis from May 1 through August 1 in addition to Descanso Gardens' maintenance of the fuel management zones around structures and SCE's maintenance of trees within the utility corridor, thus reducing the vegetation fuel loads along the slopes surrounding the Master Plan Area.[45] The proposed project would not hinder these fuel management efforts.

The LHMP identifies road access as a major issue for all emergency service providers, especially in residential areas.[46] The proposed project would not involve projects that would impair emergency access to public streets. Within the Master Plan Area, the Service Route, which currently provides staff with a paved vehicular access loop through the developed gardens, would be widened to 20 feet wide to accommodate

[42] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[43] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

[44] Descanso Gardens. December 2009. Long Range Conceptual Plan.

[45] Bare, David, Descanso Gardens. November 12, 2019. Telephone call to Laura Male, Sapphos Environmental, Inc. Subject: Vegetation Maintenance at Grounds.

[46] City of La Cañada Flintridge. Approved July 9, 2019. Local Hazard Mitigation Plan: City of La Cañada Flintridge. https://cityoflcf.org/wp-content/uploads/2019/08/LHMP_Final_8-7-19.pdf

emergency response vehicles such as fire trucks (see Table 1.10.1-1, *New Preliminary Circulation Routes*) and proposed new impervious surfaces (Figure 1.10.3-1). The widened paved Service Route would better facilitate vehicular access to conduct fuel management efforts along the edge of the developed gardens. Therefore, the proposed project would result in less than significant impacts to wildfire in relation to exacerbated wildfire risk due to slope, prevailing winds, and other factors and thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No further analysis is warranted.

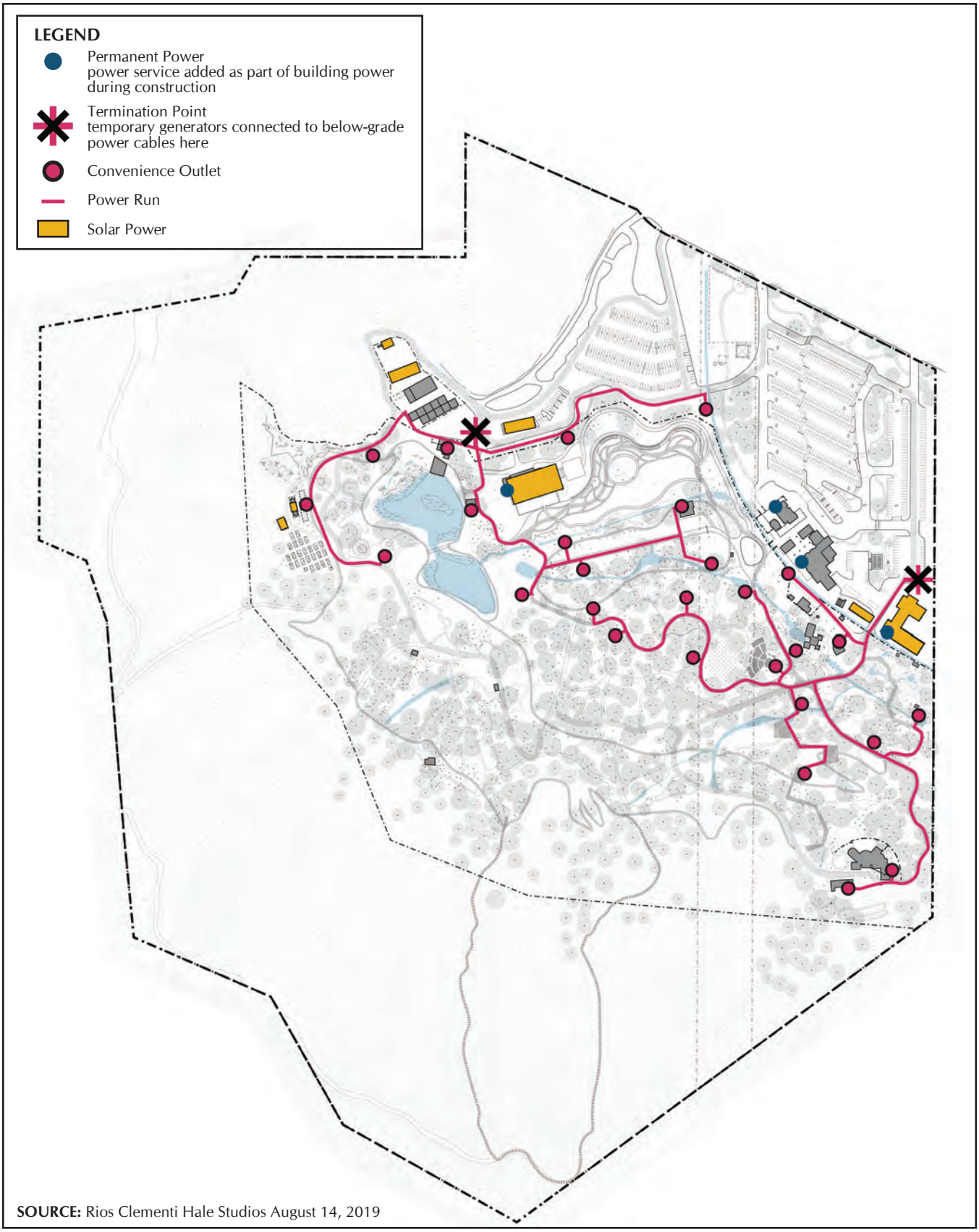
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to wildfire in relation to the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in the temporary or ongoing impacts to the environment in or near SRAs or lands classified as VHFHSZs. As stated in the Safety Elements of both the City of LCF General Plan and the County General Plan 2025, the Master Plan Area is located in a VHFHSZ within an LRA (see Figure 2.9-1). The proposed project would not require the installation of new roads, fuel breaks, emergency water sources, power lines, or other utilities. The proposed project would involve enhancements to an existing emergency water source (relining the Lake) and upgrades to critical infrastructure within the developed gardens, including installation of new infrastructure (lighting, electricity, and Wi-Fi) to provide maximum flexibility for Descanso Gardens to curate new programs and installations, permanent power hookups to support existing and future programming without temporary generators (currently used), and new lighting along pathways and in event areas to support and enable nighttime programming (Figure 2.20-1, *Master Plan Diagram: Power*). New utilities would be installed below ground, under the paved Gardens Loop path. These proposed elements would not be expected to exacerbate fire risk because they would sustain an existing reservoir (the Lake) and replace the temporary generators that are currently used to provide nighttime lighting at several locations in the developed gardens with underground infrastructure.

Roads and Fuel Breaks

The proposed project would not alter the existing roads and fuel breaks to the west and south of the Master Plan Area that are maintained by the City of LCF, City of Glendale, County, and SCE. Existing roads provide potential emergency response access to the Master Plan Area from the north (Descanso Drive, at four locations) and west (unnamed road). An unpaved road that starts in the southwestern portion of the Oak Woodland near the western edge of the developed gardens leads to a locked gate and Descanso Motorway that can be used by the County Fire Department for emergency access from the west. Descanso Motorway / Descanso Trail, an approximately 10- to 75-foot-wide stabilized decomposed granite trail along the western and southwestern edges of the Master Plan Area, is maintained by the City of LCF through an agreement with the County (see Figure 1.8.2-5, *Existing Trails*).[47] As with several City of LCF trails, this route is wide enough to support vehicular access for fire response and/or SCE maintenance access.

[47] La Cañada Flintridge Trails Council. Accessed November 14, 2019. Descanso Trail. https://www.lcftrails.org/trails/descanso-trail/



SOURCE: Rios Clementi Hale Studios August 14, 2019

FIGURE 2.20-1
Master Plan Diagram: Power

At the northwestern edge of the Master Plan Area is an approximately 130-foot by 175-foot area that is kept clear of vegetation and wide enough to provide a turnaround for LACFD access (per a 32-foot minimum turning radius required by Title 32 – County Fire Code).[48] Descanso Motorway can be accessed by vehicle from the west via a winding unpaved road at Stancrest Drive near SR-2 and from the south along five maintained unpaved roads:

1. A steep SCE maintenance access road along the southeastern edge of the Master Plan Area leading to SCE's electrical utility corridor, Edison Road, Edison Road / Forest Hill Fire Road Trail, and the City's paved street network at Forest Hill Drive

2. Edison Road / Forest Hill Fire Road Trail leading to the City of LCF's paved street network at Forest Hill Drive

3. Cherry Canyon Motorway / Cherry Canyon Fire Road Trail leading to the City of LCF's paved street network at Hampstead Road (to the east then north) and Sugarloaf Drive (to the south)

4. Cherry Canyon Motorway / Cherry Canyon Fire Road Trail leading to Ridge Motorway and the City of LCF's paved street network at Flintridge Drive as well as Camino San Rafael

5. Fern Motorway / Rim of the Valley Trail leading southwest to Fox Hill Drive and Fern Lane near SR-2

Additionally, the proposed project would involve widening of the existing paved service road (proposed Service Route) to facilitate fire truck access within the developed gardens. The widening of this existing road to a uniform 20 feet is not anticipated to exacerbate fire risk (see Figures 1.10.1-1 and 1.10.3-1).

Emergency Water Sources

The proposed project would not involve the installation of new emergency water sources, although it would involve improvements and maintenance of an existing water reservoir on-site. There are two existing fire hydrants at the northern edge of the Master Plan Area along Descanso Drive, one existing fire hydrant in the southwestern portion of the Main Parking Lot, one existing fire hydrant in the southeastern portion of the Master Plan Area near the Boddy House, and addition hydrants that are located in the surrounding area (see Section 2.9, *Hazards and Hazardous Materials,* and Figure 2.9-1, *Nearest Existing Fire Hydrants*). During the development review process for individual projects, the City of LCF and the LACFD would review water flow and distribution requirements for new development projects to ensure adequate water pressure for firefighting (see Section 2.9). The City would also evaluate the adequacy of emergency water line capacity as it relates to fire flow requirements. Furthermore, the proposed project is intended to reduce the property's dependence on potable water with on-site treatment, a relined Lake (which provides emergency water), and bioswales to capture stormwater from the parking lots.

Power Lines or Other Utilities

The proposed project would not involve the installation of new power lines. SCE maintains the electrical transmission lines and towers that pass through the Master Plan Area. Consistent with California Public Utilities Commission regulations (General Order No. 69-C), access to SCE's ROW and facilities within the SCE electrical utility corridor that extends through the Master Plan Area is maintained 24/7 to ensure SCE's

[48] Los Angeles County Code of Ordinances, Title 32- Fire Code.
https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT32FICO

access for system operations, maintenance, and emergency response.[49] Allowable uses by licensees if consistent with SCE's guidelines and approved in advance include shade structures, shadehouses/hothouses, greenhouses, irrigation systems, trailers, parking areas, and material storage.[50] Three overhead electrical distribution lines are also located within the Master Plan Area.

In addition, the Master Plan Area, owned by the County and in coordination with the City of LCF, has ongoing fuel vegetation maintenance and brush clearance efforts on an annual basis from May 1 through August 1 in addition to Descanso Gardens' maintenance of the fuel management zones around structures and SCE's maintenance of trees within the utility corridor, thus reducing the vegetation fuel loads along the slopes surrounding the Master Plan Area,[51] as well as widening of the service route to 20 feet wide to accommodate emergency response vehicles such as fire trucks (Table 1.10.1-1). Therefore, the proposed project would result in less than significant impacts in relation to exacerbating wildfires risk. No further analysis is warranted.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to wildfires related to exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes in or near SRAs or lands classified as VHFHSZs in the Master Plan Area or vicinity. As stated in the Safety Elements of both the City of LCF General Plan and the County General Plan 2035, the Master Plan Area is located in a VHFHSZ within an LRA (see Figure 2.9-1). The portions of the Master Plan Area located west of the Auxiliary Parking Lot and Lake and south of the existing Main Lawn are characterized by sloped terrain that exceeds 25 percent and 50 percent slopes towards the undeveloped portions of the Master Plan Area. The proposed project would involve development of new unpaved paths within the sloped southern portion of the Master Plan Area, and the new Nature Discovery Gardens would be installed on sloped terrain within the perimeter fence line of the developed gardens. The remainder of the elements of the proposed project would be concentrated on shallower slopes and developed portions of the gardens. The new buildings would be located in the Nature Discovery Gardens, the graded area north of the Boddy Lodge, the existing maintenance storage area west of the Auxiliary Parking Lot, the relatively flat terrain of the Rose Garden, and the relatively flat terrain southeast of Van de Kamp Hall.

Flooding

The proposed project has been designed with strategies to reduce risks for downslope or downstream flooding as a result of runoff and drainage changes from the chaparral washes west and south of the developed gardens (Figure 2.20-2, *Master Plan Diagram: Water*). Visitors and structures would be concentrated within the fenced perimeter of the developed gardens, the parking lots and maintenance areas north of the developed gardens, and the Wilds Loop south of the fenced perimeter. Based on an evaluation detailed in a Hydrology Technical Report for Descanso Gardens (Appendix 6), the proposed project would not impede or redirect flood flows; substantially create, contribute, increase the rate, amount or depth of runoff; or place structures within the flood hazard area (see Section 2.10, *Hydrology and Water Quality,* and Appendix 6).

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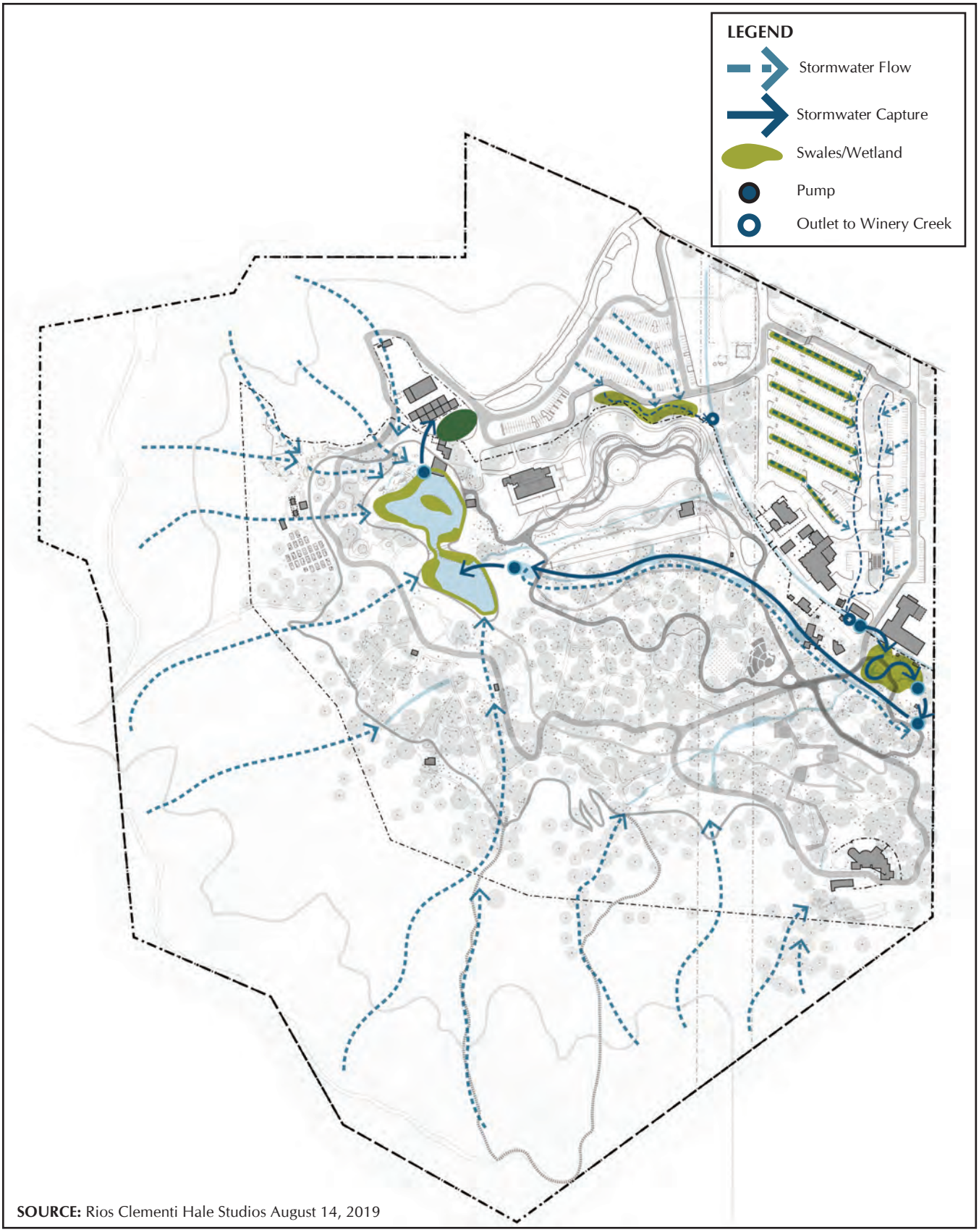
[49] Public Utilities Commission of the State of California. Effective July 10, 1985. Easements on Property of Public Utilities Resolution No. L-230. Proposed General Order No. 69-C. http://docs.cpuc.ca.gov/published/Graphics/645.PDF

[50] Southern California Edison. Accessed November 7, 2019. Using SCE Fee-Owned Property. https://www.sce.com/partners/real-estate-and-locations/secondary-land-use

[51] Bare, David, Descanso Gardens. November 12, 2019. Telephone call to Laura Male, Sapphos Environmental, Inc. Subject: Vegetation Maintenance at Grounds.



SOURCE: Rios Clementi Hale Studios August 14, 2019

FIGURE 2.20-2
Master Plan Diagram: Water

Two Hydrologic Management Strategies would be implemented to reduce surface runoff leading to flooding on-site: Drainage Conveyances and Monitoring and Adaptive Management. Drainage Conveyances would be designed to convey on-site stormwater flows associated with capital or urban flood protection, per the project criteria for flood control, to limit flooding on-site to less than substantial levels. Monitoring and Adaptive Management would be implemented to evaluate whether the proposed project drainage system is effective in managing on-site flooding and to remedy those areas where excess flooding is observed. Four more Hydrologic Management Strategies would be implemented to surface runoff leading to flooding off-site: Lake Operations, Distributed Volume and Flow Management, Regional Detention/Retention Basins, and Drainage Conveyances. These methods would be implemented with sufficient storage volume and attenuation to meet the frequency analysis standards, per the project criteria for hydromodification control, to prevent stormwater from discharging offsite onto neighboring property. The Hydrology Technical Report (Appendix 6) found that the proposed project would not place structures in the federal 100-year flood hazard areas, including Zone X shaped areas of FEMA FIRM. Additionally, the proposed project would not change the course of streams or rivers such as Winery Canyon Channel, which is a reinforced cement concrete (RCC) lined rectangular channel that is fixed and would not be altered. As stated in Section 2.9, *Hazards and Hazardous Materials*, all new buildings over 5,000 square feet in size would be required to incorporate fire sprinklers.

Landslides

As stated in Section 2.7, *Geology and Soils*, a portion of the upper hillslope in the southern part of the Master Plan Area is classified as a Landslide Hazard Zone (see Figure 2.7-2, *Liquefaction and Landslide Zone*). The proposed project would include installation of trail paths within the mapped Landslide Hazard Zone. Final project design would be prepared for construction and operation of each proposed project element, including the installation of the trail paths, to avoid potential impacts related to landslides. Due to the presence of landslide hazard areas, additional design-level analyses would be prepared for construction and operation of each proposed project element to evaluate potential presents of areas prone to landslides or rockfall and include applicable engineering practices and remedial recommendations to avoid potential impacts related to landslides.

Therefore, the proposed project would result in less than significant impacts to wildfires related to exposure of people or structures to significant risks as a result of runoff, postfire slope instability, or drainage changes in or near state responsibility areas or lands classified as VHFHSZs in the Master Plan Area. No further analysis is warranted.

e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

The proposed project would result in less than significant impacts to wildfire related to exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires in or near SRAs or lands classified as VHFHSZs within the Master Plan Area. As stated in the Safety Elements of both the City of LCF General Plan and the County General Plan 2035, the Master Plan Area is located in a VHFHSZ within an LRA in the City of LCF (see Figure 2.9-1).

The County General Plan 2035, City of LCF General Plan, and SCE identify goals, objectives, and policies that provide guidance towards management in wildfire areas such as the Master Plan Area and the ranking of VHFHSZ with LRA.[52] As stated in the Descanso Gardens Long Range Concept Plan, the LACFD assisted

[52] City of La Cañada Flintridge. Adopted January 22, 2013. City of La Cañada Flintridge General Plan 2030. https://cityoflcf.org/planning/

with fuel management efforts 10 years ago.[53] Vegetation management helps in the reduction of fuel and in preparation for future wildfire events. The Master Plan Area, owned by the County and in coordination with the City of LCF, has ongoing fuel vegetation maintenance, brush clearances, and inspection efforts on an annual basis from May 1 through August 1, in addition to Descanso Gardens' maintenance of the fuel management zones around structures and SCE's maintenance of trees within the utility corridor.[54] The proposed project would not hinder these fuel management efforts.

While the proposed project would involve construction of new buildings and structures within the western fenced portion of the property, including two kitchens that have the potential to become a new fuel source for increased fire risk, more maintenance would occur in the proposed Nature Discovery Garden to maintain the garden facilities that would reduce vegetation fuel loads. Additionally, although the proposed Wilds Loop would extend south beyond the fenced area into the undeveloped portion of the property, which would not be easily accessible by fire response personnel, the new trail would be defensible from the Descanso Motorway above the Wilds Loop trail and the widened driveway leading to the Boddy House from below. Furthermore, the proposed project would include widening of the entire service loop around the developed gardens to a 20-foot paved road to improve fire truck access from the existing condition. Therefore, the proposed project would result in less than significant impacts to wildfires related to exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires in or near state responsibility areas or lands classified as very high fire hazard severity zones within the Master Plan Area and vicinity. No further analysis is warranted.

[53] Descanso Gardens. December 2009. Long Range Conceptual Plan.

[54] Bare, David, Descanso Gardens. November 12, 2019. Telephone call to Laura Male, Sapphos Environmental, Inc. Subject: Vegetation Maintenance at Grounds.

2.21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

The proposed project would have the potential to result in significant impacts regarding degrading the quality of the environment, substantially reducing the habitat of a fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, threatening to eliminate a plant or animal community, substantially reducing the number or restricting the range of a rare or endangered plant or animal or eliminating important examples of the major periods of California history or prehistory. The County has identified mitigation measures to reduce any impacts to below the level of significance.

Biological Resources

As stated in Section 2.4, *Biological Resources*, the proposed project would have the potential to result in significant impacts regarding degrading the quality of the environment, substantially reducing the habitat of a fish or wildlife species, and substantially reducing the number or restrict the range of a rare or endangered plant or animal, or threatening to eliminate a plant or animal community. Potentially significant impacts on listed, sensitive, and locally important species and their habitats would be limited to the proposed Wilds Loop trail, which would extend beyond the developed garden area. Four plant species that are considered rare in the State of California or are locally important to the region have suitable habitat within the undeveloped portion of the Master Plan Area and have a high to moderate potential to be present (see Appendix 8, *Biological Resources Technical Report*, Table 5-3). During survey efforts, Sapphos Environmental, Inc. biologists did not observe any naturally occurring rare plant species. Several rare and locally important species, including Parish's gooseberry have been planted within the botanical garden but may not occur naturally within the Master Plan Area. Suitable habitat is present in the Master Plan Area for the three CNPS rare plants: Plummer's mariposa-lily, Engelmann oak, and California black walnut. During site surveys, the only special-status species observed were coastal whiptail, Cooper's hawk, and California black walnut. Construction associated with the Circulation Framework Improvements, New and Improved Gardens and Facilities, and New Buildings, Structures, and Infrastructure that would occur within the developed garden area would not result in impacts to sensitive species or their habitats. The proposed Wilds Loop trail beyond the developed garden area would result in the direct removal of up to 0.14 acre of scrub oak chaparral, which is considered suitable habitat for listed plant species. This would not result in a significant loss of habitat, and direct impacts to individuals are not anticipated as no sensitive plants were observed in the proposed alignment. Direct impacts to these species would be limited to the disturbance of natural habitats during the construction of the proposed project. Implementation of Mitigation Measure BIO-1 would reduce impacts to below the level of significance. The environmental analysis for the Wilds Loop trail to sensitive plant and wildlife species and their habitats is based on a potential worst-case scenario for construction activities associated with building a new trail. The

finalized trail design is subject to refinement, and the level of impact would be subject to additional survey, design, and engineering work to support development and ultimately project construction, operation, and maintenance.

The Lake would be drained, regraded, and relined, resulting in potential impacts to up to 3.96 acres of riparian habitat. Implementation of Mitigation Measures BIO-1 and BIO-2 would reduce these impacts to below the level of significance. Although these activities would result in impacts to the existing riparian habitat, the overall goal of the proposed projects is to restore and improve aquatic resources and increase the long-term viability of the Lake. Installation of a new lakebed liner would reduce loss of water from leakage. Dredging of the Lake sediments, an improved aeration system as well as creating wetland shelves, sediment bays, and floating wetlands would provide habitat for native wildlife species and maintaining the water level would further promote establishment of wetland habitat at the Lake. This analysis of impacts of projects included in the Master Plan to sensitive plant communities and riparian habitats is based on a potential worst-case scenario for construction activities and the current general configurations of the Master Plan. The proposed Lake and Wilds Loop projects are conceptual and would require additional survey, design, and engineering work to support design development and ultimately project construction and are subject to verification at the project level of environmental review pursuant to CEQA. Any projects that could result in impacts to the Lake would be subject to the provisions of Section 1600 of the State Fish and Game Code in which a Lake or Streambed Alteration Agreement would need to be obtained prior to the alteration of a state jurisdictional area. At the Lake, the proposed projects would result in up to 1.39 acres of impacts to Freshwater Pond and approximately 0.26 acres of impacts to Freshwater Forested/Shrub Wetland that have the potential to be considered federally and/or State protected wetlands and/or waters of the United States. Additionally, approximately 3.96 acres of riparian vegetation occurring around the Lake would be impacted (see Table 2.4-2, *Hydrological Features*, in Section 2.4). Riparian habitat may be under jurisdiction of CDFW. The proposed project would not result in impacts to Riverine features (Winery Channel). Proposed Lake projects would be subject to the provisions of Section 404 of the federal CWA. Dredge or fill in Waters of the United States is subject to the regulatory authority of the USACE pursuant to Section 404 of the federal CWA and also the provisions of Section 1600 of the State Fish and Game Code, under which a Lake or Streambed Alteration Agreement would need to be obtained prior to any alteration of a State jurisdictional area. The intent of proposed projects at the Lake is to restore and to improve wetland and riparian habitat. Additionally, implementation of Mitigation Measure BIO-3 would reduce impacts to below the level of significance. Therefore, the proposed project would result in less than significant impacts after mitigation to biological resources regarding having a substantial adverse effect on federally or State protected wetlands or Waters of the United States.

There are no previously recorded nursery sites within the Master Plan Area; however, the Master Plan Area does contain suitable nesting habitat for a variety of bird species as well as areas suitable for bat roosting and foraging (see Appendix 8). Direct impacts to nesting birds and bat roosts would be limited to the construction of projects proposed within the Master Plan; however, impacts would be reduced to below the level of significance with incorporation of Mitigation Measures BIO-1, BIO-4, and BIO-5.

Oak and other native woodlands are present throughout the Master Plan Area (see Appendix 8, Figure 4-1). The Master Plan Area includes a total of approximately 31.12 acres of Oak Woodland. Individual oak and native trees distinct from woodland communities are also present in the Master Plan Area. However, the oak woodlands are not pristine habitat, having been continually disturbed and maintained by garden upkeep and fuel modification activities and contain many nonnative and/or invasive species within their understory. No direct removal of oak trees is anticipated. Direct impacts to oaks could occur during the construction of the proposed widened service road in southeast corner of the Master Plan Area. Indirect impacts could result from construction of the Canopy Walk in areas where it is not possible to avoid activities within the dripline of oak trees. However, the Master Plan proposes to restore the existing woodlands within the developed garden by removing, and transplanting elsewhere, existing camellias that are too close to oak root zones and

replacing them with species more compatible with the native oak understory. This would encourage the long-term health of the oak woodland ecosystem and encourage the establishment of oak seedlings on either side of the drip line of the oaks. This analysis of impacts of projects included in the Master Plan to oak woodlands or woodlands otherwise containing oak or other unique native tress is based on a potential worst-case scenario for construction activities and the current general configurations of the Master Plan. Proposed projects in the Master Plan are conceptual and would be designed to avoid the removal or disturbance of any protected oak trees. The Master Plan would seek to ensure the continued protection and stewardship of these woodlands. In addition, implementation of Mitigation Measures BIO-1 and BIO-6 would reduce impacts to below the level of significance.

Therefore, the proposed project would result in potentially significant impacts to biological resources regarding degrading the quality of the environment, substantially reducing the habitat of a fish or wildlife species, substantially reducing the number or restrict the range of a rare or endangered plant or animal, or threatening to eliminate a plant or animal community. However, implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-6 would reduce impacts to designated critical habitat by requiring habitat restoration such that occupied habitat is avoided or there is sufficient habitat restoration such that there is no net loss of habitat functions or values.

Important Examples of the Major Periods of California History or Prehistory

As stated in Section 2.5, *Cultural Resources*, the proposed project would have the potential to eliminate important examples of the major periods of California history or prehistory. Incorporation of mitigation measures would reduce these impacts to below the level of significance. The results of the records searches and field surveys determined that two newly recorded historic archaeological resources and 20 historical built resources are located within the Master Plan Area. Improvements and additions of new circulatory routes would impact the known historical resources including the Japanese Gardens, Boddy Lodge, Lakeside Lookout, and the Camellia Forest. The Garden Loop, Woodland Walk, Nature Path, Nature Walk, and Service Route would include the construction of approximately 1.0 mile of paved and 2.7 miles of unpaved paths, removal of 219 feet of paved paths and 1.7 miles of unpaved paths, new seating, and the installation of underground utilities all either running through or in close proximity to these historical resources. There would also be an addition of an elevated Oak Canopy Walk through the mature canopies of the oak trees within the Camellia Forest. This would consist of an elevated path terminating at the Boddy House, three observation decks, and two sets of stairs located within the Camellia Forest. The construction of these new paths, removal of old paths, seating, installation of underground utilities and construction of the Oak Canopy walk would result in impacts to historical resources and would require the consideration of mitigation measures to ensure that there are no unauthorized impacts to known historical resources.

Improvements and additions of new buildings, structures, and infrastructures would impact known historical resources including the Boddy Lodge, Descanso Creek features, and the Japanese-style Minka House. A Lake Terrace would be added to the southwest façade of the Boddy Lodge extending from the existing enclosed patio to the Lake. The project would also include a new prep kitchen located behind the Boddy Lodge. The construction of the terrace to the exterior of the Boddy Lodge and the prep kitchen in the rear has the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation measures to avoid, reduce, or compensate for the impacts of this alteration. Improvements to the manmade stream of the Descanso Creek Landscape are proposed as part of the overall improvements to hydraulic function of the gardens. Improvements to the Descanso Creek Landscape have the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation measures to avoid, reduce, or compensate for the impacts of this alteration. The Japanese-style Garden Minka House would be converted from a staff bathroom to a public bathroom and an additional restroom would be added to the structure. The addition of an additional restroom

to the structure has the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation measures to avoid, reduce, or compensate for the impacts of this alteration.

Improvements and additions of new gardens within the proposed project site would impact known historical resources including the Japanese Gardens, the Camellia Forest, and the Lakeside Lookout. Lighting would be added to the Japanese Gardens to support evening events. The addition of lighting has the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation to avoid, reduce, or compensate for the impacts of this alteration. The proposed project would create a Camellia Strolling Garden in the northern area of the of the existing Camellia Forest. This element would remove camellias from the 9-acre camellia forest that are designated in poor or alive condition and relocate those designated in excellent, good, or fair condition away from the oak root zone. The Camellia Forest was historically an oak forest that now contains an abundance of camellia plants that were planted in the 1940s. The movement of the camellias away from the roots of the oak trees would preserve the health of the camellia plants and allow for a better focus on the plants themselves. Seventy-five percent of the camellia plants would be preserved and replanted adjacent to the north of the oak trees in a more concentrated footprint of 3 acres. With the consolidation of the camellia plants, the area known as the Camellia Forest would be updated as the Oak Woodland and Meadow. Treatments to the understory would help promote long-term health of the trees. The movement of the camellia plants from the Camellia Forest north to a more concentrate footprint has the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation to avoid, reduce, or compensate for the impacts of this alteration. The Perimeter Walk would provide an elevated walk along the water's edge. The walk would run along the western façade of the Lakeside Lookout. No alterations to this façade are anticipated with the construction of the Lake Perimeter, but construction of the walk in close proximity of the Lakeside Lookout has the potential to adversely affect this contributing element of the Descanso Gardens Historic District, thus requiring the consideration of mitigation to avoid, reduce, or compensate for the impacts of this alteration. All alterations and additions to the Minka House, Boddy Lodge, and addition of the Oak Canopy Walk in the Camellia Forest must comply with the Secretary of the Interior's *Standards for Rehabilitation*, which state, "new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." Additions and removal of circulatory paths through and adjacent to the Japanese Gardens, Boddy Lodge, Lakeside Lookout, and the Camellia Forest; improvements to the Descanso Creek; construction of the Lake Perimeter Walk; and the addition of lighting in the Japanese Gardens must comply with the Secretary of the Interior's *Standards for Preservation*, which state, "distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the property will be preserved."[1] The movement of the camellia plants from the Camellia forest for the health of both the camellia plants and the oak trees must also comply with the Secretary of the Interior's *Standards for Preservation*, which state, "a property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces, and spatial relationships."[2] The preservation of the camellias and oak trees in their original setting and the preservation of the oak tree's location is recommended to ensure less than significant impacts to these resources and compliance with this standard. Design review by an architectural historian who meets the Secretary of the Interior's *Professional Qualification Standards* for Architectural History and History is recommended for all work on or adjacent to the Japanese Gardens, the Boddy Lodge, Lakeside Lookout, Camellia Forest, Descanso Creek, and Minka House to ensure compatibility and compliance. Mitigation Measures CULTURAL-1 and CULTURAL-2 would reduce impacts to below the level of significance.

[1] National Park Service U.S. Department of the Interior, "Standards for Preservation," accessed October 2019, available at: https://www.nps.gov/tps/standards/four-treatments/treatment-preservation.htm.

[2] Ibid.

The proposed project would result in potentially significant impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource. Incorporation of mitigation measures would reduce these impacts to below the level of significance. The archival research did not identify any previously recorded archaeological resources within the Master Plan Area. Two newly recorded historic-period archaeological sites (DG Site 1 and DG Site 2) were recorded during the Phase I cultural resources survey. Projects requiring excavation within 60 feet of DG Site 1 and DG Site 2 would require monitoring by a qualified archaeologist. Where archaeological resources are encountered, evaluation, avoidance or recovery, documentation, and curation of such resources would reduce impacts to below the level of significance. Additionally, the results of the SLF record search conducted through the NAHC were positive for the Pasadena USGS quadrangle map in its entirety. Ground-disturbing work associated with this previously underdeveloped area would have the potential to damage or destroy previously recorded, previously unknown, and/or buried TCRs. Therefore, coordination with the Native American contacts identified by the NAHC is recommended to address unanticipated discovery of materials during construction. The Wilds Loop, the Nature Discovery Garden, the Nursey, and the New Service Yard would be constructed in the western and northwestern edges of the Master Plan Area. Most of this area is undeveloped and ground disturbing activity has not occurred here. Implementation of Mitigation Measures CULTURAL-1 and CULTURAL-2 would reduce impacts to below the level of significance regarding ground-disturbing construction for the Wilds Loop; the Nature Discovery Garden, the Nursery; and the New Service Yard.

The presence of recorded paleontological resources and fossil localities within the Master Plan Area were assessed using information obtained from records searches at the NHM. Geologic maps of the region were also examined to evaluate the potential for the geological deposits within the Master Plan Area to yield unique paleontological resources. The results of the map review indicate that the Master Plan Area is characterized by a variety of sedimentary rock formations. The property lies at the foot of the Transverse Ranges and is characterized by alluvial fan gravel and sand derived from the San Gabriel Mountains during the Pleistocene era. Rock units within the central Transverse Ranges adjacent to the study area consist of early Cretaceous and older plutonic and meta-igneous rocks such as quartz diorite. The geological structure surrounding the property immediately to the north, south, and west consists of early Cretaceous age non-gneissoid quartz diorite and late Mesozoic granitic rock. The NHM does not have on file any vertebrate fossil localities that lie directly within the Master Plan Area boundaries, but there are localities nearby from sedimentary deposits similar to those that may occur at depth in the Master Plan Area. In the elevated western and southern portions of the Master Plan Area, the bedrock is composed of igneous or metamorphic rocks that will not contain recognizable fossils. The less elevated northeastern portion of the Master Plan Area has surficial deposits that consist of older Quaternary alluvial fan deposits derived from the adjacent San Rafael Hills and the San Gabriel Mountains to the north. The closest vertebrate fossil locality in these older Quaternary deposits is LACM (CIT) 342, in Eagle Rock almost due south of the western-most portion of the Master Plan Area east of the Glendale Freeway (SR-2) and Eagle Rock Boulevard just south of York Boulevard, that produced fossil specimens of turkey, *Parapavo californicus*, and mammoth, *Mammuthus*, at a depth of 14 feet below the surface. A little farther but to the southeast of the Master Plan Area, in the City of Pasadena south of Washington Boulevard and west of Allen Avenue near the western end of Brigden Road, the older Quaternary locality LACM 2027 produced a fossil specimen of mammoth, *Mammuthus*. The construction of the Nature Discovery Garden, the Nursery, and the New Service Yard would require a qualified paleontologist to be consulted to determine if additional paleontological studies and/or monitoring are necessary. Mitigation Measure CULTURAL-3 would reduce impacts to below the level of significance.

Although no resources have been identified as a result of prior investigations, the potential exists to encounter human remains when conducting excavations in native soils. There are no recorded cemeteries within the Master Plan Area. Ground-disturbing activities associated with the construction would not be expected to directly or indirectly affect or destroy human remains. However, because there are known historic

archaeological sites within the Master Plan Area, ground-disturbing work associated with the project has the potential to damage or destroy previously recorded, previously unknown, and/human remains. Three previously recorded Native American village sites with burials are located within 0.5 mile of the Master Plan Area. No formal historic or modern cemeteries were identified within the Master Plan Area or the 0.5-mile buffer. No formal cemeteries or previously recorded burial sites are known within the Master Plan Area (Appendix 9). The proposed project has been designed to avoid the location of extant and historical cemeteries and burial grounds. The chance of an unanticipated discovery remains, but implementation of Mitigation Measure CULTURAL-4 would reduce impacts to below the level of significance.

Implementation of Mitigation Measures CULTURAL-1, CULTURAL-2, CULTURAL-3, and CULTURAL-4 would reduce impacts to below the level of significance.

As stated in Section 2.18, *Tribal Cultural Resources*, the proposed project would have the potential to cause a substantial adverse change in the significance of a tribal cultural resource. Incorporation of Mitigation Measures TRIBAL-1, TRIBAL-2, and TRIBAL-3 would reduce impacts to below the level of significance.

Quality of the Environment

As stated in Sections 2.1, *Aesthetics,* 2.3, *Air Quality*, and 2.16, *Recreation*, the proposed project would result in less than significant impacts to the quality of the environment regarding visual character or quality in the area and recreation impacts. As stated in Section 2.13, *Noise*, the proposed project would have the potential to result in significant impacts to the quality of the environment regarding generation of a substantial temporary increase in ambient noise levels in the vicinity of the project. The proposed demolition and construction of two buildings (Meeting Pavilion and Administrative Headquarters) would occur within 1,000 feet of sensitive receptors. Sensitive receptors surrounding the Master Plan Area include 1,378 single-family residential parcels, 76 multi-family residential parcels, and the USC Verdugo Hills Hospital (see Figure 1.11-1, *Sensitive Receptors within ½ Mile of Construction Activities*). Noise from these activities would have the potential to result in exceedance of the County Ordinance. However, implementation of Mitigation Measure NOISE-1 would reduce impacts to below the level of significance.

Therefore, the proposed project would have the potential to result in significant impacts regarding degrading the quality of the environment, substantially reducing the habitat of a fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, threatening to eliminate a plant or animal community, substantially reducing the number or restrict the range of a rare or endangered plant or animal or eliminating important examples of the major periods of California history or prehistory, requiring implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, CULTURAL-1, CULTURAL-2, CULTURAL-3, CULTURAL-4, NOISE-1, TRIBAL-1, TRIBAL-2, and TRIBAL-3 to reduce impacts to below the level of significance.

b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?	☐	☐	☐	☒

The proposed project would result in no impacts regarding the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. The proposed project would ensure that Descanso Gardens, a County Special Use Facility that provides recreation opportunities in Los Angeles County, sustains its operations through the 15-year planning period of the Master Plan. The proposed project is a long-term plan intended to increase the Master Plan Area's water and energy efficiency with upgraded infrastructure and provide a separate drop-off entry location that provides opportunities for reduced VMT in

the future (e.g., shuttles and public transit buses). Therefore, the proposed project would result in no impacts, and no mitigation would be required.

c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? ☐ ☐ ☒ ☐

The proposed project would result in less than significant impacts regarding impacts that are individually limited but cumulatively considerable. Aside from the proposed project, 19 related private and public projects are proposed or planned in the vicinity of the Master Plan Area that may overlap with the construction, operation, and maintenance of the Master Plan (see Table 1.13-1, *List of Related Projects*). The proposed project involves the development of new gardens, replacement of existing buildings, and improvements to existing buildings, parking lots, and gardens within an existing botanic garden. Of the 19 projects, 1 is statewide (A), 1 is regional (B), 6 are within the City of LCF (C, D, E, F, G, and H), 6 are in the unincorporated community if La Crescenta-Montrose (M, N, P, Q, R, and S), and 5 are in the City of Glendale (I, J, K, L, and O; see Figure 1.13-1, *Related Projects Map*). A timeline for construction has been defined for three projects that may overlap with construction of the elements of the Master Plan (Table 2.21-1, *Timeframe for Related Projects*). There are 11 residential development projects. The nearest residential development project (I) is located approximately 0.1 mile northwest of the Master Plan Area.

TABLE 2.21-1
TIMEFRAME FOR RELATED PROJECTS

Label	Project Name	Construction Overlap Time Period
A	Statewide Comprehensive Outdoor Recreation Plan (SCORP)	n/a
B	Rim of the Valley Corridor Special Resource Study	n/a
C	I-210 Soundwalls Improvement Project, Phase III	September 2021–Completion
D	HSIP Cycle 9 Foothill Boulevard Traffic Signals Improvement Project	April 2022–Completion.
E	Office	Unknown
F	Core Power Yoga	Unknown
G	Rebuild Descanso Drive	Unknown
H	YMCA of the Foothills Project	Unknown
I	New Residential Congregate Living/Medical Facility (La Cañada Assisted Living)	Unknown
J	14 dwelling unit and 2,762 square feet of gross leasable floor area retail space	Unknown; currently under construction as of September 2019
K	New Mixed Use Building	Unknown
L	City of Glendale Biogas Renewable Generation Project	Entire 15-year planning period (2020–2035)
M	9 dwelling unit apartment in Montrose	Unknown
N	4 dwelling unit apartment in Montrose	Unknown
O	3 dwelling unit apartment in Montrose	Unknown
P	8 dwelling unit apartment in Montrose	Unknown
Q	16 dwelling unit condominium in Montrose	Unknown**;** currently under construction as of September 2019
R	28 dwelling unit apartment in Montrose	Unknown
S	6 dwelling unit apartment in Montrose	Unknown

As the proposed project would result in no impacts regarding Agriculture/Forestry Resources, Energy, Land Use/Planning, Mineral Resources, and Population and Housing, there would be no contribution towards cumulative impacts for these environmental issue areas. As the remaining 15 environmental issue areas were determined to have less than significant impacts or impacts that would be less than significant with the incorporation of mitigation measures, a brief discussion is provided by environmental issue area.

Aesthetics

The proposed project would not contribute to cumulatively considerable impacts in relation to aesthetics, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As the proposed project would result in no impacts regarding scenic vistas, there would be no contribution towards cumulative impacts. Regarding views from regional trails, state scenic highways, visual character/quality, and shadows/light/glare, the proposed project's incremental contribution towards cumulative impacts when taken together with related projects would be less than significant because the proposed project and related projects would be located at lower elevations (not ridgelines) and surrounded by similar exiting land uses to the projects (residential, commercial, streets/highways, and a landfill). The up-to-14-foot-high soundwalls (Project C) would not be prominent in the viewshed from regional trails because they would be constructed within a portion of the I-210 freeway corridor that is recessed below grade. Although Project C would affect the viewshed from an eligible state scenic highway (I-210), the proposed project would not contribute towards this effect as the proposed project would not create any obstructions to the hillside views or views from the scenic highways. Therefore, the related projects would not be expected to obstruct views. As with the proposed project, the related projects would be located within an area already characterized by very high nighttime light levels except where dense tree canopy exists (such as the residential neighborhoods in the City of LCF). Therefore, the proposed project would not result in cumulatively considerable impacts regarding aesthetics.

Air Quality

The proposed project would not contribute to cumulatively considerable impacts in relation to air quality, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As the proposed project would result in no impacts regarding other emissions (such as those leading to odors), there would be no contribution towards cumulative impacts. As stated in Section 2.3, *Air Quality*, the proposed project would result in less than significant impacts regarding resulting in cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment. The County portion of the South Coast Air Basin is a Federal and State nonattainment area for 1-hour ozone, 8-hour ozone, $PM_{2.5}$, PM_{10} (state), and lead (federal) for near-source monitors. The proposed project would generate these pollutants during the construction of Master Plan elements such as new buildings. The operations and maintenance phases of the project would not cause a cumulatively considerable net increase of any criteria pollutant, as the proposed project is an existing recreational facility generating minimal new vehicle trips and requiring minimal new equipment for maintenance. Furthermore, electric vehicles would be utilized for maintenance where feasible, and the proposed project includes EV charging stations. Short-term cumulative impacts related to air quality could occur if project construction and nearby construction activities were to occur simultaneously. In particular, with respect to local impacts, cumulative construction particulate matter (i.e., fugitive dust) impacts are considered when projects are located within a few hundred yards of each other. Many of the related

projects located within the vicinity of the Master Plan Area are multifamily residential with the potential to create significant air quality impacts cumulatively during the construction phase. However, the proposed project is a recreation facility master plan, which provides recreational opportunities near areas where people live and work. This is consistent with the strategies in the SCAG 2016–2040 RTP/SCS for reducing VMT and enhancing public health. Therefore, the proposed project's emissions would not be cumulatively considerable, and the proposed project would not result in cumulatively considerable impacts regarding air quality.

Biological Resources

The proposed project would not contribute to cumulatively considerable impacts in relation to biological resources, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill (Related Project L). Related Project L would be located along the southern edge of the existing landfill site, which has been heavily graded (except in the southeastern portion of the proposed area of disturbance) and contains existing structures. Related Projects C-K and M-S would be located in residential and commercial developed areas and street rights-of-way, which have been previously graded. As the proposed project would result in no impacts regarding conflicts with local policies or ordinances protecting biological resources or conflicts with an adopted HCP, NCCP or other approved habitat conservation plan, there would be no contribution towards cumulative impacts. As these related projects would be predominantly located within developed areas in an urbanized context (in existing commercial and multi-family residential areas, along major streets and highways, and at an existing landfill), it is anticipated that the related projects would not result in significant impacts to biological resources regarding listed species, sensitive natural communities, protected wetlands, wildlife movement or nursery sites, or conversion of oak woodlands or other unique native woodlands, from which the proposed project would contribute significantly to cumulative impacts. A records search for the vicinity of the Master Plan Area identified 18 federally, state or candidate listed species, 70 rare California plant species, and 29 state-sensitive wildlife species. As there would be no net loss of listed species, sensitive natural communities, protected wetlands, migratory wildlife, oak woodland, or other unique native woodlands as a result of the proposed project after implementation of mitigation measures, there would be no cumulative impacts. Therefore, the proposed project would not result in cumulatively considerable impacts regarding biological resources.

Cultural Resources

The proposed project would not contribute to cumulatively considerable impacts in relation to cultural resources, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As there would be no net adverse change in the significance of a historical resource, archaeological resource, paleontological resource, or human remains as a result of the proposed project after implementation of mitigation measures, there would be no cumulative impacts. Therefore, the proposed project would not result in cumulatively considerable impacts regarding cultural resources.

Geology/Soils

The proposed project would not contribute to cumulatively considerable impacts in relation to geology/soils, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects

would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As the proposed project would result in no impacts regarding soils incapable of adequately supporting the use of on-site wastewater treatment systems or conflicts with the HMA Ordinance, there would be no contribution towards cumulative impacts. As with the proposed project, none of the related projects would be located within an earthquake fault zone. Of the related projects, Project L at Scholl Canyon Landfill is anticipated to require the most grading; the other related projects would occur within more gently sloped terrain and previously graded sites that are not anticipated to result in substantial soil erosion or a geologic unit or soil that is unstable or would become unstable as a result of the projects such that the proposed project would contribute incrementally to cumulatively considerable impacts. As there would be no net substantial risk to life or property regarding being located on expansive soil as a result of the proposed project after implementation of mitigation measures, there would be no cumulative impacts. Therefore, the proposed project would not result in cumulatively considerable impacts regarding geology/soils.

Greenhouse Gas Emissions

The proposed project would not contribute to cumulatively considerable impacts in relation to GHG emissions, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As the proposed project would result in no impacts regarding conflicts with applicable plans, policies, or regulations adopted to reduce GHG emissions, there would be no contribution towards cumulative impacts. The proposed project would not contribute to cumulative impacts on GHG emissions, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the net effect of the recreation planning efforts would be to enhance facilities and programs to accommodate recreation users within an existing botanic garden. The proposed project's construction and operation GHG emissions would be well below the reporting thresholds. The proposed Master Plan would help achieve the GHG reduction goals proposed by the SCAG 2016–2040 RTP/SCS and CARB. Cumulative impacts with multifamily residential projects in the vicinity would not exceed CARB thresholds. As the proposed project would result in no impacts regarding conflicts with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, the proposed project would not result in cumulatively considerable impacts regarding GHG emissions.

Hazards & Hazardous Materials

The proposed project would not contribute to cumulatively considerable impacts in relation to hazards and hazardous materials, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As the proposed project would result in no impacts regarding emitting hazardous emissions or handling hazardous materials within one-quarter mile of sensitive land uses, being located on a listed hazardous materials site, airport land use plans, and emergency response plans or emergency evacuation plans, there would be no contribution towards cumulative impacts. Of the related projects, Project L at Scholl Canyon Landfill is anticipated to require the most grading and have the greatest wildfire risk due to its location within mountainous terrain near methane energy production activities. Construction of Project C would be anticipated to temporarily obstruct the shoulder and perhaps 1 traffic lane, which could affect disaster routes identified by the County (I-210; please see Transportation analysis below). The other related projects would

occur within more gently sloped terrain and previously developed sites that are not anticipated to exacerbate wildfire risk as a result of the projects such that the proposed project would contribute incrementally to cumulatively considerable impacts. Therefore, the proposed project would not result in cumulatively considerable impacts regarding hazards and hazardous materials.

Hydrology/Water Quality

The proposed project would not contribute to cumulatively considerable impacts in relation to hydrology/water quality, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As the proposed project would result in no impacts regarding federal 100-year flood hazard areas or County Capital Flood floodplains, on-site wastewater treatment systems in areas with known geological limitations or in close proximity to surface water, or conflicts with water quality control plans or sustainable groundwater management plans, there would be no contribution towards cumulative impacts. The related projects in the City of LCF and unincorporated community of La Crescenta-Montrose would be required to comply with the Los Angeles County LID Ordinance for project approval; similarly, the related projects in the City of Glendale would need to comply with the City of Glendale LID Ordinance (No. 5857).[3] The larger related projects would be required to implement a SWPPP as required by the CGP. As with the proposed project, the related projects would not be located within a flood zone,[4] tsunami or seiche zone. Of the related projects, Project L at Scholl Canyon Landfill is anticipated to require the most grading; the other related projects would occur within more gently sloped terrain and previously graded and developed sites that are not anticipated to result in violations of water quality standards, altered drainage patterns, or risk of release of pollutants due to project inundation as a result of the projects such that the proposed project would contribute incrementally to cumulatively considerable impacts. Therefore, the proposed project would not result in cumulatively considerable impacts regarding hydrology/water quality.

Noise

The proposed project would not contribute to cumulatively considerable impacts in relation to noise, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As the proposed project would result in no impacts regarding excessive groundborne vibration or airstrips, there would be no contribution towards cumulative impacts. The proposed project would not contribute to cumulative impacts on noise, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the net effect of the recreation planning efforts would be to enhance facilities and programs to accommodate recreation users within an existing botanic garden. The proposed project would result in potentially significant impacts to noise and would require the incorporation of mitigation measures outlined in Section 2.13, *Noise*. Construction activities associated with the proposed project would result in less than significant impacts after mitigation in relation to exposing sensitive receptors to noise levels in excess of the standards established by the City of LCF or County Municipal Codes. The proposed project would comply with all applicable construction standards an requirements including limiting construction and maintenance activities to 7:00 a.m. to 7:00 p.m. on weekdays and Saturdays, and prohibiting work on federal holidays and Sundays, along with

[3] City of Glendale. Approved 2015. *Ordinance No. 5857*. Available at: http://www.qcode.us/codes/glendale/revisions/5857.pdf

[4] Los Angeles County Department of Public Works. Accessed November 15, 2019. *Flood Zone Determination website*. Available at: https://dpw.lacounty.gov/floodzone/

limiting noise levels to below 75 dBA for mobile equipment and 60 dBA for stationary equipment at sensitive receptor locations. The proposed project would not be anticipated to change operational noise levels. Although the parking lot would expand to the east near the existing residences, there would also be a berm constructed between the parking lot and the residences, which would reduce noise levels to sensitive receptors during operation. As with existing conditions, operation of the proposed project would comply with County regulations and the City of LCF's 10:00 p.m. curfew for nighttime events adjacent to residential properties. Therefore, impacts would be less than significant with incorporation of mitigation measures, and the proposed project would not result in cumulatively considerable impacts regarding noise.

Public Services

The proposed project would not contribute to cumulatively considerable impacts in relation to public services, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As the proposed project would result in no impacts regarding schools, parks, libraries, or other public facilities, there would be no contribution towards cumulative impacts. The proposed project would not contribute to cumulative impacts on public services, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the net effect of the recreation planning efforts would be to enhance facilities and programs to accommodate recreation users within an existing botanic garden. As stated in Section 2.14, *Population and Housing*, the proposed project would result in no impacts regarding cumulatively exceeding official regional or local population projections. The proposed project involves improvements to an existing recreation facility that would not induce population growth. Of the related projects, Project L at Scholl Canyon Landfill is anticipated to require the most grading and have the greatest emergency fire response risk due to its location within mountainous terrain near methane energy production activities. Construction of Project C would be anticipated to temporarily obstruct the shoulder and perhaps 1 traffic lane, which could affect fire and police emergency response and disaster routes identified by the County (I-210; please see Transportation analysis above). The other related projects would occur within more gently sloped terrain and previously developed sites served by existing streets that are not anticipated to create capacity or service level problems associated with the provision of fire protection and police/sheriff protection as a result of the projects such that the proposed project would contribute incrementally to cumulatively considerable impacts. Therefore, the proposed project would not result in cumulatively considerable impacts regarding public services.

Recreation

The proposed project would not contribute to cumulatively considerable impacts in relation to recreation, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As the proposed project would result in no impacts regarding regional open space connectivity, there would be no contribution towards cumulative impacts. The proposed project would not contribute to cumulative impacts on increased recreation use or construction/expansion of recreational facilities, in conjunction with other recreation planning efforts within the vicinity of Descanso Gardens, as the net effect of the recreation planning efforts would be to enhance facilities and programs to accommodate recreation users. Therefore, the proposed project would not result in cumulatively considerable impacts regarding recreation.

Transportation

The proposed project would not contribute to cumulatively considerable impacts in relation to transportation, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As the proposed project would result in no impacts regarding hazards due to a road design feature or inadequate emergency access, there would be no contribution towards cumulative impacts.

The proposed project would not contribute to cumulative impacts on transportation, in conjunction with other traffic-generating planning efforts within the vicinity of Descanso Gardens, as the net effect of the transportation planning efforts would be to improve parking circulation and pedestrian access to accommodate recreation users. As operations would result in minor changes to the Master Plan Area (such as 10 additional full-time staff, an expanded parking lot with additional parking spaces, and conversion of the Exit Only driveway at the Auxiliary Parking Lot to a two-way Enter/Exit driveway), transportation impacts are anticipated to be minimal during operations. Transportation impacts from the construction activities would be less than significant because the parking lots would be used for staging, reducing congestion impacts in nearby streets, and construction activities would be extended over approximately 11 years, possibly longer if fundraising efforts are slow. The timeframe for construction of 17 projects would potentially overlap with the 15-year Master Plan (Table 2.21-1). However, as the majority of these projects are located at a distance from the Master Plan Area, transportation impacts from related projects in Montrose (on the opposite side of SR-2, including Related Projects J, K, M, N, O, P, Q, R, and S)) and along Foothill Boulevard (Related Projects D, E, F, and H) are not anticipated to be cumulative (see Figure 1.13-1). Construction of Related Projects C and I may require temporary lane closures along Verdugo Boulevard and closed shoulders, potentially as well as the far-right lane of I-210. As I-210 has four westbound lanes bordered by shoulders on both sides and three to four eastbound lanes where the soundwalls are proposed, Related Project C would not be expected to fully obstruct traffic along I-210 at any point during construction. As Verdugo Boulevard has a westbound parking lane, bike lane, and two westbound traffic lanes near Related Project I and an existing parking lot on the west and north sides of the lot, Related Project I would not be expected to fully obstruct traffic along Verdugo Boulevard at any point during construction.

Related Project G would involve rebuilding an approximately 0.9-mile stretch of road in the City of LCF. Descanso Drive is an existing primarily residential road with two vehicle lanes, two biking lanes, and two parking lanes, it is anticipated that construction of this contemplated capital improvements project for the City (not yet included in a capital improvements program [CIP]) would be phased to avoid a full road closure. As a Traffic Control Plan would be prepared prior to construction of individual projects identified in the Master Plan, it would need to incorporate an approach to maintaining street access during any concurrent construction efforts. Therefore, the proposed project would not result in cumulatively considerable impacts regarding transportation.

Tribal Cultural Resources

The proposed project would not contribute to cumulatively considerable impacts in relation to tribal cultural resources, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As there would be no net substantial adverse change in the significance of a tribal cultural resource as a result of the proposed project after implementation of mitigation measures, there would be no cumulative impacts.

Therefore, the proposed project would not result in cumulatively considerable impacts regarding tribal cultural resources.

Utilities

The proposed project would not contribute to cumulatively considerable impacts in relation to utilities, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. As the proposed project would result in no impacts regarding management and reduction statutes and regulations related to solid waste, there would be no contribution towards cumulative impacts. As with the proposed project, the related projects are located within an urban context currently served with municipal or private utility provided water supply, wastewater treatment utilities (sewer except potentially Project I), stormwater system, electricity, natural gas, and telecommunication facilities. Projects in this area that are not served by sewer would include septic or other on-site wastewater treatment systems. As stated in Section 2.14, *Population and Housing*, the proposed project would result in no impacts regarding cumulatively exceeding official regional or local population projections. The related projects in the City of Glendale would be required to comply with Glendale's Zero Waste Policy. As with the proposed project, the related projects in unincorporated territory of Los Angeles County would be required to comply with standards such as the County of Los Angeles Construction and Demolition Debris Recycling and Reuse Ordinance, as well as the County's Green Building Standards Code. Of the related projects, Project L at Scholl Canyon Landfill is anticipated to require the most grading and have the greatest wildfire risk due to its location within mountainous terrain near methane energy production activities. Construction of Project C would be anticipated to temporarily obstruct the shoulder and perhaps one traffic lane, which could affect disaster routes identified by the County (I-210; please see Transportation analysis above). The other related projects would occur within more gently sloped terrain and previously developed sites that are not anticipated to exacerbate wildfire risk as a result of the projects such that the proposed project would contribute incrementally to cumulatively considerable impacts. As stated in Section 2.19, *Utilities,* the proposed project would result in less than significant impacts regarding generating excessive solid waste (Related Project L); therefore, there would be no cumulative contribution to impacts on Scholl Canyon Landfill. Therefore, the proposed project would not result in cumulatively considerable impacts regarding utilities.

Wildfire

The proposed project would not contribute to cumulatively considerable impacts in relation to wildfire, in conjunction with other planning efforts within the vicinity of Descanso Gardens, as the related projects would involve programmatic open space and recreation planning (Related Projects A and B), residential and commercial development, and infrastructure improvement projects within developed residential and commercial communities along main roads, as well as the developed Scholl Canyon Landfill. Of the related projects, Project L at Scholl Canyon Landfill is anticipated to require the most grading and have the greatest wildfire risk due to its location within mountainous terrain near methane energy production activities. Construction of Project C would be anticipated to temporarily obstruct the shoulder and perhaps one traffic lane, which could affect disaster routes identified by the County (I-210; please see Transportation analysis above). The other related projects would occur within more gently sloped terrain and previously developed sites that are not anticipated to exacerbate wildfire risk as a result of the projects such that the proposed project would contribute incrementally to cumulatively considerable impacts. Therefore, the proposed project would not result in cumulatively considerable impacts regarding wildfire.

The environmental impacts of these projects would add to the impacts of the proposed project on a cumulative basis. However, the impacts of the proposed project would be limited in scope and intensity due to the scattered locations, small scale, extended time frame for construction of all Master Plan elements, and types of improvements proposed. As project impacts would be less than significant after mitigation, impacts associated with the proposed project are not expected to be cumulatively considerable when added to the impacts of related projects in the vicinity of the Master Plan Area.

Therefore, the proposed project would result in less than significant impacts regarding having impacts that are individually limited, but cumulatively considerable, and no mitigation would be required.

d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

The proposed project would result in less than significant impacts regarding having environmental effects which will cause substantial adverse effects which will cause substantial adverse effects on human beings, either directly or indirectly. Potential environmental impacts associated with the proposed project in regard to human health and safety during construction, operations, and maintenance would be less than significant through consistency with the Best Management Practices, development of a Traffic Control Plan for construction period, and implementation of Mitigation Measure NOISE-1 to reduce construction noise levels near sensitive receptors. Therefore, the proposed project would result in less than significant impacts regarding having environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly, and no mitigation would be required.

Section 3

Mitigation Measures

This Mitigated Negative Declaration has identified mitigation measures for Biological Resources, Cultural Resources, Geology and Soils, Noise, and Tribal Cultural Resources to reduce significant impacts identified as a result of the environmental analysis provided in Section 2.0, *Environmental Checklist*, and capable of reducing impacts to below the level of significance. Mitigation measures were further refined in response to comments provided during public review of the mitigated negative declaration.

BIOLOGICAL RESOURCES

Mitigation Measure BIO-1: To mitigate potential impacts of the proposed Wilds Loop trail on **listed, sensitive, and locally important species and their habitats**:

- Directed surveys shall be conducted in the impact area for the proposed Wilds Loop trail and within 50 feet on either side of the trail. Surveys shall be conducted by a qualified biologist using approved USFWS and CDFW protocols to identify any listed, sensitive, and locally important species within the impact area.
- If sensitive biological resources are observed during the preconstruction survey, fencing and/or flagging shall be used to delineate Environmentally Sensitive Areas (ESAs), which shall be off-limits during trail construction.
- The Wilds Loop trail shall be designed, constructed, and maintained to avoid disturbance of any occupied habitat.
- For protected plans where disturbance is unavoidable, the proper agency shall be notified to salvage and relocate the plants to conserved suitable habitat.
- Qualified biological monitors shall be required on-site for initial ground disturbance and clearing as well as periods when trail construction would be undertaken within 50 feet of delineated ESAs.

Mitigation Measure BIO-2: To mitigate potential impacts on **riparian, state sensitive plant communities, state protected wetlands, and federally protected wetlands and Waters of the United States**:

- A jurisdictional delineation shall be conducted by a certified wetland delineator to identify any state or federally protected wetlands, riparian areas, and state sensitive plant communities on-site.
- Although proposed activities would take place within existing protected habitats, the overall goal of the proposed project is to restore and improve aquatic resources and increase the long-term viability of the Lake, resulting in beneficial effects to these areas. Where the jurisdictional delineation identifies State-designated sensitive plant communities, riparian habitat, state or federally protected wetlands, or Waters of the United States to be present, and that will not be improved by project activities, impact avoidance, impact minimization, and/or compensatory mitigation (i.e., on-site mitigation) shall be implemented such that there is no net loss of habitat functions or values.
- Where impacts are located in areas subject to the jurisdiction of the CDFW pursuant to Section 1600 of the State Fish and Game Code, a Lake or Streambed Alteration Agreement shall be obtained prior to commencing ground-disturbing activities or any other alternation of a lake or stream.
- Where impacts are located in areas subject to the jurisdiction of the USACE pursuant to Section 404 of the federal CWA, obtain authorization to complete the required work pursuant to a Nationwide or individual permit.

  Where impacts are subject to the jurisdiction of the Regional Water Quality Control Board (RWQCB), obtain a Waiver of Water Quality Certification or Notice of Applicability of Waste Discharge Requirement permit.

Mitigation Measure BIO-3: To mitigate for impacts to **Jurisdictional Resources** that cannot be avoided:

- The County of Los Angeles Department of Parks and Recreation (DPR) shall apply for a Section 401 permit from the RWQCB and a 1602 Streambed Alteration Agreement from CDFW. These permits shall be obtained prior to approval of improvement plans; issuance of grading permits; and/or any clearing, grading, or excavation work.
- The DPR shall ensure that the proposed projects would result in no net loss of Waters of the State by providing mitigation through impact avoidance; impact minimization; and/or compensatory mitigation (i.e., on-site mitigation) for the impact, as determined in the Streambed Alteration Agreement.
- The DPR retains responsibility for the implementation and success of the mitigation project. Evidence of secured permits shall be provided prior to approval of improvement plans; issuance of grading permits; and/or any clearing, grading, or excavation work.

Mitigation Measure BIO-4: To avoid impacts to **nesting birds protected under the MBTA**:

- Construction related to proposed projects should take place outside of the nesting bird season, which generally occurs between February 15 and September 1.
- If construction activities cannot avoid the nesting bird season, pre-construction nesting bird surveys shall be conducted by a qualified biologist no more than three days prior to the start of construction and shall include a 300-foot survey area for non-raptors and a 500-foot survey area for raptors.
- On the first day of construction at any given site, a qualified biologist shall perform a pre-construction "sweep" to identify any bird nests or other resources that may have appeared since the nesting bird survey.
- On each subsequent day of construction during the nesting season, a biological monitor shall first perform a daily sweep at each work site to look for nesting birds. The daily sweeps shall be conducted to identify new nests (partially built, active, or inactive) not detected during the preconstruction survey or clearance sweep.
- Should nesting birds be discovered within or adjacent to the construction footprint during these surveys, a non-disturbance buffer shall be placed around the active nest[1] to prevent impacts to nesting birds.
- Construction shall be halted within the non-disturbance buffer (typically 250 feet for non-raptors and 500 feet for raptors) until the biologist has determined that the young have fledged and are flying well enough to avoid the proposed construction activities. Established buffer sizes depend on site-specific conditions, known tolerances species and individual bird behavior and shall be determined by the qualified biologist.
- Active nests near construction work areas shall be monitored. If a nesting bird appears to be stressed as a result of project activities and is at risk of abandoning its nest, the biologist shall halt activity in the immediate area until the bird resumes its normal behavior or until the nest has been determined to no longer be active.

[1] The MBTA does not clearly define what an active (or inactive) nest is. However the USFWS has clarified that the federal regulations do not pertain to the destruction of nests alone (without birds or eggs), provided that possession of the nests does not occur and the activities do not otherwise result in take of migratory birds covered by the MBTA. (See U.S. Fish and Wildlife Service. June 14, 2018. Memorandum: Destruction and Relocation of Migratory Nest Contents. Accessed January 15, 2020. https://www.fws.gov/policy/m0407.pdf). CDFW has not provided clarification on the regulations pertaining to nesting birds. Therefore, for purposes of this measure, non-raptor, non-special-status species nests without eggs or chicks are considered inactive. For raptors, a nest is considered active when raptors exhibit nest construction or nest decorating behavior. The project biologist will determine when a nest is active based upon field observations at each nest.

Mitigation Measure BIO-5: To mitigate potential impacts to **bat species**:

- Pre-construction surveys shall be conducted by a qualified biologist, including nighttime surveys, at least seven consecutive days prior to the start of project activities near suitable roosting habitat[2].
- If it is determined during the pre-activity surveys that the area (including oak woodland and riparian habitat) could be used as roost sites by bat species, to avoid the direct loss of bats that could result from disturbance to trees or structures that may provide maternity roost habitat (e.g., in cavities or under loose bark) or structures that contain a hibernating bat colony, the following steps shall be taken:
  - To the extent feasible, demolition or disturbance to suitable bat roosting habitat shall be scheduled between October 1 and February 28, outside of the maternity roosting season.
  - If suitable bat roosting habitat must be encroached during the maternity season (March 1 to September 30), a qualified bat specialist shall conduct a pre-construction survey to identify the habitat proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.
  - Any suitable bat roosting habitat identified as potentially supporting an active maternity roost and each structure potentially supporting a hibernating colony shall be closely inspected by the bat specialist no greater than seven days prior to the habitat's disturbance to more precisely determine the presence or absence of roosting bats.
  - If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, it is preferable to bring down trees, buildings, or structures in a controlled manner using heavy machinery.
  - In order to ensure the optimum warning for any roosting bats that may still be present, trees, buildings, or structures shall be nudged lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. Trees, buildings, or structures may then be pushed to the ground slowly under the supervision of a bat specialist.
  - Felled trees shall remain in place until they are inspected by a bat specialist. Trees that are known to be bat roosts shall not be sown up or mulched immediately. A period of at least 48 hours shall elapse prior to such operations to allow bats to escape.
  - Bats shall be allowed to escape prior to demolition of structures or buildings. This may be accomplished by placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.
  - Maternity season lasts from March 1 to September 30. Trees, buildings, or structures determined to be maternity roosts shall be left in place until the end of the maternity season. A suitable bat roosting habitat containing a hibernating colony shall be left in place until a qualified biologist determines that the bats are no longer hibernating.

Mitigation Measure BIO-6: To mitigate potential impacts on **oak and other native woodlands**:

- Environmentally Sensitive Area fencing shall be placed around the driplines or trunks of protected oak trees within and adjacent to the limits of disturbance, depending on the scheduled construction activity, such that no work shall occur within the protected area.
- Use of on-site monitors shall be required for periods when construction shall be undertaken within 250 feet of oak woodlands, and native woodlands, and when construction is within 100 feet of the dripline of individual isolated protected native trees.

[2] For sensitive bat species with potential to occur in the Master Plan Area this includes high cliffs, rocky outcrops, rock crevices, caves, mineshafts, under bridges, in buildings, tall trees, hollow trees, beneath exfoliating bark, abandoned woodpecker holes, or foliage.

- To ensure no loss of oak trees within and adjacent to the limits of disturbance after completion of construction activities, trees shall be monitored, for up to 5 years, for mortality and replanted at the appropriate ratios below to compensate as needed. .
- Per the County Oak Tree Ordinance for every protected tree that must be removed, the same species shall be replaced at a minimum of a 2:1 ratio.
    - Compensatory mitigation for protected trees in the jurisdiction of the County may include replacement at a 3:1 ratio for trees with a diameter at breast height of 8 inches or more at an appropriate mitigation site, and replacement at a 10:1 ratio for heritage oaks.
    - Replacement trees shall be monitored by a licensed arborist, for at least one year, to ensure survivability of replacement trees meet success criteria.

To comply with Public Resources Code 21083.4:

If the County determines that there may be a significant effect to oak woodlands, the County shall require one or more of the following oak woodlands mitigation alternatives to mitigate the significant effect of the conversion of oak woodlands:

1. Conserve oak woodlands, using conservation easements.
2. Plant an appropriate number of trees, including maintaining plantings and replacing dead or diseased trees.
    a. The requirement to maintain trees pursuant to this measure terminates 7 years after the trees are planted.
3. Restore former oak woodlands.
4. Contribute funds to the Oak Woodlands Conservation Fund

CULTURAL RESOURCES

Mitigation Measure CULTURAL-1: *Archaeological and Historical Resources – Avoidance and Monitoring.* Completion of a Worker Education and Awareness Program (WEAP) for all personnel who will be engaged in ground-disturbing activities shall be required prior to the start of ground-disturbing activities. This shall include training that provides an overview of cultural resources that might potentially be found and the appropriate procedures to follow if cultural resources are identified. This requirement extends to any new staff prior to engaging in ground-disturbing activities.

Prior to the initiation of ground-disturbing activities, the County of Los Angeles Department of Parks and Recreation (DPR) shall review the construction plans to ensure that any known cultural resources that are required to be avoided have been marked as "off-limits" areas for construction and construction staging. In addition, DPR shall require monitoring of all ground-disturbing activities by a qualified archaeologist within 60 feet of a known extant unique archaeological resource or significant historical resource.

In the event that previously unknown unique archaeological resources or significant historical resources are encountered during construction, the resources shall either be left *in situ* and avoided, or the resources shall be salvaged, recorded, and reposited at the Natural History Museum of Los Angeles County (NHM) or other repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan.[3] Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate adverse effects to cultural resources eligible or listed under Section 106 Criterion D/CRHR Criterion 4, as it preserves important information that will otherwise be lost.

[3] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

Mitigation Measure CULTURAL-2: *Pre-Construction Surveys.* At the time that any construction activity is proposed that would require ground-disturbing activities in soils that have been predominantly *in situ* during the past 50 years, records and archival information shall be reviewed to determine if there are any recorded unique archaeological resources and significant historical resources as defined in Section 15064.5(a) of the CEQA Guidelines. At a minimum, the records and archival review shall include a search of the South Central Coastal Information Center if more than five years have passed since the previous records search. The appropriate course of action shall be undertaken in light of the results of the records search:

(A) Where the project study area has been subject to a Phase I Walkover Survey within two years of the proposed activity and no unique archaeological resources or significant historical resources are known within the project footprint, work shall proceed per the provision of Mitigation Measure CULTURAL-1.

(B) Where all or a portion of the project footprint has not been surveyed for cultural resources within two years of a proposed ground-disturbing activity, a qualified archaeologist who meets the Secretary of the Interior's *Professional Qualification Standards* for Archaeology and shall conduct a Phase I Walkover Survey to ascertain the presence or absence of unique archaeological and/or significant historical resources, as defined in Section 15064.5(a) of the CEQA Guidelines.

a. If the survey and record searches determines no unique archaeological resources or significant historical resources, including potential Tribal cultural resources, then the work shall proceed consistent with the provisions of Mitigation Measure CULTURAL-1.

b. If the survey determines potential unique archaeological resources or significant historical resources, then one of two courses of action shall be employed:

i. Where avoidance is feasible, construction should avoid the potentially significant cultural resource, and the work shall then proceed consistent with the provisions of Mitigation Measure CULTURAL-1. The project area shall be surveyed by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior. An archaeological monitor under direction of a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior shall be present during ground-disturbing activities within 60 feet of previously recorded cultural resources.

ii. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior to determine the significance of the cultural resource. If the Phase II investigation identifies a unique/eligible cultural resource within the area proposed for ground-disturbing work, the County shall determine whether to avoid the resource through redesign or to proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of Mitigation Measure CULTURAL-1.

Mitigation Measure CULTURAL-3: *Paleontological Resources – Paleontological Monitoring.* Impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance by monitoring, salvage, and curation at

the NHM.[4] Unanticipated paleontological resources discovered during ground-disturbing activities in previously undisturbed native soils located five or more feet below the ground surface that would have the potential to contact geologic units with a high to moderate potential to yield unique paleontological resources. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, DPR shall require and be responsible for salvage and recovery of those resources by a qualified paleontologist consistent with standards for such recovery established by the Society of Vertebrate Paleontology.[5]

Paleontological Resources Sensitivity Training given by a qualified paleontologist or archaeologist cross-trained in paleontology shall be required for all project personnel involved in ground disturbing activities prior to the start of these activities in geologic units with a moderate to high potential to yield unique paleontological resources. This shall include a brief field training that provides an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified. This requirement extends to any new staff involved in earth disturbing that joins the project.

Construction monitoring by a qualified monitor (archaeologist cross-trained in paleontology or paleontologist) shall be implemented during all ground-disturbing activities that affect previously undisturbed geologic units 5 or more feet below the ground surface and have the potential to encounter geologic units with a moderate to high potential to yield unique paleontological resources. In the event that a paleontological resource is encountered during construction, all ground-disturbing activity within 100 feet of the find shall be halted until a qualified paleontologist can evaluate the significance of the discovery. Additional monitoring recommendations may be required. If the resource is found to be significant, the paleontologist shall determine the most appropriate treatment and method for stabilizing and collecting the specimen. Curation of the any significant paleontological finds shall be housed at a qualified repository, such as the NHM.

Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to DPR with an appended, itemized inventory with representative snapshots of specimens. The report and inventory, when submitted to DPR, shall signify the completion of the program to mitigate impacts to paleontological resources. A copy of the report/inventory shall be filed with DPR and the NHM.

Mitigation Measure CULTURAL-4: *Regulatory Requirements – Human Remains.* In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

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[4] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

[5] A Qualified Professional Paleontologist (Principal Investigator, Project Paleontologist) is a practicing scientist who is recognized in the paleontological community as a professional and can demonstrate familiarity and proficiency with paleontology in a stratigraphic context. A paleontological Principal Investigator shall have the equivalent of the following qualifications:

1. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.

2. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.

3. Proficiency in recognizing fossils in the field and determining their significance.

4. Expertise in local geology, stratigraphy, and biostratigraphy.

5. Experience collecting vertebrate fossils in the field.

GEOLOGY AND SOILS

Mitigation Measure GEO-1: To mitigate potential impacts related to **expansive soils**:

- During construction of proposed project elements, and in the event expansive soils are encountered during construction activities such as proposed grading, soil materials shall be removed, mixed with nonexpansive soils, or segregated and stockpiled for potential use as low-permeable materials during grading.

NOISE

Mitigation Measure NOISE-1: To mitigate noise levels during construction activities at sensitive receptors located within 21 feet of construction, sound walls shall be installed at the construction barrier by the contractor during the construction phase for the demolition of the two buildings and construction projects on the northeast edge of the Master Plan Area along the property boundary facing the existing residents. Mufflers, blankets, and baffles shall also be implemented to ensure the reduction of noise levels. The noise barriers shall provide noise level reductions up to 20 dBA depending upon the placement and structure of the sound wall to bring construction noise levels below 75 dBA, which is the requirement for sound levels at the nearest sensitive receptors.

TRIBAL CULTURAL RESOURCES

Mitigation Measure TRIBAL-1: *Tribal Resources – Avoidance and Monitoring.* Prior to the initiation of ground-disturbing activities, DPR shall review the construction plans to ensure that any known TCRs that are required to be avoided have been marked as "off-limits" areas for construction and construction staging. DPR shall require monitoring of all ground-disturbing activities by a Native American monitor within 60 feet of a known TCR.[6] In addition, consultation shall be undertaken with the Native American local Tribal contacts designated by the NAHC and the Tribe to determine if a Native American monitor shall be present during all or a portion of the ground-disturbing activities within additional areas that are sensitive for TCRs.

In the event that previously unknown TCRs are encountered during construction, the resources shall either be left *in situ* and avoided through redesign, or the resources shall be salvaged, recorded, and reposited at the NHM or other repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan.[7] The cultural resource management plan will include further consultation with the Tribe. Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate adverse effects to cultural resources eligible or listed under Section 106 Criterion D/CRHR Criterion 4, as it preserves important information that will otherwise be lost.

Mitigation Measure TRIBAL-2: *Pre-Construction Surveys.* At the time that any construction activity is proposed for development that would require ground-disturbing activities in soils that have been predominantly *in situ* during the past 50 years, records and archival information shall be reviewed to determine if there are any recorded TCRs as defined by AB 52 in the project footprint.[8] At a minimum, the records and archival review shall include a search of the South Central Coastal Information Center if more than five years have passed since the previous records search, a request for Sacred Lands File from the NAHC, and a request

[6] County of Los Angeles Department of Parks and Recreation. 2018. Parks and Recreation Facilities Project Cultural Resources Management Plan.

[7] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

[8] Fifty years or older is the standard cutoff age for "historic" age resources.

for information regarding TCRs from the Native American local Tribal contacts designated by NAHC and the Tribe. The appropriate course of action shall be undertaken in light of the results of the records search:

(A) Where the project study area has been subject to a Phase I Walkover Survey within two years of the proposed activity and no TCRs are known within the project footprint, work shall proceed per the provision of Mitigation Measure TRIBAL-1.

(B) Where all or a portion of the project footprint has not been surveyed for cultural resources within two years of a proposed ground-disturbing activity, a qualified archaeologist who meets the Secretary of the Interior's *Professional Qualification Standards* for Archaeology and shall conduct a Phase I Walkover Survey to ascertain the presence or absence of TCRs, as defined in Section 15064.5(a) of the CEQA Guidelines.

a. If the survey and record searches determine no potential TCRs, then the work shall proceed consistent with the provisions of Mitigation Measure TRIBAL-1.

b. If the survey determines potential TCRs, then one of two courses of action shall be employed:

i. Where avoidance is feasible, the construction shall avoid the potentially significant TCRs, and the work shall then proceed consistent with the provisions of Mitigation Measure TRIBAL-1. The project area shall be surveyed by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior. DPR shall require monitoring of all ground-disturbing activities by a Native American monitor within 60 feet of a known TCR.[9] In addition, consultation shall be undertaken with the Native American local Tribal contacts designated by the Native American Heritage Commission and the Tribe to determine if a Native American monitor shall be present during all or a portion of the ground-disturbing activities within additional areas that are sensitive for TCRs.

ii. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken by a qualified archaeologist who meets the *Professional Qualification Standards* of the Secretary of the Interior to determine the significance of the cultural resource. If the Phase II investigation identifies a unique/eligible TCR within the area proposed for ground-disturbing work, the County shall in consultation with the Tribe, determine whether to avoid the resource through redesign or to proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of Mitigation Measure TRIBAL-1.

Mitigation Measure TRIBAL-3: *Regulatory Requirements – Human Remains*. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

If the County Coroner determines that the remains are or are believed to be Native American, s/he shall notify the NAHC in Sacramento within 24 hours. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC shall immediately notify the person(s) it believes to be the most likely descendant (MLD) of the deceased Native American. The descendants shall complete their inspection and make a

[9] County of Los Angeles Department of Parks and Recreation. 2018. Parks and Recreation Facilities Project Cultural Resources Management Plan.

recommendation within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with DPR, the disposition of the human remains. The MLD's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If DPR rejects the MLD's recommendations, the agency shall rebury the remains with appropriate dignity on the property within a time frame agreed upon between the County and the MLD's in a location that will not be subject to further subsurface disturbance (14 California Code of Regulations §15064.5(e)).

Section 4

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Section 5

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