INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

PALM CREST ELEMENTARY SCHOOL MODERNIZATION PROJECT

Prepared for:



La Cañada Unified School District

4490 Cornishon Avenue La Cañada, CA 91011

Prepared by:



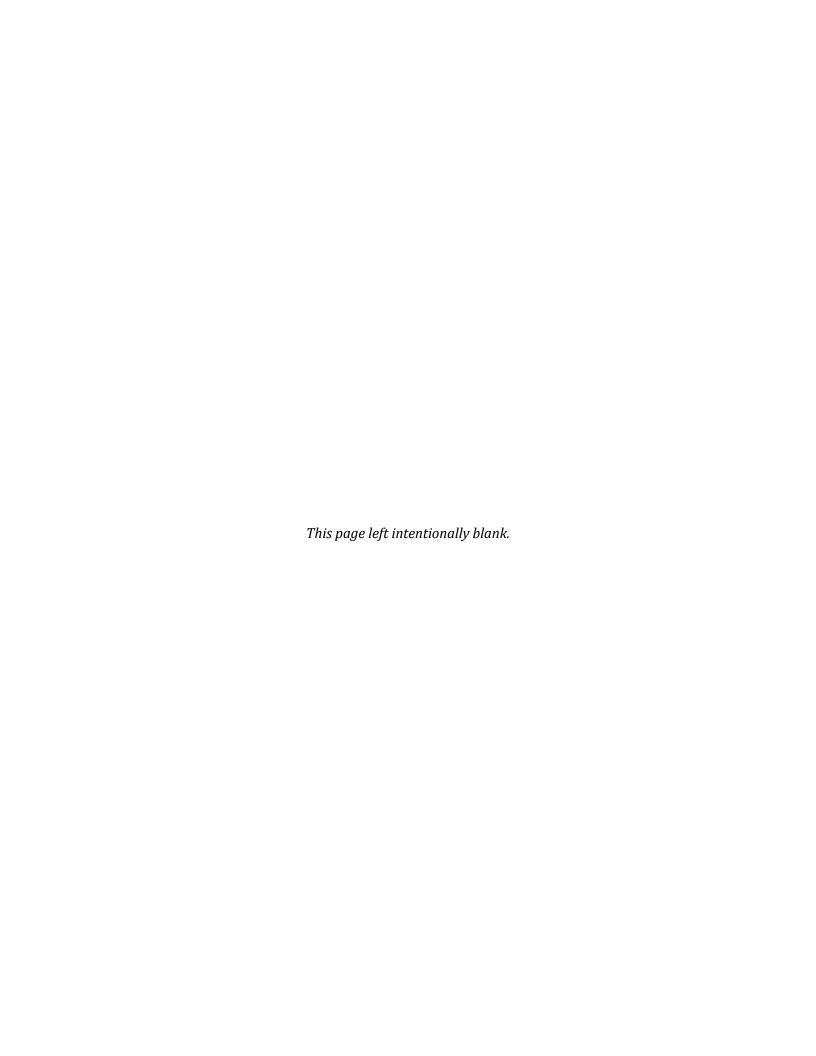
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July 2020

Project: 7046





Project Information Sheet

1. **Project Title** Palm Crest Elementary School Modernization Project

2. **CEQA Lead Agency and Address** La Cañada Unified School District

> 4490 Cornishon Avenue. La Cañada, CA 91011

3. **Contact and Phone Number** Harold J. Pierre, P.E., Program Manager

(818) 952-8077

Project Applicant La Cañada Unified School District

5. 5025 Palm Drive **Project Location**

La Cañada Flintridge, CA 91011

Assessor's Parcel Number APN 5806-018-900

Project Site General Plan

Designation

Public

Project Site Zoning Designation

Public/Semi-public (PS)

Surrounding Land Uses and Setting

Density Residential development single-family homes are located to the north, across Solliden Lane and Jessen Drive, to the south, to the east across Palm Drive and to the west. Additionally, Halls Canyon Channel and a detention pond are located to the west of the project site.

10. Description of Project

The proposed project involves the construction of one new two-story, approximately 23,184-square-foot classroom building (comprised of two wings); renovation of 18 existing classrooms; conversion of one classroom building to four specialty classrooms; demolition of the old District Office and garage; removal of trees for construction of a new upper parking lot; alteration/improvement to the existing drop-off area; alteration/improvement to the existing west parking lot; installation of temporary portable classrooms for use during project construction; and construction and extension of site utilities to new classroom buildings, improvement to landscaping areas, and pedestrian walkways.

11. Selected Agencies whose Approval is Required

Agencies that will review the proposed project include but are not limited to the following:

California Department of Education (CDE) -School Facilities Planning Division



- California Department of General Services Division of State Architect (DSA)
- Los Angeles County Fire Department
- California Geological Survey (CGS)
- California Regional Water Quality Control Board - Los Angeles
- South Coast Air Quality Management District
- Department of Toxic Substances Control (DTSC)
- 12. 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, has consultation begun?

The La Cañada Unified School District has begun the Assembly Bill 52 consultation process. The District sent letters to seven tribes on April 8, 2020, asking if they wished to consult with the District. To date only the Gabrieleno Band of Mission Indians - Kizh Nation responded to request consultation. A meeting between the tribe and the District was held April 15, 2020. Information on past and planned construction at the project site was requested by the tribe which the District will provide, after which another meeting will be scheduled if required or requested.



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Acronyms and Abbreviations

Acronym/Abbreviation	Term		
AB	Assembly Bill		
AB 939	Zero-waste program		
ACM(s)	Asbestos-Containing Material(s)		
ADA	Americans with Disabilities Act		
AIA	Airport Influence Area		
ALUCP	Airport Land Use Compatibility Plan		
ALUC(s)	Airport Land Use Commission(s)		
ALUP	Airport Land Use Plan		
amsl	above mean sea level		
ANSI	American National Standards Institute		
APE	Area of Potential Effect		
AQMP	Air Quality Management Plan		
ARB	California Air Resources Board		
bgs	below the ground surface		
BMPs	Best Management Practices		
BSA	Biological Survey Area		
CAAQS	California Ambient Air Quality Standards		
CalEEMod	California Emissions Estimator Model		
CAL FIRE	California Department of Forestry and Fire Protection		
CALGreen Code	Green Building Standards Code		
CalRecycle	California Department of Resources Recycling and Recovery		
CAP	Climate Action Plan		
CAOs	Cleanup and Abatement Orders		
CBC	California Building Code		
CCAA	California Clean Air Act		
CCR	California Code of Regulations		
CDE	California Department of Education		
CDFG	California Department of Fish and Game		
CDFW	California Department of Fish and Wildlife		
CDOs	Cease and Desist Orders		
CEC	California Education Code		
CEQA	California Environmental Quality Act		
	Comprehensive Environmental Response, Compensation, and		
CERCLA	Liability Act		
CESA	California Endangered Species Act		
CFCs	chlorofluorocarbons		
cfs	cubic feet-per-second		
CGS	California Geological Survey		



Acronym/Abbreviation	Term		
CH ₄	methane		
CHRIS	California Historical Resources Information System		
City	City of La Cañada Flintridge		
CNDDB	California Natural Diversity Database		
CNEL	Community Noise Equivalent Level		
CNPS	California Native Plant Society		
СО	carbon monoxide		
CO ₂ e	CO ₂ equivalent		
CRPR	California Rare Plant Rank		
CRHR	California Register of Historical Resources		
CWA	Clean Water Act		
dB	decibel		
dBA	A-weighted decibel scale		
District	La Cañada Unified School District		
DOC	California Department of Conservation		
DPM	Diesel particulate matter		
DSA	Division of State Architect		
DTSC	Department of Toxic Substances Control		
EIR	Environmental Impact Report		
ESA	Federal Endangered Species Act		
ESA	Environmental Site Assessment		
FEMA	Federal Emergency Management Area		
FHSZ	Fire Hazard Severity Zones		
FIRM	Flood Insurance Rate Map		
FTA	Federal Transit Administration		
GHG	greenhouse gas		
GIS	Geographic Information System		
GPS	Global Positioning Systems		
GWP	global warming potential		
НСР	Habitat Conservation Plan		
HSC	Health and Safety Code		
Hz	hertz		
I-	Interstate		
IPaC	Information, Planning and Conservation		
IR	Interpretation of Regulations		
IS	Initial Study		
kWh	Kilowatt-hours		
L ₉₀	noise level that is exceeded 90 percent of the time at a given location		
LACoFD	Los Angeles County Fire Department		



Acronym/Abbreviation	Term		
LARWQCB	Los Angeles Regional Water Quality Control Board Region 4		
LBP	lead-based paint		
LCID	La Cañada Irrigation District		
LCUSD	La Cañada Unified School District		
L _{dn}	day-night average noise		
LED	Lighting-emitting diode		
LID	Low Impact Development		
LOS	level of service		
LRA(s)	Local Responsibility Area(s)		
LRP	Legally Responsible Person		
LSTs	localized significance thresholds		
LUST	leaking underground storage tank		
M	million		
MBTA	Migratory Bird Treaty Act		
mgd	million gallons per day		
MLD	Most Likely Descendant		
MM(s) Mitigation Measure(s)			
MMRP	Mitigation Monitoring and Reporting Program		
MND	Mitigated Negative Declaration		
MRZ	Mineral Resource Zone		
MS4	Municipal Separate Storm Sewer Systems permit		
MtCO ₂ e	million tonnes of CO ₂ e		
MU	Mixed use		
MWD	Metropolitan Water District		
N ₂ O	nitrous oxide		
NAAQS	National Ambient Air Quality Standards		
NAHC	Native American Heritage Commission		
NCCP	Natural Community Conservation Plan		
ND	Negative Declaration		
NESHAP	National Emissions Standards for Hazardous Air Pollutants		
NHD National Hydrography Dataset			
NMFS	National Marine Fisheries Service		
NO	nitric oxide		
NO ₂ nitrogen dioxide			
NOI	Notice of Intent		
NO _x	nitrogen oxides		
NPDES	National Pollutant Discharge Elimination		
NRCS	Natural Resources Conservation Service		
NWI	National Wetlands Inventory		

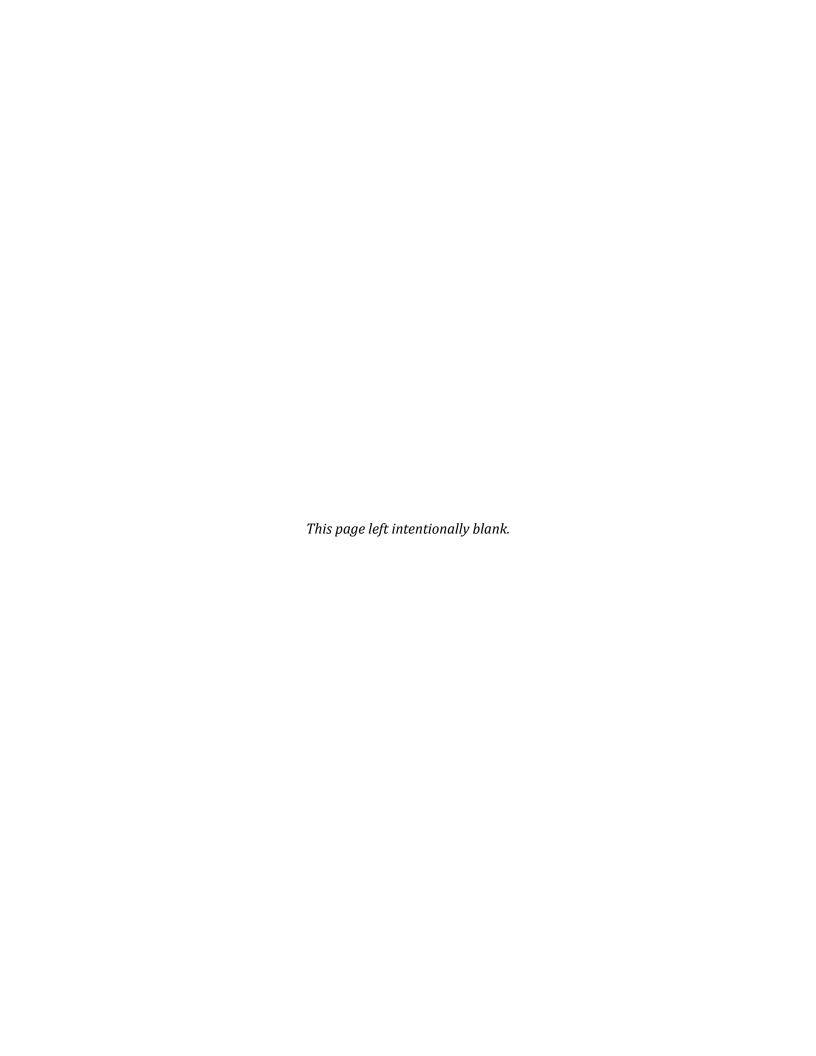


Acronym/Abbreviation	Term		
0 ₃	ozone		
OPR	Office of Planning and Research		
OPSC	Office of Public School Construction		
OSHA	Occupational Safety and Health Administration		
Pb	Lead		
PCBs	Lead polychlorinated biphenyls		
PM	polychlorinated biphenyls particulate matter		
PM_{10}	respirable particulates		
PM _{2.5}	fine particulate matter		
PPV	peak particle velocity		
PRC	Public Resources Code		
PRDs	Permit Registration Documents		
Project	Palm Crest Elementary School Modernization Project		
PS	Public/Semi-Public zoning designation		
Qof	Pleistocene aged older dissected surficial sediments		
Qyf	Quaternary Young Alluvial Fan Deposits		
RCRA	Resource Conservation and Recovery Act		
RECs	Recognized Environmental Conditions		
RMS	root mean square		
ROG	Reactive organic gases		
RWQCB	Regional Water Quality Control Board		
SB	Senate Bill		
SCAB	South Coast Air Basin		
SCAG	Southern California Association of Governments		
SCAQMD	South Coast Air Quality Management District		
SCCIC	Southern Central Coastal Information Center		
SCE	Southern California Edison		
SCH	State Clearinghouse		
SF ₆	sulfur hexafluoride		
SIP	California State Implementation Plan		
SLF	Sacred Lands File		
SMARA	Surface Mining and Reclamation Act		
SMP	Soil Management Plan		
SO ₂	sulfur dioxide		
SoCalGas	Southern California Gas Company		
SR	State Route		
SRA	State Responsibility Area		
SRAs	source receptor areas		
SSC	species of special concern		





Acronym/Abbreviation	Term		
SWPPP	Stormwater Pollution Prevention Plan		
SWRCB	State Water Resources Control Board		
t	tonnes		
TAC	toxic air contaminant		
tCO ₂ e	tonnes of CO ₂ e		
TCRs	tribal cultural resources		
TMDLs	Total Maximum Daily Loads		
tonnes	metric tons		
UBC	Uniform Building Code		
UltraSystems	UltraSystems Environmental Inc.		
USDA	United States Department of Agriculture		
USEPA	United States Environmental Protection Agency		
USFWS	United States Fish and Wildlife Service		
USGS	United States Geological Survey		
VdB	vibration decibels		
VHFHSZ(s)	very high fire hazard severity zones		
VMT	vehicle miles traveled		
VOC	volatile organic compound		
WEAP	Worker Environmental Awareness Program		
WOS	Waters of the State		
WOUS	Waters of the United States		
WQMP	Water Quality Management Plan		
WRI	World Resources Institute		
WRCC	Western Regional Climate Center		
ybp	years before present		
zero dBA	reference pressure level of 20 micropascals		
§	Section		
°F	degrees Fahrenheit		





1.0 INTRODUCTION

1.1 Project Overview

This Initial Study (IS) was prepared by UltraSystems Environmental Inc. (UltraSystems) for the La Cañada Unified School District (District) to assess whether there may be significant environmental impacts from the proposed Palm Crest Elementary School Modernization Project (herein referred to as project or proposed project). Based on the responses to the IS checklist questions, the District finds that a Mitigated Negative Declaration (MND) is the appropriate level of CEQA environmental documentation. This MND was prepared on the basis that either there was no substantial evidence that there may be significant environmental impacts on specific environmental areas, or, if there was a potentially significant impact, feasible mitigation measure(s) have been identified that would avoid or mitigate the potential impacts to a less than significant level.

1.2 Lead Agency

The District is the Lead Agency for this project pursuant to the California Environmental Quality Act (CEQA) and implementing regulations.¹ The Lead Agency has the principal responsibility for implementing and approving a project that may have a significant effect on the environment.

The purpose of an IS under § 15063(c) of the CEQA Statute and Guidelines is to:

- Provide the Lead Agency with information necessary to decide if an Environmental Impact Report (EIR), Negative Declaration (ND), or MND should be prepared.
- Enable a Lead Agency to modify a project to mitigate adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a ND or MND.
- Assist in the preparation of an EIR, if required, by focusing the EIR on adverse effects
 determined to be significant, identifying the adverse effects determined not to be significant,
 explaining the reasons for determining that potentially significant adverse effects would not
 be significant, and identifying whether a program EIR, or other process, can be used to
 analyze adverse environmental effects of the project.
- Facilitate an environmental assessment early during project design.
- Provide documentation in the ND or MND that a project would not have a significant effect on the environment.
- Eliminate unnecessary EIRs.
- Determine if a previously prepared EIR could be used for the project.

In cases where no potentially significant impacts are identified, the Lead Agency may issue an ND and no mitigation measures would be needed. Where potentially significant impacts are identified, the Lead Agency may determine that mitigation measures would adequately reduce these impacts to less than significant levels. The Lead Agency would then prepare a MND for the proposed project. If the

¹ Public Resources Code §§ 21000 - 21177 and California Code of Regulations Title 14, Division 6, Chapter 3.



Lead Agency determines that individual or cumulative effects of the proposed project would cause a significant adverse environmental effect that cannot be mitigated to less than significant levels, then the Lead Agency would require an EIR to further analyze these impacts.

1.3 Other Agencies

Other public agencies are provided the opportunity to review and comment on the IS/MND. Each of these agencies is described briefly below.

- A Responsible Agency (14 CCR § 15381) is a public agency, other than the Lead Agency, that
 has discretionary approval power over the project, such as permit issuance or plan approval
 authority.
- A Trustee Agency² (14 CCR § 15386) is a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California.
- Agencies with Jurisdiction by Law (14 CCR § 15366) are any public agencies who have authority (1) to grant a permit or other entitlement for use; (2) to provide funding for the project in question; or (3) to exercise authority over resources which may be affected by the project. Furthermore, a city or county will have jurisdiction by law with respect to a project when the city or county having primary jurisdiction over the area involved is: (1) the site of the project; (2) the area which the major environmental effects will occur; and/or (3) the area in which reside those citizens most directly concerned by any such environmental effects.

1.3.1 Requirements

CEQA Guidelines § 15063(d) identifies the following specific contents of an IS.

- A description and the location of the project.
- A description of the environmental setting.
- An assessment of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.
- A discussion of measures to mitigate significant adverse environmental effects, if any.
- An examination of existing zoning, plans and other land use controls that apply to the project.
- The names of persons that participated in the preparation of the document.

² The four Trustee Agencies in California listed in CEQA Guidelines § 15386 are California Department of Fish and Wildlife, State Lands Commission, State Department of Parks and Recreation, and University of California.



1.3.2 Mitigation Measures

Per CEQA Guidelines § 15041, Authority to Mitigate, a lead agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards. As defined by 14 CCR § 15040, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

If significant impacts are identified, then mitigation measures are adopted to reduce the impact to less than significant levels. Mitigation measures must meet the following criteria:

- An essential nexus (i.e., connection) must be established between the mitigation measure and a legitimate governmental interest.
- The mitigation measure must be "roughly proportional" to the impacts of the project.

There are several forms of mitigation under CEQA (§ 15370). These are summarized below.

- **Avoiding** the impact by preservation and maintenance operations during the life of the action.
- *Minimizing* impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- *Reducing or eliminating* the impact over time by preservation and maintenance operations during the life of the action.
- *Compensating* for the impact by replacing, or providing substitute resources for, the impacted environment(s) having similar functions of equal or greater ecological value.

Avoiding impacts is the preferred form of mitigation measure, followed by minimizing and rectifying the impact to less than significant levels. Compensating for impacts would be used only when the other mitigation measures are not feasible.

Moreover, a lead agency may approve a project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that:

- a) There is no feasible way to lessen or avoid the significant effect.
- b) Specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project.

1.4 Incorporation by Reference

Pursuant to CEQA Guidelines § 15150, this IS/MND incorporates by reference all or portions of other technical documents that are a matter of public record. Those documents either relate to the



proposed project or provide additional information concerning the environmental setting for the project. Where all or a portion of another document is incorporated by reference, the incorporated language considered is described within the text of this IS/MND.

The information contained in this IS/MND (refer to **Section 5.0**, References) is based, in part, on the following related technical studies and/or planning documents that include the project site or provide information addressing the general project area:

- City of La Cañada-Flintridge General Plan 2030 (adopted January 22, 2013). The General Plan is a policy document designed to give long-range guidance for decision-making affecting the future character of the City. It represents the official statement of the community's physical development as well as its economic, social, and environmental goals.
- City of La Cañada-Flintridge Municipal Code. The Municipal Code covers all aspects of regulations including zoning and various development-related requirements for the City of La Cañada-Flintridge.

1.5 Organization of Initial Study/Mitigated Negative Declaration

This IS/MND is organized to satisfy CEQA requirements, and includes findings that no significant environmental impacts would occur when proposed mitigation measures are adopted. The IS/MND includes the following sections:

- Section 1, *Introduction*, which identifies the purpose and scope of the IS/MND.
- Section 2, *Environmental Setting*, which describes location, existing site conditions, land uses, zoning designations, topography, and vegetation associated with the project site.
- Section 3, *Project Description*, which provides an overview of the project objectives, a description of the proposed development, project phasing during construction, and discretionary actions for the approval of the project.
- Section 4, *Environmental Checklist*, which presents checklist responses for each resource topic to identify and assess impacts associated with the proposed project, and proposes mitigation measures, where needed, to render potential environmental impacts less than significant, where feasible.
- Section 5, References, which includes a list of documents cited in the IS/MND.
- Section 6, *List of Preparers*, which identifies the persons who contributed to preparation of the IS/MND, and shows their technical specialties.
- Section 7, *Mitigation Monitoring and Reporting Plan* (MMRP), which specifies the recommended mitigation measures, the implementation stage, and the enforcement agency.



1.6 Process for Adoption of MND

Prior to MND and proposed project consideration, a Notice of Intent to Adopt an MND will be provided to Responsible Agencies, Trustee Agencies, Agencies with Jurisdiction by Law, and the public for 30 days to review and comment on the IS/MND.

Approval of the proposed project by the Lead Agency is contingent on adoption of the IS/MND after considering agency and public comments. By adopting the IS/MND, the Lead Agency certifies that the analyses provided in the IS/MND were reviewed and considered by the La Cañada Unified School District, and reflect its independent judgment and analysis.

1.7 Findings from the Initial Study

1.7.1 No Impact or Impacts considered Less Than Significant

The project would have no impact or a less than significant impact on the following environmental categories listed from Appendix G of the CEQA Guidelines:

Agriculture
Air Quality
Energy
Greenhouse Gas Emissions
Hydrology and Water Quality
Land Use and Planning
Mineral Resources
Population and Housing
Public Services
Recreation
Tribal Cultural Resources
Utilities and Service Systems
Wildfire

1.7.2 Impacts Considered Less than Significant with Mitigation Measures

Based on IS findings, the project would have a less than significant impact on the following environmental categories listed in Appendix G of the CEQA Guidelines when proposed mitigation measures are implemented:

Aesthetics
Biological Resources
Cultural Resources
Geology and Soils
Hazards and Hazardous Materials
Noise
Transportation

Technical Studies and other documents, which include supporting information or analyses used to prepare the IS/MND, are included in the following appendices:



Appendix A Project Plans

Appendix B1 Exterior Materials and Landscaping

Appendix B2 Shadow Exhibits

Appendix C1 Air Quality/GHG Summary

Appendix C2 CalEEMod Input and Output Data Appendix D1 Arborist Tree Inventory Sheet Appendix D2 Tree Inventory Photo Plate

Appendix D3 West Access Road Tree Management Rubric

Appendix E1 Cultural Resources Assessment

Appendix E2 Historic Evaluation

Appendix F Geotechnical Investigation Report
Appendix G Paleontological Records Search

Appendix H1 Phase I Environmental Site Assessment

Appendix H2 Asbestos Inspection Report

Appendix H3 Lead-Based Paint/Ceramic Tile Inspection Report

Appendix I1 Noise Technical Summary

Appendix I2 Ambient Noise Measurement Noise Field Sheets and Data

Appendix J Traffic Impact Assessment

Appendix K Information Request Letters and Responses



2.0 ENVIRONMENTAL SETTING

2.1 Project Site

The project site is located on the grounds of the Palm Crest Elementary school campus in the City of La Cañada Flintridge in central Los Angeles County (refer to **Figure 2.1-1** through **Figure 2.1-3**).

The City's General Plan land use designations and zoning in the vicinity of the project site are listed in **Table 2.1-1**, and shown in **Figure 2.1-4** and **Figure 2.1-5**. The project site is zoned by the city of La Cañada Flintridge as Public/Semi-public (PS). The area to the north is zoned as Mixed Use 1; east is zoned as R-1 20,000; west is zoned as Open Space (OS); and south is zoned as Mixed Use 1.

Table 2.1-1
SUMMARY OF LAND USES AND ZONING

Area	Existing General Plan Land Use	Zoning	Existing use
Palm Crest Elementary School	Public	Public/Semi-public (PS)	Educational and Athletics Facilities
North	Low Density Residential	Mixed Use 1	Single-Family Homes
East	Very Low Density Residential	R-1 20,000	Single-Family Homes
West	Open Space	Open Space (OS)	Vacant Land
South	Low Density Residential	Mixed Use 1	Single-Family Homes

2.2 Campus History

Palm Crest Elementary School was built in 1956 on an approximately 9.15-acre site. The elementary school serves children in levels Kindergarten through 6th grade. There are currently 35 classrooms on the project site. Campus modernization occurred in 1997, 2001, 2002, and 2009 as detailed below (LPA, 2017. p. 111).

- The 1997 Modernization included classrooms, seismic upgrade at all main classroom buildings (A, B, C & D), new accessible paths and ramps, addition of relocatable classrooms, site power upgrade (for relocatables), and low voltage system upgrades.
- The 2001 Modernization included modernization of relocatables including paint, lighting, paving, casework and sinks.
- The 2002 modernization included new fire alarm system and renovation of playgrounds.
- The Multi-Purpose Room was replaced and expanded in 2009.

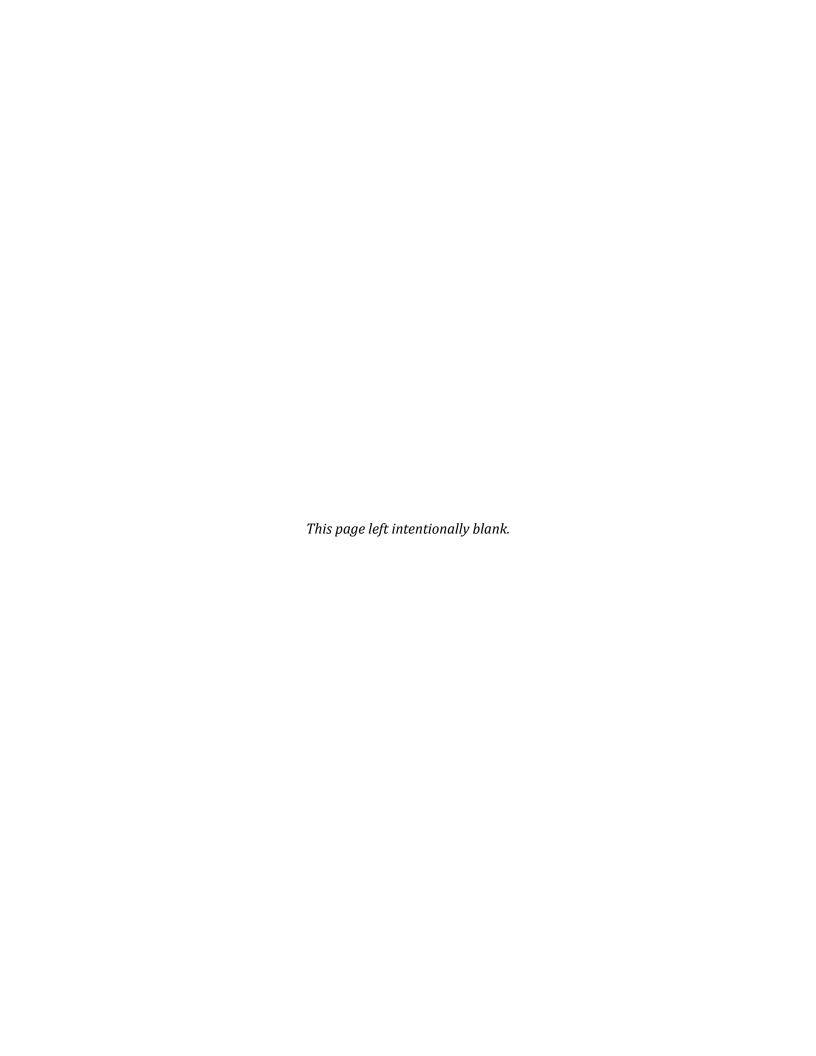
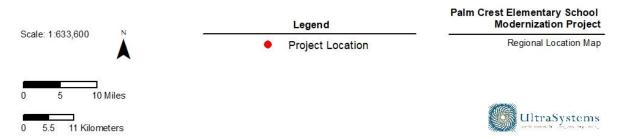




Figure 2.1-1 REGIONAL LOCATION





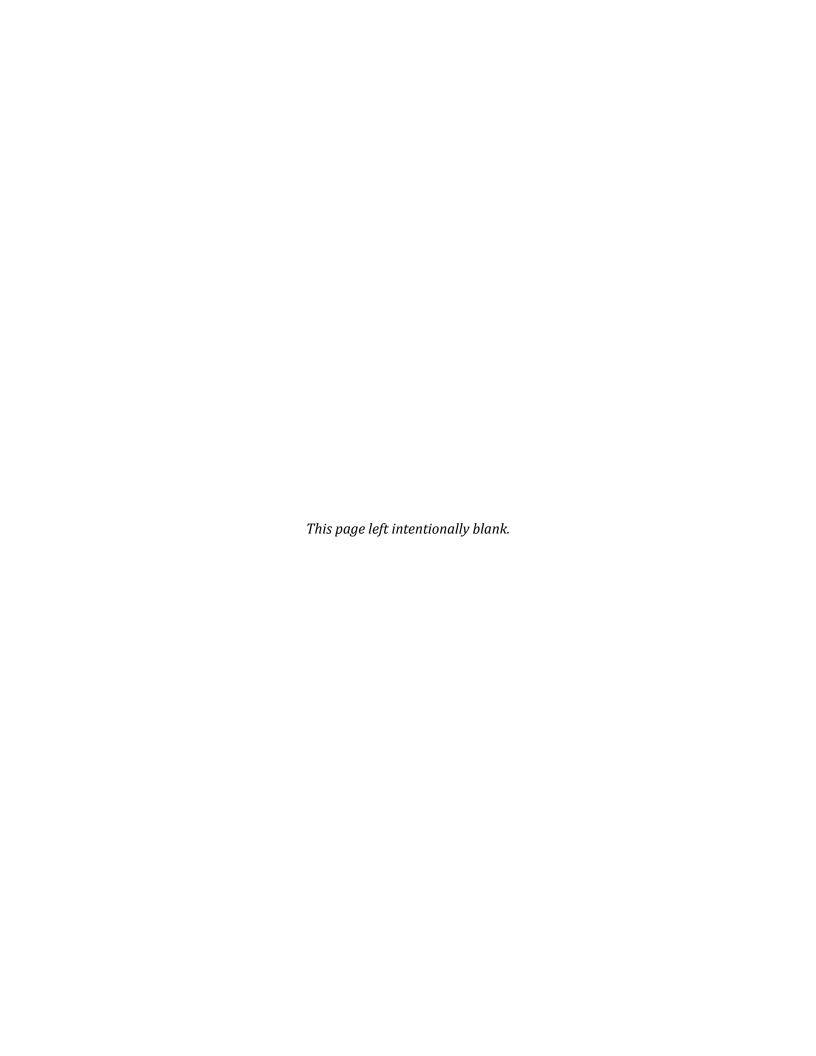
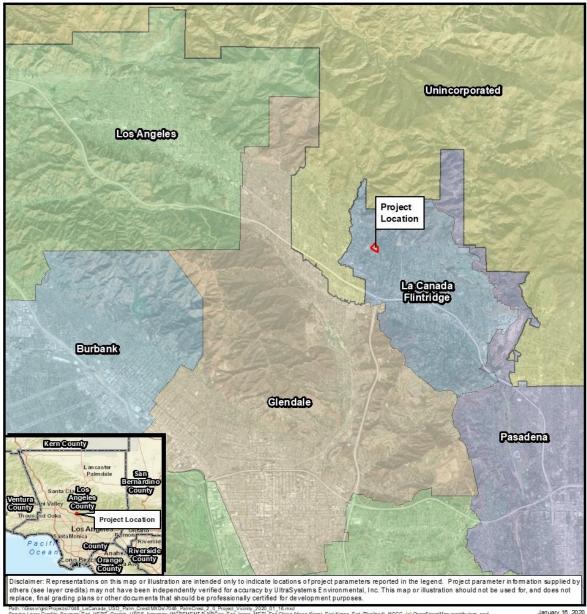
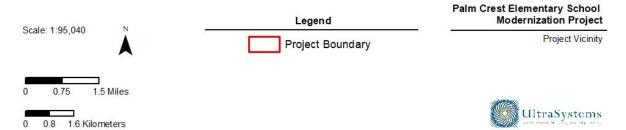




Figure 2.1-2 PROJECT VICINITY





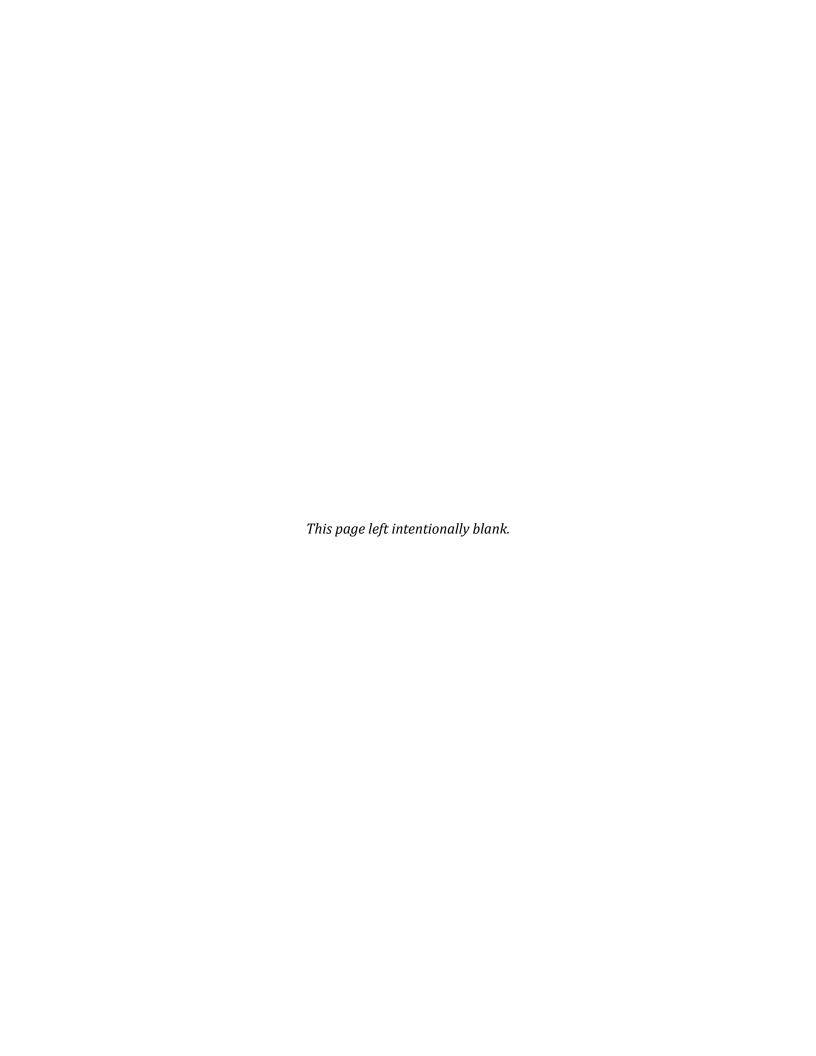


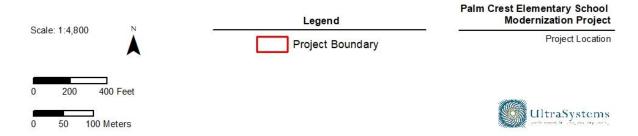


Figure 2.1-3 PROJECT LOCATION



Service Layer Credits. Sources: Est, HERE, Garmin, USGS, Intermap, INCREMENT P. NRCan, Est Japan, METT, Est Chinā (Hong Korg), Est Korea, Est (Thalland), NGCC, (c) OpenStreetMap contributions, and the GIS User Community, Source: Est, Digital/Globe, GeoSyte, Estrictstar Geographics, CMESA/butbs DS, USGS, AreoGRID, IGN, and the GIS User Community Missaystems Environmental, Inc., 2020.

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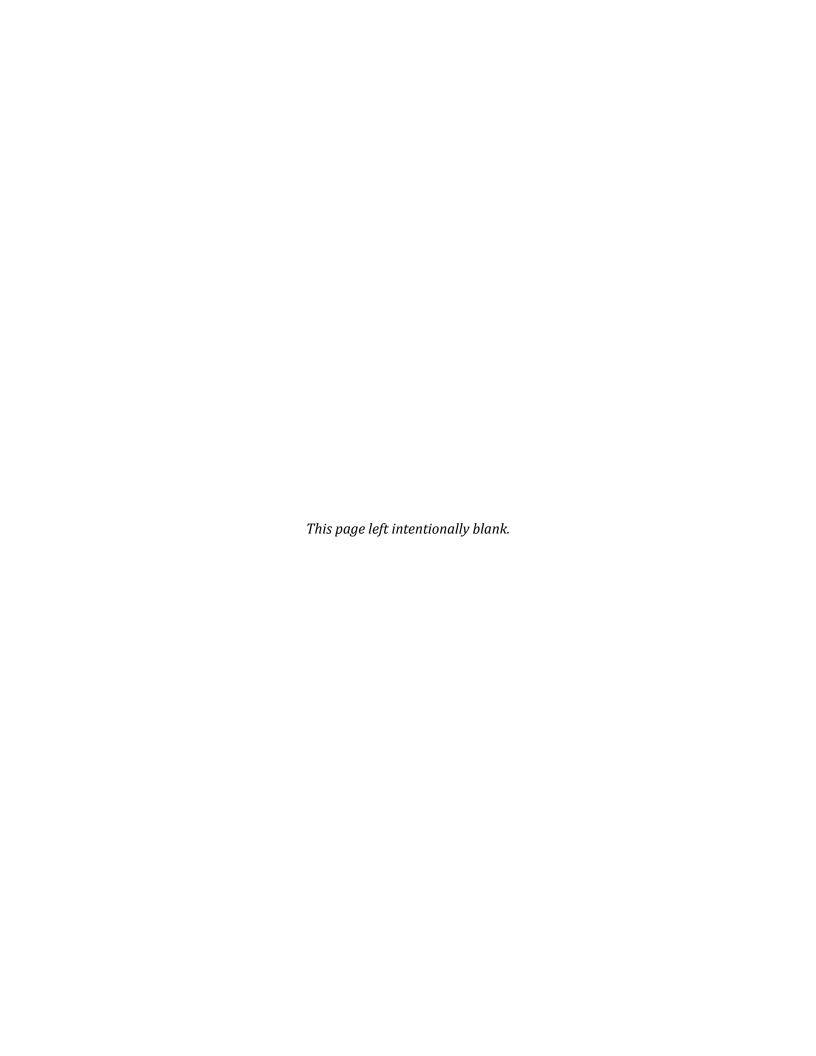
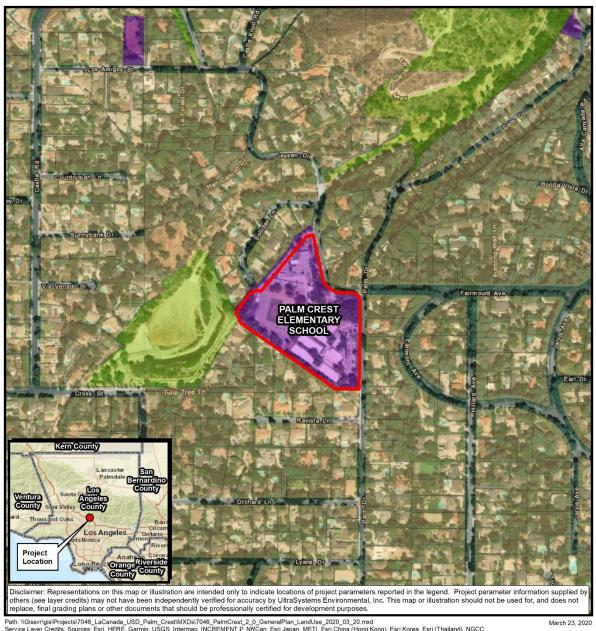
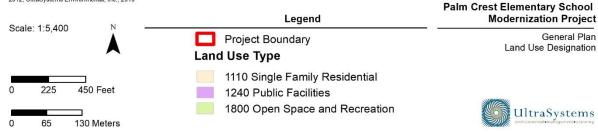




Figure 2.1-4 GENERAL PLAN LAND USE DESIGNATION





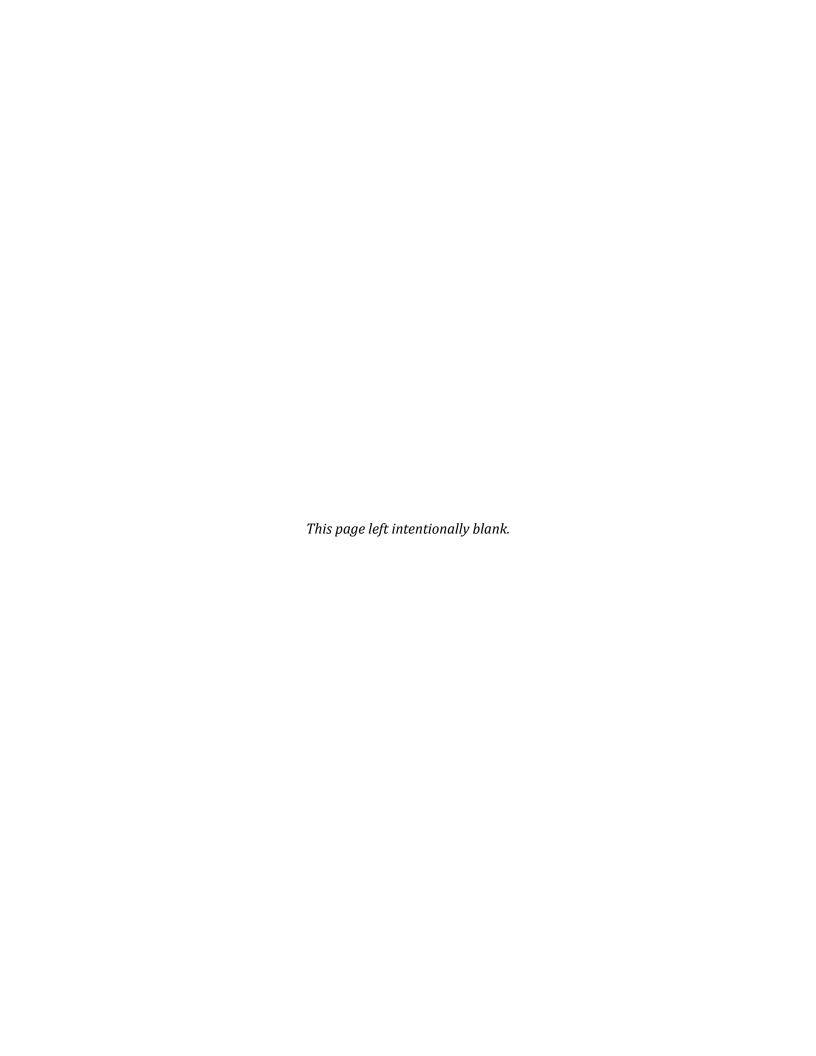
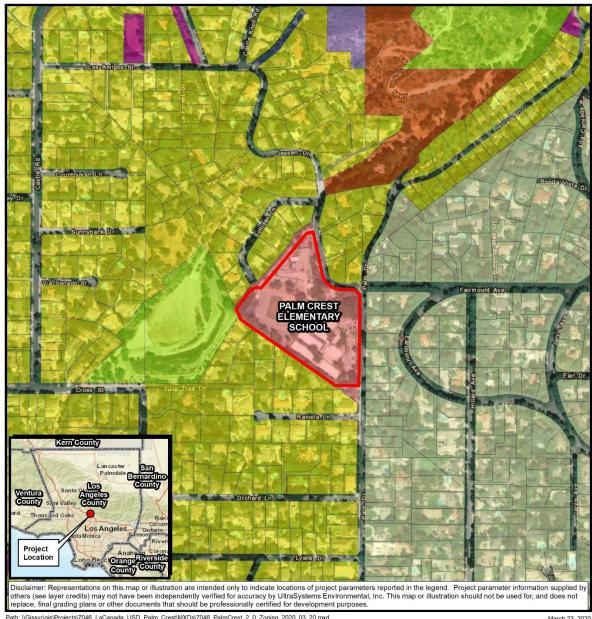




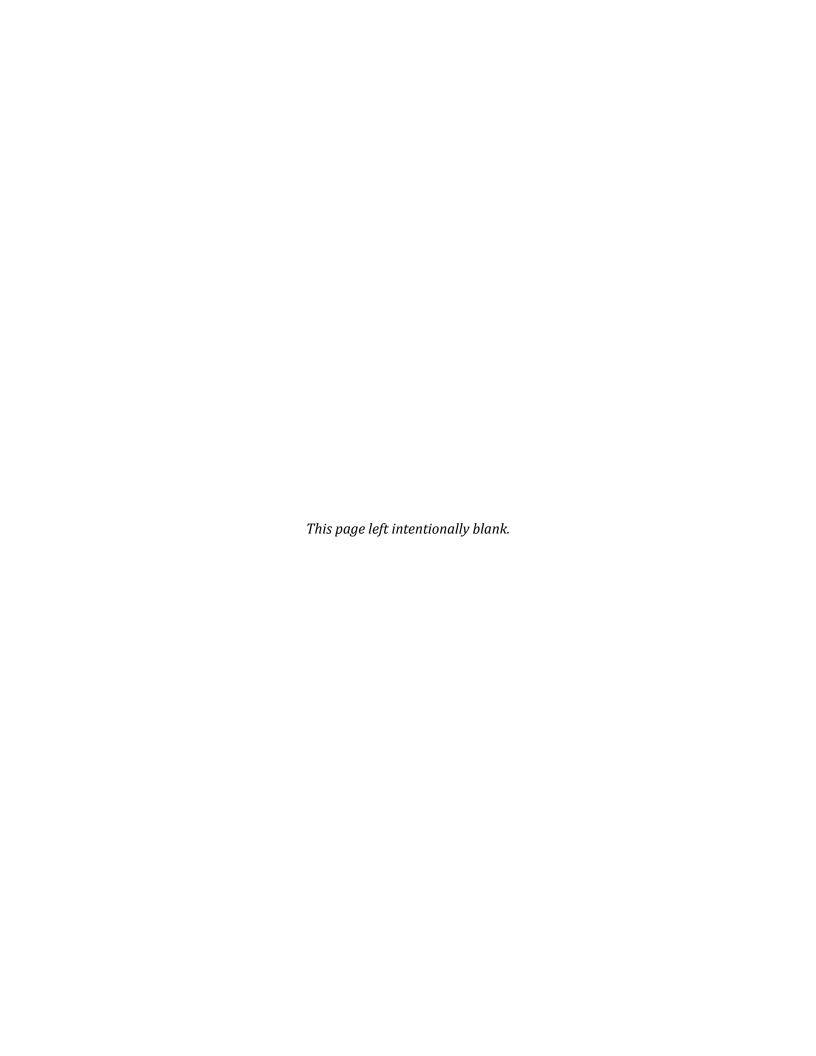
Figure 2.1-5 ZONING DESIGNATION



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Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS User community, Source: Esri. DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, SCAG, 2012; 2012; UltraSystems Environmental, Inc., 2019

March 23, 2020







2.3 Existing Conditions

The Palm Crest Elementary School campus is currently developed with 19 permanent buildings (including an indoor gym) and 16 relocatable (portable) buildings, ballfield, three basketball courts, and a playground. Three existing surface parking lots are located in northern, southern, and western portions of the school campus. A photo key map is provided in **Figure 2.3-1** and project site photographs are provided in **Figure 2.3-2** through **Figure 2.3-5**.

2.4 Climate and Air Quality

The annual average temperature in La Cañada Flintridge is approximately 63 degrees Fahrenheit (°F), and annual average total precipitation is approximately 21 inches, which occurs mostly during the winter. Winds in this region are generally light (Climate Data, 2020).

The project site is located within the South Coast Air Basin (SCAB), a 6,600-square-mile area encompassing all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Based on regional monitoring data and the National Ambient Air Quality Standards (NAAQS), the SCAB is currently designated as an extreme nonattainment area for 8-hour ozone (O_3) ; attainment for nitrogen dioxide (NO_2) ; attainment for carbon monoxide (CO); attainment for particulate matter PM_{10} ; nonattainment for lead (Pb); serious nonattainment for particulate matter $PM_{2.5}$; and attainment for sulfur dioxide (SO_2) (AQMD, 2018).

The SCAB is currently designated nonattainment for O_3 and particulate matter PM_{10} and $PM_{2.5}$; attainment for CO, NO_2 , sulfates, and Pb; and attainment for hydrogen sulfides under the California Ambient Air Quality Standards (CAAQS) (AQMD, 2018).

2.5 Geologic and Soil Setting

The project site is identified on the geologic map of the Pasadena quadrangle, Los Angeles County, California as being Pleistocene aged older dissected surficial sediments (Qof). The older surficial sediments are described as alluvial fan gravel and sand derived from the San Gabriel Mountains. The United States Department of Agriculture Natural Resources Conservation Service National Cooperative Soil Survey identifies the site soils as Urban land-Soboba-Tujunga complex. The Soboba series is described as excessively drained sandy loam to very cobbly sand with low runoff and the Tujunga series is described as somewhat excessively drained loam to cobbly sand with low runoff (Citadel, 2020, p. 4).

2.6 Project Topography and Hydrology

As detailed in the U.S. Geological Survey (USGS) Pasadena Quadrangle (7.5 Minute Series), dated 2015, the project site is at an elevation of approximately 1,753 feet above mean sea level (amsl) and appears to slope to the south-southwest (Citadel, 2020, p. 2). The project site is located within the San Fernando Valley groundwater basin. The estimated depth to groundwater is 148.6 feet below ground surface (bgs), approximately 0.87 mile southwest of the project site. There are no flood zones identified within a one-mile radius of the project site (Citadel, 2020 p. 4).

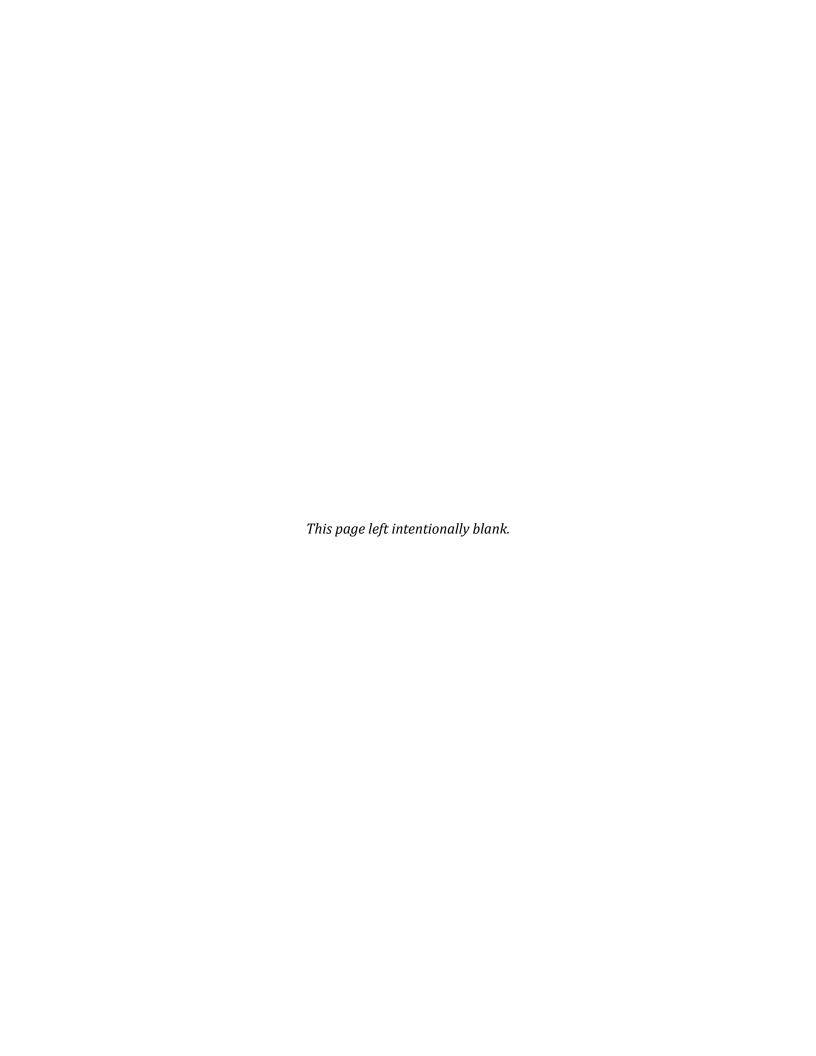




Figure 2.3-1 PHOTO LOCATION MAP





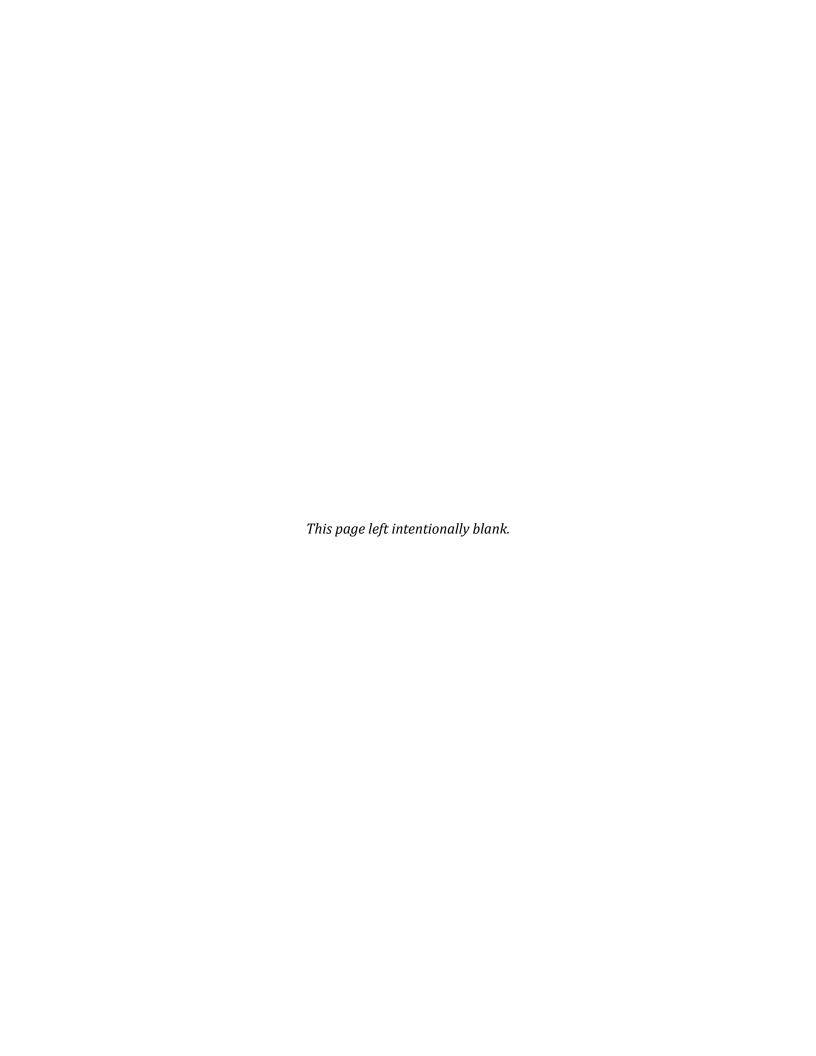




Figure 2.3-2 PROJECT SITE PHOTOS 1-4



Photo 1: Classrooms 17-18.



Photo 2: Classrooms 13-16.



Photo 3: Front of school with Multi Purpose Building.



Photo 4: Trailers 20-23 and 30-34.

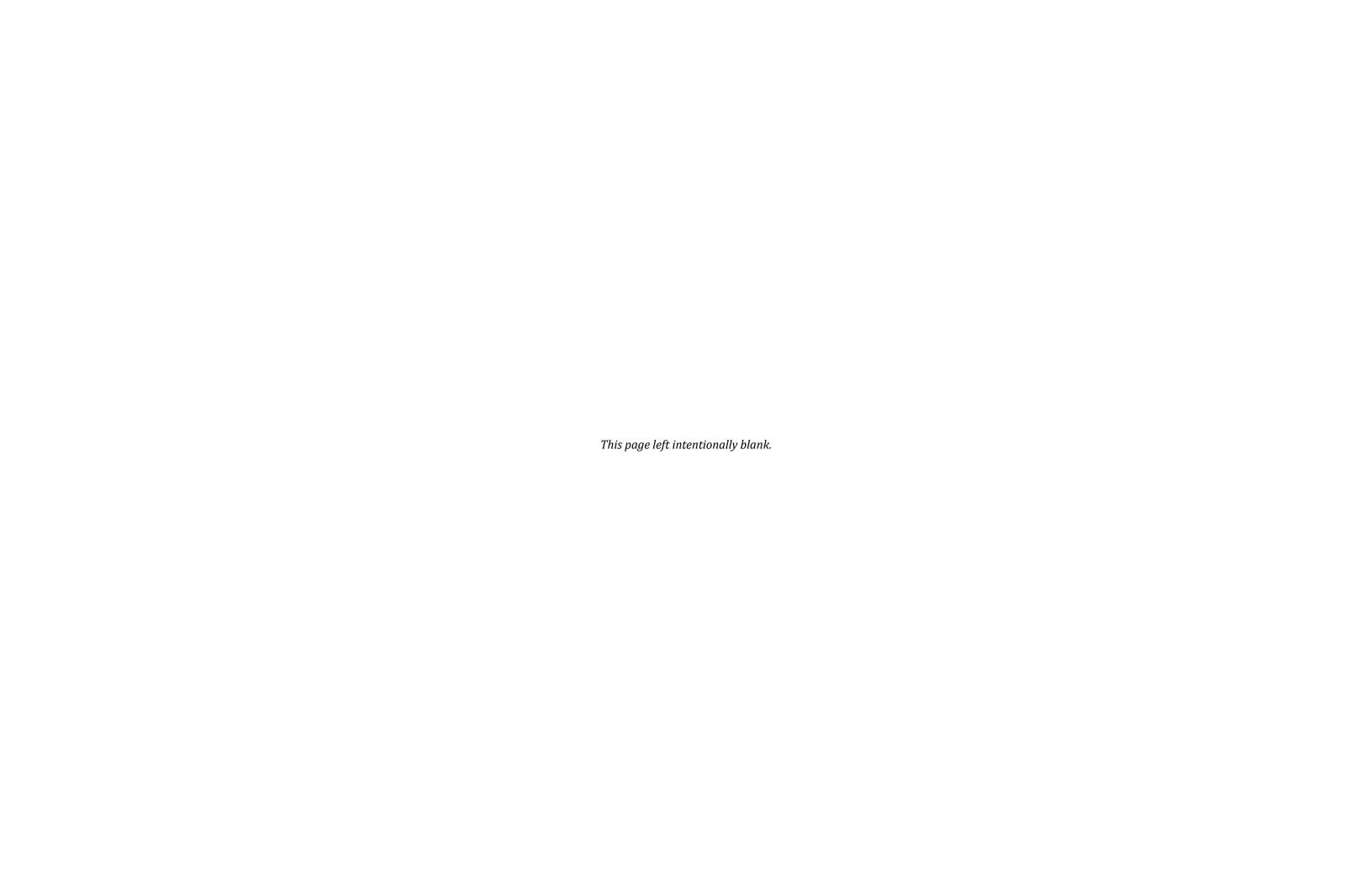




Figure 2.3-3 PROJECT SITE PHOTOS 5-8



Photo 5: Baseball fields looking north.



Photo 6:Old District office to be demolished.



Photo 7: Staff Parking lot located to the northwest.



Photo 8: Administration building.

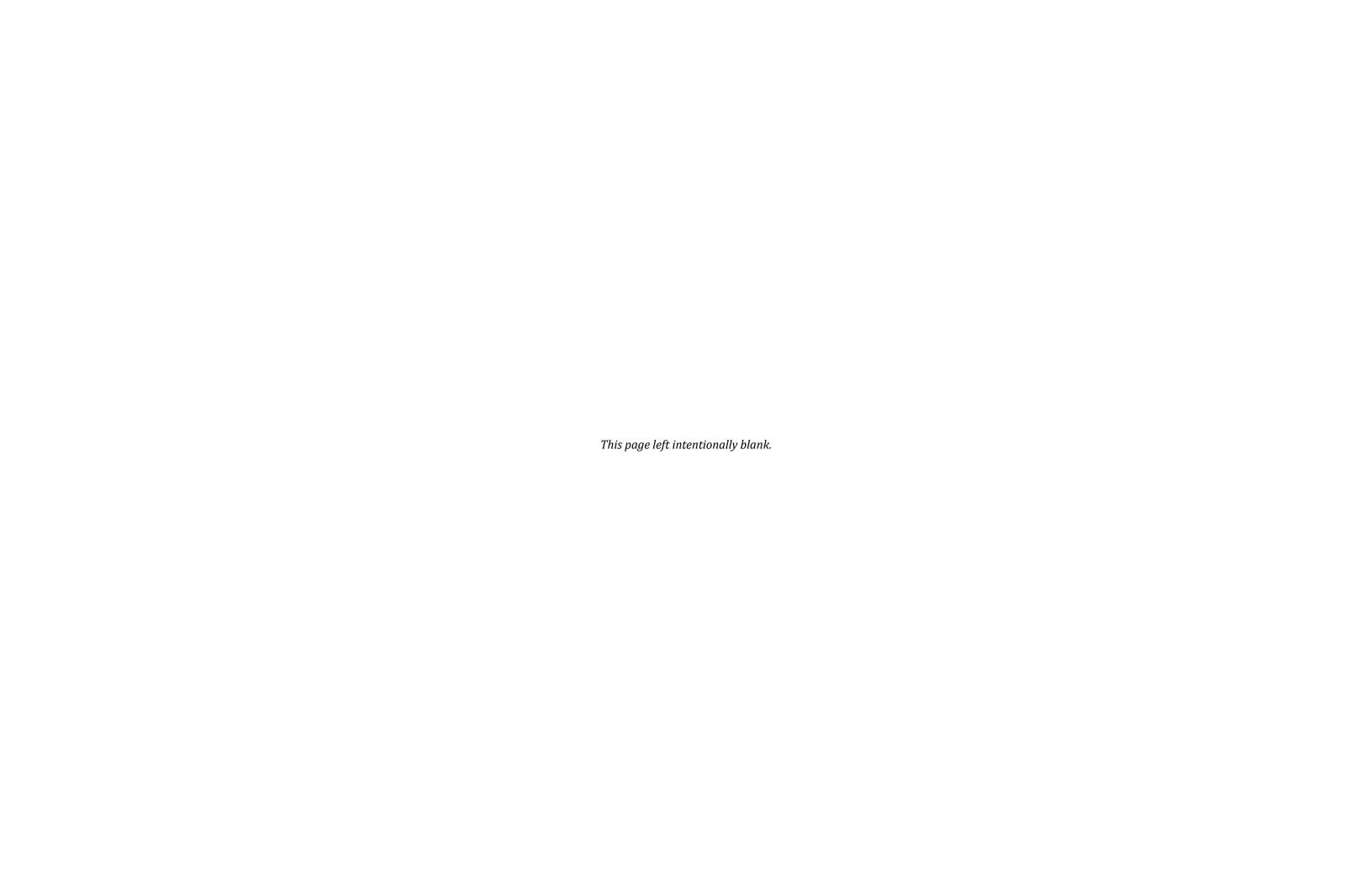




Figure 2.3-4 PROJECT SITE PHOTOS 9-12



Photo 9: Residences across Solliden Lane from the project site.



Photo 10: Residences across Solliden Lane from the project site.



Photo 11: Residences across Solliden Lane from the project site.



Photo 12: Residence along Jessen Drive.

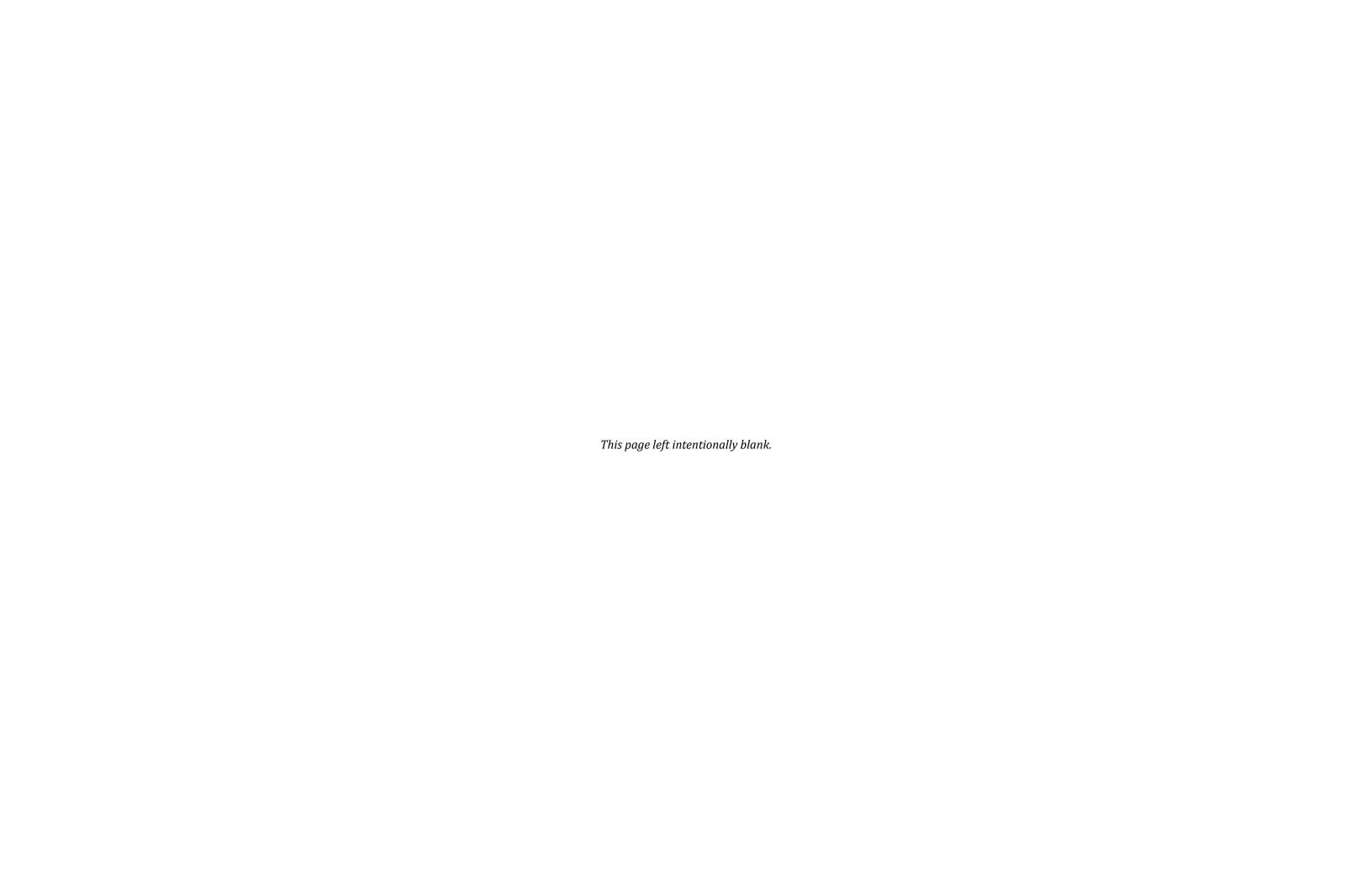




Figure 2.3-5 PROJECT SITE PHOTOS 13-16



Photo 13: Residences across Palm Drive from the project site.



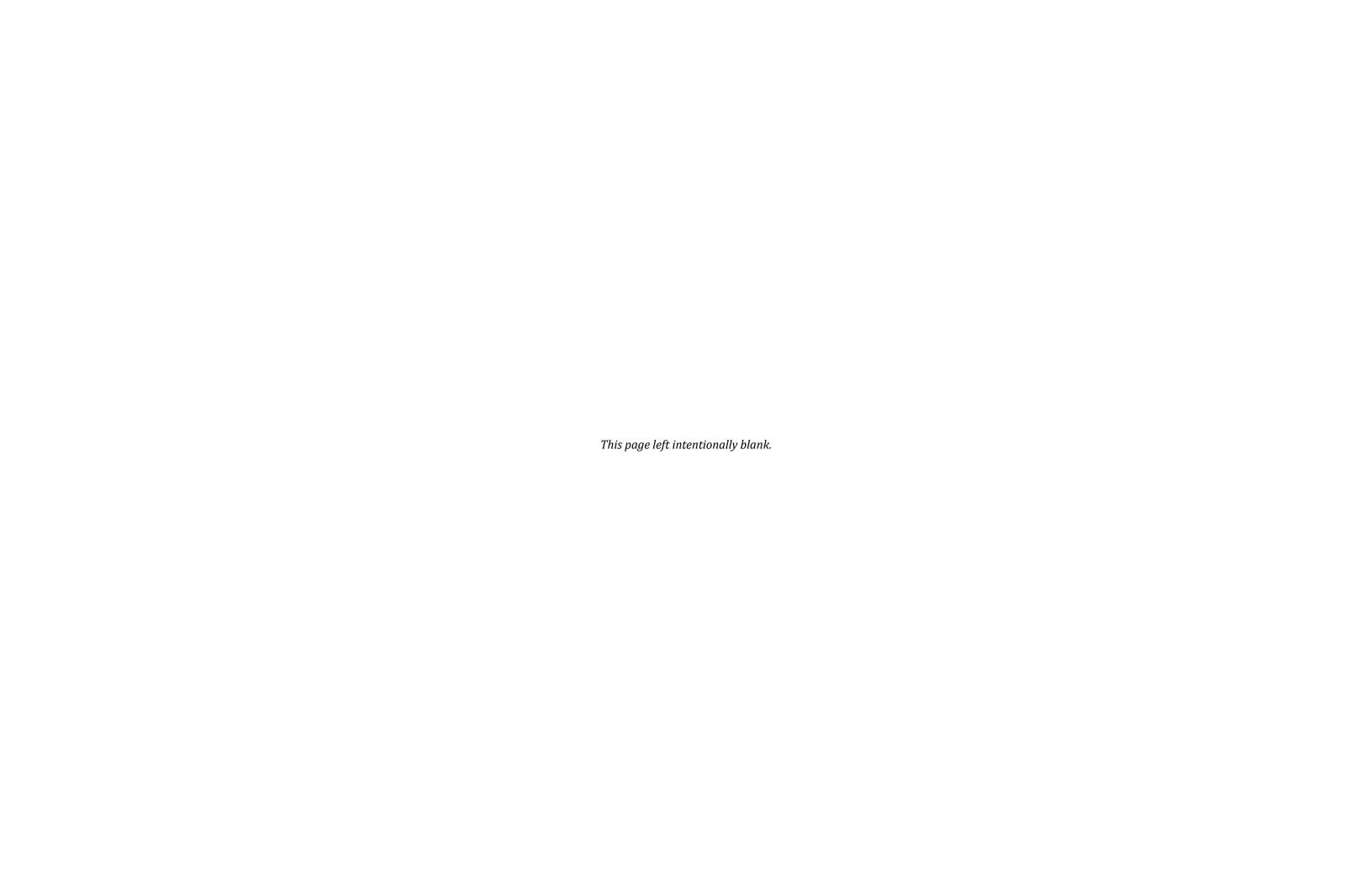
Photo 14: Residence across Palm Drive from the project site.



Photo 15: Residence across Palm Drive from the project site.



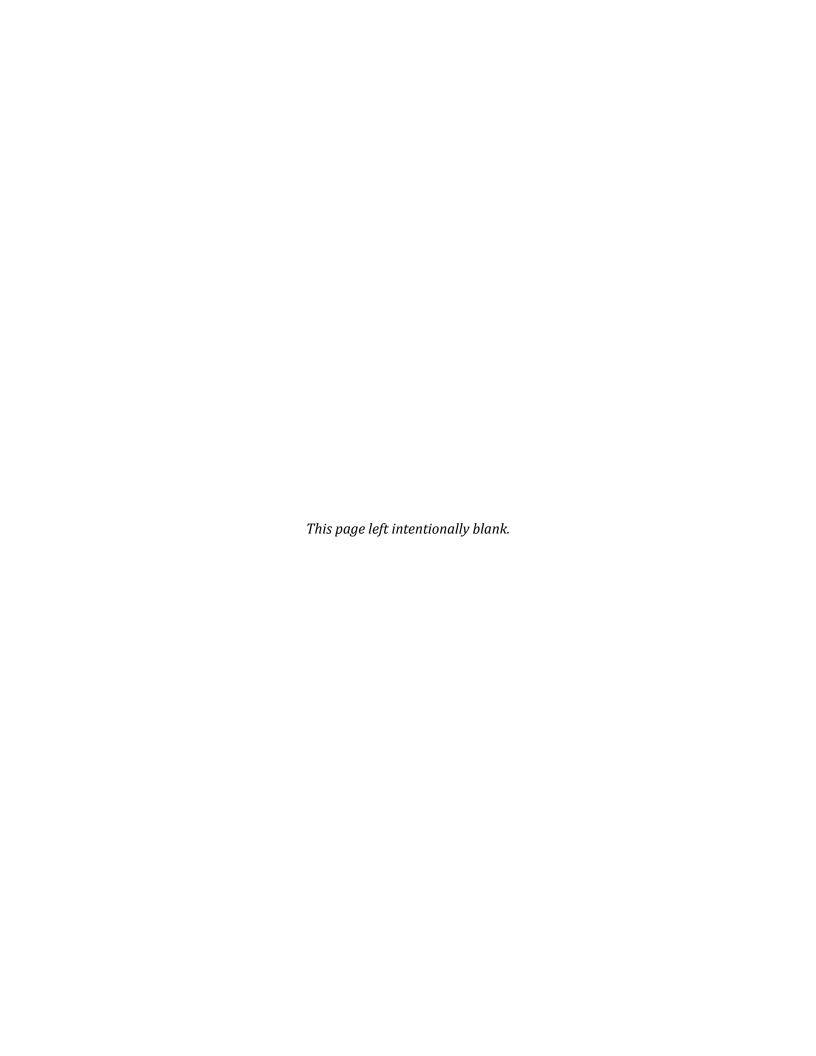
Photo 16: Residence adjacent to the project site.





2.7 Biological Setting

The project site is located in a residential setting which provides low habitat value for special-status plant and wildlife species. The literature review and reconnaissance biological survey conducted in January 2020 assessed that the project site contains structures, sidewalks, multiple paved surface areas with impervious surfaces, and lacks suitable soils, biological resources, and physical features to support any candidate, sensitive, or special-status plant and animal species. Additionally, no special-status plants or wildlife were observed within the project site during any site surveys. Of the 87 trees on the project site scheduled for removal, six were native tree species, and all of these were coast live oak (*Quercus agrifolia*). The Arborist also surveyed the 53 trees on the project site scheduled for protection and identified nine native trees and 44 ornamental trees. Of the native trees, there were four coast live oak, four coast redwood (*Sequoia sempervirens*) and one white alder (*Alnus rhombifolia*). There were no special-status or sensitive tree species observed on the project site. There are no wetlands on the project site. Halls Canyon Channel to the west/southwest of the project site is classified as non-wetland waters of the United States because it is part of tributary system that flows into the Los Angeles River.





3.0 PROJECT DESCRIPTION

3.1 Project Overview

Palm Crest Elementary school was built in 1956 and has an enrollment of approximately 677 students³ (California Department of Education, 2019) in grades kindergarten through six. The campus has facilities that are over 50 years old which are augmented by relocatable/portable classroom buildings (portables). The school site is approximately 9.15 acres and contains 35 classrooms, 16 of which are portables. Refer to **Figure 3.1-1** below, which shows the existing conditions at the project site. As detailed below, the modernization project would provide new classroom buildings and new parking areas for the school site as well as provide repairs and improvements to site utilities for new classroom building, and improvement to, landscaping, and walkways.

The La Cañada Unified School District (District) has a Facilities Master Plan (FMP) (LPA, 2017), which identifies a vision for development for the next 10 to 15 years. The FMP contains site master plans for individual schools within the District. The individual school site master plan is not a design but rather a plan for the future improvement of the District's facilities infrastructure in support of the educational program goals for increased student outcomes and achievement. As projects move forward, design teams (architects and engineers) will plan individual aspects of the projects recommended in the FMP (LPA, 2017, p. 2).

The District proposes to modernize buildings and facilities at Palm Crest Elementary School. These improvements would be Phase I, or the first part of a range of various improvements to be made to the Palm Crest Elementary school over time. Additional improvements would be made to the school in the future when funding is available. These additional potential future improvements are not a part of the proposed project. The environmental analysis in this IS/MND document is for Phase I of the school improvements, as described in this section. As detailed in Section 5.3 of the FMP, Phase I includes a proposed site master plan that is similar but not identical to the proposed project.

The proposed project involves the construction of one new classroom building, which would be comprised of an east and a west wing. The two-story building would include approximately 23,184 square feet, evenly divided between the first and second floor. The project would also include renovation of 18 existing classrooms; conversion of one classroom building to four specialty classrooms; demolition of the old District Office and existing garage; removal of trees for construction of a new upper parking lot; alteration/improvement to the existing drop-off area; alteration/improvement to the existing west parking lot; installation of temporary portable classrooms for use during project construction; and construction and extension of site utilities to new classroom buildings, improvement to landscaping areas, and construction of pedestrian walkways.

³ For the 2018-2019 school year.

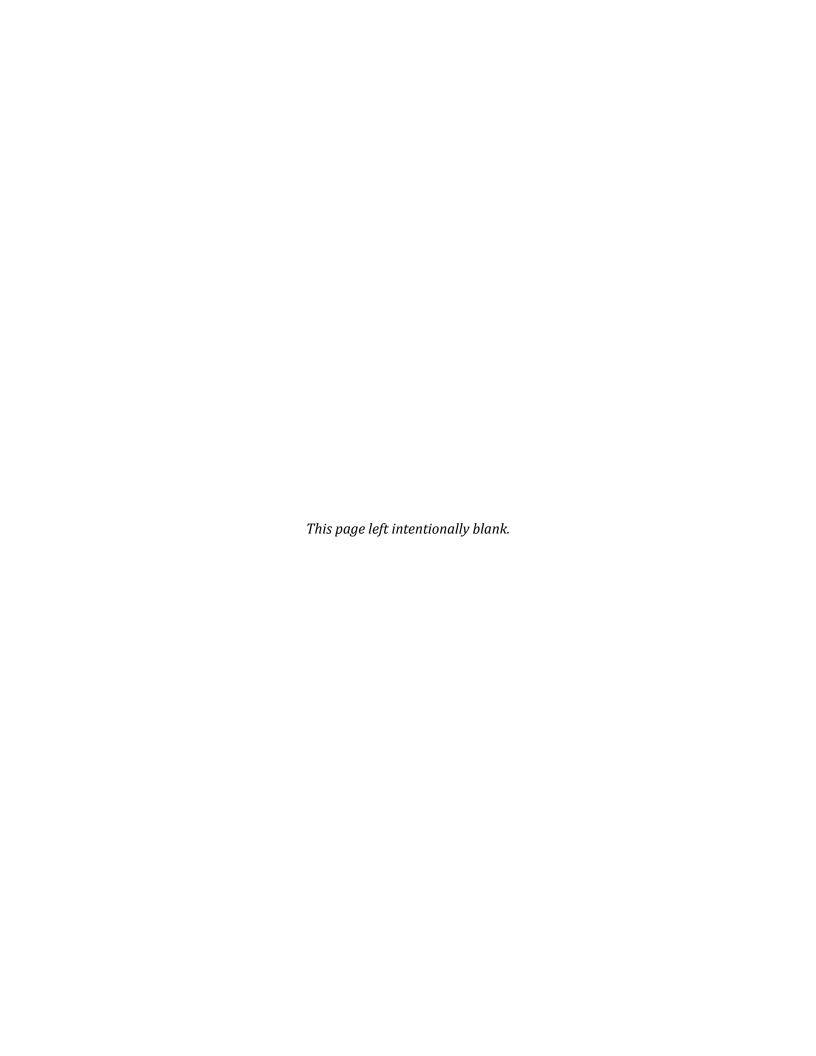
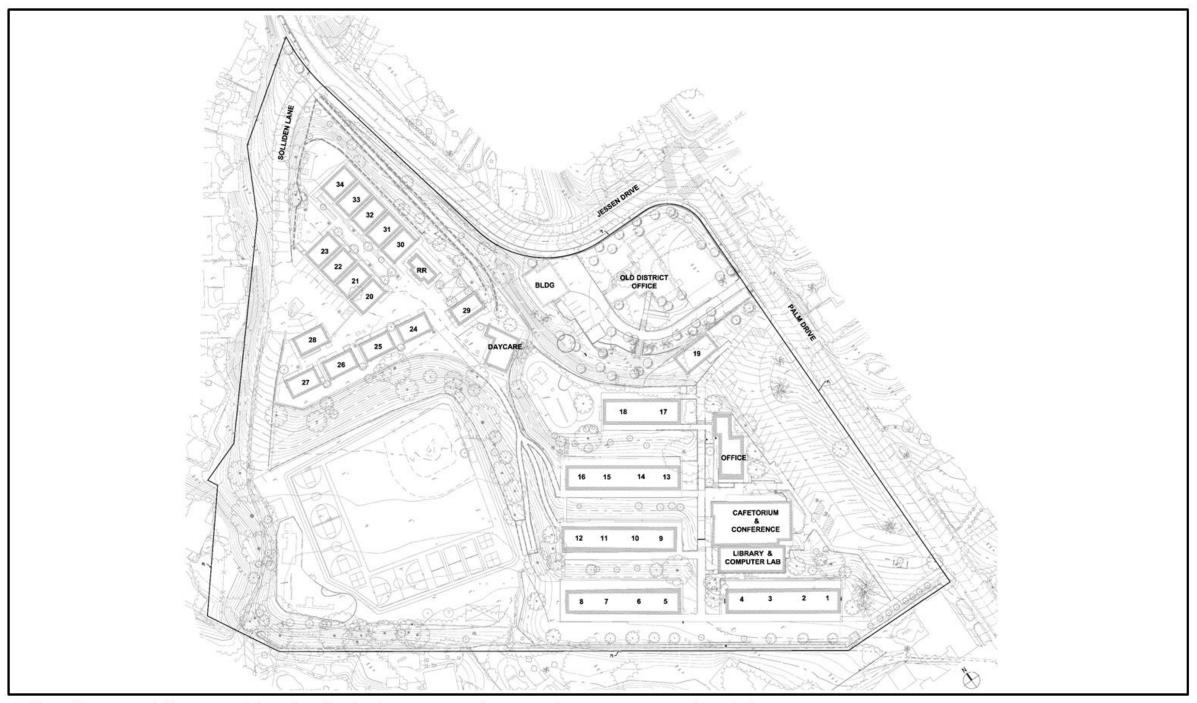




Figure 3.1-1
EXISTING FACILITIES AT PALM CREST ELEMENTARY SCHOOL



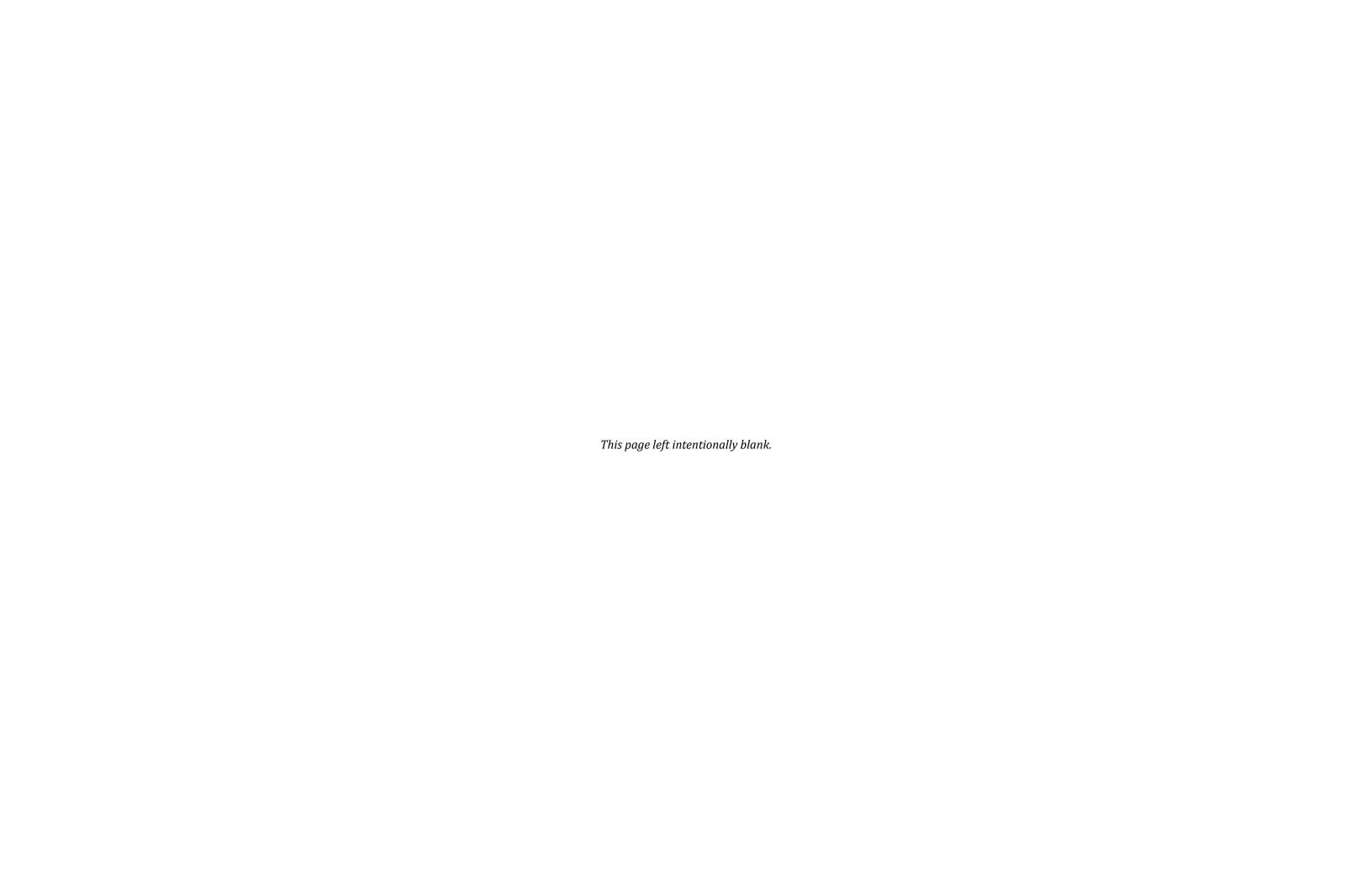
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Source: LPA, Inc., June 1, 2020

Palm Crest Elementary School Modernization Project

Existing Facilities at Palm Crest Elementary School







Project Design Refinements

In response to community comments, the project design was refined to include the following:

- 1. Provide additional landscape and irrigation along the access road (Solliden Lane) to help screen the proposed new building.
- 2. Explore alternate exterior finish materials and/or colors.
- 3. Reduce overall building length by relocating one classroom bay from the west wing to the east. This will require shifting the east wing of the building eight feet to the north and relocating one staircase.
- 4. Move the building further away from neighboring homes by rotating the west wing by five degrees, which:
 - Provides 18 feet of clearance from the access road to the face of the building at the narrowest point.
 - Allows for 13 feet of additional planting along the access road edge of building.
 - Loses 480 square feet of learning courtyard space (total), including 300 square feet less of green space.
 - Loses three trees in the learning courtyard.
 - Makes the visual supervision of the area between the parking and the building more difficult.

3.2 Project Location

The proposed project is located on the campus of Palm Crest Elementary School in the city of La Cañada Flintridge, in Los Angeles County, California. The school is located at 5025 Palm Drive. The project site is located in an urban area and is surrounded by residential uses. The Halls Canyon Channel is located west of the project site (USGS, 1995), beyond the existing homes. The project is generally located south of Jessen Drive and Solliden Lane, west of Palm Drive and north of Ravista Lane. Refer to **Section 2.0** of this document for a detailed description of the project's existing environmental setting.

3.3 Proposed Project

The various components of the proposed project are described in detail below. Previous **Figure 3.1-1** shows the existing facilities at Palm Crest Elementary School. **Figure 3.3-1** below shows the overall site plan for the proposed project. **Figure 3.3-2** shows the project refinements discussed above.

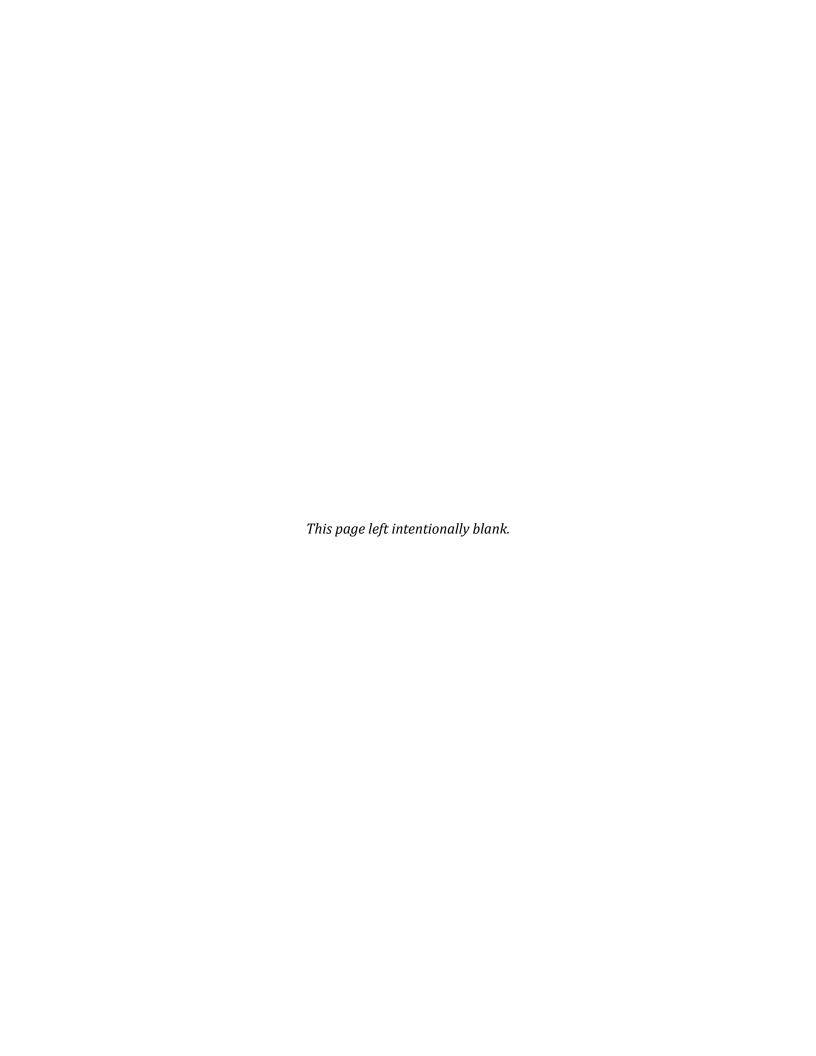
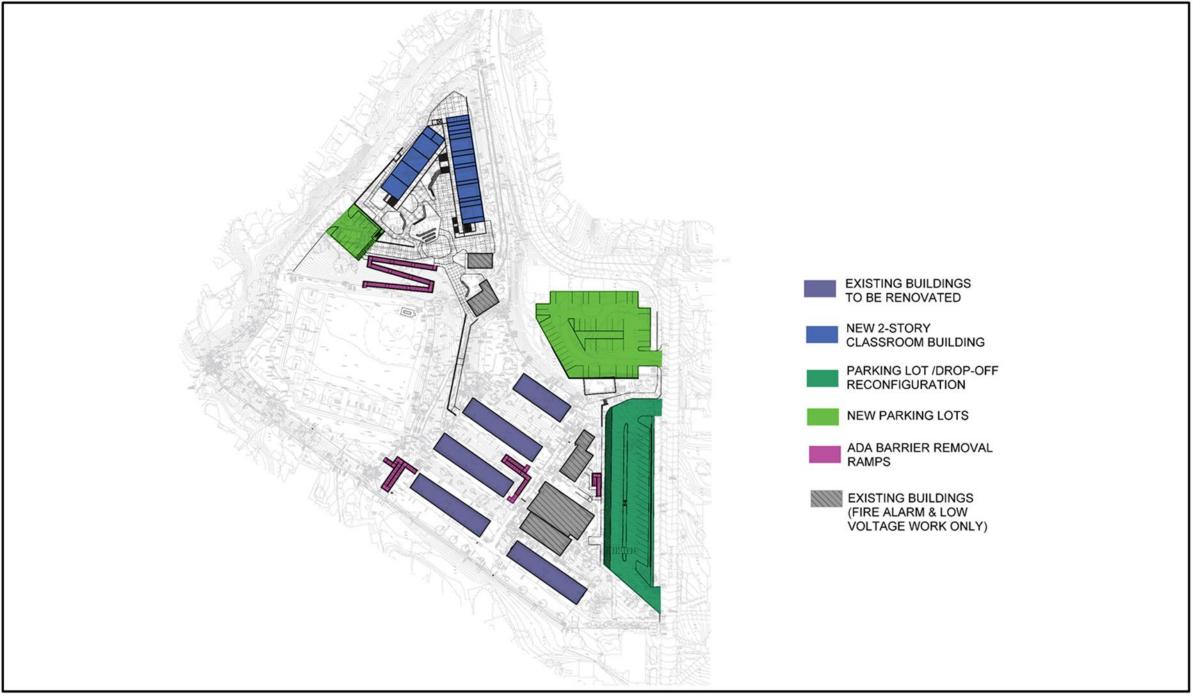




Figure 3.3-1 PROPOSED SITE PLAN



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Source: LPA, Inc., June 1, 2020



Palm Crest Elementary School Modernization Project

Proposed Site Plan

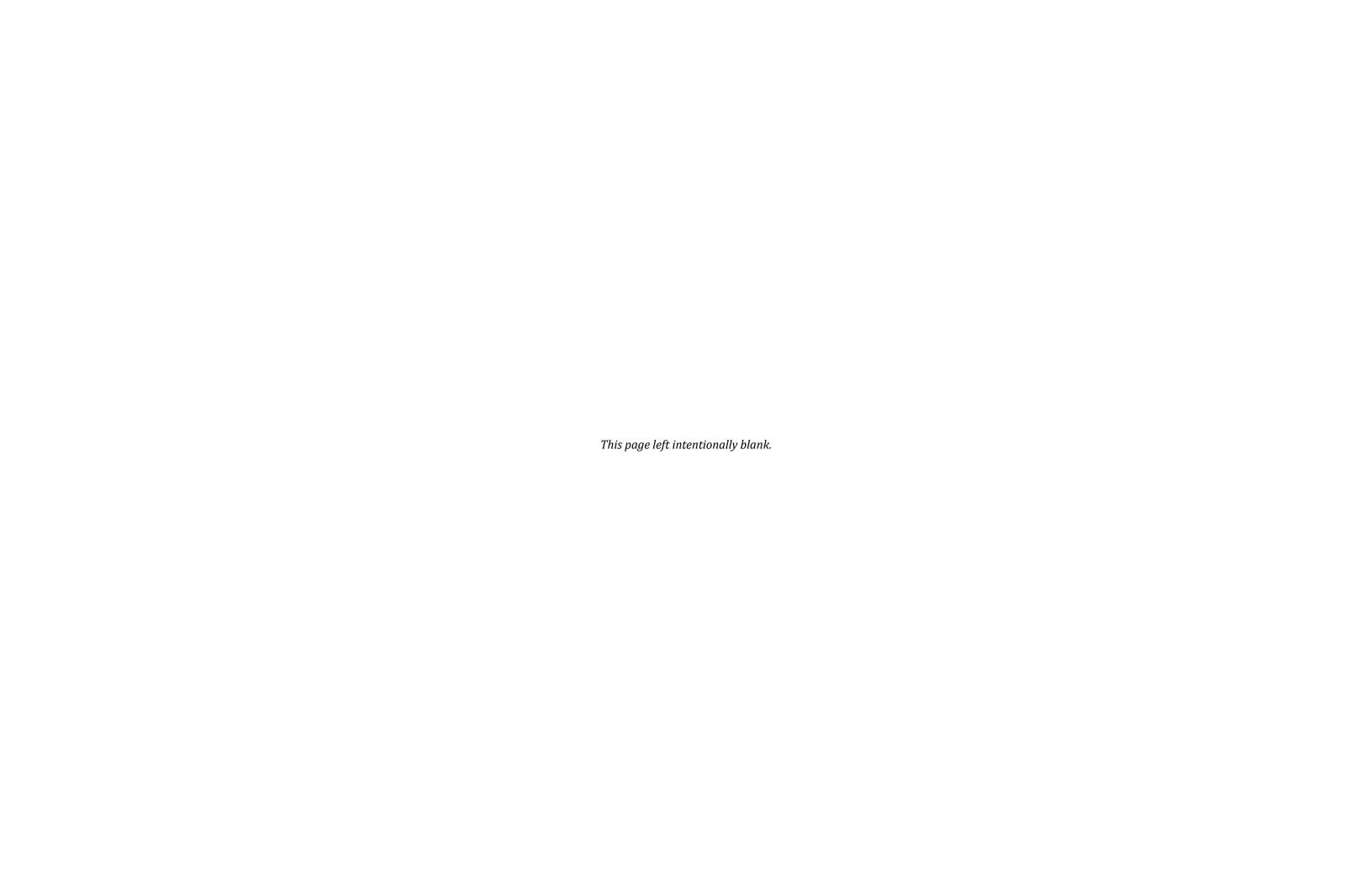
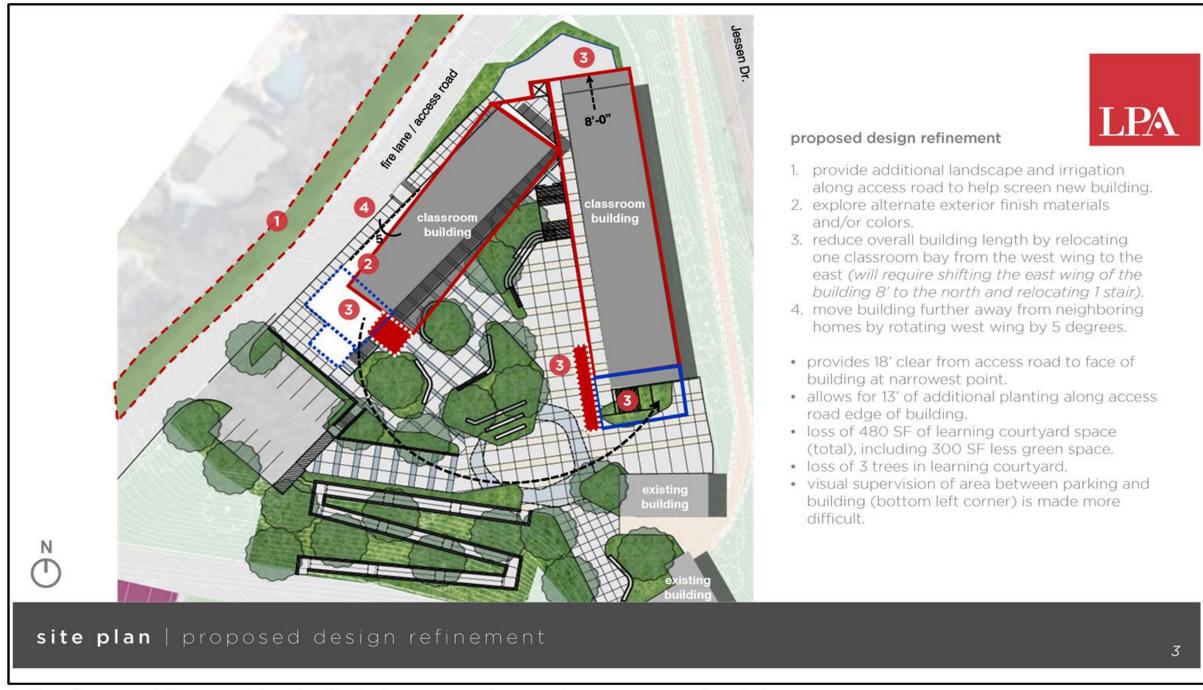




Figure 3.3-2 PROPOSED DESIGN REFINEMENT

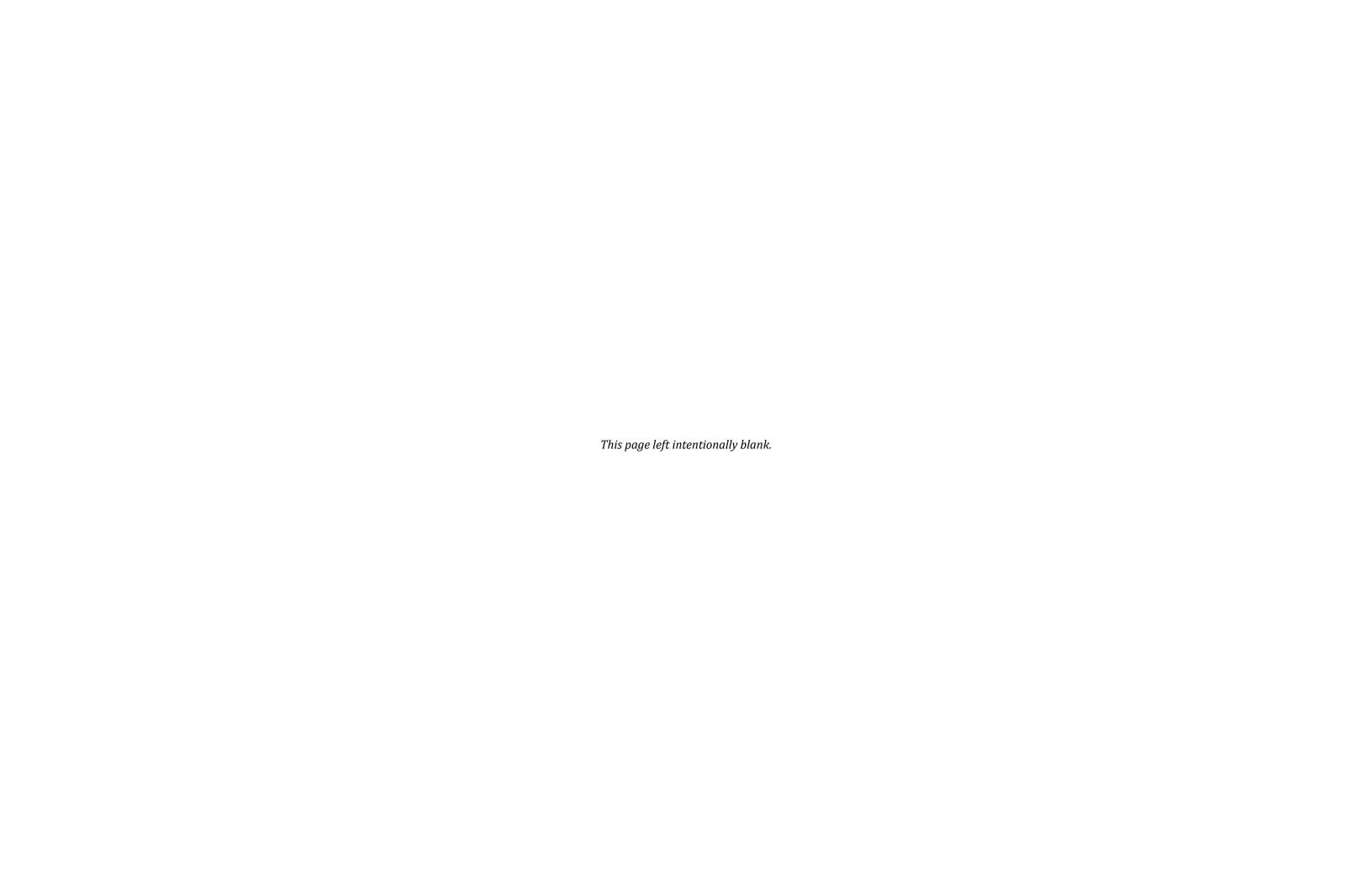


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Palm Crest Elementary School Modernization Project

Site Plan | Proposed Design Refinement





3.3.1 Removal of Existing Onsite Portables and Restroom Building

As part of the proposed project, 15 portable buildings (approximately 16,290 square feet) would be demolished, along with the 556-square-foot restroom building. Fourteen of the 15 portable buildings are located north/northwest of the existing daycare building on site. The sixteenth portable building to be removed would be the one located south of the existing old District office and north of the lower parking lot.

3.3.2 Construction of One New Two-Story Classroom Building

The proposed new two-story classroom building would contain two wings (an east and west wing) and would be a total of 23,184 square feet evenly divided between the first floor and 2nd floor. The building would contain 20 classrooms, restrooms, a conference room, and storage. This new building would replace 15 of the 16 existing portable classroom buildings on the school site. Standard spread footing type foundations would be used and no pile driving is anticipated for building foundations.

3.3.3 Installation of Temporary Portable Classrooms

As detailed in **Figure 3.3-4**, the project would remove 15 of the 16 portables on the project site to construct the new classroom building. Temporary portable classrooms would be installed to serve as interim classrooms during project construction. The school would continue normal operations during project construction.

3.3.4 Relocation of Students/Staff to Interim Housing

Students and school staff currently utilizing the existing portables on site that would be demolished would be temporarily relocated to interim housing on campus during construction of the classroom building. The interim housing building would consist of 14 temporary portable classrooms at 960 square feet each for a total building area of approximately 13,440 square feet.

During project construction the interim housing would be located on the existing baseball field and would also encroach on the existing basketball courts. The onsite baseball field would be unusable during project construction. The basketball courts and remaining playground area would be usable for physical education and recreational recess. The baseball field and a portion of the basketball courts would be usable upon completion of project construction, when the students would be able to use the new two-story buildings. Refer to **Figure 3.3-1**, which shows the location of the proposed interim housing. **Figure 3.3-3** shows the proposed design refinements. **Figure 3.3-4** shows the overlay of the proposed building with the existing project site. **Figure 3.3-5** shows the demolition of structures that would occur on the north side of the school site and **Figure 3.3-6** shows the demolition that would occur on the south side of the school site.

3.3.5 Lighting

Outdoor lighting would be upgraded to light-emitting diode (LED) to provide adequate pathway lights for pedestrians on campus. Exterior lighting would be designed to meet California Building Code requirements. Lighting would be controlled by time clock. Pedestrian lighting poles would be Viper LED luminaires by Beacon (or an approved equal) and fixtures would be 12 feet to 15 feet high. Parking lot poles would be Viper LED luminaires by Beacon (or an approved equal) and fixtures would be 25 feet to 30 feet high.

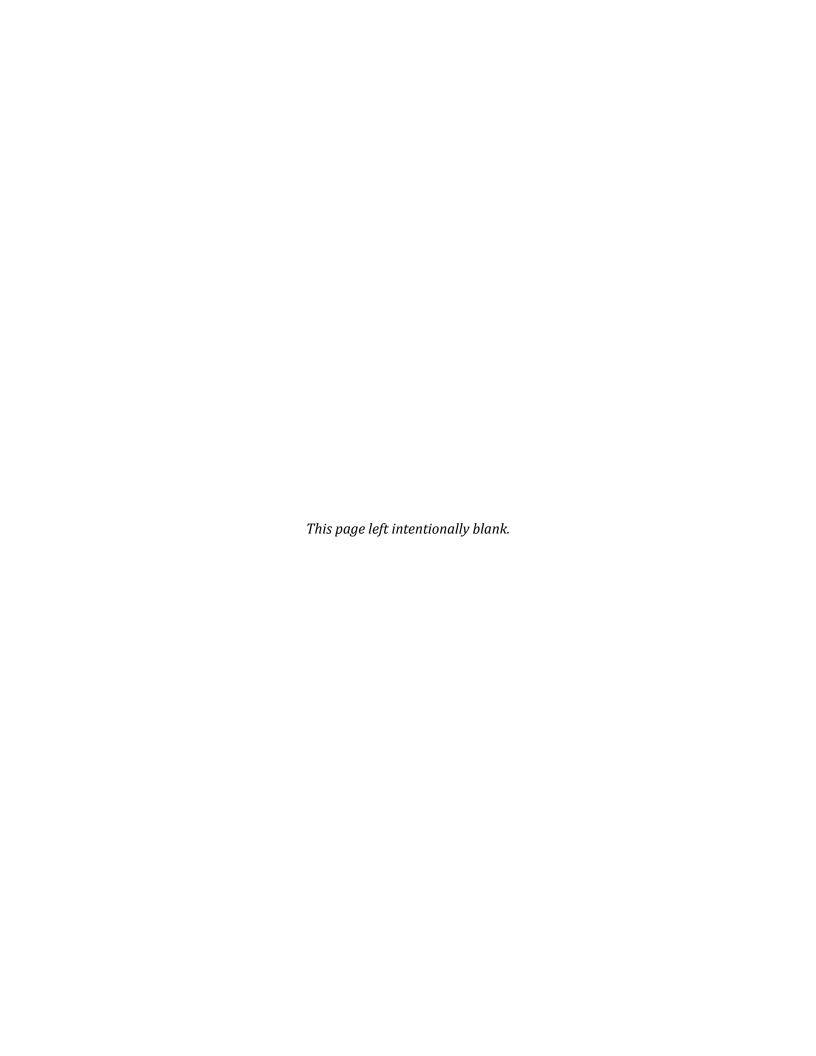




Figure 3.3-4
EXISTING SITE OVERLAY



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Palm Crest Elementary School Modernization Project

Existing Site Overlay

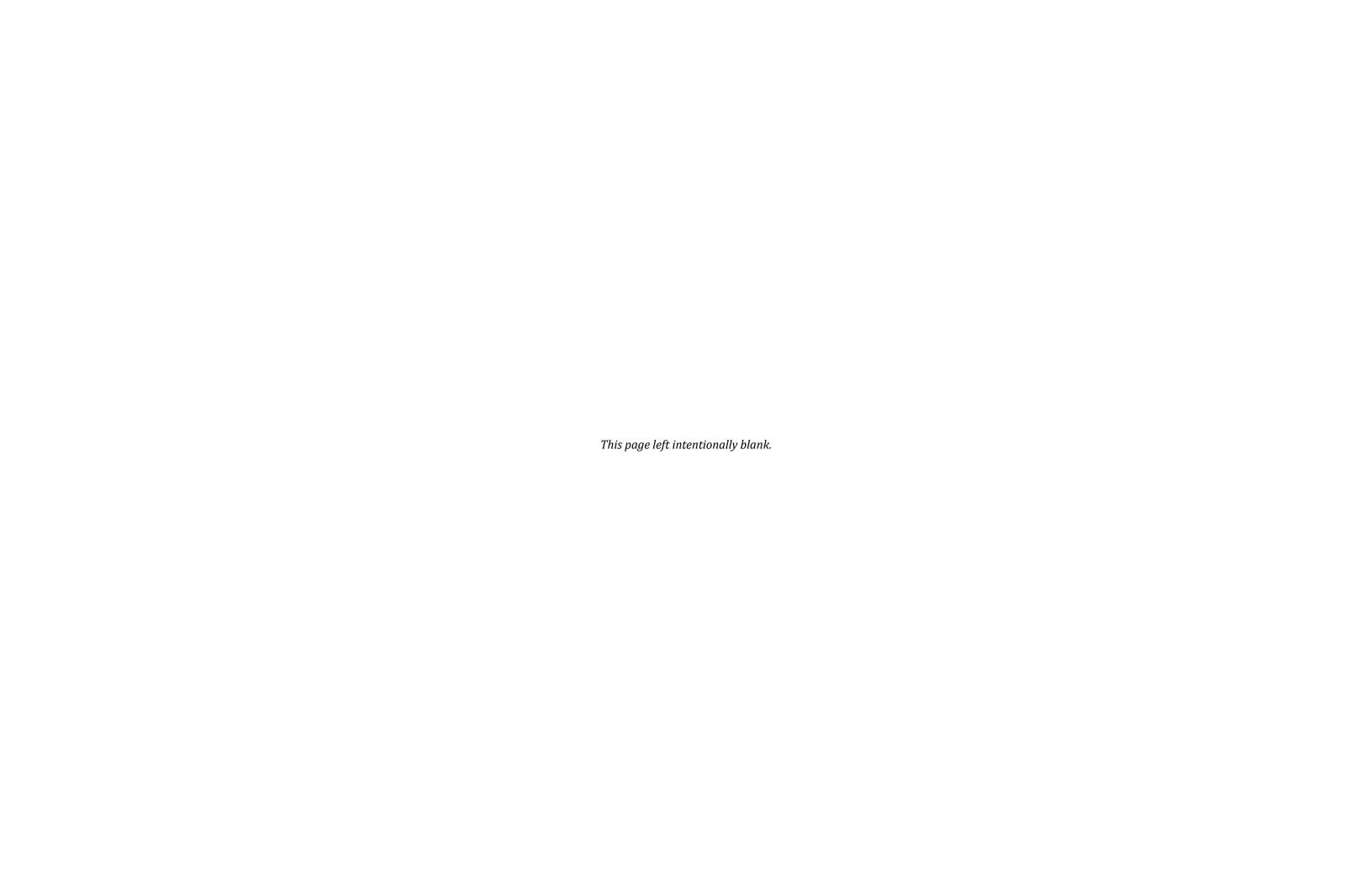
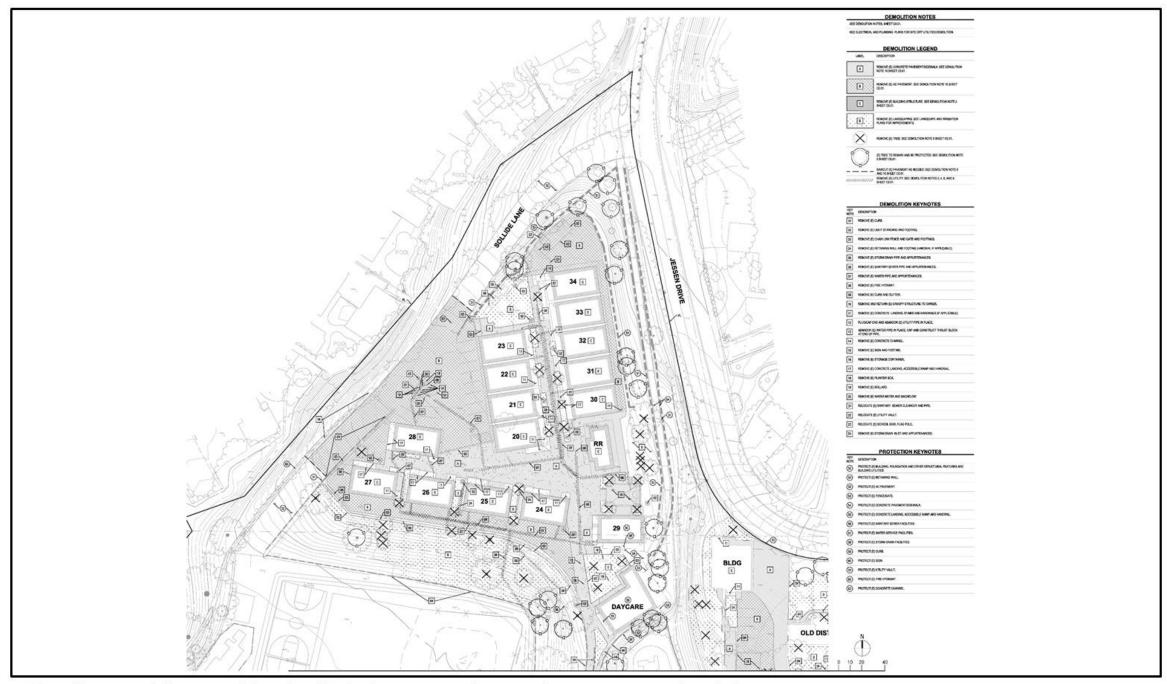




Figure 3.3-5
DEMOLITION PLAN - NORTH SIDE OF CAMPUS



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Source: LPA, Inc., June 1, 2020



Palm Crest Elementary School Modernization Project

Demolition Plan - North Side of Campus

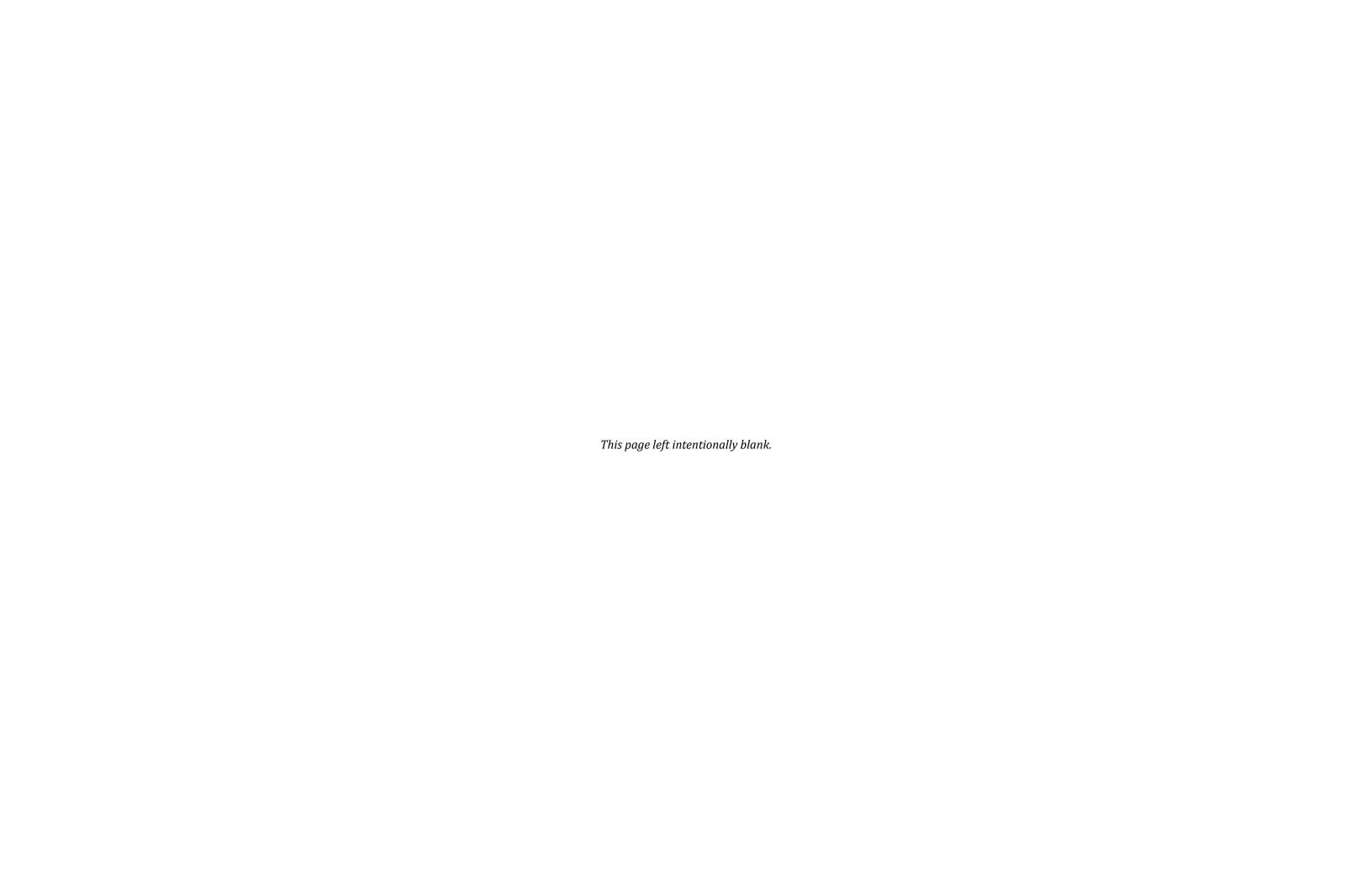
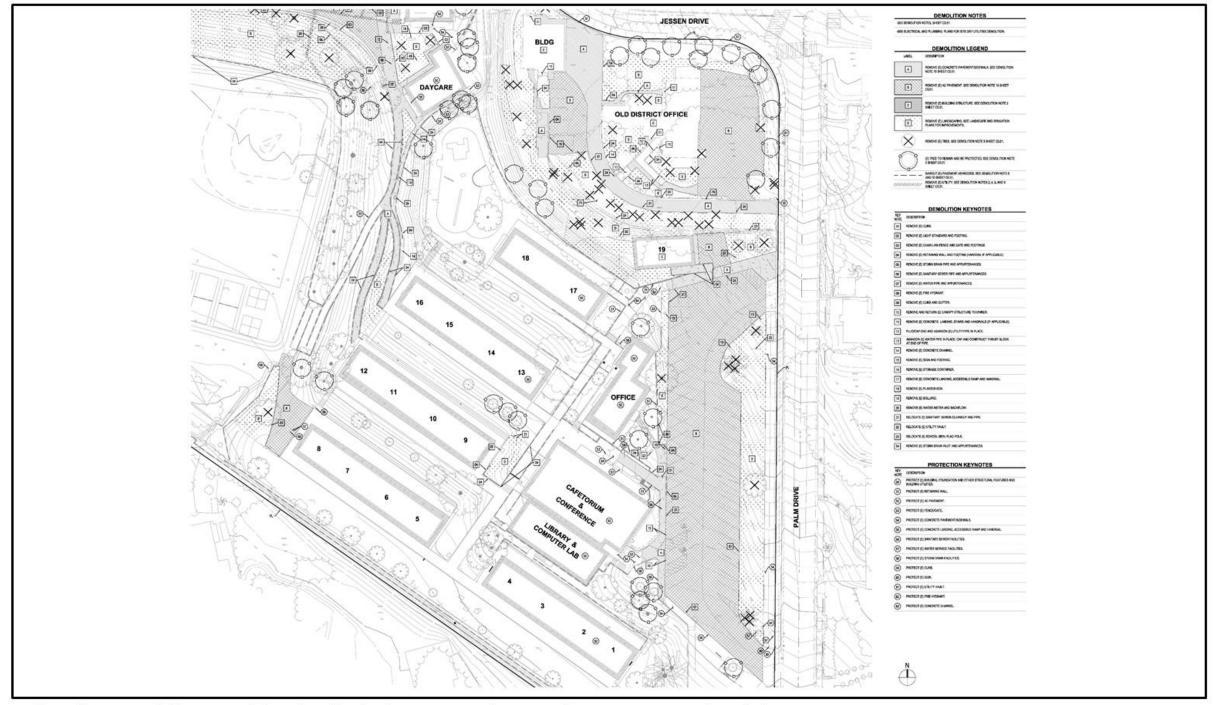




Figure 3.3-6
DEMOLITION PLAN - SOUTH SIDE OF CAMPUS

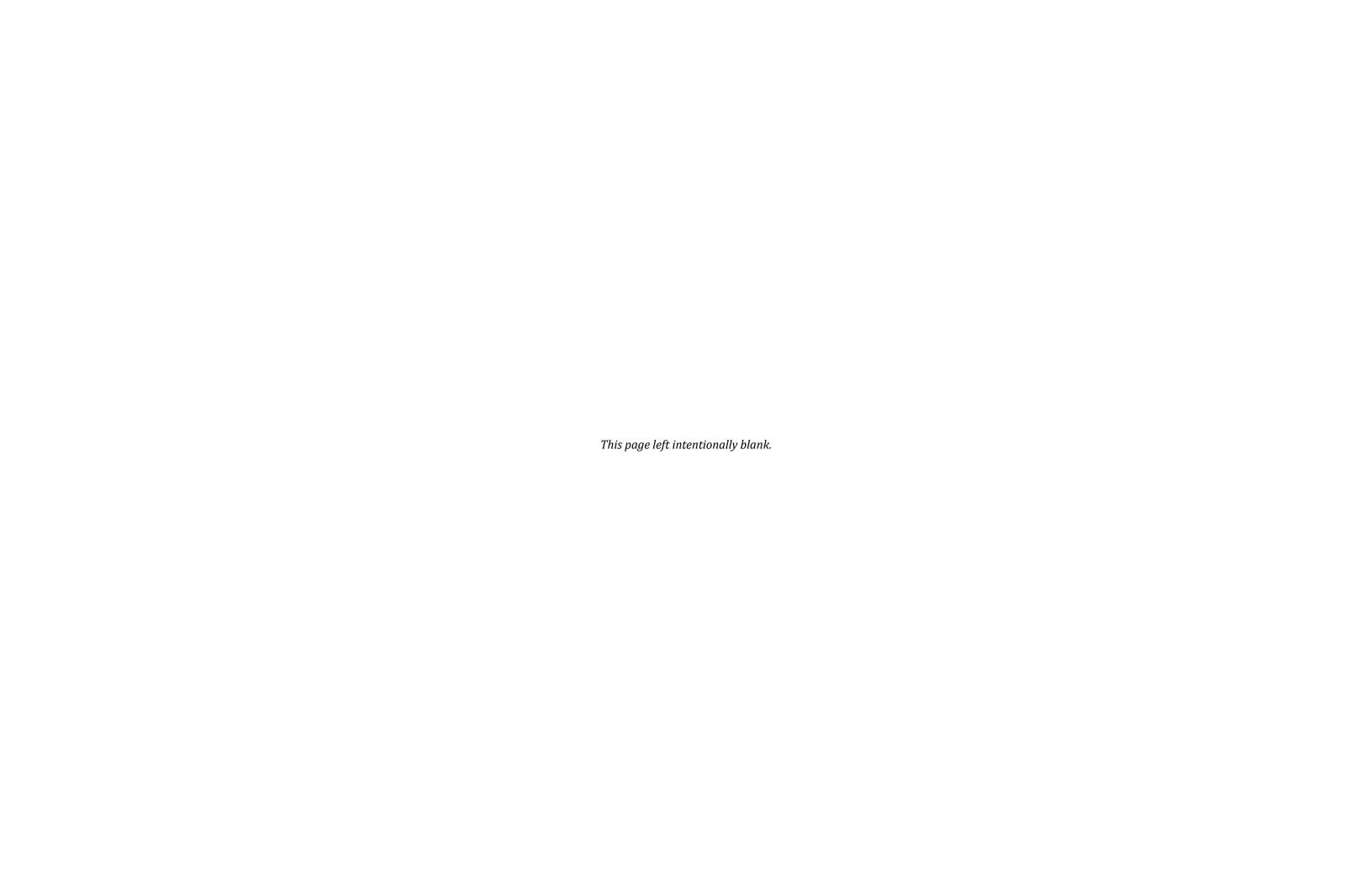


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Palm Crest Elementary School Modernization Project

Demolition Plan - South Side of Campus







3.3.6 Renovation of Existing Classrooms

The project would renovate and modernize 18 existing classrooms in buildings A through E. Renovation would include repairs and replacement of mechanical, plumbing, electrical, lighting, fire alarm and other communications systems, flooring, wall finishes, and casework. **Table 3.3-1** provides details about the modernization that would occur for each of the five buildings.

Table 3.3-1
RENOVATION OF EXISTING CLASSROOMS

Classroom Building	Number of Stories	Size (square feet)	Description of Renovations
A	1	4,240	Work will include replacement of cabinetry,
В	1	4,221	
С	1	4,320	carpet, wall finishes, flooring, lighting,
D	1	4,208	plumbing and HVAC equipment.
E	1	2,962	счиршенс.

3.3.7 Conversion of One Classroom Building

The project includes conversion of one existing classroom building (Building D), consisting of four classrooms to serve students with special needs, where Special Day Classes would be held. Specifically, there will be two Special Day Classes. One room will be converted to an Occupational/Physical Therapy room. One room will be converted to program uses (speech, counseling, psychologist, and Intervention).

3.3.8 Demolition of Old District Office and Garage

The project would demolish the old District Office, which was a single-family residential unit that was previously used as the District's administrative office. It would also demolish the existing garage located northwest of the old District Office. The project would demolish a total of 4,829 square feet for both the old District Office and garage. Refer to **Figure 3.3-6.** In place of the old District Office and garage, the project would construct a new parking lot. Construction of the new parking lot would require removal of trees⁴

3.3.9 Landscaping

The project proposes the addition of new planting areas between the two wings of the new classroom building as well as south of the proposed new west parking lot.

⁴ Refer to Section 4.4, Biological Resources, of this document for analysis of potential project impacts to biological resources.



3.3.10 Parking Lot Improvements

The project proposes to make alternations and improvements to the existing lower parking lot, west parking lot and upper parking lot (adjacent to the old District Office). Refer to **Table 3.3-2** below for details of all parking lot improvements proposed as part of the project.

Table 3.3-2
PARKING LOT IMPROVEMENTS

Parking Lot	Number of Existing Spaces	Number of Proposed Spaces	Net change (+/-) in the number of parking spaces on site
Upper	26 spaces (includes 0 accessible	61 (includes 3	+35
	spaces)	accessible spaces)	+33
Lower	42 (includes 2 accessible	21 (includes 1	-21
	parking spaces)	accessible space)	-21
West	17 (includes 1 accessible space)	11 (includes 1	-6
	17 (iliciudes 1 accessible space)	accessible space)	-0
TOTAL	85 (includes 3 accessible	93 (includes 5	+8
	spaces)	accessible spaces)	+6

3.3.11 Extension of Site Utilities

The project would extend site utilities (water, sewer, communications) to the new two-story building addition and shall make improvements to landscaping areas, and pedestrian walkways. This includes repairs to some pedestrian walkways for Americans with Disabilities Act (ADA) compliance and minor improvements to landscaping.

Sewer

The project proposes a new six-inch sewer main which would run north of the existing sewer main to the courtyard between the two wings of the proposed new building.

Electricity

The existing site is served by an 800A, 208V 3-phase electrical service located on the northwest end of the site and one 1200A, 208V, 3-phase service located on the southeast corner of the site. These services will be consolidated and replaced with a 1600A 480V 3-phase service to be located on the southeast corner of the site. The total average monthly electrical consumption is 18,000 kilowatt hours (kWh) for non-summer months, and 22,000 kWh for the summer months. It is expected that the new project would provide for energy efficient lighting and, HVAC to result in overall reduction of energy usage.

Water

The project would install a new eight-inch water main in the access road on the west side of the campus which is connected to the existing water main on Jessen Road. A fire water line for the new building would be installed onsite and would connect to the proposed eight-inch water main on the access road on the west side of campus. Domestic water for the proposed classroom building would be provided by a branch off from the proposed new eight-inch water main and would include a new water meter. Additionally, a new line for fire water would be constructed for the interim classroom



buildings to feed the new fire hydrant. The fire water line would go from the access road on the west side of campus to the proposed new fire hydrant and interim classroom buildings.

Storm Drain

Storm drain system serving the project area would conform to the State Water Board construction general permit post-construction requirements by incorporating design elements with the following considerations:

- Consideration of BMP(s) to implement as part of the project to minimize impact.
- Consideration of BMPs to reduce water volume leaving the site and slow or absorb storm water runoff.
- Maintenance of post-construction measures.

3.4 Construction Activities and Schedule

Construction activities for the proposed project are anticipated to begin on or about spring 2021 and last approximately 40 months (3.3 years). Construction is expected to be completed in eight phases (listed below). The stages for proposed improvements are provided in **Table 3.4-1** below:⁵

<u>Table 3.4-1</u> CONSTRUCTION SCHEDULE

Construction Task	Planned Construction Duration		
HAZMAT Abatement at Old District Office	March 2021 – June 2021		
Asbestos and lead abatement	March 2021 Julie 2021		
Interim Housing and Main Electrical Upgrade			
Replacement of existing transformer and switchgear, extension of site utilities to interim housing and new building addition, and installation of	June 2021 – August 2021		
14 temporary classroom portables on playfield			
Demolition of Old District Office and Construction of Temporary			
Parking	June 2021 – August 2021		
Demolition of building and site structures, trees, and paving, and			
construction of temporary parking			
Construction of New Building Addition			
Demolition/removal of the existing portables, demolition of site	June 2021-August 2022		
concrete, asphalt and grading/earthwork			
Removal of Interim Housing Portables & Restoration of Playfield	June 2022 – August 2022		
Renovation of existing Classroom Buildings	June 2022 – August 2023		
	June 2023 – October 2023, with		
Construction of New Parking Lot and Drop-off Area	the drop-off area completed by		
	August 2023		

Total duration for project construction would be approximately 32 months (March 2021-October 2023).

⁵ Per email correspondence from Harold Pierre on March 16, 2020.



It is anticipated that the following pieces of construction equipment would be used onsite; two backhoes, one skip loader, one excavator, one grader, one vibrating smooth-wheeled roller, two light soil compacting pieces of equipment, concrete trucks, and dump trucks (Pierre, 2020).

The project would begin with the removal/demolition of the existing portables, old District Office, and associated improvements, including the existing garage adjacent to the old District Office, as well as trees, pavement, and landscaping. Debris would be disposed of at an appropriate landfill or recycling facility that accepts construction and demolition waste. Subsequently, grading/excavation activities would occur. Following this, the building and associated improvements would be constructed.

Construction access would be provided via the access driveway located on the west side of the campus. It is anticipated that the number of employees at peak demand during project construction would be between 30 and 35. Between 15 and 20 construction personnel are anticipated to be on the project site for those construction phases that do not require the peak number of employees.

Construction staging would occur at the northeast portion of the site where the existing Old District Office is located. The Old District Office would be demolished and the site would be graded temporarily to provide staging and parking for contractors. The District's construction contractor would prepare and comply with a Storm Water Pollution Prevention Plan (SWPPP), including site-specific best management practices (BMPs) for erosion and sediment control, as required by the State Water Resources Control Board's General Construction Permit.

The proposed project would be designed, approved and constructed in accordance with the requirements of the Division of the State Architect (DSA), the latest adopted version of the California Building Code (CBC) for the construction of public school buildings, and the recommendations outlined in the DSA's Interpretation of Regulations (IR).

The IRs were created by DSA as an acceptable method for achieving compliance with applicable building codes and regulations including structural design, relocatable buildings, fire-resistive building materials, fire alarms, fire suppression equipment, safe occupant egress, and firefighting equipment access. Compliance with these standards and code requirements would ensure implementation of structural safety, fire protection, energy-efficient design, water conservation measures, and would aid in the reduction of greenhouse gas emissions.

Grading

The total area being graded is approximately 67,000 square feet at five feet of over-excavation and re-compaction for a total of 12,400 cubic yards of soil. Approximately 600 cubic yards of soil would be exported. In addition, approximately 2,700 cubic yards of building materials (i.e., asphalt, concrete and other debris) would be removed and disposed of. Approximately 3,700 linear feet of trenches (between three and six feet deep) would be dug for the proposed project (Pierre, 2020).

Project operators would dig trenches of the following sizes per respective utility: storm and sewer lines would be five to six feet deep and three feet wide; and water and electrical trenches would be three feet wide and three feet deep. Water and electrical lines will be distributed throughout the campus so that all buildings have appropriate utility infrastructure. Heavy equipment to conduct these activities would be the same as those used for the demolition and construction operations.



3.5 Reviewing Agencies

The following agencies would be provided an opportunity to review the IS/MND for compliance with applicable requirements, and to submit written comments, if any, to the Lead Agency.

State

- California Office of Planning and Research State Clearinghouse
- California Department of Education
- California Geological Survey
- Division of the State Architect
- Native American Heritage Commission
- Department of Conservation
- California Department of Fish and Wildlife
- Department of Health Services
- Office of Emergency Services
- State Water Resources Control Board

Regional and Local

- Los Angeles County Fire Authority
- City of La Cañada Flintridge Planning Division
- County of Los Angeles Sheriff's Department
- South Coast Air Quality Management District

3.6 Discretionary Actions

Following Lead Agency approval of this IS/MND (refer to **Section 1.0**), the following approvals would be required prior to construction.

AGENCY	PERMIT OR APPROVAL			
California Division of the State Architect (DSA)	Approval of plans and specifications			
California Geological Society	Review of geotechnical information			
California Regional Water Quality Control Board	Issuance of National Pollutant Discharge Elimination			
– Los Angeles	(NPDES) permit to contractor			
South Coast Air Quality Management District	Issuance of applicable air quality permits			
California Department of Education	Approval of Plans			



4.0 ENVIRONMENTAL CHECKLIST

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or as a "Potentially Significant Unless Mitigation Incorporated," as indicated by the checklist on the following pages.

	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agricultural Resources	☐ Hazards and Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology and Water Quality	□ Transportation
⊠ Biological Resources	☐ Land Use and Planning	☐ Tribal Cultural Resources
☑ Cultural Resources	☐ Mineral Resources	☐ Utilities and Service Systems
☐ Energy	Noise Noise	□ Wildfire
☐ Geology and Soils	☐ Population and Housing	
Determination (To Be Compl	eted by the Lead Agency)	
On the basis of this initial evaluation	on:	
\square I find that the proposed project NEGATIVE DECLARATION will be	_	effect on the environment, and a
I find that although the propose will not be a significant effect in agreed to by the project proponen	this case because revisions in th	e project have been made by or
\square I find that the proposed pro ENVIRONMENTAL IMPACT REPO		ect on the environment, and an
☐ I find that the proposed proposed proposed proposed proposed in an earlier of the control of	pact on the environment, but a document pursuant to applicable based on the earlier analysis as	t least one effect (1) has been legal standards, and (2) has been described on attached sheets. An
☐ I find that although the properties of the propose of the properties	effects (a) have been analyzed nt to applicable standards, and (b ATIVE DECLARATION, including	adequately in an earlier EIR or) have been avoided or mitigated revisions or mitigation measures
Signature	 Date	
	La Cañada Unit	ied School District
Printed Name	La Callada Ulli	ieu school District



Evaluation of Environmental Impacts

- (1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites 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 would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- (2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- (3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if 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 less than significant level.
- (5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. (See § 15063(c)(3)(D) of the CEQA Guidelines.) In this case, a brief discussion should identify the following:
 - (a) Earlier Analyses Used. Identify and state where the earlier analysis is 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 that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- (6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated. A source list should be attached and other sources used or individuals contacted should be cited in the discussion.



- (7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- (8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- (9) The explanation of each issue should identify:
 - (a) The significance criteria or threshold, if any, used to evaluate each question; and
 - (b) The mitigation measure identified, if any, to reduce the impact to less than significant.



4.1 Aesthetics

Re	Except as provided in Public esources Code Section 21099, would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?			X	
b)	Substantially damage scenic resources, including, but not limited to, trees, outcroppings, and historic buildings within a state scenic highway?				х
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		Х		

A "visual environment" includes the built environment (development patterns, buildings, parking areas, and circulation elements) and natural environment features (such as hills, vegetation, rock outcroppings, drainage pathways, and soils). Visual quality, viewer groups and sensitivity, duration, and visual resources characterize views. Visual quality refers to the general aesthetic quality of a view, such as vividness, intactness, and unity. Viewer groups identify who is most likely to experience the view. High-sensitivity land uses include residences, schools, playgrounds, religious institutions, and passive outdoor spaces such as parks, playgrounds, and recreation areas. Duration of a view is the amount of time that a particular view can be seen by a specific viewer group. Visual resources refer to unique views, and views identified in local plans, from scenic highways, or of specific unique structures or landscape features.

a) Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?

Less than Significant Impact

The city's General Plan does not identify any scenic vistas within city boundaries; however, it identifies scenic corridors that offer key public vantage points from which prominent viewscapes can be seen. The designated scenic corridors include Foothill Boulevard, Interstate 210 (I-210), State Route 2 (SR-2), and Verdugo Boulevard east of SR-2. Foothill Boulevard is located approximately 0.6 mile south of the project site; SR-2 is located approximately 2.0 miles northeast of the project site; I-210 is located approximately 0.9 mile southwest of the project site; and



Verdugo Boulevard is located approximately 1.2 miles south of the project site (ICF Jones & Stokes, 2013, p. 4-6).

The project site is located in a developed portion of the City. Views within the project area are generally limited to immediately adjacent land uses/structures. The project site is surrounded by a residential development on all sides. Views of the scenic corridors are obstructed due to intervening structures and large distances; therefore, impacts regarding scenic vistas would be less than significant.

b) Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact

According to the City's General Plan, the project site is not located in the vicinity of an officially designated or eligible state scenic highway, designated as part of the California Scenic Highway Program. As depicted in **Figure 4.1-1** below, the closest official state scenic highway is SR-2, located approximately 2.0 miles northeast of the project site. Additionally, the closest eligible state scenic highway is a portion of I-210, located approximately 0.9 miles southwest of the project site (ICF Jones and Stokes, 2013, p. 4-14). Therefore, due to the distance between the project site and the closest state scenic highway, the project would not damage any scenic resources within a state scenic highway and no impact would occur.

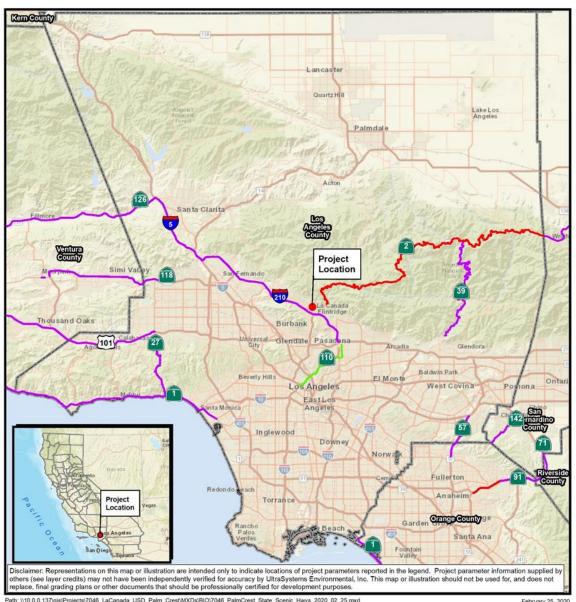
c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact

The project site is located in an urban setting characterized by residential uses surrounding the project site. Views of the existing streetscape are characterized by low height (one-story to two-story) residences, utilities infrastructure (including utility lines, poles and street lights) and landscaping. Refer to **Table 4.1-1**, which describes the existing visual character in the vicinity of the project site. **Figure 4.1-2** is a photo key map showing where photos were taken in **Figures 4.1-2a** through **4.1-2c**, which include photographs of the existing visual character of the project area.

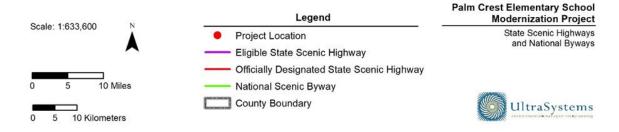


Figure 4.1-1
DESIGNATED AND ELIGIBLE STATE SCENIC HIGHWAYS



Path: \\10.0.0.137gis\Projects\7046_LaCanada_USD_Palm_Crest\MXDs\BIO\7046_PalmCrest_State_Scenic_Hwys_2020_02_25.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreeMap contributors, and the GIS User Community; Caltrains, 2014; National Byways- U.S. DOT, 2013; UltraSystems Environmental, Inc., 2020

February 25, 202





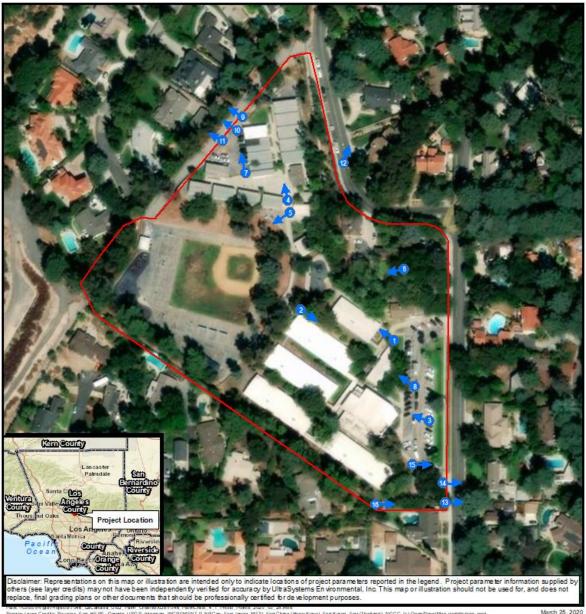
<u>Table 4.1-1</u>
EXISITING VISUAL CHARACTER AND LAND USES IN THE PROJECT AREA

Location	General Characteristics	Existing Lighting	Building Height and Design	Landscaping
Project Site	Palm Crest Elementary School	Exterior lighting associated with the school buildings, parking lot lighting, street lighting.	One-story buildings with sloping roofs and white/gray plastered exterior walls.	Mature trees and ornamental vegetation.
Surroundin	g Areas			
North	Single-family homes.	Exterior lighting associated with the residential developments and street lighting.	One-story to two-story buildings with tiled sloping roofs and plastered exterior walls painted in varying colors. Buildings are at a lower elevation than the project site.	Mature trees and ornamental landscaping.
East	Single-family homes.	Exterior lighting associated with the residential developments and street lighting.	One-story to two-story buildings with tiled sloping roofs and plastered exterior walls painted in varying colors.	Mature trees and ornamental landscaping.
West	Single-family homes.	Exterior lighting associated with the residential developments and street lighting.	One-story to two-story buildings with tiled sloping roofs and plastered exterior walls painted in varying colors. Buildings are at a lower elevation than the project site.	Mature trees, shrubs, and ornamental landscaping.
South	Single-family homes.	Exterior lighting associated with the residential developments and street lighting.	One-story to two-story buildings with tiled sloping roofs and plastered exterior walls painted in varying colors. Buildings are at a lower elevation than the project site.	Mature trees, shrubs, and ornamental landscaping.

Source: UltraSystems, 2020



Figure 4.1-2 PHOTO KEY MAP



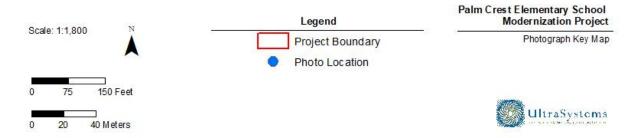




Figure 4.1-2a EXISITING VISUAL CHARACTER IN THE VICINITY OF THE PROJECT SITE



PHOTO 1: View looking northwest of single-family residences along Solliden Lane.



PHOTO 3: View looking southeast of single-family residences across Palm Drive.



PHOTO 2: View looking southwest of single-family residences.



PHOTO 4: View looking southwest of single-family residence along Solliden Lane.



Figure 4.1-2b EXISITING VISUAL CHARACTER IN THE VICINITY OF THE PROJECT SITE



PHOTO 5: Residences along Solliden Lane to the north.



PHOTO 7: Residence along Solliden Lane to the north.



PHOTO 6: Residences along Solliden Lane to the south.



PHOTO 8: Residence adjacent to the project site, along Palm Drive.



Figure 4.1-2c EXISITING VISUAL CHARACTER IN THE VICINITY OF THE PROJECT SITE

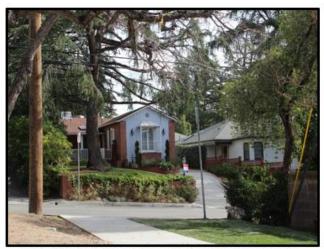


PHOTO 9: Residences across Palm Drive from the project site.



PHOTO 11: Residence across Palm Drive from the project site.



PHOTO 10: Residences across Palm Drive from the project site.



PHOTO 12: Residence across Palm Drive from the project site.



Construction

The project applicant would remove some trees during construction of the proposed project. An Arborist Assessment has been prepared for the project (refer to **Appendix D1**). Construction of the proposed project would include views associated with construction activities, construction staging areas, grading, excavation, construction equipment, material storage areas, construction debris, exposed trenches, etc. Construction elements would be inconsistent with the visual character of the project vicinity. Project construction could temporarily degrade the existing visual character of the project area and its immediate surroundings. This impact would be short term and these elements would be removed following construction. The California Supreme Court held that public school districts are a matter of statewide concern and that school districts, being local agencies of the state, are not subject to municipal construction regulations when engaged in such sovereign activities as the construction of school buildings.⁶ It was subsequently held that school construction is regulated and inspected at the state level through the Division of State Architect (DSA) and the Field Act per the Education Code.⁷ Therefore, construction of the proposed project would have no impact regarding conflict with existing state, regional, county, or local laws, policies, regulations, plans or guidelines.

Operation

The proposed project includes modernization and replacement of buildings and facilities on the Palm Crest Elementary School campus. The proposed project would complement the existing buildings and architecture on campus (refer to **Appendix B1**, which provides depictions of exterior materials and landscaping for the proposed project).

Development on the Palm Crest Elementary School campus are subject to review by the Division of State Architect (DSA), which issues the building/construction permits for projects on campus. The project would be developed in compliance with DSA requirements and would not conflict with regulations governing scenic quality. Therefore, the proposed project would have a less than significant impact in this regard.

As shown in **Figures 4.1-3** through **4.1-6** below, the proposed project would not degrade the visual character of the project site because it would replace the existing classrooms with one new two-story classroom building that complements the school campus. Although the proposed project would construct a new two-story building onsite, views of the surrounding area would not be significantly degraded or altered due to the difference in elevation between the project site and the surrounding residences. As described in **Section 3.0** of this document, the following project design refinements have been made to the site and building design to address community input regarding the proposed building:

- 1. Provide additional landscape and irrigation along the access road (Solliden Lane) to help screen the proposed new building.
- 2. Explore alternate exterior finish materials and/or colors.

⁶ See Hall v. City of Taft (1956) 47 Cal.2d 177 [302 P.2d 574].

⁷ See Town of Atherton v. Superior Court (1958) 159 Cal.App.2d 417 [324 P.2d 328].



Figure 4.1-3
NEW BUILDING CONCEPTUAL DRAWING



Source: LPA Inc., April 21, 2020



Palm Crest Elementary School Modernization Project

New Building Conceptual Drawing



Figure 4.1-4 SCREENING AT ACCESS ROAD



Source: LPA Inc., April 21, 2020



Palm Crest Elementary School Modernization Project

Screening at Access Road



Figure 4.1-5
VIEW FROM PARKING LOT



Disclaimer: Illustration provided by LPA Inc., who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: LPA Inc., April 21, 2020



Palm Crest Elementary School Modernization Project

View from the Parking Lot



Figure 4.1-6 VIEW AT SOUTHWEST STAIRCASE



 $Disclaimer: Illustration\ provided\ by\ LPA\ Inc.,\ who\ has\ indicated\ that\ the\ information\ is\ true\ and\ correct.\ No\ other\ warranties\ are\ expressed\ or\ implied.$

Source: LPA Inc., April 21, 2020



Palm Crest Elementary School Modernization Project

View at the Southwest Staircase



- 3. Reduce overall building length by relocating one classroom bay from the west wing to the east. This will require shifting the east wing of the building eight feet to the north and relocating one staircase.
- 4. Move the building further away from neighboring homes by rotating the west wing by five degrees, which:
 - Provides 18 feet of clearance from access road to the face of the building at the narrowest point.
 - Allows for 13 feet of additional planting along the access road edge of building.
 - Loses 480 square feet of learning courtyard space (total), including 300 square feet less green space.
 - Loses three trees in the learning courtyard.
 - Visual supervision of the area between the parking and the building would be made more difficult.

Additionally, the existing tall mature trees and proposed additional trees located between the project site and the surrounding residences will serve as a visual barrier between the proposed building and residences located along Solliden Lane. Therefore, implementation of the proposed project would result in less than significant visual impacts.

Shade and Shadows

Shadow-sensitive uses include all residential uses and routinely usable outdoor spaces associated with recreational or institutional uses, commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the project vicinity are limited to the residential uses to the north, south, east and west of the project site (refer to **Table 4.1-1** and **Figure 4.1-2**).

The project proposes one two-story building, comprised of an east and west wing, to be located on the northern side of the school campus, near Jessen Drive. Refer to **Appendix B2** which show the shadow exhibits prepared by the project architect. As depicted in these figures, shade and shadows produced by the project would not impact adjacent land uses. Therefore, the project would have a less than significant impact regarding generation of shade and shadow on adjacent land uses and structures.



d) Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact with Mitigation Incorporated

Construction

Light and Glare

During project construction there would be additional sources of light that would be used to provide security lighting for the construction staging area(s) on the project site. Additionally, construction equipment during project construction may produce glare because construction equipment would be stored and operated onsite during the construction phase of the project. To ensure that construction lighting and glare do not have a significant impact on surrounding residential land uses, mitigation measure **AES-1** is recommended to reduce potential temporary construction lighting and glare impacts to a less than significant level.

Mitigation Measure

MM AES-1 During project construction, the project applicant shall employ low level lighting so as to minimize to the maximum extent possible any potential lighting and/or glare impacts to nearby residences. The lighting used during project construction shall consist of the minimum amount of light necessary for safety and security on the project site.

Level of Significance After Mitigation

With implementation of **MM AES-1** and given that project construction would be temporary, the proposed project would have a less than significant impact regarding temporary construction lighting.

Operation

Light

The project site is located in an urban area, which is characterized by low to medium nighttime ambient light levels. Street lights, traffic on local streets and exterior lighting in surrounding homes are the primary sources of light that contribute to the ambient light levels in the project area. Light-sensitive uses in the project vicinity are limited to surrounding residences.

The project proposes exterior lighting throughout the site. Outdoor lighting would be upgraded to light-emitting diode (LED) to provide adequate pathway lights for pedestrians on campus. Exterior lighting would be designed to meet California Building Code requirements. Lighting would be controlled by time clock. Pedestrian lighting poles would be Viper LED luminaires by Beacon (or an approved substitute) and fixtures would be between 12 feet and 15 feet high. Parking lot poles would be Viper LED luminaires by Beacon (or an approved substitute) and fixtures would be between 25 feet to 30 feet high. Installation of proposed exterior lighting would be necessary for safety and nighttime visibility throughout the proposed development. The new project lighting would be visible from the surrounding area. Therefore, the project's proposed exterior lighting is expected to



contribute to ambient nighttime illumination in the project vicinity. The existing perimeter trees (many large eucalyptus) will mask aesthetically much of the new classroom building, since the homes are below grade to Solliden Lane and the trees in that area are large. The project would provide additional landscape and irrigation along the access road (Solliden Lane) to help screen the proposed new building Additionally, the project would comply with the City's Municipal Code 11.16.060, which requires that exterior lighting devices for parking and pedestrian walkways shall be provided for safety and security, without excessive lighting or glare (City of La Cañada Flintridge Municipal Code, 2020). Therefore, impacts in this regard would be less than significant.

Glare

Glare could be produced from glass windows and from parked cars, however the project would not result in significant glare impacts because two of the three parking lots on campus would continue to exist in their current locations on the project site. The proposed parking lot to be located where the Old District Office is currently located would not produce substantial amounts of glare compared to existing conditions. Additionally, as depicted in **Figure 4.1-7**, the proposed project would not include highly reflective or mirrored surfaces on the proposed new building. The project proposes white plaster exterior walls facing Solliden Lane, as well as gray metal louvers and gray metal panels at walkways, windows, and as trim. Blue plaster is proposed at the elevator and blue translucent glass would be installed at street-facing windows. The materials and colors chosen would not create significant amounts of glare onsite. Additionally, the project would provide additional landscape and irrigation along the access road (Solliden lane) to help screen the proposed new building. Therefore, impacts in this regard would be less than significant.



Figure 4.1-7 EXTERIOR FINISHES AND MATERIALS - BUILDING ELEVATION



Disclaimer: Illustration provided by LPA, Inc., who has indicated that the information is true and correct. No other warranties are expressed or implied. Source: LPA, Inc., April 21, 2020

Palm Crest Elementary School Modernization Project



Exterior Finishes and Materials - Building Elevation



4.2 Agriculture and Forestry Resources

	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?				х
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				Х
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				Х
d)	Result in the loss of forest land or conversion of forest land to nonforest use?				х
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?				х

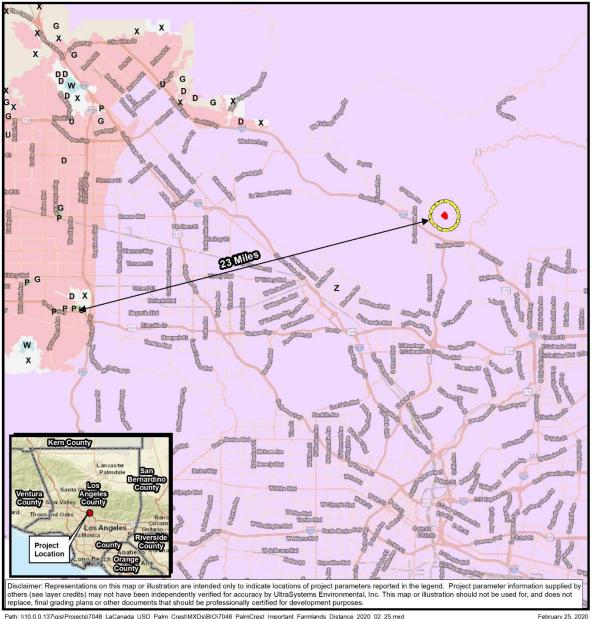
a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact

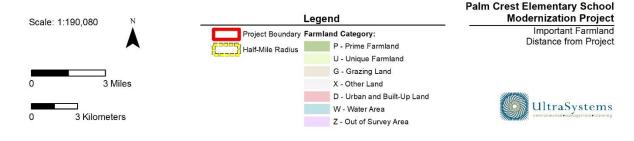
The project site is located in an urban setting containing a mix of institutional, commercial, and residential uses. The project is proposed on an existing elementary school campus. The project site has not been surveyed. However, the project site is already developed and would not convert prime, unique, or farmland of statewide importance to urban use. As depicted in **Figure 4.2-1**, the nearest farmland to the project site is Unique Farmland located approximately 23 miles away. Therefore, no impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur as a result of the project.



Figure 4.2-1 IMPORTANT FARMLAND CATEGORIES



Path: W10.0.0.137/gislProjects/7046_LaCanada_USD_Palm_CrestMXDs/BIO/7046_PalmCrest_Important_Farmlands_Distance_2020_02_25.mxd Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors; CA Dept. of Conservation, 2016; UltraSystems Environmental, Inc., 2020





b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact

The project is proposed on the Palm Crest Elementary School campus. Therefore, the project site is not located on land enrolled in a Williamson Act contract (DOC, 2019). Additionally, the project site is not located within an area zoned for agricultural use. The project site is currently zoned by the City of La Cañada Flintridge as Public/Semi-Public (PS) (City of La Cañada Flintridge, 2020a). Therefore, no impact would occur.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact

The project is proposed on the Palm Crest Elementary School campus, in a developed/urban area. No forestland or timberland are located on the project site. The site's existing zoning of PS does not support the definitions provided by Public Resources Code § 42526 for timberland, PRC § 12220(g) for forestland, or Government Code § 51104(g) for timberland zoned for production. Therefore, no impacts related to the conversion of timberland or forest land would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact

As previously stated in **Section 4.2 c) above**, the project is located within an existing elementary school campus, in a developed urban area. Implementation of the project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

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

No Impact

The project site is located on campus of an existing elementary school in a completely urban setting containing a mix of institutional, commercial, and residential uses. No forest land is located within the project boundary or in the vicinity of the project site. Implementation of the project would not result in changes to the environment which, due to their location or nature, could result in the conversion of farmland to non-agricultural use or converting forest land to non-forest use. Therefore, no impact would occur.



4.3 Air Quality

	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 the applicable air quality plan?			X	
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?			Х	
c)	Expose sensitive receptors to substantial pollutant concentrations?			X	
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			х	

Pollutants of Concern - Criteria Pollutants

The criteria air pollutants of concern are nitrogen dioxide (NO_2) , carbon monoxide (CO), particulate matter (PM), sulfur dioxide (SO_2) , lead (Pb), and ozone (O_3) , and their precursors. Criteria pollutants are air pollutants for which acceptable levels of exposure can be determined and an ambient air quality standard has been established by the U.S. Environmental Protection Agency (USEPA) and/or the California Air Resources Board (ARB). Since the proposed project would not generate appreciable SO_2 or Pb emissions, it is not necessary for the analysis to include those two pollutants. Presented below is a description of the air pollutants of concern and their known health effects.

Nitrogen oxides (NO_X): NO_X serve as integral participants in the process of photochemical smog production and are precursors⁸ for certain particulate compounds that are formed in the atmosphere. The two major forms of NO_X are nitric oxide (NO) and NO_2 . NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO_2 is a reddish-brown pungent gas formed by the combination of NO and oxygen. NO_2 acts as an acute respiratory irritant and eye irritant, and increases susceptibility to respiratory pathogens. A third form of NO_X , nitrous oxide (N_2O), is a greenhouse gas.

Carbon monoxide (CO): CO is a colorless, odorless non-reactive pollutant produced by incomplete combustion of carbon-containing fuels (e.g., gasoline, diesel, and biomass). CO levels tend to be highest during the winter months and low wind speed when the meteorological conditions favor the accumulation of the pollutants. This occurs when relatively low inversion levels trap pollutants near the ground and concentrate the CO. CO is essentially inert to plants and materials but can have

A precursor is a directly emitted air contaminant that, when released into the atmosphere, forms, causes to be formed, or contributes to the formation of a secondary air contaminant for which an ambient air standard has been adopted, or whose presence in the atmosphere will contribute to the violation of one or more standards.



significant effects on human health. The primary adverse health effect associated with CO is its binding with hemoglobin in red blood cells, which decreases the ability of these cells to transport oxygen throughout the body. Prolonged exposure can cause headaches, drowsiness, or loss of equilibrium; high concentrations are lethal.

Particulate matter (PM): PM is a mixture of microscopic solids and liquid droplets suspended in air. This pollution is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, soil or dust particles, and allergens (such as fragments of pollen or mold spores). Two forms of fine particulate matter are now regulated. Respirable particles, or PM₁₀, include that portion of the particulate matter with an aerodynamic diameter of 10 micrometers (i.e., 10 one-millionths of a meter or 0.0004 inch) or less. Fine particles, or PM_{2.5}, have an aerodynamic diameter of 2.5 micrometers (i.e., 2.5 one-millionths of a meter or 0.0001 inch) or less. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. However, wind action on the arid landscape also contributes substantially to the local particulate loading. Fossil fuel combustion accounts for a significant portion of PM_{2.5}. In addition, particulate matter forms in the atmosphere through reactions of NO_x and other compounds (such as ammonia) to form inorganic nitrates. Both PM₁₀ and PM_{2.5} may adversely affect the human respiratory system, especially in those people who are naturally sensitive or susceptible to breathing problems.

Reactive organic gases (ROG): ROG are compounds comprised primarily of atoms of hydrogen and carbon that have high photochemical reactivity. The major source of ROG is the incomplete combustion of fossil fuels in internal combustion engines. Other sources of ROG include the evaporative emissions associated with the use of paints and solvents, the application of asphalt paying and the use of household consumer products. Adverse effects on human health are not caused directly by ROG, but rather by reactions of ROG to form secondary pollutants. ROG are also transformed into organic aerosols in the atmosphere, contributing to higher levels of fine particulate matter and lower visibility. The term ROG is used by the ARB for air quality analysis and is defined essentially the same as the federal term volatile organic compound (VOC).

Ozone (O₃): Ozone is a secondary pollutant produced through a series of photochemical reactions involving ROG and NO_x. Ozone creation requires ROG and NO_x to be available for approximately three hours in a stable atmosphere with strong sunlight. Because of the long reaction time, peak ozone concentrations frequently occur downwind of the sites where the precursor pollutants are emitted. Thus, ozone is considered a regional, rather than a local, pollutant. The health effects of ozone include eye and respiratory irritation, reduction of resistance to lung infection and possible aggravation of pulmonary conditions in persons with lung disease. Ozone is also damaging to vegetation and untreated rubber.

Meteorology and Climate

Air quality is affected by both the rate and location of pollutant emissions and by meteorological conditions that influence movement and dispersal of pollutants. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients, along with local topography, provide the link between air pollutant emissions and air quality.

The South Coast Air Basin (SCAB) is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the southwest and high mountains around its remaining 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 vertical dispersion of air pollutants in the SCAB is hampered by the presence of persistent temperature inversions. An upper layer of dry air that warms as it descends characterizes high-pressure systems, such as the semi-permanent high-pressure zone in which the SCAB is located. This upper layer restricts the mobility of cooler marine-influenced air near the ground surface and results 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 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 mph, smog potential is greatly reduced.

The annual average maximum and minimum temperatures, as recorded at the Altadena weather station (5.4 miles east-southeast of the proposed project site), are 74.1 degrees Fahrenheit (°F) and 50.0°F. The highest monthly maximum recorded temperatures are 86.8°F in August and 64.3°F in January. The highest average minimum recorded temperatures are 59.1°F in August and 42.3°F in January. The annual average of total precipitation in the proposed project area is approximately 22.00 inches, which occurs mostly during the winter and relatively infrequently during the summer. Precipitation averages approximately 12.65 inches during the winter (December, January, and February), approximately 10.13 inches during the spring (March, April, and May), approximately 3.27 inches during the fall (September, October, and November), and approximately 0.30 inch during the summer (WRCC, 2020).

Winds in the SCAB are generally light, tempered by afternoon sea breezes. Severe weather is uncommon in the Basin, but strong easterly winds known as the Santa Ana winds can reach 25 to 35 miles per hour below the passes and canyons. During the spring and summer months, air pollution is carried out of the region through mountain passes in wind currents or is lifted by the warm vertical currents produced by the heating of the mountain slopes. From the late summer through the winter months, because of the average lower wind speeds and temperatures in the proposed project area and its vicinity, air contaminants do not readily disperse, thus trapping air pollution in the area.

Regional Air Quality

Table 4.3-1 shows the area designation status of the SCAB for each criteria pollutant for both the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS).

Local Air Quality

The South Coast Air Quality Management District (SCAQMD) has divided the SCAB into source receptor areas (SRAs), based on similar meteorological and topographical features. The proposed project site is in SCAQMD's West San Gabriel Valley SRA 8. However, the nearest monitoring site to the project is in Pasadena on South Wilson Avenue, located 16.5 miles southeast of the proposed project site. Criteria pollutants monitored at the Pasadena Monitoring Station include ozone, $PM_{2.5}$, and NO_2 . The nearest site that monitors PM_{10} is the Los Angeles station on North Main Street, approximately 21.6 miles south of the prosed project site. The ambient air quality data in the



proposed project vicinity as recorded at the Pasadena and Los Angeles Monitoring Stations from 2016 to 2018 and the applicable federal and state standards are shown in **Table 4.3-2**.

<u>Table 4.3-1</u> FEDERAL AND STATE ATTAINMENT STATUS

Pollutants	Federal Classification	State Classification	
Ozone (O ₃)	Nonattainment (Extreme)	Nonattainment	
Particulate Matter (PM ₁₀)	Maintenance (Serious)	Nonattainment	
Fine Particulate Matter (PM _{2.5})	Nonattainment (Moderate)	Nonattainment	
Carbon Monoxide (CO)	Maintenance (Serious)	Attainment	
Nitrogen Dioxide (NO ₂)	Maintenance	Attainment	
Sulfur Dioxide (SO ₂)	Attainment	Attainment	
Sulfates		Attainment	
Lead (Pb)	No Fodovol Cton doudo	Attainment	
Hydrogen Sulfide (H ₂ S)	No Federal Standards	Attainment	
Visibility Reducing Particles		Unclassified	

Sources:

USEPA, 2019a; USEPA, 2019b; USEPA, 2019c; USEPA, 2019d; USEPA, 2019e; ARB, 2019b.

Table 4.3-2
AMBIENT AIR QUALITY MONITORING DATA

Air Pollutant	Standard/Exceedance	2016	2017	2018
Ozone (O3) - Pasadena	Max. 1-hour Concentration (ppm) Max. 8-hour Concentration (ppm) # Days > Federal 8-hour Std. of 0.070 ppm # Days > California 1-hour Std. of 0.09 ppm # Days > California 8-hour Std. of 0.070 ppm	0.126 0.090 18 12 19	0.139 0.100 36 18 38	0.112 0.090 19 8 20
Nitrogen Dioxide (NO ₂) - Pasadena Max. 1-hour Concentration (ppm) Annual Average (ppm) # Days > California 1-hour Std. of 0.18 ppm		0.0719 0.015 0	0.0723 0.015 0	0.0682 0.014 0
Respirable Particulate Matter (PM $_{10}$) – Los Angeles-North Main Max. 24-hour Concentration (µg/m³) #Days > Fed. 24-hour Std. of 150 µg/m³ #Days > California 24-hour Std. of 50 µg/m³ Annual Average (µg/m³)		74.6 0 21 ND	96.2 0 40 ND	81.2 0 31 34.0
Fine Particulate Matter (PM _{2.5}) - Pasadena	Max. 24-hour Concentration (μg/m³) State Annual Average (μg/m³) #Days > Fed. 24-hour Std. of 35 μg/m³ Federal Annual Average (μg/m³)	29.2 9.5 0 9.5	22.8 9.7 0 9.6	32.5 10.3 0 10.2

Source: ARB, 2019a.

ND There were insufficient (or no) data available to determine the value.



Sensitive Receptors

Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, the elderly over 65 years of age, and children under 14, are particularly sensitive to certain pollutants. Facilities and structures where these sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses identified to be sensitive receptors by SCAQMD in the CEQA Handbook include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Sensitive receptors may be at risk of being affected by air emissions released from the construction and operation of the proposed project.

The proposed project would be in La Cañada Flintridge near several existing single-family residences to the northwest, north, east, and south. The Halls Canyon Channel is located directly west of the proposed project site. Exposure to potential emissions would vary substantially 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. The construction phase emissions estimated in this analysis are based on conservative estimates and worst-case conditions, with maximum levels of construction activity occurring simultaneously within a short period of time. The nearest sensitive receptors to the proposed project site, with the highest potential to be impacted by the proposed project, are across Solliden Lane and approximately 30 meters from the project boundary.

Asbestos

Asbestos is the name given to several naturally-occurring fibrous silicate minerals that have been mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. The three most common types of asbestos are chrysotile, amosite, and crocidolite. Chrysotile, also known as white asbestos, is the most common type of asbestos found in buildings. Chrysotile makes up approximately 90 to 95% of all asbestos contained in buildings in the United States.

The proposed project includes demolition of existing buildings. Due to the age of some of the buildings to be demolished, there exists the potential for the presence of asbestos.

Air Quality Management Plan (AQMP)

The SCAQMD is required to produce plans to show how air quality will be improved in the region. The California Clean Air Act (CCAA) requires that these plans be updated triennially to incorporate the most recent available technical information. A multi-level partnership of governmental agencies at the federal, state, regional, and local levels implements the programs contained in these plans. Agencies involved include the USEPA, ARB, local governments, Southern California Association of Governments (SCAG), and SCAQMD. The SCAQMD and the SCAG are responsible for formulating and implementing the Air Quality Management Plan (AQMP) for the SCAB. The SCAQMD updates its AQMP every three years.

The 2016 AQMP (SCAQMD, 2017) was adopted by the SCAQMD Board on March 3, 2017, submitted to the ARB and on March 10, 2017 was made part of the State Implementation Plan (SIP), which was submitted to the USEPA (ARB, 2017). It focuses largely on reducing NO_X emissions as a means of attaining the 1979 1-hour ozone standard by 2022, the 1997 8-hour ozone standard by 2023, and the

⁹ CCAA of 1988.



2008 8-hour standard by 2031. The AQMP prescribes a variety of current and proposed new control measures, including a request to the USEPA for increased regulation of mobile source emissions. The NO_X control measures will also help the Basin attain the 24-hour standard for $PM_{2.5}$.

Air Quality Thresholds

A project may have a significant impact if project-related emissions would exceed federal, state, or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. To address potential impacts from construction and operational activities, the SCAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds outlined in **Table 4.3-3** be considered significant. The City defers to these thresholds for the evaluation of construction and operational air quality impacts.

<u>Table 4.3-3</u> SCAQMD THRESHOLDS OF SIGNIFICANCE

Pollutant	Mass Daily Thresholds (Pounds/Day)			
Ponutant	Construction	Operation		
Nitrogen Oxides (NOx)	100	55		
Volatile Organic Compounds (VOC)	75	55		
Respirable Particulate Matter (PM ₁₀)	150	150		
Fine Particulate Matter (PM _{2.5})	55	55		
Sulfur Oxides (SO _x)	150	150		
Carbon Monoxide (CO)	550	550		
Lead	3	3		

Source: SCAQMD, 2019.

The SCAQMD Governing Board adopted a methodology for calculating localized air quality impacts through localized significance thresholds (LSTs), which is consistent with SCAQMD's Environmental Justice Enhancement Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable state or national ambient air quality standard (SCAQMD, 2008). The LSTs are developed based on the ambient concentrations of that pollutant for each source receptor area and are applicable to NO₂, CO, PM₁₀, and PM_{2.5}.

The project site is in SRA 8 (West San Gabriel Valley). It is assumed that construction will disturb no more than five acres per day and that sensitive receptors are within 30 meters. According to the 2006-2008 look-up tables provided in the LST Guidelines for a conservative five acres per day disturbed at a receptor distance of 25 meters, the appropriate LSTs for construction activity are as shown in **Table 4.3-4**. LSTs for operational emissions only apply to onsite sources. Since the primary source of emissions for this project is associated with offsite vehicle trips, an LST analysis of long-term emissions is not required.



Table 4.3-4
SCAQMD LOCALIZED THRESHOLDS FOR CONSTRUCTION

Pollutant	Localized Significance Threshold (lbs/day)		
Nitrogen Dioxide (NO ₂) ^a	148		
Carbon Monoxide (CO)	1,540		
Inhalable Particulate Matter (PM ₁₀)	12		
Fine Particulate Matter (PM _{2.5})	7		

Source: Air Quality Significance Thresholds. South Coast Air Quality Management District. Revised October 21, 2009.

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

Less than Significant Impact

Typically, assessments of air quality plan consistency use four criteria for determining project consistency with the current AQMP. The first and second criteria are from the SCAQMD. According to the SCAQMD, there are two key indicators of AQMP consistency: (1) whether the project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP; and (2) whether the project will exceed the assumptions in the AQMP based on the year of project build out and phase (SCAQMD, 2006). The third criterion is compliance with the control measures in the AQMP. The fourth criterion is compliance with the SCAQMD regional thresholds.

Project's Contribution to Air Quality Violations

As shown in Impact 4.3 b) the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, the project meets the first indicator.

AQMP Assumptions

One way to assess project compliance with the AQMP assumptions is to ensure that the population density and land use are consistent with the growth assumptions used in the air plans for the air basin. According to ARB transportation performance standards, the rate of growth in vehicle miles traveled (VMT) and trips should be held to the rate of population growth. Compliance with this performance standard is one way suggested by the ARB of showing compliance with the growth assumptions used in the AQMP. If the total VMT generated by the proposed project at build-out is at or below that predicted by the AQMP, then the proposed project's mobile emissions are consistent with the AQMP. It is assumed that the existing and future pollutant emissions computed in the AQMP were based on land uses from area general plans.

The project concerns mainly construction activities in the replacement and/or upgrade of educational facilities. Increases in long-term operational emissions are not expected; therefore,

^aThe threshold is for emissions of NO_x.



the project will be substantially equal to what was appropriately assumed for the site in any growth rate or trip generation assumptions. Therefore, the proposed would not conflict with AQMP and impacts would be less than significant.

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

Less than Significant Impact

Construction activities, including soil disturbance dust emissions and combustion pollutants from onsite construction equipment and from offsite trucks hauling dirt would create a temporary addition of pollutants to the local and regional airsheds. Construction emissions were estimated using CalEEMod Version 2016.3.2 (CAPCOA, 2017). As shown in **Table 4.3-5**, all construction emissions associated with the project would be below the regional significance thresholds and LST Thresholds.

<u>Table 4.3-5</u> ESTIMATED CONSTRUCTION EMISSIONS

Phase	Maximum Daily Emissions (lbs/day)					
riiase	ROG	NOx	СО	PM ₁₀	PM _{2.5}	
Demolition - 2021	0.88	8.28	8.22	1.07	0.52	
Site Preparation - 2021	0.66	7.84	4.23	0.41	0.30	
Grading - 2021	1.61	18.39	8.90	5.48	3.24	
Building Construction - 2021	0.84	8.41	7.77	0.59	0.45	
Building Construction - 2022	0.74	7.42	7.62	0.51	0.38	
Inside Painting – 2022	0.92	1.41	1.89	0.10	0.09	
Inside Painting - 2023	0.90	1.31	1.88	0.09	0.08	
Parking Lot and Dropoff Area - 2023	0.69	5.55	7.64	0.47	0.30	
Project Maximum Daily	1.61	18.39	8.90	5.48	3.24	
SCAQMD Daily Threshold	75	100	550	150	55	
Exceed Thresholds?	No	No	No	No	No	
LST Threshold		148	1,540	12	7	
Maximum Daily Onsite	N/A	17.00	8.19	5.27	3.18	
Exceed Thresholds?		No	No	No	No	

Operational emissions were not calculated because the school district does not anticipate any changes in student enrollment.



The proposed project would not exceed SCAQMD thresholds during construction or operation of the proposed project. Impacts would be less than significant.

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

Less than Significant Impact

In accordance with CEQA Guidelines § 15130(b), this analysis of cumulative impacts incorporates a summary of projections. The following three-tiered approach is to assess cumulative air quality impacts.

- Consistency with the SCAQMD project specific thresholds for construction and operation;
- Project consistency with existing air quality plans; and
- Assessment of the cumulative health effects of the pollutants.

Project-Specific Thresholds

During construction or operation, emissions of ROG, NO_X , PM_{10} , and $PM_{2.5}$ are not expected to exceed the SCAQMD regional significance thresholds. The SCAQMD estimates that emissions that do not exceed the project specific thresholds will not result in a cumulative impact. In addition, onsite construction emissions, as seen in **Table 4.3-5**, are below the SCAQMD's localized significance analysis thresholds for all the pollutants that are to be analyzed for sensitive receptor exposure.

Air Quality Plans

The SCAB, in which the project site is located, is in nonattainment for federal ozone and PM_{2.5} standards. Therefore, the SCAQMD is required to prepare and implement an AQMP and to document the strategies and measures to be undertaken to reach attainment of ambient air quality standards.¹⁰ While the SCAQMD does not have direct authority over land use decisions, it was recognized that changes in land use and circulation planning were necessary to maintain clean air. As discussed above in Impact 4.3 a), the proposed project is compliant with the AQMP.

Cumulative Health Impacts

The SCAB is in nonattainment for federal ozone and $PM_{2.5}$, which means that the background levels of those pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect the health of sensitive individuals (i.e., elderly, children, and the sick). Therefore, when the concentration of those pollutants exceeds the standard, it is likely that some of the sensitive individuals of the population experience adverse health effects.

The localized significance analysis in Impact 4.3 b) demonstrated that during construction activities, no localized significance thresholds are expected to be exceeded. Therefore, impacts due to the emissions of particulate matter, NO_2 , and CO would be less than significant.

¹⁰ The AQMP becomes incorporated in California's State Implementation Plan (SIP), which is required by the USEPA.



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

Less than Significant Impact

During construction activities, diesel equipment would be operating. Diesel particulate matter (DPM) is known to the State of California as a toxic air contaminant (TAC). The risks associated with exposure to substances with carcinogenic effects are typically evaluated based on a lifetime of chronic exposure, which is defined in the California Air Pollution Control Officers' Association Air Toxics "Hot Spots" Program Risk Assessment Guidelines as 24 hours per day, 7 days per week, 365 days per year, for 70 years. DPM would be emitted during the short term of construction assumed for the proposed project from heavy equipment used in the construction process. Because diesel exhaust particulate matter is considered carcinogenic, long-term exposure to diesel exhaust emissions has the potential to result in adverse health impacts. Due to the short-term nature of project construction, impacts from exposure to diesel exhaust emissions during construction would be less than significant.

It is anticipated that there exists the potential for asbestos to be present; however, the School District will coordinate survey and demolition activities with the SCAQMD and will comply with SCAQMD's Rule 1403. Removal activities will be subject to SCAQMD inspection. Asbestos-containing materials will be transported to a landfill that accepts hazardous waste. Compliance with asbestos management rules and regulations will reduce any potential impacts to a level of less than significant.

As discussed in **Section 3.0**, no changes will occur to the number of students as a result of the project. Therefore, impacts from project operation would be less than significant.



4.4 Biological Resources

	Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				х
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				х
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 nursery sites?				х
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		Х		
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				х

4.4.1 Methodology

Matthew Sutton, an UltraSystems biologist, researched readily available information, including relevant literature, databases, agency websites, various previously completed reports and management plans, GIS data, maps, aerial imagery from public domain sources, and in-house records



to identify the following: 1) habitats, special-status plant and wildlife species, jurisdictional waters, critical habitats, and wildlife corridors that may occur in and near the project site; and 2) local or regional plans, policies, and regulations that may apply to the project. The following data sources were accessed by UltraSystems for synthesis of data within this report.

- United States Geological Survey (USGS) 7.5-Minute Topographic Map Quadrangle (USGS, 1979) and current aerial imagery (Google Earth, 2020).
- The Web Soil Survey, provided by the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) (NRCS, 2020).
- California Natural Diversity Database (CNDDB), provided by the California Department of Fish and Wildlife (CDFW) (CDFW, 2019a).
- Information, Planning and Conservation (IPaC), provided by the USFWS (USFWS, 2020b).
- Inventory of Rare and Endangered Plants of California, 8th Edition, provided by the California Native Plant Society (CNPS, 2020a).
- National Wetlands Inventory (NWI), provided by the USFWS (USFWS, 2020d).
- National Hydrography Dataset, provided by the USGS (USGS, 2020).
- Critical Habitat Portal, provided by the USFWS (USFWS, 2020c).
- eBird online database of bird distribution and abundance, provided by Cornell Lab of Ornithology (eBird, 2017).
- Sawyer, J.O., T. Keeler-Wolf, J.M. Evens, 2009. *A Manual of California Vegetation, Second Edition,* provided by California Native Plant Society Press
- EPA Waters GeoViewer, provided by USEPA (USEPA, 2020).

Plant and wildlife species protected by federal agencies, state agencies, and nonprofit resource organizations, such as the California Native Plant Society (CNPS), are collectively referred to as "special-status species". When plant and animal species that are federally or state listed endangered, threatened, or candidate species are discussed as a subcategory of special-status species they are referred to as "listed species". When plant and animal species are protected by an agency but not a "listed species" and are discussed as a subcategory of special-status species they are referred to as "sensitive species". Some of these plant and wildlife species are afforded special legal or management protection because they are limited in population size, and typically have a limited geographic range and/or habitat.

Aerial imagery from the above-mentioned sources was overlaid with geospatial data by utilizing Geographic Information System (GIS) software (ArcGIS 10.1) to identify documented observations of the following biological or environmental components within the project vicinity:

¹¹ Avian species protected by the Migratory Bird Treaty Act (MBTA) are not considered "special-status species."



- 1) Previously recorded observations within the project vicinity and geographic range of special-status species and potentially suitable habitats;
- 2) special-status vegetation communities;
- 3) protected management lands;
- 4) proposed and final critical habitats;
- 5) wetlands, waters of the State (WOS), and waters of the United States (WOUS); and
- 6) wildlife corridors.

An analysis was then made to plan either the avoidance of, or to minimize project impacts to any of those biological resources. A Biological Study Area (BSA) was defined for the project and includes the school property and a 500-foot buffer zone around the perimeter of the project site (refer to **Figure 4.4-1**).

Matthew Sutton and Hugo Flores, UltraSystems biologists, conducted a field evaluation for existing biological resources of the BSA on January 23 and 28, 2020. In this survey the biologists documented habitat types, potential threats to ecosystem health and plant and wildlife species in the BSA.



Figure 4.4-1
PROJECT SITE BOUNDARY AND BIOLOGICAL STUDY AREA (BSA)





4.4.2 **Discussion of Impacts**

Would the project have a substantial adverse effect, either directly or through habitat a) 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 or U.S. Fish and Wildlife Service?

Less Than Significant Impact with Mitigation Incorporated

The project site is located in a residential setting which provides low habitat value for special-status plant and wildlife species. The literature review and reconnaissance biological survey conducted in January 2020 assessed that the project site contains structures, sidewalks, and multiple paved areas with impervious surfaces, and lacks suitable soils, biological resources, and physical features to support any special-status plant and animal species. Additionally, no special-status plants or wildlife were observed within the project site during any site surveys. Therefore, no direct or indirect impacts on special-status plant or animal species are anticipated as a result of the project activities.

The project site is an existing school campus located in an urbanized area, which contains several school buildings such as a gymnasium, classroom structures, an office building, an administrative building, parking lots, walkways, a small playground and a larger outdoor recreational area with a baseball field, bordered by basketball courts and other hardcourt game areas located west and south of the field. The project site is surrounded by residential streets and homes. Vegetation on the project site consists of multiple trees, the majority of which are ornamental, grassy areas and some areas of landscaped hedges and plants. The project site lies within 300 feet of an offsite detention pond and channel where some native habitat occurs. The project proposes construction of new a new classroom building, modifications to existing buildings, a new upper parking lot, and the modification of existing parking lots.

The existing onsite vegetation consists of turf grass field and sparsely distributed native and ornamental tree and shrub species that do not support sensitive habitats and provide low habitat value for special-status species. According to a literature review, including the assessment of site photographs, the project lacks suitable soils, biological resources, and/or physical features to support special-status plant or wildlife species on the project site or within the project vicinity. Therefore, impacts to sensitive habitat, or to special-status plant species is not anticipated.

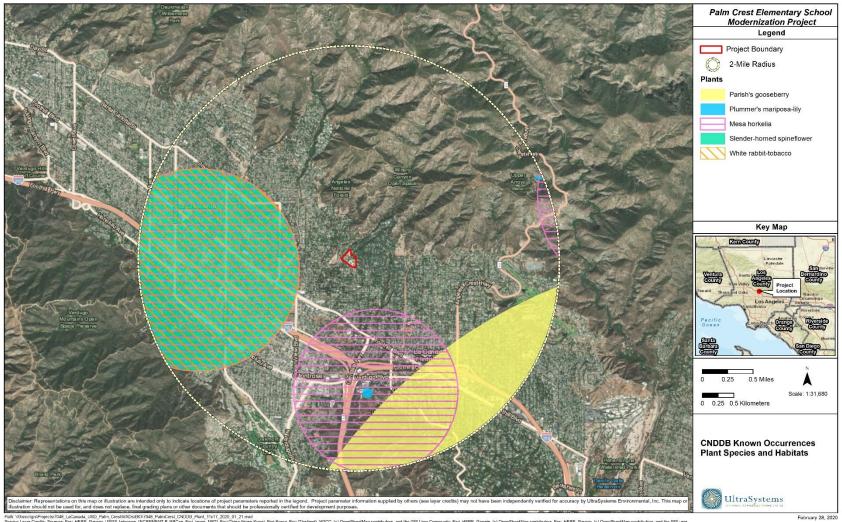
Habitat Assessment Survey Results (Plants and Vegetation Types)

This section describes the land cover types determined to be present within the BSA as determined by the literature review (Figure 4.4-2) and biological survey and augmented by examining aerial imagery. Seven different land cover types were observed and mapped within the BSA.

Descriptions of vegetation communities and habitats within the BSA were based on the dominant perennial species. Generally, classifications of habitat types or vegetation communities were based on A Manual of California Vegetation Second Edition (Sawyer et al., 2009), with modifications to better represent existing site conditions.



Figure 4.4-2 CNDDB PLANT SPECIES AND HABITATS MAP





Environmental Setting

Based on a habitat assessment survey conducted by UEI biologists Matthew Sutton and Hugo Flores on January 23 and 28, 2020, the majority of the BSA consists of developed and landscaped areas with a very limited area of onsite native habitat and more native habitat occurring offsite along an intermittent channel. No special-status plant or wildlife species were observed during the survey.

The project site itself consists of an elementary school and a former school district office building and associated parking area, which is still used for parking. The school site contains classrooms, offices, other buildings, outdoor recreation areas, a parking lot, and several walkways and paved areas connecting the various school buildings. Interspersed throughout both the school premises and the former district office grounds, there are several trees and landscaped areas consisting primarily of non-native ornamental trees. There is a small area (0.14 acre) in the western section of the project site in which disturbed laurel sumac scrub occurs. This disturbed habitat consists of laurel sumac (*Malosma laurina*), toyon (*Heteromeles arbutifolia*), lemonade berry (*Rhus integrifolia*) and several ornamental tree species such as eucalyptus (*Eucalyptus* spp.) and non-native pine (*Pinus* spp.) trees.

The offsite regions of the BSA consist primarily of developed and landscaped areas with private homes and a network of paved roads; however, there is a region in the western section of the BSA in which there is less developed open space. The neighborhood surrounding the project site contains several mature trees along the streets and in landscaped areas between the homes. There is a narrow strip of land owned by the La Cañada School District that is immediately west of the project site and abutting several privately-owned properties This strip consists of a fire access road and several large ornamental tree species such as eucalyptus, deodar cedar, acacia, and pine trees.

The landscaped and developed areas throughout the BSA have a patchy distribution of trees in which some trees form contiguous stands providing nearly 100% canopy cover. Within these wooded areas, tree species primarily consist of ornamental trees such as non-native pine trees, eucalyptus trees and deodar cedar (*Cedrus deodara*) intermixed with some native tree species such as coast live oak (*Quercus agrifolia*) and toyon. There are a few small groupings (i.e., 5-7 trees) of coast live oak within the landscaped areas of the BSA.

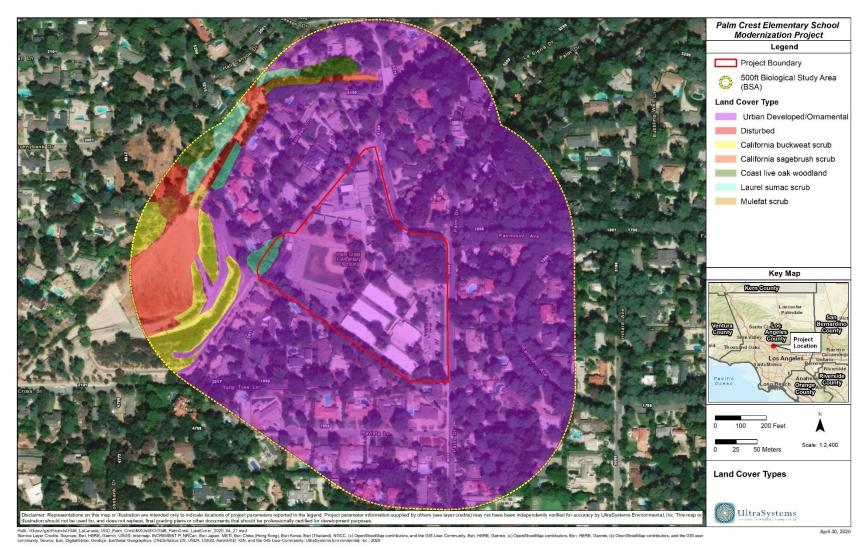
Outside of the project area, the open space "natural land" of the BSA consists of a channel and associated detention pond. Halls Canyon Channel is an intermittent stream within a natural, trapezoid-shaped channel, with rock and sand substrate terminating into an artificial detention pond (approximately 450 feet by 250 feet) located near the eastern perimeter of the BSA (**Figure 4.4-3**). This channel and detention pond comprise a mix of native and ornamental vegetation.

There are a few native vegetation stands occurring within the channel bottom, the slopes above the channel banks, and the slopes bordering the detention pond. Within the channel bottom the substrate is primarily unvegetated with small patches of mulefat scrub, highly intruded by ornamental shrub and vine species. These thickets contain many non-native species such as tree tobacco (*Nicotiana glauca*) and castor bean (*Ricinus communis*).

The slopes bordering the channel consist of small patches of laurel sumac scrub and coast live oak woodland; however, the slopes are dominated by ornamental tree, shrub and vine species likely introduced by propagules originating in the landscaping of the homes that line the top of the slopes. The laurel sumac scrub consists of native species such as laurel sumac, toyon, and lemonade berry. The coast live oak woodland consists of coast live oak, and several ornamental conifers, eucalyptus and other tree species, agave and cactus species.



Figure 4.4-3 LAND COVER TYPES





The detention pond bottom consists of a sparsely-vegetated sandy substrate, which is dominated by non-native annual grass and mustard species. California buckwheat scrub dominates the slopes of the detention pond. California buckwheat (*Eriogonum fasciculatum*) dominates the eastern slopes with approximately 90% cover interspersed with occurrences of white sage (*Salvia apiana*), coyote brush (*Baccharis pilularis*), and yerba santa (*Eriodictyon* sp.). There is also a small patch of laurel sumac scrub south of the west access road and northeast of the California buckwheat scrub, overlapping the western section of the project site and an area outside of the project site. This native scrub habitat is very intermixed with ornamental species such as pine trees and eucalyptus trees.

On the western slope that borders residential homes there is higher concentration of ornamental species such as agave and cactus species interspersed with California buckwheat, coastal sage brush (*Artemisia californica*), mulefat (*Baccharis salicifolia*) and coyote brush. Although the onsite laurel sumac scrub and the offsite California buckwheat scrub on the eastern slope above the detention pond could potentially receive storm flows that would bring loose sediments stockpiled during project operations, potential flows will be minimized because project operators will implement standard stormwater control best management practices (BMPs).

List of Land Cover Types

Urban Developed/Ornamental (onsite): Urban Developed/Ornamental lands are non-vegetated features within the BSA that describe areas occupied by manmade structures, paving and other impermeable surfaces that cannot support vegetation. Onsite developed lands consist of paved access roads, parking lots, playground surfaces, driveways, walkways, classroom facilities, offices, student activity facilities, and other permanent structures and cover 8.57 acres. The offsite developed areas cover 41.29 acres of the BSA. These developed areas provide virtually no habitat for wildlife species. Landscaping (ornamental trees, shrubs, turf, etc.) associated with the developed lands are also included within this category. These developed areas provide virtually no habitat for wildlife species; however, birds could use the ornamental trees for foraging and nesting. Urban Developed/Ornamental lands does not have a global or state rank and is not considered a sensitive plant community.

Laurel Sumac Scrub (onsite and offsite): There is a small patch of laurel sumac scrub south of the west access road and northeast of the California buckwheat scrub, overlapping the western section of the project site and an area outside of the project site. This native scrub habitat is very intermixed with ornamental species such as pine trees and eucalyptus trees. There are also some patches of laurel sumac scrub along the banks of Halls Creek Channel. Altogether, there is 0.94 acre of this habitat in the BSA. The laurel sumac scrub consists of native species such as laurel sumac (Malosma laurina), toyon, and lemonade berry (Rhus integrifolia). Typical laurel sumac scrub community supports a diversity of species including California sagebrush, big pod ceanothus (Ceanothus megacarpus), sticky monkeyflower (Diplacus aurantiacus), bush sunflower, coastal buckwheat (Eriogonum cinereum), California buckwheat, chaparral yucca, toyon, chaparral beardtongue (Keckiella antirrhinoides), evergreen buckthorn (Rhamnus ilicifolia), lemonade berry, sugar bush (Rhus ovata), purple sage, black sage, Parry's tetracoccus (Tetracoccus dioicus) and poison oak.

Disturbed (offsite): The disturbed land cover type is characterized by areas lacking vegetation or containing ruderal vegetation due to anthropogenic land uses and disturbances and covers 3.21 acres of the BSA. They provide little to no habitat value for wildlife. Disturbed habitats observed within the BSA do not fit any classification described in A Manual of California Vegetation Second Edition (Sawyer et al., 2009). All of the disturbed habitats in the BSA occur offsite and are located



either in Halls Canyon Channel or the detention pond described above. Disturbed habitats are not considered a sensitive plant community

California Buckwheat Scrub (offsite): California buckwheat scrub dominates the slopes of the detention pond, with approximately 90% cover on the eastern slope and 40% cover on the western slope and covers 2.01 acres in the BSA. The eastern slope appears to have been planted with California buckwheat scrub; California buckwheat is the dominant species and is interspersed with occurrences of white sage, coyote brush, and yerba santa. Typical California buckwheat scrub community supports a diversity of species including California buckwheat, chaparral yucca (Hesperoyucca whipplei), California sagebrush (Artemisia californica), coyote brush, sticky monkeyflower, Bush sunflower (Encelia californica), brittlebush (Encelia farinosa), goldenbush (Isocoma menziesii), deerweed (Acmispon glaber), chaparral bush mallow (Malacothamnus fasciculatus), white sage, and black sage (Salvia mellifera).

California Sagebrush Scrub (offsite): There is a small patch of California sagebrush scrub located on the western slope of the detention pond that covers 0.13 acre. This occurrence is dominated by California sagebrush. Typical California sagebrush scrub supports a diversity of species including California sagebrush, chamise (Adenostoma fasciculatum), coyote brush, bladderpod (Peritoma arborea), sticky monkeyflower, bush sunflower, brittlebush, California buckwheat, chaparral yucca, goldenbush, heart leaved keckiella (Keckiella cordifolia), deerweed, prickly pear cactus (Opuntia littoralis), lemonade berry, white sage, purple sage (Salvia leucophylla), black sage, black elderberry (Sambucus nigra), and poison oak (Toxicodendron diversilobum).

Coast Live Oak Woodland (offsite): There are two small patches of coast live oak woodland along Halls Canyon Channel in the BSA that cover 0.57 acre; one occurring on the north bank of the channel a little east of Jessen Drive and the other occurring on the west bank of the channel a little north of the detention pond. The coast live oak woodland consists of coast live oak, and several ornamental conifers, eucalyptus and other tree species, agave and cactus species. Typical coast live oak woodland community supports a diversity of species including coast live oak, bigleaf maple (Acer macrophyllum), boxelder (Acer negundo), Madroño (Arbutus menziesii), black walnut (Juglans californica), western sycamore (Platanus racemosa), cottonwood (Populus fremontii), blue oak (Quercus douglasii), Engelmann oak (Quercus engelmannii), black oak (Quercus kelloggii), valley oak (Quercus lobata), arroyo willow (Salix lasiolepis), and California bay (Umbellularia californica).

Mulefat Thickets (offsite): There is a small stand of mulefat thickets in Halls Canyon Channel a little north of the detention pond, covering a mere 0.26 acre of the BSA. It is highly intruded by ornamental shrub and vine species. These thickets contain mulefat as well as many non-native species such as tree tobacco and castor bean. Typical mulefat thickets community supports a diversity of species including California sagebrush, willow baccharis (Baccharis emoryi), coyote brush, laurel sumac, tree tobacco, arrow weed (Pluchea sericea), Rubus spp., narrowleaf willow (Salix exigua), arroyo willow, black elderberry, and tamarisk (Tamarix spp.).

Special-Status Plants

Based on a literature review and query from publicly available databases (CDFW, 2020a; CNPS, 2020a; USFWS, 2020a, b) for reported occurrences, within a ten-mile radius of the project site, a total of ten special-status plant species, four listed and six sensitive, resulted from the query and met one of the following criteria: reported as recent occurrences (\leq 20 years), or documented historical observation within two miles of the BSA, or recognized as occurring based on previous surveys or



knowledge of the area. None of those ten species were determined to have a potential to occur within the project BSA (refer to **Figure 4.4-2**), as discussed below.

Due to several biological and physical disturbances within the BSA, it was determined that none of the special-status plant species identified in the 10-mile radius database query have the potential to occur in the BSA vicinity (Calflora, 2020; CDFW, 2019a, b; CNPS, 2020a, b; Google Earth, 2020; Jepson, 2020; NRCS, 2020; Sawyer et al., 2009; Soil Survey Staff, 2020; USDA, 2006; USEPA, 2020; USFWS, 2020a, b). First, there is a high level of soil compaction due to development and foot traffic. Many species cannot establish in compacted soils. Second, there is high cover of non-native ornamental landscaping species that reduce available space for native plant species, thus precluding the establishment of plant species. Third, habitat fragmentation from development reduces the size of habitat patches containing contiguous stands of native vegetation that would provide a seed source, although native seeds are often brought in with wildlife. With the exception of the California buckwheat scrub adjacent to the detention pond, there are no patches of native vegetation stands that are very large and hence there is unlikely to be high native plant diversity in those small patches. Fourth, native plant recruitment is inhibited by several factors such as soil compaction from various human activities, and gardeners' activities like weeding, mowing, manicuring, and irrigating that occur throughout the BSA. Finally, no special-status species were observed during any survey. For all of the abovementioned reasons, none of the ten special-status plant species have a potential to occur within the BSA and therefore they will not be discussed further.

Ten special-status plant species were determined not to have a potential to occur within the project BSA because the BSA lacks suitable habitat for the establishment of those species, or the BSA does not lie within the species' reported distribution or elevation range, or a combination of all of those factors. These species and a description of their statuses as determined by various state, federal, regional and local regulatory agencies and the ranking notations from the most relevant agencies (**Table 4.4-1**) are listed below:

- Braunton's milk-vetch (*Astragalus brauntonii*) FE, 1B.1
- Nevin's barberry (Berberis nevinii) FE, SE, 1B.1
- Plummer's mariposa lily (Calochortus plummerae) 4.2
- San Fernando Valley spineflower (Chorizanthe parryi var. fernandina) FE, SE, 1B.1
- slender-horned spineflower (Dodecahema leptoceras) FE, SE, 1B.1
- mesa horkelia (Horkelia cuneata ssp. puberula) 1B.1
- Davidson's bush-mallow (Malacothamnus davidsonii) 1B.2
- White rabbit-tobacco (Pseudognaphalium leucocephalum) 2B.2
- Parish's gooseberry (Ribes divaricatum var. parishii) 1A
- Greata's aster (Symphyotrichum greatae) 1B.3



<u>Table 4.4-1</u> SPECIAL-STATUS PLANT SPECIES RANKING NOTATIONS

California Endangered Species Act Listing Codes			Federal Endangered Species Act Listing Codes			
SE	State listed as Endangered	FE	State listed as Endangered			

<u>California Rare Plant Ranks (Based on ranking system developed by the California Native Plant Society [CNPS])</u>

CRPR: 1A - California Rare Plant Rank 1A - plants presumed extirpated in California and either rare or extinct elsewhere: the plants with a CRPA of 1A are presumed extirpated because they have not been seen or collected in the wild in California for many years. This rank includes plants that are both presumed extinct as well as those plants which are presumed extirpated in California. All of the plants constituting CRPR 1A meet the definitions of § 2062 and § 2067 (CESA) of the Fish and Game Code, and are eligible for state listing. Should these taxa be rediscovered, it is mandatory that they be fully considered during preparation of environmental documents relating to CEQA.

CRPR: 1B - California Rare Plant Rank 1B - plants rare, threatened, or endangered in California and elsewhere: plants with a CRPR of 1B are rare throughout their range with the majority of them endemic to California. Most of the plants that are ranked 1B have declined significantly over the last century. All of the plants constituting CRPR 1B meet the definitions of § 2062 and § 2067 (CESA) of the Fish and Game Code, and are eligible for state listing. It is mandatory that they be fully considered during preparation of environmental documents relating to CEQA.

CRPR: 2B - California Rare Plant Rank 2B - plants rare, threatened, or endangered in California, but more common elsewhere: except for being common beyond the boundaries of California, plants with a CRPR of 2B would have been ranked 1B. From the federal perspective, plants common in other states or countries are not eligible for consideration under the provisions of the ESA. All of the plants constituting CRPR 2B meet the definitions of § 2062 and § 2067 (CESA) of the Fish and Game Code, and are eligible for state listing. It is mandatory that they be fully considered during preparation of environmental documents relating to CEQA.

CNPS Threat Ranks – The CNPS Threat Rank is an extension added onto the California Rare Plant Rank (CRPR) (as a decimal code) and designates the level of threats by a 1 to 3 ranking with 1 being the most threatened and 3 being the least threatened. A Threat Rank is present for all CRPR 1B's, 2B's, 4's, and the majority of CRPR 3's. CRPR 4 plants are seldom assigned a Threat Rank of .1, as they generally have large enough populations to not have significant threats to their continued existence in California; however, certain conditions exist to make the plant a species of concern and hence be assigned a CRPR. In addition, all CRPR 1A and 2A (presumed extirpated in California), and some CRPR 3 (need more information) plants, which lack threat information, do not have a Threat Rank extension.

- .1 seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
- .2 moderately threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)
- .3 not very threatened in California (<20% of occurrences threatened/low degree and immediacy of threat or no current threats known)



Tree Survey Methods and Results

Two separate tree surveys were conducted at the project site, one of which, Tree Survey 1 (LPA, Inc. Demolition Plan [LPA 2019]), conducted in January, 2020, was aimed at inventorying and assessing health and environmental impacts of tree removals that will occur as a result of construction and project operations associated with the demolition plan provided by the applicant LPA, Inc. (hereafter LPA); the other survey, Tree Survey 2 (Fire Access Road Tree Management Project), conducted in March, 2020, was aimed at assessing tree health for a stand of trees off the project site but still on school property. The UEI Arborist surveyed only the trees that will be directly impacted by project operations as several trees on the project site will not be impacted (**Figure 4.4-4**). Slightly different methodologies were used for each survey, according to what information was necessary to guide the construction phase related to Tree Survey 1 and the post-construction phase related to Tree Survey 2. The methods and results of each survey are described below.

Tree height measurements were performed using a rangefinder hypsometer with clinometer feature and/or were visually estimated. The GPS coordinates of each tree was measured using a Trimble GTX unit and a tree inventory map was generated using these data points. Only living tree parts were measured. Dead trunks that were diseased or otherwise compromised and no longer producing new growth were not measured.

It should be noted that the health of a tree is generally dependent on general climactic and soil conditions, as well as potential physical or mechanical damage of a non-biotic origin, such as fire, and/or infestation of various pests including, but not limited to, ants, termites, wood-boring beetles, cambium eating beetles, fungus of various types, and parasitic plants (i.e., mistletoe [Phoradendron villous] or Dodder vine [Cuscuta californica]). Climbing plants which may use trees for support, such as Algerian or English ivy (Hedera sp.), honeysuckle (Lonicera subspicata), wild cucumber (Marah macrocarpus) and poison oak (Toxicodendron diversilobum) would also be considered as health-threatening infestations. While the aesthetic value of a tree is subjective, a tree is usually considered highly aesthetic if it has generally dense foliage, a relatively uniform or spectacular irregular shape and large size.

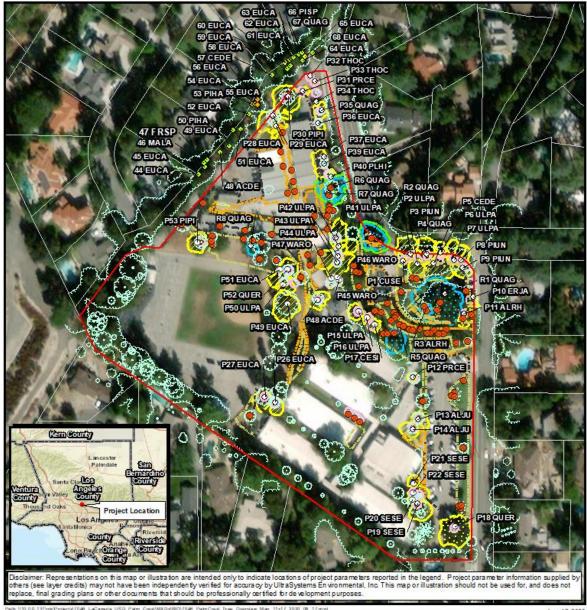
Assessments of aesthetic and health factors for each tree, as well as an overall aesthetic grade, were recorded on the Tree Inventory Table (**Appendix D1**, *Arborist Tree Inventory Sheet*). Trees were evaluated for overall health. Health was rated as excellent, good, fair, poor, or dead with ratings defined below. Photographs of each individual tree were also taken to document the condition of the tree during the inventory (**Appendix D2**, *Tree Inventory Photo Plate*).

The following criteria were used to establish each overall grade:

- "5" = Excellent: A healthy and vigorous tree characteristic of its species and reasonably free of any visible signs of stress, disease or pest infestation.
- **"4" = Very good:** A healthy and vigorous tree with less than 25% of the tree affected by visible signs of stress, disease and/or pest infestation.
- "3" = Average: Although healthy in overall appearance, 25% 75% of the tree shows evidence of stress, disease and/or pest infestation.



Figure 4.4-4 TREE OVERVIEW MAP



Service Layer Chedita Sturces. Exit HERE, Germin, USOS, Infermin, HEREMONI P. NINCIA., Earl Japan, METL, Earr China (Hong Kong), Earl Kores, Exit (Thatand), NGCC, (b) OpenStreakBap contributors. In the GIS User Community, Source, Exit OpenState Study, God, M., Earling Companying, Inc., 2020.

June 17, 2020





- "2" = Poor: More than 75% of this tree shows evidence of stress, disease and/or pest infestation and appears to be in a state of moderate decline. The degree of decline may vary greatly.
- "1" = Very poor/Dead: This tree shows extensive evidence of stress, disease and/or pest infestation and appears to be in a state of rapid decline. The degree of decline indicates that tree death is imminent. Dead trees exhibit no signs of life at all.

Tree Survey 1 (LPA Demolition Plan): A tree survey was conducted in January 2020 of trees identified in the demolition plan created by LPA (LPA, 2019). Surveyed trees included trees designated for removal due to demolition and construction operations or designated as Protect-in-Place. All of the Protect-in-Place trees will be protected as feasible in accomplishing the project goals.

In order to conduct the project operations, the contractors will use various heavy equipment such as backhoes, skip loaders, excavators, graders, compacting equipment, and concrete trucks. Several trees will be removed to accommodate the project operations which include demolishing several existing structures and paved surfaces and constructing new buildings, parking lots and other structures.

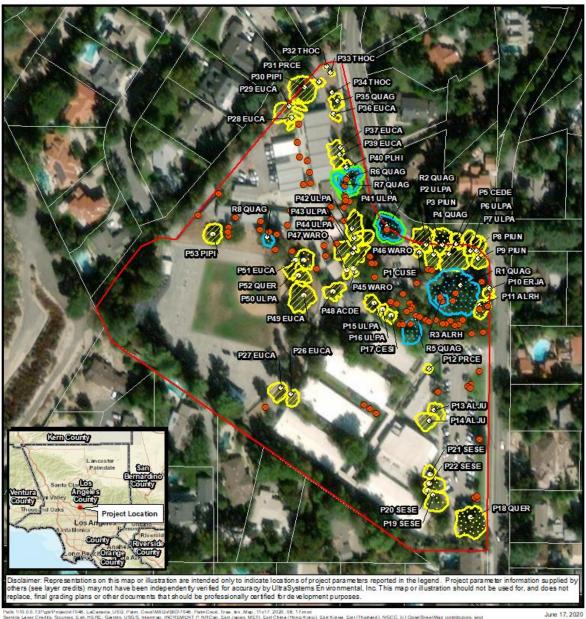
Methodology: All of the trees designated as Protect-in-Place and all of the native tree species designated for removal in the demolition plan were surveyed by UEI Arborist Matthew Sutton, with assistance from UEI Biologist Hugo Flores on January 23, 27 and 28, 2020. Ornamental trees slated for removal were marked with white spray paint to assist contractors in identifying these trees; however, none of these trees were surveyed as they lack protections by federal, state or local conservation organizations. The City of La Cañada Flintridge does protect trees in the public right-of-way; however, all of these trees slated for removal or that would be impacted during the construction are on the property of La Cañada School District and are not subject to the City's tree protection ordinances. Instead, the La Cañada School District makes every effort to protect native trees and other highly aesthetic trees from being impacted by construction and project operations.

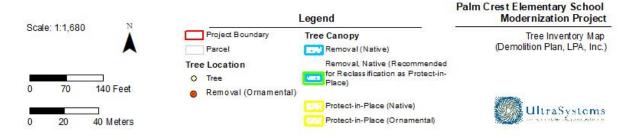
The tree characteristics that were recorded in the survey included trunk diameter, canopy diameter, health ranking and species. A tree inventory table was created to represent the abovementioned tree characteristics (**Appendix D1**, *Tree Inventory Table*). Every surveyed tree was photographed (**Appendix D2**, *Tree Inventory Photo Appendix*), mapped and assigned a numerical identifier (**Figure 4.4-5**).

Results: Of the 90 trees scheduled for removal, seven are native trees; six of these are coast live oak and one is white alder (*Alnus rhombifolia*); however, LPA project designers now plan to protect three of the coast live oak trees originally designated for removal and those trees are identified as "Removal (Candidate for Protect-in-Place)" on **Figure 4.4-5**. The Arborist surveyed the 49 trees on the project site designated as "protect-in-place" trees that are within the project operation area but which are not designated for removal throughout the project operations. Of these 49 trees, there are nine native trees and 40 ornamental trees. Of the native trees, there are four coast live oak, four coast redwood (*Sequoia sempervirens*) and one white alder.



Figure 4.4-5 TREE INVENTORY 1







Of the seven native trees designated for removal, The UEI arborist recommends that three of the coast live oak trees (Trees R2, R6 and R7 on **Figure 4.4-5**) be reclassified as Protect-in-Place because it has high habitat value for local wildlife and because they are located on the periphery of the project site and the project operations can be achieved without removing these trees. There are no special-status tree species observed on the project site. Therefore, no direct or indirect impacts on special-status tree species would occur as a result of the proposed project.

<u>Tree Survey 2 (Fire Access Road Tree Management Project)</u>: In discussions between the applicant and local homeowners in March, 2020, several homeowners raised concerns about how these trees would be managed. In response to those concerns, the applicant requested that UEI survey these trees to assess the health and desirability of each tree and to make recommendations of how to manage the trees based on that assessment.

Methodology: On March 27, 2020, UEI arborist Matthew Sutton surveyed 25 trees that occur in a narrow band of soil immediately north of the project site between the fire access road and a fence that demarcates the border between school property and several private properties to the northwest. Mr. Sutton recorded each tree's species and tagged each with a numerical identifier. In addition, the trunk diameter, canopy height, and health ranking were recorded for all 25 trees (**Appendix D1**). Photographs were recorded for each tree (**Appendix D2**).

All of the West Access Road trees were scored and assigned one of three management categories: Protect, Protect (Removal Candidate), and Removal. Determination of category assignment was based primarily on health ranking in which trees that exhibited poor health were designated as removal and trees that had average health with evidence of heavy stress were designated as candidates for removal. Thus, the category of "Protect (Removal Candidate)" represents trees of average health that are subject to the discretion of the landscape maintenance director as to whether they should remain and be protected or be removed because they either lack optimal growing conditions or they may pose a hazard if not removed. Other factors that the arborist considered in making management recommendations were tree density and susceptibility of branch failure. Tree density was considered if trees were clustered such that certain trees lacked sufficient light to grow with sound branch structure.

Results: In total, 25 trees were surveyed (**Figure 4.4-6**) The majority of the trees in this area were eucalyptus trees. Other tree species included coast live oak, laurel sumac, deodar cedar, an acacia tree, a few pine trees and an ash tree.

Tree health ratings of the 25 trees all received rankings between Excellent and Average. No trees received rankings of poor or very poor. No trees exhibited signs of substantial stress due to disease, insect infestation or other cause of health impairment. Health rankings for the trees had the following number of trees per ranking: Excellent (six), Very Good (13), and Average (six).

One of the strongest contributing factors to lower health rankings was the severity and manner of some of the pruning maintenance of the trees. Several trees appeared to have been topped, thus resulting in an abundance of shoot growth (i.e., lion's tailing) in the upper half of these trees. Trees that are topped lack defined primary and secondary branches and thus branch integrity may be compromised.



Figure 4.4-6
TREE INVENTORY 2 (FIRE ACCESS ROAD)



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Another factor that contributed to lower health rankings was lack of sufficient light for optimal tree growth. Some trees were growing underneath or in close proximity to several other larger trees. The result of trees growing around taller surrounding trees is that insufficient light reached these crowded trees. Trees that are shaded often do not develop strong branching because the branches have to grow out so far to obtain adequate light for leaf production that branch strength is weakened.

Recommendations: Of the 25 surveyed trees, 19 were assigned Protect, four were assigned Protect (Removal Candidate) and two were assigned Removal. Refer to **Figure 4.4-6** above, which shows the tree survey map and **Appendix D1**, which lists relevant characteristics of each tree Also refer to **Appendix D2**, which provides photographs of each tree.

It is recommended that tree contractors remove Trees 59 and 65 even though both of these trees are in average health and do not show any immediate signs of severe health decline. Tree 59 is growing around several nearby and taller trees. Removal of this tree will encourage healthier branch development of neighboring trees. In addition, removal of this tree will not adversely impact privacy of nearby homes because the surrounding trees will still provide plenty of screening between the homes and the adjacent school property. Tree 65 is recommended for removal because it is experiencing some canopy dieback and may be shaded by the adjacent taller Tree 64. Removal of this tree will not cause privacy issues because surrounding trees will still provide adequate screening for neighbors. In addition, removal of this tree may open up more light to an adjacent coast live oak tree and thus create better growing conditions for that native tree.

The UEI arborist also recommends that Trees 53, 55, 56, and 62 be classified as Protect (Removal Candidate) and that tree contractors use their discretion to remove these trees if deemed appropriate. Tree 53 was placed in this category because its primary trunk is growing at a severe angle such that the majority of its canopy grows into a neighboring yard. This tree may create maintenance concerns for the affected homeowner. Trees 55, 56, and 62 received this classification because each of these trees grow adjacent to larger trees and removing them may foster better growth of the neighboring trees. None of the abovementioned trees need to be removed due exclusively to poor health.

There are no special-status tree species observed on the project site. Therefore, no direct or indirect impacts on special-status tree species would occur as a result of the proposed maintenance and project operations. Considering that none of the abovementioned special-status plant species has a potential to occur in the BSA, there is no potential for the proposed project to impact any special-status plant species. No special-status plant species would be impacted by the tree removal operations. Because migratory bird species could potentially nest in some of the trees scheduled for removal, mitigation measure **(MM) BIO-1** discussed below would need to be implemented. With the implementation of this mitigation, the project would have a less than significant impact on special-status wildlife species.

Special-Status Wildlife

Based on a literature review and query from publicly available databases (CDFW, 2020a, b; eBird, 2017; USFWS, 2020a, b) for reported occurrences within a ten-mile radius of the project site, 36 special-status wildlife species, seven listed and 29 sensitive, were reported as recent occurrences (≤ 20 years), or documented within two miles of the BSA, or recognized as occurring based on previous surveys or knowledge of the area. Of those 36 species, three listed and eleven sensitive wildlife species were determined to have a potential to occur within the project BSA as represented in **Table 4.4-2** (refer to **Figure 4.4-7**, *CNDDB Wildlife Species and Habitats Map*).



<u>Table 4.4-2</u> WILDLIFE LITERATURE REVIEW RESULTS – POTENTIAL TO OCCUR

Scientific Name	Common Name	Status Listed End	General Habitat	Habitat (Present, Absent)	Potential for Occurrence in the BSA			
Wildlife with official	Listed Endangered, Threatened, and Candidate Wildlife: Wildlife with official status under the federal Endangered Species Act (ESA) and/or the California Endangered Species Act (CESA). A species may have other sensitive designations in addition to their federal or state listing.							
Bombus crotchii	Crotch bumble bee	SCE, G3G4, S1S2	Open grassland and scrub habitats.	НР	Low: Although the BSA supports some suitable habitat (e.g., scrub habitats), the project site does not support suitable habitat.			
Gymnogyps californianus	California condor	FE, SE, FP, G1, S1	Pine or chaparral covered mountain ranges. Forages in foothills covered by grasslands or oak savannah habitats. Roost in cliffs or large trees.	НР	Low: Although the BSA supports some suitable habitat (e.g., open habitat), neither the BSA or project site support suitable nesting habitat. The project site itself lacks suitable habitat.			
Polioptila californica californica	coastal California gnatcatcher	FT, SSC, G4G5T2Q, S2	Coastal sage scrub primarily, and chaparral, grassland, and riparian habitats adjacent to CSS.	НР	Low: Although the BSA supports some suitable habitat (e.g., CSS and riparian), neither the BSA or project site support suitable nesting habitat.			
These animals hav			Sensitive Wildlife: A and/or the CESA. However, they a ncies, and/or local conservation ago		ed as sensitive or locally important by organizations.			
Accipiter cooperii	Cooper's hawk	WL, G5, S4	In woodland openings and edges of deciduous, conifer and mixed woodland habitats and urban settings with forested areas.	НР	Low: Although the BSA supports some suitable habitat (e.g., woodland edges), neither the BSA or project site support suitable nesting habitat.			
Baeolophus inornatus	oak titmouse	BCC, G4, S4	Primarily found in oak habitat. Also occurs in montane hardwood- conifer, montane hardwood, blue, valley, and coastal oak woodlands, chaparral, and montane and valley foothill riparian habitats.	НР	Moderate: The BSA and project site support suitable habitat required by this species; however, due to high daily activity on project site, this species is more likely to occur in other parts of the BSA.			



Scientific Name	Common Name	Status	General Habitat	Habitat (Present, Absent)	Potential for Occurrence in the BSA
Calypte costae	Costa's hummingbird	BCC, G5, S4	Desert wash, desert riparian, valley foothill riparian, coastal scrub, desert scrub, desert succulent shrub, chaparral, palm oasis.	НР	Low: Although the BSA supports some suitable habitat (e.g., riparian and CSS), neither the BSA or project site support suitable nesting habitat.
Chamaea fasciata	wrentit	ВСС	Year-round resident in coastal scrub and chaparral along the West Coast. Away from the coast it lives in dense shrublands.	НР	Low: Although the BSA supports some suitable habitat (e.g., chaparral, mountainous areas, burned areas), neither the BSA or project site support suitable nesting habitat.
Falco peregrinus anatum	American peregrine falcon	FP, BCC, G4T4, S3S4	Open habitats, including tundra, marshes, seacoast, savannahs and high mountains. Year-round in riparian areas, coastal and inland wetlands. Breeds in woodland, forest, wetlands, cities, agricultural areas and coastal habitats. Open ledges, caves, and potholes on high vertical cliffs generally 100 to 300 feet in height that overlook rivers, lakes, or the ocean for nesting sites.	НР	Moderate: The BSA and project site support suitable habitat required by this species for foraging; however, neither the BSA or project site support suitable nesting habitat.
Lasiurus cinereus	hoary bat	G5, S4, M	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding.	НР	Low: Although the BSA supports some suitable habitat (e.g., open habitats), neither the BSA or project site support suitable nesting habitat. Furthermore, there is no suitable habitat on the project site.
Lasionycteris noctivagans	silver-haired bat	G5, S3S4, M	Feeds above forest streams, ponds, and open brushy areas. Roosts in hollow trees, snags, buildings, rock crevices, caves, and under bark. Primarily aa forest dweller, feeding over streams, ponds, and open brushy areas.	НР	Low: Although the BSA supports some suitable foraging habitat (e.g., brushy areas, trees, buildings), neither the BSA or project site support suitable nesting habitat. Furthermore, there is no suitable habitat on the project site.



Scientific Name	Common Name	Status	General Habitat	Habitat (Present, Absent)	Potential for Occurrence in the BSA
Picoides nuttallii	Nuttall's woodpecker	ВСС	Low-elevation woodlands. Nest in dead trees of riparian habitat.	НР	Low: Although the BSA supports some suitable habitat (e.g., riparian), neither the BSA or project site support suitable nesting habitat.
Selasphorus sasin	Allen's hummingbird	ВСС	Found in sparse to dense scrub habitats and sparse to open woodlands. Depend upon nectar sources. Nest on branches and twigs of trees.	НР	Moderate: The BSA and project site support suitable habitat required by this species.
Spinus lawrencei	Lawrence's goldfinch	BCC, G3G4, S3S4	Oak woodland, chaparral, riparian woodland, valley foothill hardwood-conifer, pinyon-juniper woodlands, usually near water. Breed in open woodlands.	НР	Low: Although the BSA supports some suitable foraging habitat (e.g., oak woodland, riparian), neither the BSA or project site support suitable nesting habitat.
Toxostoma redivivum	California thrasher	ВСС	Preferred habitat is chaparral. Also found in coastal sage scrub in southern range and open woodlands in northern range. Require underbrush with thick leaf litter for foraging.	НР	Moderate: The BSA and project site support suitable habitat required by this species.

*Notes

- The BSA contains approximate elevations of 1,640 to 1,940 feet above mean sea level (amsl).
- The BSA comprises landscaped/developed land types with a small patch of semi-natural stands, coastal sage scrub and riparian scrub habitat along an ephemeral channel and detention pond in its western edge. The BSA occurs in the foothills of the San Gabriel Mountains of southern California.
- **Yes** = the BSA is located within the plant species' known distribution, elevation range, and/or the BSA contains suitable habitats and/or soils to support the plant species. The plant species has a potential to occur within the BSA. Further evaluation is needed.
- **No** = the BSA is located outside the plant species' known distribution, elevation range, and/or the BSA lacks suitable habitats and/or soils to support the plant species. It is highly unlikely for the plant species to have a potential to occur within the BSA. No further evaluation is needed.
- Low = the BSA contains suitable habitat and is within the species' distribution; however, there is a low probability of occurrence due to lack of optimal foraging and/or nesting habitat.
- **Moderate** = the BSA contains suitable habitat and is within the species' distribution and there is a reasonable likelihood of occurrence due to the presence of favorable foraging and/or nesting habitat.

Federal Endangered Species Act (ESA) Listing Codes: the ESA is administered by the USFWS and NMFS. The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife such as whales and anadromous fish such as salmon. For the purposes of the ESA, Congress defined species to include subspecies, varieties, and, for vertebrates, distinct population segments. The official federal listing of Endangered and Threatened animals is published in 50 CFR § 17.11.



Scientific Name	Common Name Status	General Habitat	Habitat (Present, Absent)	Potential for Occurrence in the BSA
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• **FE = federally listed as endangered:** any species of plant or animal that is in danger of extinction throughout all or a significant portion of their range. **FT = federally listed as threatened:** any species of plant or animal that is considered likely to become endangered throughout all or a significant portion of its range within the foreseeable future.

California Endangered Species Act (CESA) Listing Codes: the CESA is administered by CDFW. The official listing of Animals of California Declared to Be Endangered or Threatened is contained in the California Code of Regulations, Title 14, § 670.5. Species and subspecies of California native animals are declared to be endangered or threatened as defined by §§ 2062 and 2067 of the Fish and Game Code.

- **SE = state-listed as endangered:** "endangered species" means a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease (Fish and Game Code § 2062).
- SCE = state candidate for listing as endangered: a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the Fish and Game Commission has formally noticed published in the California Regulatory Notice Register as being under review by CDFW for addition to the list of endangered species, or a species for which the Fish and Game Commission has published a notice of proposed regulation to add the species to the list (Fish and Game Code § 2068).

California Department of Fish and Wildlife (CDFW) Designations:

For some wildlife species, the CNDDB is only concerned with specific portions of the life history, such as roosts, rookeries, or nesting colonies. For many species of birds, the primary emphasis is on the breeding population in California. For some species which do not breed in California but winter here, emphasis is on wintering range. The species of special concern (SSC) designation thus may include a comment regarding the specific protection provided such as nesting or wintering

- SSC = species of special concern: a species of special concern is a species, subspecies, or distinct population of an animal (fish, amphibian, reptile, bird and mammal) native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria: is extirpated from the state or, in the case of birds, in its primary seasonal or breeding role; is listed as federally-, but not state-, threatened or endangered; meets the state definition of threatened or endangered, but has not formally been listed; is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for state threatened or endangered status; has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for state threatened or endangered status.
- **FP = Fully protected:** fully protected animal species 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. Lists were created for fish (Fish and Game Code § 5515), amphibians and reptiles (Fish and Game Code § 5050), birds (Fish and Game Code § 3511) and mammals (Fish and Game Code § 4700).
- **WL = watch list**: this list includes birds identified in the *California Bird Species of Special Concern* (Shuford and Gardali, 2008) report and are not on the current CDFW species of special concern list, but were on previous lists and they have not been state-listed under CESA; were previously state or federally listed and now are on neither list; or are on the list of fully protected species.

United States Fish and Wildlife Service (USFWS) Designations:

• **BCC = bird of conservation concern:** a bird of conservation concern is listed in the USFWS' 2008 *Birds of Conservation Concern* report. The report identifies species, subspecies, and populations of all migratory and non-migratory bird species (beyond those already designated as federally threatened or endangered)



Scientific Name	Common Name	Status	General Habitat	Habitat (Present,	Potential for Occurrence in the BSA
				Absent)	

that, without additional conservation actions, are likely to become candidates for listing under the ESA. While all of the bird species included in the report is priorities for conservation action, the list makes no finding with regard to whether they warrant consideration for ESA listing.

Global Conservation Status Definitions:

- **G1 = Critically Imperiled**: At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.
- **G4 = Imperiled**: At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.
- **G3 = Vulnerable**: At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.
- **G4 = Apparently Secure**: Uncommon but not rare; some cause for long-term concern due to declines or other factors.
- **G5 = Secure**: Common, widespread and abundant.

Subspecies Level

Taxa which are subspecies or varieties receive a taxon rank (T-rank) attached to their G-rank. Where the G-rank reflects the condition of the entire species, the T-rank reflects the global situation of just the subspecies. For example, the Point Reyes mountain beaver, Aplodontia rufa ssp. phase is ranked G5T2. The G-rank refers to the whole species range i.e., Aplodontia rufa. The T-rank refers only to the global condition of ssp. phase. Taxa which have taxonomic questions associated with them are assigned a letter Q notation. For example, G1Q indicates the element is very rare, but there are taxonomic questions associated with it.

State Conservation Status Definitions:

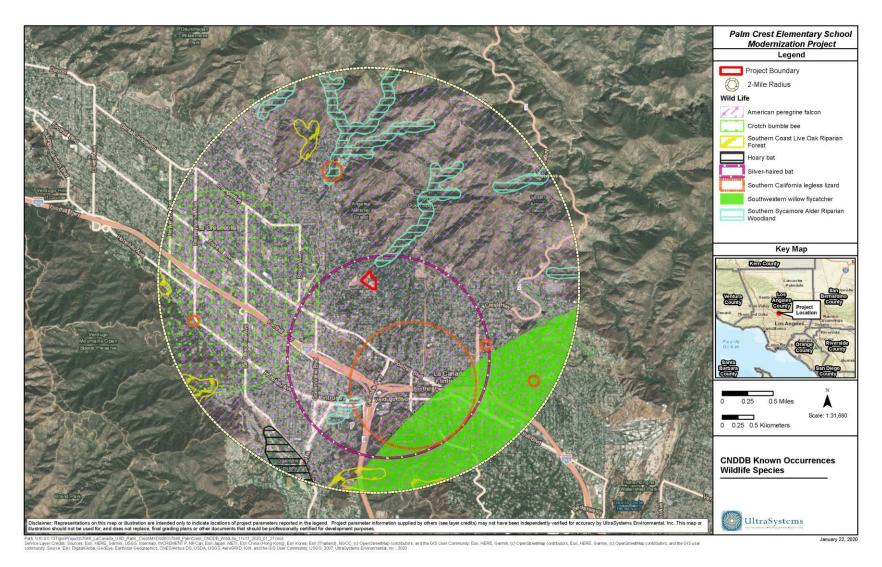
- **S1 = Critically Imperiled:** Critically imperiled in the state because of extreme rarity (often 5 or fewer populations) or because of factor(s) such as very steep declines making it especially vulnerable to extirpation from the state.
- **S2 = Imperiled:** Imperiled in the state because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the state.
- **S3 = Vulnerable:** Vulnerable in the state due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the state.
- **S4 = Apparently Secure:** Uncommon but not rare in the state; some cause for long-term concern due to declines or other factors.

Western Bat Working Group (WBWG) Priority Matrix: The Western Bat Species Regional Priority Matrix is a product of the Western Bat Working Group Workshop held in Reno, Nevada, February 9-13, 1998. The matrix is intended to provide states, provinces, federal land management agencies, interested organizations and individuals a better understanding of the overall status of a given bat species throughout its western North American range. Subsequently, the importance of a single region or multiple regions to the viability and conservation of each species becomes more apparent. The matrix should also provide a means to prioritize and focus population monitoring, research, conservation actions, and the efficient use of limited funding and resources currently devoted to bats.

- H = High 'high' designation represents those species considered the highest priority for funding, planning, and conservation actions. These species are imperiled or are at high risk of imperilment.
- M = Medium 'medium' designation indicates a level of concern that should warrant closer evaluation, more research, and conservation actions of both the species and possible threats. A lack of meaningful information is a major obstacle in adequately assessing these species' status and should be considered a threat.



Figure 4.4-7
CNDDB WILDLIFE SPECIES AND HABITATS MAP



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The 22 special-status wildlife species determined to have no potential to occur within the project BSA are discussed briefly below. These species have no potential to occur because the BSA lacks suitable habitat for foraging, nesting or breeding, or the BSA does not lie within the species reported distribution or elevation range, or a combination of all of those factors (CDFW, 2019a, b; CDFW, 2020b; Cornell, 2015; eBird, 2017; Google Earth, 2020; NRCS, 2020; Soil Survey Staff, 2020; USDA, 2006; USEPA, 2020; USFWS, 2020a, b, c, d, e; Zeiner et al., 1988-1990). These 22 species comprised the following classes of wildlife species with number of species represented in parenthesis: birds (12), reptiles and amphibians (seven), and fish (three).

Due to several biological and physical disturbances within the BSA, it was determined that there is a lack of suitable habitat conditions to support 22 of the 36 special-status wildlife species identified in the 10-mile radius database query. First, some of species for which the suitable habitat type may occur in the BSA, or for which the BSA overlaps with the appropriate elevation range and species range, were excluded because the concentration of feral domestic pet species is high and those feral species would hunt and reduce populations of small rodents, amphibians and reptiles that lack effective defense mechanisms. Second, there is high cover of non-native ornamental landscaping species that outcompete and thus preclude the establishment of native plant species. Many of the wildlife species require native vegetation for their foraging and nesting requirements. Third, habitat fragmentation from development reduces the size of habitat patches containing contiguous stands of native vegetation. Thus, certain species would not have sufficient foraging habitat or cover for nesting or shelter requirements. Fourth, the BSA lacks complex vegetation communities. In general, more complex natural communities with more vegetation layers and more plant species provide higher value wildlife habitat than less complex vegetation communities. More complex communities contain more niches for wildlife and usually support more animal species than less complex communities.

For all of the abovementioned reasons, the following 22 special-status and sensitive wildlife species were determined not to occur within the BSA and will not be discussed further (see **Table 4.4-2** for listing status description):

- southern California legless lizard (*Anniella stebbinsi*) SSC, G3, S3
- coastal whiptail (Aspidoscelis tigris stejnegeri) SSC, G5T5, S3
- burrowing owl (Athene cunicularia) SSC, BCC, G4, S3
- Santa Ana sucker (Catostomus santaanae) FT, G1, S1
- black swift (Cypseloides niger) SSC, BCC, G4, S2
- San Bernardino ring-necked snake (Diadophis punctatus modestus) G5T2T3, S2
- southwestern willow flycatcher (Empidonax traillii extimus) FE, SE, G5T2, S1
- western pond turtle (*Emys marmorata*) SSC, G3G4, S3
- common yellowthroat (*Geothlypis trichas sinuosa*) SSC, BCC, G5T3, S3
- arroyo chub (*Gila orcuttii*) SSC, G2, S2
- short-billed dowitcher (*Limnodromus griseus*)
- marbled godwit (*Limosa fedoa*)
- Lewis's woodpecker (Melanerpes lewis) BCC, G4, S4
- Song sparrow (*Melospiza melodia*)
- southern mountain yellow-legged frog (*Rana muscosa*) FE, SE, WL, G1S1
- Santa Ana speckled dace (Rhinichthys osculus ssp. 3) SSC, G5T1Q, S1
- rufous hummingbird (*Selasphorus rufus*) BCC, G5, S1S2
- yellow warbler (Setophaga petechia) SSC, BCC, G5, S3S4
- black-chinned sparrow (Spizella atrogularis) BCC



- Coast Range newt (*Taricha torosa*) SSC, G4S4)
- two-striped garter snake (Thamnophis hammondii) SSC, G4S3S4
- least Bell's vireo (Vireo bellii pusillus) FE, SE, G5T2, S2

Listed Bird Species

There were two listed bird species determined to have a low potential to occur in the BSA, One special-status bird species, California condor (*Gymnogyps californianus* FE, SE, FP, G1, S1), a vulture that feeds on large mammal carcasses, was determined to have a low potential to occur within the BSA. California condors typically form nests in caves positioned on high cliffs. Due to the absence of cliffs, there is no potential for nesting in the BSA. This species forages in grassland, open oak savannah and scrub habitats (Cornell, 2015). Although there is a small patch of scrub habitat surrounding the detention pond, no evidence of large mammal activity was observed there, and it is unlikely a large mammal species would die in this region. Thus, there is a low potential for condors to forage in the BSA because condors would only visit in the unlikely event of food source availability. Project construction and operation would have no impact on condors.

Another listed bird species, coastal California gnatcatcher (*Polioptila californica californica* FT, SSC, G4G5T2Q, S2), was determined to have a low potential to occur in the BSA. This species is a permanent resident of and breeds within coastal sage scrub habitat. It also utilizes chaparral, grassland and riparian habitats next to CSS (Cornell, 2015). There is a small patch of CSS in the slopes west of the detention pond and within the BSA where this species could occur. It has recently been observed within 1.2 miles of the project site (eBird, 2017), and considering that individuals disperse after breeding, it is possible that one could visit the CSS habitat in the BSA. This patch of CSS habitat is very small (i.e., 0.13 acre); moreover, this patch is located nearly 500 feet from the project site and would not be affected by noise and dust of project operations. Project construction and operation is not anticipated to impact this species due to the distance of potential habitat from the project site and MM BIO-1 to protect nesting birds.

Sensitive Bird Species

There were four sensitive bird species determined to have a moderate potential to occur in the BSA, of those being the American peregrine falcon (*Falco peregrinus anatum* FP, BCC, G4T4, S3S4). Peregrines visit many open habitats such as tundra, marshes, seacoasts, savannahs and high mountains (Cornell, 2015). These falcons hunt from high perches such as tall trees or buildings. Since there are tall conifers, eucalyptus and pine species within the BSA and even on the project site, there is a moderate potential for peregrines to occur in the BSA for foraging purposes. Peregrines breed in cliffs (or tall buildings) and the lack of such structures indicates that there is no potential for breeding within the BSA. Removal of some of the tall trees on the site could impact this bird species and **MM BIO-1** described below will ensure this species is not adversely impacted.

A second sensitive bird species, oak titmouse (*Baeolophus inornatus* BCC), has been reported to occur in the BSA and has a moderate potential to occur in the BSA based on available habitat. Oak titmice typically occur in oak habitats. Within the BSA, there are small stands of coast live oak both in landscaped areas and along Halls Canyon Channel. This species breeds March 15 through July 15 and uses tree cavities for their nesting sites (USFWS, 2020e). However, no evidence of active or abandoned nests were observed in any of the oak trees on the project site. As there is removal scheduled for some of the oak trees on the project site, which could impact this bird species if nest sites are present, a Biologist needs to survey the oak trees prior to construction and if any nests are



found ensure that protections are put in place. Mitigation measure **BIO-1** will ensure this species is not adversely impacted.

A third sensitive bird species, Allen's Hummingbird (*Selasphorus sasin* BCC), has been reported to occur in the BSA. This hummingbird species occurs in sparse to dense scrub habitats and sparse to open woodlands. This species is dependent on an abundant nectar supply. Considering that there are several flowering ornamental trees on the project site such as palm and eucalyptus species are located on the project site and within the BSA, there is a moderate potential to occur in the BSA. This species breeds between February 1 and July 15 (USFWS, 2020e). No nests were observed in the BSA during the survey. Project operations on the project site could potentially impact the foraging behavior of this species by interfering with its visits to flowering plants within the project site. However, there are abundant sources of nectar-producing flowering plant species available to hummingbirds in areas adjacent to the project site, which would be undisturbed by construction noise and dust. Thus, any impacts of project construction and operations on this species would be less than significant.

A fourth sensitive bird species, California thrasher (*Toxostoma redivivum* BCC), has been reported to occur in the BSA. Their preferred habitat is chaparral. They are also found in coastal sage scrub in their southern range. California thrashers require underbrush with thick leaf litter for foraging (Cornell, 2015). Since maintenance workers consistently remove leaf litter on the project site, this species is not expected to occur there. However, there is substantial leaf litter in the laurel sumac scrub that occurs along the Halls Canyon Channel and there is a moderate potential for this species to occur in the BSA. This species breeds between January 1 and July 31. It is unlikely that this species will either forage or breed on the project site because of the lack of suitable habitat on the project site. Construction and project operation on the project site would not impact this species.

There are six other sensitive bird species determined to have a low potential to occur on the project site and are listed under The Migratory Bird Treaty Act of 1918 (MBTA), codified at 16 U.S.C. §§ 703-712. Those species are Costa's hummingbird (*Calypte costae* BCC), Lawrence's goldfinch (*Spinus lawrencei* BCC), Nuttall's woodpecker (*Dryobates nuttallii* BCC), spotted towhee (*Pipilo maculatus*), and Cooper's hawk (*Accipiter cooperii* WL). All six of these species have been reported within the BSA or within 500 feet of the BSA (eBird, 2017). Similarly, all six of these species breed during the spring months. There is suitable habitat for these species along the channel and around the detention pond but it is unlikely they utilize habitat within the project site due to disturbance levels associated with daily school activities.

One of these sensitive bird species, Wrentit (*Chamaea fasciata* BCC), has been reported to occur in the BSA. It is a year-round resident in coastal scrub and chaparral along the West Coast. Away from the coast it lives in dense shrublands (Cornell, 2015). As this species prefers dense, native shrub habitat it is unlikely to occur on the project site because there are very few shrubs. This species has a low potential to occur in the laurel sumac scrub of the channel within the BSA due to the high abundance of non-native ornamental species in that area. This species breeds between March 15 and August 10 (USFWS, 2020e). Therefore, construction and project operation would not impact this species.

Another species is the Costa's hummingbird (*Calypte costae* BCC). This species occupies scrub and woodland habitats; it prefers more arid habitats such as desert scrub (Cornell, 2015). Hummingbirds are dependent on an abundant insect and nectar supply. Considering that several flowering native and ornamental trees such as palm, alder and eucalyptus species are located on the project site and within the BSA, there is a low potential for these species to occur in the BSA. Costa's hummingbirds



breed between January and July (USFWS, 2020e). No nests were observed in the BSA during the survey. As there are foraging sources available to this species adjacent to the project site, this species can maintain its normal foraging behavior during project construction and operations and thus, project impacts to this species would be less than significant.

An additional sensitive bird species that was determined to have a potential to occur in the BSA is Cooper's hawk (*Accipiter cooperii*). This determination was based on common professional knowledge that Cooper's hawks occur in urbanized habitats such as this where there are numerous larger trees available for perching and abundant prey sources such as rodents and smaller birds. However, they prefer more densely wooded areas than occur in the BSA such as woodland openings and edges of riparian and oak habitats (Cornell, 2015). Furthermore, they prefer to nest where there is a grove of six or more contiguous trees providing dense canopy cover and no such grove occurs in the BSA. Thus, there is a low potential for Cooper's hawks to occur in the BSA. Project construction and operations would not impact this species.

Another sensitive bird species that was determined to have a potential to occur in the BSA is Lawrence's goldfinch (*Spinus lawrencei* BCC). This species utilizes oak woodland, chaparral, riparian woodland, valley foothill hardwood-conifer habitats usually near water (Cornell, 2015 and USFWS, 2020e). There is a potential that they could occur in Halls Canyon Channel in the BSA during wetter periods when water is present in that channel. They nest in oaks, conifers and deciduous trees, all of which occur in the BSA. Considering that water is intermittently available within the BSA there is a low potential for this species to occur. Similarly, since there are no standing water sources available on the project site, and the potential water source within the BSA is distant from the project site, this species would not be impacted by project construction and operations.

An additional sensitive bird species determined to have a potential to occur in the BSA is Nuttall's woodpecker (*Dryobates nuttallii* BCC). This species is a common resident of oak woodlands, especially where mixed with California sycamore (*Platanus racemosa*) and deciduous riparian habitats (Cornell, 2015). Since there is oak woodland and riparian habitat within Halls Canyon Channel in the BSA, there is a potential for this species to use this habitat. They utilize dead trees for nests. No dead trees were observed within the BSA. Considering that there is a lack of optimal nesting locations and that there is a high level of disturbance due to human activity near the woodland habitat in the BSA, there is a low potential for this species to occur in the BSA. Project construction and operations will not impact this species.

There is suitable habitat within the BSA to support spotted towhee (*Pipilo maculatus*). These birds occupy a variety of habitats including forests, thickets, shrubby yards and fields, chaparral and canyon bottoms (Cornell, 2015). There is suitable habitat in the detention pond slopes within the BSA where there are populations of buckwheat and coastal sage scrub. This species typically nests on the ground or near it. There is no suitable habitat within the project site because of a high level of human activity throughout the day. Project construction and operations will not impact this species because the suitable habitat is sufficiently distant from activities such that there will be no noise, dust, or other impacts.

In addition to all of the bird species listed above, the project site contains ornamental vegetation and building structures that could potentially provide cover and nesting habitat for bird species that have adapted to urban areas, such as rock pigeons (*Columba livia*) and mourning doves (*Zenaida macroura*) (Cornell, 2015; USFWS, 2020e). Native bird species such as mourning doves are protected by the MBTA and the California Fish and Game Code (Sections 3503, 3503.5, and 3513), which render it unlawful to take native breeding birds, their nests, eggs, and young. Indirect impacts on breeding



birds could occur from increased noise, vibration, and dust during construction, which could adversely affect the breeding behavior of some birds, and lead to the loss (take) of eggs and chicks, or nest abandonment. Therefore, the project has the potential to impact migratory non-game breeding birds, and their nests, young and eggs. With implementation of **MM BIO-1**, impacts from project operations and construction would be less than significant on migratory bird species.

The proposed project plans include the removal or destruction of vegetation (including trees) during the nesting season (generally between February and September); however, none of these impacts would affect breeding of special-status or sensitive bird species because the project site lacks suitable habitat to support nesting or raising young of any of these species. Increased noise, vibration, and dust generated during construction during the nesting season could cause indirect impacts on special-status birds. However, the nearest suitable habitat for potential nesting activity of special-status birds is located in the Halls Canyon channel and the slopes surrounding the detention pond, all of which occur at least 300 feet from the project site. These areas are so distant from the project site that construction and project operations would not adversely affect nesting behavior of special-status bird species or lead to the loss (take) of eggs and chicks, or nest abandonment.

With the implementation of **MM BIO-1**, the project would have less than significant impacts to native bird species protected under the MBTA and the California Fish and Game Code. Therefore, with implementation of **MM BIO-1**, the proposed project would not have substantial adverse effects, either directly or through habitat modifications, to habitat, plant or wildlife special-status species and less than significant impacts would occur.

Sensitive Mammal Species

Two sensitive mammal species have a low potential to occur within the BSA. The hoary bat (*Lasiurus cinereus* G5, S4), a tree roosting bat species, is distributed throughout North and South America. They prefer forested habitats and there are wooded habitats within the BSA (WBWG, 2020). This species roosts in both coniferous and deciduous tree species, both of which occur within the BSA. These bats prefer foraging on moths but also hunt various flying insects. Considering that there is a high level of activity throughout the project site it is unlikely that this species roosts in any of the trees located on site. Since any trees this species may utilize within the BSA are distant from the project site, noise and dust produced by construction activities will not impact this species. Similarly, due to the distance of potential habitat from the project site, project operations would not adversely impact this species. Therefore, construction and project operations would not impact this species.

Another sensitive mammal species, silver-haired bat (*Lasionycteris noctivagans* G5, S3S4), (a tree roosting species) was determined to have a low potential to occur within the BSA. Their preferred roosting habitat is in bird-excavated cavities of trees because they need a cluster of large trees to serve as roosting area (WBWG, 2020). They prefer foraging on moths and also hunt other flying insects. Considering that there is a high level of activity throughout the project site and that there are no cluster of closely grouped large trees, it is unlikely that this species roosts in any of the trees located on the project site. Since any trees this species may utilize within the BSA are distant from the project site, noise and dust produced by construction activities will not impact this species. Similarly, due to the distance of potential habitat from the project site, project operations would not adversely impact this species. Therefore, construction and project operations would not impact this species.



Other Wildlife Species

One special-status insect species, Crotch bumble bee (*Bombus crotchii* SCE, G3G4, S1S2), a bee species that forages in open grassland and scrub habitats in southern to central California, was determined to have a low potential to occur within the BSA. This species requires both floral resources and undisturbed nest sites and overwintering sites (CDFW, 2019b). Due to the frequent disturbances that occur on the project site, there is no potential for this species to occur on the project site. However, there is an abundance of floral species and a lack of disturbance along the channel and the detention pond and thus there is a potential for this species to occur within the BSA. Due to the relatively small patch size of the potential foraging habitat available in the BSA, this species is considered to have a low potential to occur. Considering that the only potential habitat in the BSA is distant from the project site, noise and dust associated with construction activities would not impact this species. Likewise, project operations would not impact this species there. In conclusion, there would be no impact to this species due to construction or project operations.

Mitigation Measure

MM BIO-1 Pre-Construction Breeding Bird Survey

If project construction occurs between February 1 and August 31, a qualified avian biologist shall conduct a preconstruction nesting bird survey no earlier than one week prior to construction. If any nests identified are still occupied, a buffer of 200 feet shall be maintained around any active nest, and the avian biologist shall visit the site once a week, until the avian biologist can determine that the young have fledged or the nest has become inactive.

Level of Significance After Mitigation

After the implementation of **MM BIO-1**, potential project impacts to native bird species protected under the MBTA and the California Fish and Game Code would be reduced to a less than significant level.

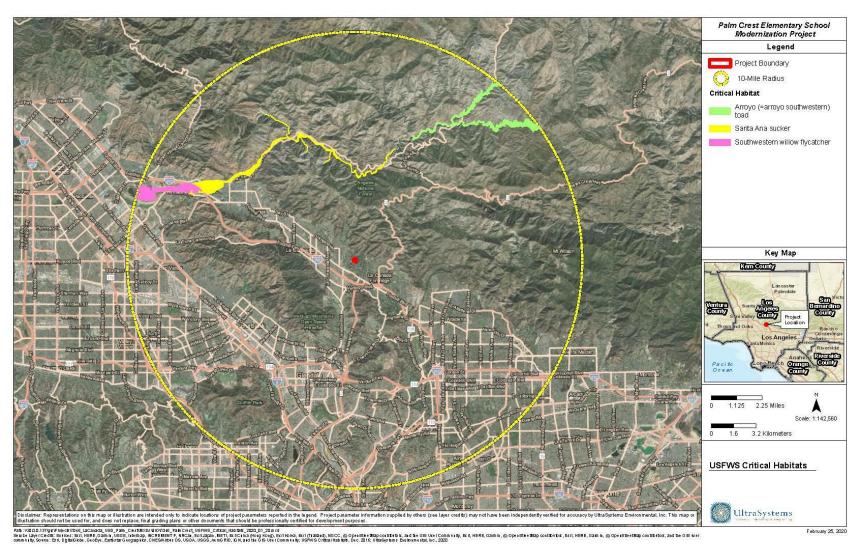
b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact

Based on results of the literature review, project site photos, and habitat assessment survey, there is a small tract of riparian habitat located within the BSA that is located in Halls Canyon Channel approximately 300 feet west of the project site (USFWS, 2020c). No other sensitive natural communities were found within project site or the BSA. All habitats within the riparian corridor, laurel sumac scrub, coast live oak woodland and mulefat scrub, are located along the channel and are highly intermixed with ornamental and non-native species. Since the small patch of riparian habitat is more than 300 feet from the project site, no project construction or project operations would impact these habitats. No critical habitats are located within the project BSA (**Figure 4.4-8**, *USFWS Critical Habitat*). Therefore, project construction and project operations would have no direct or indirect impacts on riparian habitats or other sensitive natural communities and no substantial adverse effect would occur to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS.



Figure 4.4-8
USFWS CRITICAL HABITAT



7046/Palm Crest ES Modernization Project Initial Study/Mitigated Negative Declaration



c) Would the project have a substantial adverse effect on federally protected wetlands as defined by § 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact

Based on results of the literature review (USFWS, 2020d), project site photos, and habitat assessment survey, there are no wetlands within the BSA (see **Figure 4.4-9**). Halls Canyon Channel and the detention pond located within the BSA are classified as non-wetland waters of the United States because they are part of tributary system that flows into the Los Angeles River. Project construction and operation would not release any debris or sediment into the channel. Therefore, the project would not have direct or indirect impacts on federally protected wetlands as defined by § 404 of the CWA. Similarly, the project would not result in adverse effects to non-wetland waters of the U.S. as defined by § 404 CWA. Therefore, the project would not result in substantial adverse effects to federally protected wetlands and other waters of the U.S. through direct removal, filling, hydrological interruption, or other means. The project would have no impact in this regard.

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

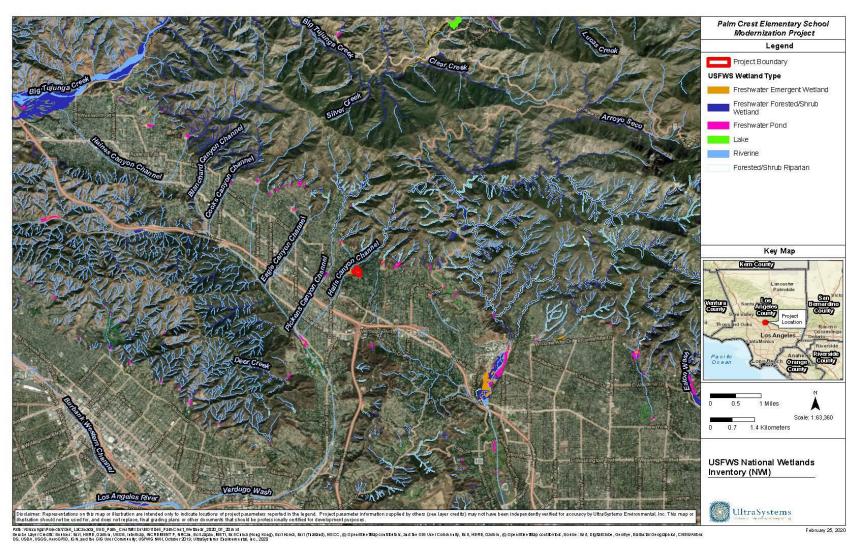
No Impact

Based on the results of the literature review and project site photos, there are potential wildlife movement corridors within the BSA but not on the project site. The BSA contains potential wildlife travel routes, such as a riparian strip along Halls Canyon Channel and culverts under roads that maintain the uninterrupted flow of this channel that could facilitate wildlife crossings. However, the project site has no riparian strips or culverts because it is fenced off around its perimeter which restricts the movement of large animals. However, common wildlife species such as coyotes, northern raccoons, striped skunks, and Virginia opossums could be expected to travel within the BSA in areas surrounding the project site.

The project site does not support resident or migratory fish species or wildlife nursery sites. No established resident or migratory wildlife corridors are located within the project site. Any animals such as skunks or opossums that might climb over the fence of the project site during their foraging activities would have plenty of alternative routes to utilize during construction or project operation. Project operations would occur on the project site and would not interfere substantially with or impede; 1) the movement of any native resident or migratory fish or wildlife species, 2) established native resident or migratory wildlife corridors, or 3) the use of native wildlife nursery sites. No impacts are anticipated.



Figure 4.4-9
USFWS NATIONAL WETLANDS INVENTORY





e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact with Mitigation Incorporated

The school campus is located within a developed urban area and contains trees and shrubs on public property owned by the La Cañada Unified School District (District). Ninety existing trees are scheduled to be removed as part of the proposed project. The District has not adopted a tree protection ordinance; therefore, no District tree ordinances exist to regulate the protection of tree species on the project site. Therefore, the project would not conflict with any ordinances protecting biological resources, including any local policies or ordinances protecting biological resources, as they generally do not apply to District-owned lands.

Although there are no tree ordinances that impose regulations on the impact of construction activities or project operations on any of the trees on the project site, the District wants to make every effort to protect onsite native trees that provide valuable ecological habitat and that offer visually appealing character to the community. There are several native tree species on the project site; coast live oak trees are the one species that is locally native and widely utilized by native wildlife. Coast live oak trees are a protected tree species with both the City of La Cañada Flintridge and Los Angeles County and the District aims to use portions of those standards of protection in which demolition, construction, and other project operations can be modified to ensure the health and survival of any of these trees designated for removal in the initial plans. As such, the District analyzed the proposed project operations that would potentially impact coast live oak or other native tree species scheduled for removal, and determined which removal trees could be protected with no more than minor impacts.

In total, 164 individual trees on the project site and along the fire access road were surveyed due to their potential to be impacted by construction, maintenance and project operations (**Table 4.4-3**). Of those trees, 72 were recommended for protection and 92 were recommended for removal. Of the 92 removal trees, there were seven native trees (six coast live oak and one white alder). The District evaluated all seven of the native removal trees and determined that three coast live oak removal trees should be considered for protection. There is a discussion in the proceeding paragraphs of all seven native removal trees and the reasons for reclassifying some as Protect-in-Place and maintaining the removal classification status for others.

In particular, there are three onsite oak trees (Trees R2, R6 and R7) scheduled for removal that the District recommends for protection, if feasible, and if avoidance is possible and does not interfere with project plans or construction (**Figure 4.4-5**). Tree R2, is a highly aesthetic coast live oak tree (a tree is usually considered highly aesthetic if it has generally dense foliage, a relatively uniform or noteworthy irregular shape and large size). This particular tree is adjacent to an outbuilding of the former District headquarters and its large canopy slightly overhangs Jessen Drive, making this tree a very visible and attractive tree to local community members. Although the expanded parking lot being installed in place of the former District building will come within ten feet of this tree's root collar, the District is confident that this tree can be preserved during the grading and paving activities. Moreover, during the tree survey conducted by the UEI Arborist and Biologists in January 2020, this notable tree was determined to be a candidate for protection. The other two oak trees designated for removal that the District is now recommending for protection are Trees R6 and R7, which grow next to each other in between portable classrooms and a walkway that is parallel to Jessen Drive on the northeast portion of the project site. Both trees are large, exceeding 25 feet in height and having at least a 30-inch trunk diameter at breast height. Both trees were rated as average health by the



Arborist and appear in good health with no major defects or disease evident. In its analysis of project impacts on this tree, the District determined that the nearby improvements to the existing walkway and the demolition of the nearby classrooms can proceed without causing significant damage to these trees. In fact, the lead Landscape Architect with LPA indicated that no more than five feet of these tree's canopies would need to be pruned to enable access of the construction vehicles. Considering that these trees can be preserved in good health throughout the construction and project operation activities, it is recommended that they be protected.

Unfortunately, not all of the onsite native trees designated for removal can realistically be protected due to the nature of the construction and project operations that will either necessitate their removal or cause so much damage to the root system, canopy, or a combination thereof as to render the tree fatally injured. Each of these trees will be described in more detail below as well as the specific project operations that will cause unrecoverable damage to the tree.

Table 4.4-3
SUMMARY OF SURVEYED TREES BY PROJECT CATEGORY DESIGNATION

Tree Survey	Tree Category	Tree Subcategory	Number of Native Trees	Total # of Trees Proposed for Removal	Total # of Trees
	Protect-in- Place	Protect-in- Place	9	0	49
Tree Survey 1 (LPA Demolition		Removal	oval lidate otect- 3	87	87
Plan)	Removal	Removal (Candidate for Protect- in-Place)		3	3
Tree Survey 2		Protect	2	0	19
(Fire Access Road Tree Management	Protect	Protect (Removal Candidate)	0	0	4
Project)	Removal	Removal	0	2	2
	Totals		18	92	164

One particularly aesthetic and large coast live oak tree that is scheduled for removal and that would be too highly impacted by construction and project operations to protect is Tree R1, which is situated in the middle of the proposed expanded parking lot by the former District headquarters. The combined effects of the demolition of the building which is within ten feet of the tree's root collar, the removal of the existing pavement which is within five feet of the root collar and the installation of the new parking lot would cause severe damage to the tree's root system.

Additional stresses to the tree would occur during the preparation for and the installation of the new paved surface of the parking lot. In the preparation phase, after removal of the existing pavement, the soil beneath the paved surfaces and removed building structures would need to be re-graded and



compacted. In addition, a gravel base will be added above the graded soil surface. This gravel base will be stabilized and compacted. All of these preparatory stages involve tilling up to one-foot depth of the existing soil and heavy compaction of the tilled soil and gravel base layer. The cumulative effects of these preparatory actions will cause severe damage to the tree's root system and would likely lead to the eventual death of the tree. By not removing this tree prior to the installation of the expanded parking lot, the injured tree would pose a hazard to any person or any vehicle on the lot as the entire tree or large branches could unexpectedly fall due to its weakened state. In light of this hazard, it is recommended to remove this tree prior to regrading activities.

There are three other onsite native trees that are designated for removal and cannot be protected because demolition, construction and other project operations would necessitate the complete removal of these trees. Tree R3 is a white alder and is not locally native and as such is not part of the local native ecosystem. Moreover, this tree is located adjacent to the former district headquarters and its root system will be severely damaged by the demolition of the building and by various activities associated with installing the expanded parking lot. Tree R3 cannot be protected because it would not survive the root damage that would occur. Tree R5 is a coast live oak located on a slope near the former District headquarters and must be removed because the slope it is on would be regraded to a higher elevation to accommodate the expanded parking lot's extent. As a result, this tree's root system would be buried and the tree would die even if it were protected. Finally, Tree R8, is another coast live oak tree that is located on a slope just north of the baseball field and south of existing portable classrooms. This tree is in the direct path of the planned ADA-compliant ramp that would traverse this slope. This tree needs to be removed to accommodate the installation of the ramp.

Considering that some native trees will be removed during the course of the construction and project operations, the District intends to incorporate native tree species into its landscaping plans. Of particular note, two native coast live oak trees are scheduled to be planted as part of the landscaping plans of the project design. These oaks will be installed in the courtyard of the new two-story building that will be erected in the northwest region of the project site. These trees will be in container stock that is a minimum of 48" box size or similar. In addition, other native plants including possibly one or more native tree species will be incorporated into the landscaping plan.

As a further indication of its intent to ensure that this project does not cause any adverse environmental effects, the District is committed to prohibiting any trees recognized as invasive species by the California Invasive Plant Council (Cal-IPC) in its landscaping plans. For example, Peruvian pepper trees, an invasive tree species (Cal-IPC 2020) will not be included in the landscaping plans. Instead, aesthetically pleasing ornamental trees (native or non-native), that meet the project design goals while not posing an environmental threat will be used in the plans. Four species in particular that will be planted include the native California bay (*Umbellularia californica*), desert willow (*Chilopsis linearis*), palo verde varieties (*Parkinsonia* sp.) and fern pine (*Podocarpus gracilior*). All of these species are fast-growing species that will serve to create a pleasing viewshed for surrounding homes and provide a greater sense of privacy for homeowners.

Mitigation Measure

MM BIO-2 Coast Live Oak Tree Protection Measure

During project construction, the measures described below shall be taken to protect any oak trees designated to be preserved and for which the root systems are located near and vulnerable to damage by construction activities. The exposed tap root, main roots and any surface-feeding roots exceeding one inch in diameter shall be wrapped



in protective moistened burlap during the excavation of existing pavement and buildings and during the re-grading phase and installation of the new parking lot. The roots zone (under dripline) should be excavated with a mini-excavator and/or hand tools, using a probe (metal rod or stick) to locate and unearth roots, leaving them in their natural orientation. Work will be done as quickly as possible to expose the roots for as little time as possible and the roots will be reburied with clean fill as soon as is feasible (no longer than a day or so, if possible). The burlap will be kept moist. If roots are cut, they will be cut with sharpened, clean, disinfected tools (10% bleach solution) with every effort to avoid tearing the root and to avoid tearing the root surface. A minimum distance of eight feet should be maintained of the root (distance from the root crown to terminal end of root), where possible. If the current elevation of the two tree's existing root collars differs by more than one foot from the grade of the new parking lot grade then a 10-foot radius of soil at the root collar grade shall be placed around each tree.

MM BIO-3 Coast Live Oak Planting Measure

To offset the loss of native trees scheduled for removal during construction and project operations, two coast live oak trees shall be planted in the courtyard area of the new two-story building that will be erected in the northwest region of the project site. The container stock of these oak trees will be acquired from a plant nursery and will be 48" box trees as a minimum size (or as directed by the landscape architect or certified arborist).

Level of Significance After Mitigation

Implementation of mitigation measure **BIO-2** above would reduce potential impacts to at least one highly aesthetic coast live oak tree to a less than significant level because these trees would be preserved onsite. Implementation of mitigation measure **BIO-3** would add two new coast live oak trees, thus reducing the impact of the removal of two coast live oak trees to a less than significant level.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact

The project site is located within the densely developed City of La Cañada Flintridge, and is not located in an area covered by a Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP) or other approved HCP (USFWS, 2020f). Therefore, the project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impact would occur.



4.5 Cultural Resources

Would the project:		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?		X		
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c)	Disturb any human remains, including those interred outside of formal cemeteries?		X		

Methodology

A cultural resources analysis was conducted for the Palm Crest Elementary School project site (refer to **Figure 4.5-1**), including a California Historic Resources Inventory System (CHRIS) records search and literature search at the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton. The cultural resources analysis report is provided as **Appendix E1**. The report included a search by the Native American Heritage Commission (NAHC) of their Sacred Lands File (SLF) for potential traditional cultural properties, as well as their list of local Native American tribes and tribal representatives to contact. The SCCIC records search was conducted on February 18, 2020. The NAHC request was made on January 27, 2020 and a reply was received on February 10, 2020; letters were sent to the listed tribes on February 17, 2020 and follow-up telephone calls were conducted on March 19, 2020. A pedestrian field survey was conducted on January 23, 2020.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

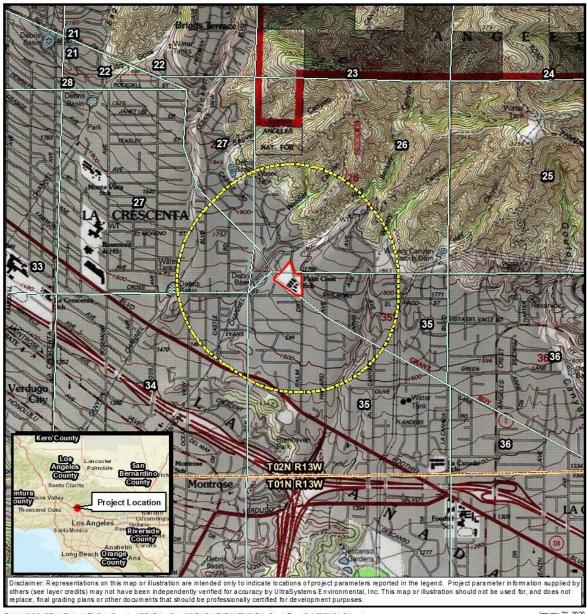
Less than Significant Impact with Mitigation Incorporated

An historical resource is defined in § 15064.5(a)(3) of the CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered as historical resources under CEQA.

Based on the cultural resources records search conducted at the SCCIC, no historical resources have been recorded within the project's Area of Potential Effect (APE) boundary (refer to **Figure 4.5-1**).



Figure 4.5-1 TOPOGRAPHIC MAP



Path: \(\)10.0.0.137/gis\Projects\(\)7048_LaCanada_USD_Palm_Crest\(\)MXDs\(CULTURAL\)7048_PalmCrest_Topo_Cul_2020_01_21.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC,
(c) OpenStreetMap contributors, and the 015 User Community, Copyright 2013 National Geographic Society, Foublet, California Department of Conservation, 2019,

nuary 22, 2020

0 1,000 2,000 Feet

Project Boundary
Half-Mile Radius
Township Boundary
Section Boundary

Palm Crest Elementary School Modernization Project

> Topographic Map USGS Quadrange: Pasadena Township: 2N Range: 13W Sections 26, 35





Based on the results of the record search, three historic-era cultural resource sites were recorded within the half-mile radius buffer zone of the APE. These occur to the east and northeast of the project APE. These resources consist of historic transmission lines (19-186861 and 19-186870) and a partially-underground reservoir (19-190046).

The result of the pedestrian survey was positive for historic cultural resources. The project would include the demolition of the current old District Office located in the eastern portion of the site. This office had been converted to District use from the historic Bullock House, also referred to as "Viewpoint." This Neo-classical, wood-framed, single-story residential building, built 1922-1923, was constructed on an irregular plan with elevated concrete footings over a partial basement, with its primary façade oriented to the southwest (Tang, 2020:5). The main interior feature includes the Arts & Crafts style decorative mantel designed by Ernest Allan Batchelder, a Pasadena artisan well-known for his ceramic tilework (Cardine, 2018; 2020). An outdoor fountain also displayed possible Batchelder tile design but its poor condition makes this unclear. Photographs of the project site were taken during the cultural resources survey. With the proposed project this building would be demolished and replaced with a parking lot for use by the school.

The Bullock House is an historic-era residence on the project site itself that would be demolished as a part of the proposed project. An historic evaluation of the residence was conducted and the building was determined not to be eligible for the National Register and it does not constitute a "historic resource" for CEQA-compliance purposes (Tang, 2020, p. 7). There has been sufficient record of the history of building and its occupants through a report on file with the Lanterman House History Center and Archives (Gregory, 2006), an historic evaluation memo prepared for UltraSystems (Tang, 2020) for this investigation (**Appendix E2**), and a site record that was prepared (**Attachment E2**). The house does contain a well-preserved fireplace carapace inside the residence built by the well-known Arts & Crafts artisan Ernest Batchelder, and an entry gate by the local Huntington Iron Works firm at the start of the driveway. These two features retain some local historic interest as indicated by interest from the Lanterman House History Center and Archives, which has expressed the desire for the artifacts to be salvaged, preserved, and displayed in the community (Tang, 2020, p. 7).

Therefore, it is recommended that the District consult with the Lanterman House History Center and Archives and the Historical Society of Crescenta Valley to explore the feasibility of salvaging the Batchelder fireplace and the Huntington Iron Works entry gate for long-term preservation.

Mitigation Measures

MM CUL-1: If historical or unique archaeological resources are discovered during construction activities, the contractor shall halt construction activities in the immediate area and notify the La Cañada Unified School District. The on-call qualified archaeologist shall be notified and afforded the necessary time to recover, analyze, and curate the find(s). The qualified archaeologist shall recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area and afforded the necessary time and funds to recover, analyze, and curate the find(s). Construction activities may continue on other parts of the project site while evaluation and treatment of historical or unique archaeological resources takes place.

MM CUL-2: The Bullock House/Viewpoint shall be recorded in a Department of California Parks and Recreation Primary Record Form 523A to be submitted to the SCCIC. The house shall also be evaluated for potential significance under CEQA. The recordation and the evaluation have been completed (see Attachment E in Appendix E1, and Tang [2020]



in **Appendix E2**). It is also recommended that, prior to scheduling its demolition, the District consult with the Lanterman House History Center and Archives and the Historical Society of Crescenta Valley to explore the feasibility of salvaging the Batchelder fireplace and the Huntington Iron Works entry gate for long-term preservation. If no entities come forward to salvage and maintain these features prior to demolition, then the District should undertake to salvage and store the Batchelder fireplace mantel and the Huntington Iron Works entry gate until such time as an entity can be found to permanently maintain them for the public good.

Level of Significance After Mitigation

With implementation of mitigation measures **CUL-1** and **CUL-2**, potential impacts related to historic resources would be less than significant.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less than Significant Impact with Mitigation Incorporated

An archaeological resource is defined in § 15064.5(c) of the CEQA Guidelines as a site, area or place determined to be historically significant as defined in § 15064(a) of the CEQA Guidelines, or as a unique archaeological resource defined in § 21083.2 of the Public Resources Code as an artifact, object, or site that contains information needed to answer important scientific research questions of public interest or that has a special and particular quality such as being the oldest or best example of its type, or that is directly associated with a scientifically recognized important prehistoric or historic event or person.

The proposed project would include excavation into previously disturbed native soils, as the project includes: the demolition of the old District Office and existing garage (the Bullock House) and removal of trees for construction of a new upper parking lot; alteration/improvement to the existing drop-off area; alteration/improvement to the existing west parking lot; installation of temporary portable classrooms for use during project construction; and extension of site utilities to the new two-story building, improvement to landscaping areas, pedestrian walkways; and construction of one new classroom building, which would be comprised of an east and a west wing. It is unlikely that undisturbed unique archeological resources exist on the project site, as determined by the cultural resources investigation conducted by UltraSystems which included a CHRIS records search of the project site and buffer zone, a search of the SLF by the NAHC, and a pedestrian field survey (see **Appendix E1**).

As detailed in the records at the SCCIC, there have been no previous cultural resource surveys that included a portion of the project area and six surveys within a half mile radius project buffer but not within the project APE (see Section 4.1 in **Appendix E1**). As noted above, none of these surveys recorded prehistoric or historic cultural resources within the project boundary.

A NAHC SLF search was conducted on and within a half-mile buffer around the project site. The NAHC letter indicated that no records exist documenting the presence of traditional cultural properties within this area. Tribal representatives of seven Native American tribes were contacted requesting a reply if they have knowledge of cultural resources in the area that they wished to share, and asking if they had any questions or concerns regarding the project. These tribes included:



- Fernandeño Tataviam Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrieleno Band of Mission Indians Kizh Nation
- Gabrielino /Tongva Nation
- San Fernando Band of Mission Indians
- Gabrielino Tongva Tribe

There have been two responses from the tribes listed above. The first response was from the Administrative Specialist of the Gabrieleño Band of Mission Indians - Kizh Nation requesting that UltraSystems provide them with the lead agency's (i.e., District's) contact information because the tribe would like to consult directly with the District per Assembly Bill 52. The District contact information was provided to the tribe by UltraSystems' Cultural Resources staff. The second response was from the Fernandeño Tataviam Band of Mission Indians, who indicated that the project area is located outside of their traditional area.

The result of the pedestrian survey was negative for prehistoric resources and positive for a historic cultural resource on the project site. Based on the results of the records search, tribal consultation, and the onsite field survey, it is unlikely that cultural resources or tribal resources would be adversely affected by construction of the project. However, grading activities associated with development of the project would cause new subsurface disturbance and could result in the unanticipated discovery of unique archeological resources.

Mitigation Measure

MM CUL-3:

If historical or unique archaeological resources are discovered during construction activities, the contractor shall halt construction activities in the immediate area and notify the La Cañada Unified School District. The on-call qualified archaeologist shall be notified and afforded the necessary time to recover, analyze, and curate the find(s). The qualified archaeologist shall recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area and afforded the necessary time and funds to recover, analyze, and curate the find(s). Construction activities may continue on other parts of the project site while evaluation and treatment of historical or unique archaeological resources takes place.

Level of Significance After Mitigation

With implementation of **MM CUL-3**, potential impacts related to archaeological resources would be less than significant.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact with Mitigation Incorporated

The proposed project would be located on a site that has been graded and has been in use since the mid-1950s. During previous ground disturbance activities, no human remains were identified or recorded onsite. In the unlikely event that human remains are discovered during precise grading or construction activities, the project would be subject to California Health and Safety Code § 7050.5, CEQA § 15064.5, and California Public Resources Code § 5097.98.



California Health and Safety Code § 7050.5 identifies procedures for the unlikely discovery of human remains. CEQA § 15064.5 indicates the process for determining the significance of impacts on archeological and historical resources. California Public Resources Code § 5097.98 stipulates the notification process during the discovery of Native American human remains, descendants, disposition of human remains, and associated artifacts.

Mitigation Measure

MM CUL-4:

If human remains are encountered during excavations associated with this project, all work shall stop within a 30-foot radius of the discovery and the Los Angeles County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the NAHC. The NAHC will be responsible for designating the Most Likely Descendant (MLD). The MLD (either an individual or sometimes a committee) will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of their notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code).

Level of Significance After Mitigation

In the unlikely event of an unexpected discovery, implementation of **MM CUL-4** and adherence to all applicable codes and regulations would ensure that impacts related to the accidental discovery of human remains would be less than significant.



4.6 Energy

	Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			Х	
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			Х	

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

and

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

Less Than Significant Impact

According to the CEQA Guidelines, "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of project implementation that cannot be avoided.

Both construction and operation of the project would lead to the consumption of limited, slowly renewable, and non-renewable resources, committing such resources to uses that future generations would be unable to reverse. The new development would require the commitment of resources that include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the project site.

Construction

During project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic



equipment, or other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of offroad construction vehicles and equipment on the project site, construction worker travel to and from the project site, and delivery and haul truck trips hauling solid waste from and delivering building materials to the project site.

Operation

During project operation, energy would be consumed for multiple purposes, including but not limited to; lighting, electronics, electricity usage, water usage, solid waste disposal, and vehicle trips. However, because student enrollment and faculty and staff employment would not change, and types and frequency of events at the elementary school would not change, there would be little or no increase in energy consumption in the project's operational phase.

The existing site is served by an 800A, 208V 3-phase electrical service located on the northwest end of the site and one 1200A, 208V, 3-phase service located on the southeast corner of the site. These services would be consolidated and replaced with a 1600A 480V 3-phase service to be located on the southeast corner of the site. The total average monthly electrical consumption is 18,000 kWh for non-summer months, and 22,000 kWh for the summer months (Pierre, 2020). Further, use of more energy-efficient building materials and design, as well as lower-energy lighting, would help minimize energy consumption. It is anticipated that the proposed project would utilize energy-efficient lighting and HVAC, which would result in an overall reduction of energy usage, compared to existing conditions. The project would comply with all applicable regulations and codes which require achievement of various levels of energy efficiency in building construction, design and operation. Therefore, the project would have a less than significant impact regarding conflict with or obstruction of a state or local plan for renewable energy or energy efficiency.

The consumption of resources would represent a long-term commitment of those resources. The commitment of resources required for the construction and operation of the project would limit the availability of such resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with the anticipated growth on the elementary school campus and would not result in energy consumption requiring a significant increase in energy production for the energy provider. Therefore, the energy demand requirements associated with the project would be less than significant.



4.7 Geology and Soils

	Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Directly or indirectly cause potential subdeath involving:	ostantial adverse	e effects, including	the risk of loss, in	jury, or
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
	ii) Strong seismic ground shaking?			X	
	iii) Seismic-related ground failure, including liquefaction?				X
	iv) Landslides?			X	
b)	Result in substantial soil erosion or the loss of topsoil?			X	
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?			х	
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?			Х	
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				Х
f)	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

Analysis in this section is based upon the March 3, 2020 *Geotechnical Investigation Report* prepared for the proposed project by Converse Consultants (**Appendix F**). The purpose of the geotechnical report is to evaluate the subsurface soil conditions and provide geotechnical and design recommendations to ensure the safe construction and operation of the proposed project.



- a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact

In California, an "Alquist-Priolo Earthquake Fault Zone" (formerly Special Study Zone) is a seismic hazard area that varies in width, but averages approximately 0.25 mile around active faults. A fault is a fracture in the crust of the earth, where the rock mass on one side moves relative to the rock mass on the other side. Most faults are the result of repeated displacements over a long period of time. A fault trace is the line on the land surface defining the fault that can be delineated on a map. Surface rupture occurs when movement on a fault occurs at the surface. These faults may pose a risk of rupture to existing or future structures.

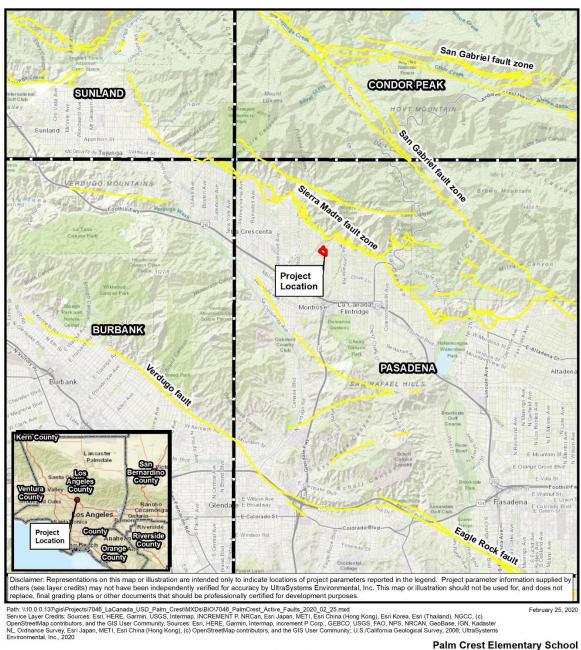
The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. This law was a direct result of the 1971 San Fernando Earthquake, which was associated with extensive surface fault ruptures that damaged numerous homes, commercial buildings, and other structures. Surface rupture is the most easily avoided seismic hazard. For the purposes of the Act, an active fault is one that has ruptured in the last 11 thousand years (Holocene time), and a potentially active fault is one that has ruptured in the last 1.6 million years (Pleistocene time). The law requires the State Geologist to establish regulatory zones (Earthquake Fault Zones), and prepare maps showing surface traces of active faults.

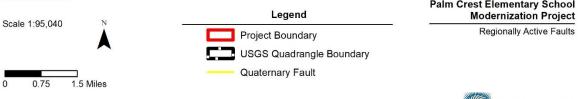
The project site is not located within a currently designated State of California Earthquake Fault Zone (formerly Alquist-Priolo Special Studies Zones) for surface fault rupture. The Alquist-Priolo Earthquake Fault Zoning Act requires the California Geological Survey to zone "active faults" within the State of California. An "active fault" has exhibited surface displacement within Holocene time (within the last 11,000 years) hence constituting a potential hazard to structures that may be located across it. Public school structures are required to be set back at least 50 feet from an active fault. The active fault set-back distance is measured perpendicular from the dip of the fault plane. Based on a review of existing geologic information, no known active faults project through or toward the site. The potential for surface rupture resulting from the movement of the nearby faults is considered low. (Converse Consultants, 2020, p. 8).

The nearest known fault to the project site with a mappable surface expression is the Sierra Madre fault, located approximately 0.4 mile to the north of the project site (Converse Consultants, 2020, p. 6). No known active or potentially active faults trend toward or through the project site (refer to **Figure 4.7-1** and **Figure 4.7-2 below**). Therefore, impacts related to the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area, or based on other substantial evidence of a known fault during the life of the project would be less than significant.



Figure 4.7-1 REGIONALLY ACTIVE FAULTS

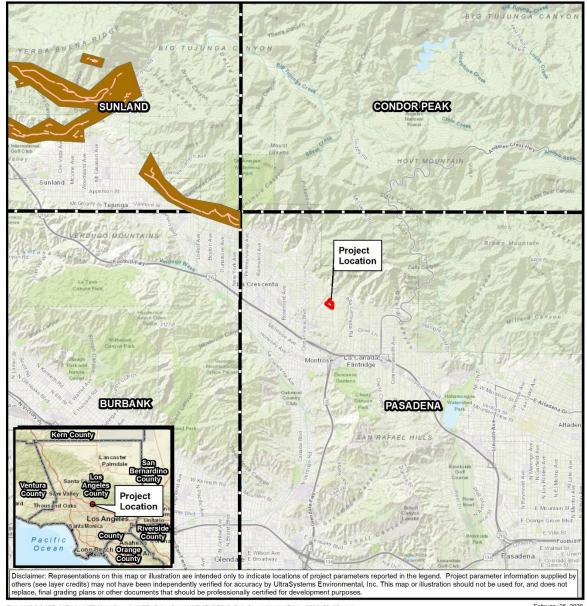




0.75 1.5 Kilometers



Figure 4.7-2
ALQUIST-PRIOLO EARTHQUAKE FAULT ZONES



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Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c)
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Environmental, Inc., 2020

February 25, 2020



Palm Crest Elementary School Modernization Project

> Alquist Priolo Earthquake Fault Zones





ii) Strong seismic ground shaking?

Less than Significant Impact

The site is located in Southern California, which is a seismically active region, and ground shaking resulting from earthquakes associated with nearby and more distant faults may occur at the project site. During the life of the project, seismic activity associated with active faults can be expected to generate moderate to strong ground shaking at the project site (Converse Consultants, 2019, p. 6).

There are a number of regional fault systems, which could produce ground shaking at the site during a major earthquake. **Table 4.7-1** shows the location of the known most capable faults within 50 kilometers (km) (31 miles) of the site (Converse Consultants, 2019, p. 6). The closest known fault to the project site with a mappable surface expression is the Sierra Madre fault, located approximately 0.7 km (0.4 mile) to the north of the project site.

Table 4.7-1
SUMMARY OF REGIONAL FAULTS

Fault Name and Section	Approximate Distance to Site (kilometers)	Maximum Moment Magnitude (M _{max})	Slip Rate (mm/year)
Sierra Madre	0.7	7.2	2.0
Sierra Madre Connected	0.7	7.3	2.0
Verdugo	6.5	6.9	0.5
Sierra Madre (San Fernando)	9.4	6.7	2.0
Raymond	11.3	6.8	1.5
Hollywood	11.6	6.7	1.0
San Gabriel	11.9	7.3	1.0
Santa Monica Connected alt 2	14.0	7.4	2.4
Elysian Park (Upper)	14.3	6.7	1.3
Northridge	17.6	6.9	1.5
Clamshell-Sawpit	20.8	6.7	0.5
Puente Hills (LA)	23.7	7.0	0.7
Santa Monica, alt 1	24.8	6.6	1.0
Santa Monica Connected alt 1	24.8	7.3	2.6
Newport-Inglewood, alt 1	25.5	7.2	1.0
Newport Inglewood Connected alt 2	25.5	7.5	1.3
Newport Inglewood Connected alt 1	25.5	7.5	1.3
Santa Susana, alt 1	27.9	6.9	5.0
Elsinore; W	29.8	7.0	2.5
Malibu Coast, alt 2	35.6	7.0	0.3
Malibu Coast, alt 1	35.6	6.7	0.3
Puente Hills (Santa Fe Springs)	35.8	6.7	0.7
S. San Andreas; SM	36.9	7.3	29
Holser, alt 1	37.3	6.8	0.4
San Jose	37.3	6.7	0.5
Anacapa-Dume, alt 2	38.2	7.2	3.0
Puente Hills (Coyote Hills)	40.0	6.9	0.7
Palos Verdes Connected	42.0	7.7	3.0
Palos Verdes	42.0	7.3	3.0
Simi-Santa Rosa	44.9	6.9	1.0



Fault Name and Section	Approximate Distance to Site (kilometers)	Maximum Moment Magnitude (M _{max})	Slip Rate (mm/year)
Cucamonga	46.4	6.7	5.0
Chino, alt 2	48.4	6.8	1.0
Chino, alt 1	48.5	6.7	1.0

Source: Converse Consultants, 2020. p. 6

Although there are a number of regional fault systems in the area, the proposed project would be constructed in accordance with applicable California Building Code (CBC) (Title 24, Part 2, California Code of Regulations) adopted by the legislature and used throughout the state, and requirements from State of California's Department of General Services, Division of the State Architect (DSA). The CBC provides minimum standards to protect property and the public welfare by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site.

The CBC requires the preparation of project-specific geotechnical reports prepared by a Certified Engineering Geologist or Geotechnical Engineer prior to construction of the proposed project. A project-specific geotechnical investigation report has been prepared for the proposed project. Site-specific recommendations provided in the geotechnical report would be incorporated into project plans that are reviewed by the DSA for school construction projects prior to approval of construction plans. Structures would also be inspected and signed off in the field by a certified DSA inspector to ensure that these requirements are implemented. For these reasons, impacts from strong seismic ground shaking would be less than significant.

Seismic-related ground failure, including liquefaction?

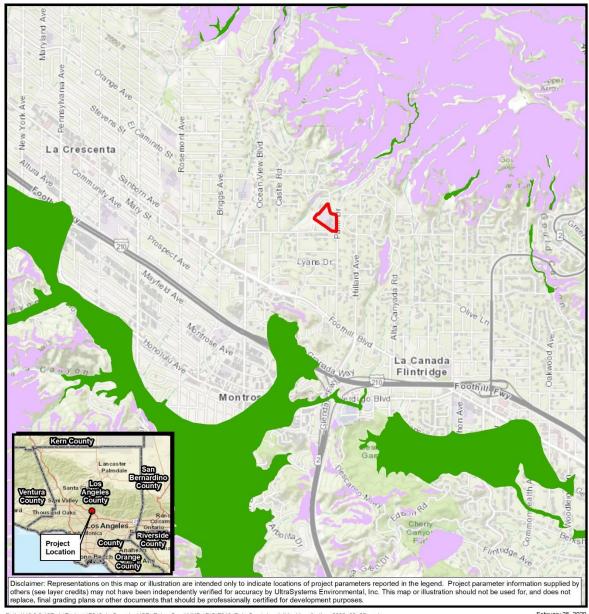
No Impact

Liquefaction is the sudden decrease in the strength of cohesionless soils due to dynamic or cyclic shaking. Saturated soils behave temporarily as a viscous fluid (liquefaction) and consequently lose their capacity to support the structures founded on them. The potential for liquefaction decreases with increasing clay and gravel content but increases as the ground acceleration and duration of shaking increase. Liquefaction potential has been found to be the greatest where the groundwater level and loose sands occur within 50 feet of the ground surface (Converse Consultants, 2020, p. 8).

The project site is not located within potential liquefaction zones (refer to **Figure 4.7-3** below). As part of the geotechnical report, soil borings were taken which revealed that there is no liquefiable layer within 50 feet below ground level, and since no ground water was encountered up to 50 feet below ground level, the project site is not susceptible to liquefaction (Converse Consultants, 2020, p. 8). Therefore, there would be no impacts.

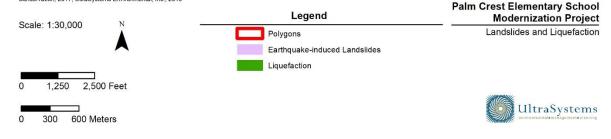


Figure 4.7-3 LANDSLIDES AND LIQUEFACTION



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Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esr China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (O) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, HERE, Garmin, Intermap, Increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Orlnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community; California Department of Conservation, 2017; UltraSystems Environmental, Inc., 2019

ebruary 25, 2020





iv) Landslides?

Less than Significant Impact

Landslides occur when the stability of the slope changes from a stable to an unstable condition. A change in the stability of a slope can be caused by a number of factors, acting together or alone. Natural causes of landslides include groundwater (pore water) pressure acting to destabilize the slope, loss of vegetative structure, erosion of the toe of a slope by rivers or ocean waves, weakening of a slope through saturation by snow melt or heavy rains, earthquakes adding loads to barely stable slope, earthquake-caused liquefaction destabilizing slopes, and volcanic eruptions.

The project site is located on a gently sloping hillside. The potential for seismically-induced landslides to affect the proposed site is considered to be low (Converse Consultants, 2020, p. 9). Therefore, impacts would be less than significant.

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

Less than Significant Impact

Construction

Section 402 of the federal Clean Water Act (CWA), as well as the State of California Porter-Cologne Water Quality Control Act (Porter-Cologne) requires construction projects that may potentially result in soil erosion to implement best management practices (BMPs) to eliminate or reduce sediment and other pollutants in stormwater runoff. If one or more acres of soil would be disturbed, a National Pollutant Discharge Elimination System (NPDES) permit is required to be obtained. NPDES permits establish enforceable limits on discharges, require effluent monitoring, designate reporting requirements, and require construction and post-construction BMPs to eliminate or reduce point and non-point source discharges of pollutants, including soil (SWRCB, 2020).

As further detailed in **Section 4.10**, the project applicant would be required to obtain an NPDES permit prior to project construction. This NPDES permit would require the Legally Responsible Person (LRP), such as the project owner, to prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to ground-disturbing construction activities to identify construction BMPs to eliminate or reduce soil erosion and pollutants in storm water, and non-storm water discharges (including soil erosion by wind) to storm water sewer systems and other drainages. Prior to NPDES permit issuance, the LRP would upload Permit Registration Documents (PRDs) to the State Water Resources Control Board (SWRCB) online Stormwater Multi-Application and Report Tracking System (SMARTS). PRDs include a Notice of Intent (NOI), site map, risk assessment, SWPPP, post-construction water balance, annual fee, and signed certification statement by the LRP attesting to the validity of the information. These preventive measures during construction are intended to eliminate or reduce soil erosion. Therefore, construction related impacts regarding soil erosion or the loss of top soil would be less than significant.

Operation

The project site is located within a gently sloping hillside. Impacts from soil erosion or the loss of topsoil would be less than significant because the proposed project must be designed to minimize, to the maximum extent practicable, the introduction of pollutants that may result in significant impacts,



generated from site runoff to the storm water conveyance system. Therefore, the potential for substantial soil erosion or the loss of topsoil would be less than significant.

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

Less than Significant Impact

The potential impact of landslides, lateral spreading, subsidence, liquefaction and collapse is discussed below.

Landslides

The potential for seismically induced landslides to affect the proposed site is considered to be low (Converse Consultants, 2020, p. 9). Therefore, impacts would be less than significant.

Lateral Spreading

Seismically-induced lateral spreading involves primarily lateral movement of earth materials due to ground shaking. It differs from the slope failure in that complete ground failure involving large movement does not occur due to the relatively smaller gradient of the initial ground surface. Lateral spreading is demonstrated by near-vertical cracks with predominantly horizontal movement of the soil mass involved. The topography at the project site and in the immediate vicinity of the site is gently sloping, with no significant nearby slopes or embankments and bedrock. Under these circumstances, the potential for lateral spreading at the project site is considered low (Converse Consultants, 2020, pp. 8-9). Therefore, impacts from lateral spreading would be less than significant.

Subsidence

Soil shrinkage and/or bulking as a result of remedial grading depends on several factors including the depth of over-excavation, the grading method and equipment utilized, and average relative compaction. The March 3, 2020 Geotechnical Investigation Report prepared by Converse Consultants for the project provided preliminary estimates of the bulking and shrinkage factors for various units of earth material at the site. The approximate shrinkage factor for the native alluvial soils is estimated to range from five to fifteen percent. For estimation purposes, ground subsidence may be taken as 0.15 feet as a result of remedial grading (Converse Consultants, 2020, p. 18). The proposed project would adhere to the geotechnical and design recommendations of the geotechnical report to ensure than soil conditions would not lead to significant subsidence impacts. Therefore, impacts would be less than significant.

Liquefaction

As part of the geotechnical report, soil borings were taken which revealed that there is no liquefiable layer within 50 feet below ground level, and since no ground water was encountered up to 50 feet below ground level, the project site is not susceptible to liquefaction (Converse Consultants, 2020, p. 8). Therefore, there would be no impacts.



Collapse

Collapsible soils consist of loose, dry, low-density materials that collapse and compact with the addition of water or excessive loading. These soils are distributed throughout the southwestern United States, specifically in areas of young alluvial fans, debris flow sediments, and loess (wind-blown sediment) deposits. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. This saturation eliminates the clay bonds holding the soil grains together. Similar to expansive soils, collapsible soils result in structural damage such as cracking of the foundation, floors, and walls in response to settlement.

The geotechnical investigation prepared for the proposed project states that, based on the field exploration, laboratory testing, and analyses of subsurface conditions at the site, remedial grading will be required to prepare the site for support of the proposed structures that are constructed with conventional shallow footings. To reduce differential settlement, variations in the soil type, degree of compaction and thickness of the compacted fill, the thickness of compacted fill placed underneath the shallow footings should be kept uniform. (Converse Consultants, 2020, p. 13).

The earth materials encountered during investigation consist of existing fill soils placed during previous site grading operations over alluvial sediments to a maximum depth of 51.5 feet below ground surface (bgs). Undocumented fills, ranging from three to four feet in thickness were encountered in the borings. Deeper artificial fill may exist at the site. The fill encountered consists primarily of silty sands, sands and gravels. The alluvial sediments consisted primarily of silty sands, sands, sand and gravel mixtures with some cobbles and possible boulders (Converse Consultants, 2020, p. 4).

Ten exploratory borings (BH-1 through BH-10) were drilled within the project site to evaluate the subsurface earth materials for the proposed project. Borings BH-5 through BH-7 were drilled to a maximum depth of approximately 51.5 feet bgs. Borings BH-1 through BH-4, and BH-8 through BH-10 were drilled using a six-inch diameter hand auger. Standard Penetration Tests (SPTs) were performed in selected borings at selected intervals (Converse Consultants, 2020, p. 2). Percolation tests were performed utilizing borehole BH-1, BH-4, and BH-5. The field tests resulted in an average percolation rate of 16.58 inches/hour and a lowest percolation rate of 16.36 inches/hour in BH-1, an average percolation rate of 2.22 inches/hour and a lowest percolation rate of 2.16 inches/hour in BH-5, and an average percolation rate of 2.17 inches/hour and a lowest percolation rate of 0.56 inches/hour in BH-5. Results of the geotechnical investigation indicate that the site is suitable from a geotechnical standpoint for the proposed development, provided that the recommendations contained in the March 3, 2020 *Geotechnical Investigation Report* by Converse Consultants are incorporated into the design and construction of the project (Converse Consultants, 2020, p. v).

Site-specific recommendations provided in the geotechnical report would be incorporated into project plans that are reviewed by the DSA for school construction projects prior to approval of construction plans. Structures would also be inspected and signed off in the field by a certified DSA inspector to ensure that these requirements are implemented. Therefore, impacts due to collapsible soils would be less than significant.



d) Would the project be located on expansive soil, as defined in Table 18-1 B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?

Less than Significant Impact

Expansive soils shrink and swell with changes in soil moisture. Soil moisture may change from landscape irrigation, rainfall, and utility leakage. Repeated changes in soil volume due to water content fluctuations may compromise structure foundations. Expansive soils are commonly very fine-grained with high to very high percentages of clay. Design provisions such as adequate reinforcements, deeper foundations or other measures may help alleviate the effects of soils expansion but may not completely eliminate the problem.

The near-surface earth materials on the project site have a "Very Low" expansion potential. However, the onsite soil materials will be mixed during grading and the expansion potential might change (Converse Consultants, 2020, p. 18). To mitigate for expansive soil, the *Geotechnical Investigation Report* recommends the following: that the expansion potential of site soils should be verified after the grading as slabs, foundations and pavement placed directly on expansive subgrade soil will likely crack over time. If the expansion potential of mixed soil is found to be above 20, Converse Consultants recommends mixing onsite soil used for support of slabs, foundations, walkways, and pavements with five percent cement to reduce expansion potential. Any proposed import fill should have an expansion index less than 20 and should be evaluated and approved by Converse Consultants prior to import to the site (Converse Consultants, 2020, p. 18).

Site-specific recommendations provided in the geotechnical report would be incorporated into project plans that are reviewed by the DSA for school construction projects prior to approval of construction plans. Structures would also be inspected and signed off in the field by a certified DSA inspector to ensure that these requirements are implemented. Therefore, impacts due to location on expansive soils would be less than significant.

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

No Impact

The project does not propose septic tanks or alternative waste water disposal systems. The project would connect to the existing wastewater infrastructure. Therefore, the project would have no impact regarding septic tanks or alternative wastewater disposal systems.

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

Less than Significant Impact with Mitigation Incorporated

The entire project site boundary is encompassed by Quaternary Young Alluvial Fan Deposits (Qyf). This deposit consists of lightly consolidated to cemented, undissected to slightly dissected deposits of unsorted boulders, cobbles, gravel, and sand that dates to the Holocene (11,650 years before present [ybp] to present) and late Pleistocene (126,000 to 11,650 years ybp) (Yerkes and Campbell, 2005).



The entire project site boundary is also described as "older Quaternary Alluvium, derived as alluvial fan deposits from the San Gabriel Mountains just to the north via the drainage from Hall Beckley Canyon that currently flows immediately to the north and west." (McLeod 2020:1). Excavation into deposits of older Quaternary Alluvium, "may well encounter significant fossil vertebrate remains" (McLeod 2020:2). Substantial excavations in the project area should be monitored to professionally recover any fossil remains discovered. With implementation of Mitigation Measure **GEO-1**, potential impacts related to paleontological resources would be less than significant.

Mitigation Measure

MM GEO-1: If paleontological resources are uncovered during construction activities, the contractor shall halt construction activities in the immediate area and notify the La Cañada Unified School District. The on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain onsite for the duration of the ground disturbance to ensure the protection of any other resources that may be in the area.

Level of Significance After Mitigation

With implementation of **MM GEO-1**, potential impacts to paleontological resources would be reduced to a less than significant level.



4.8 Greenhouse Gas Emissions

	Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			Х	
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			Х	

Constituent gases that trap heat in the Earth's atmosphere are called greenhouse gases (GHGs), analogous to the way a greenhouse retains heat. GHGs play a critical role in the Earth's radiation budget by trapping infrared radiation emitted from the Earth's surface that would otherwise have escaped into space. Prominent GHGs contributing to this process include carbon dioxide ($\rm CO_2$), methane ($\rm CH_4$), ozone, water vapor, nitrous oxide ($\rm N_2O$), and chlorofluorocarbons (CFCs). Without the natural heat-trapping effect of GHG, the earth's surface would be about 34°F cooler. This natural phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. However, anthropogenic emissions of GHGs at rates higher than natural biogenic release rates are responsible for enhancing the Greenhouse Effect. They have led to a trend of unnatural warming of the Earth's natural climate known as global warming or climate change, or more accurately Global Climate Disruption. Emissions of the gases that induce global climate disruption are attributable to human activities associated with industrial/manufacturing, utilities, transportation, residential, and agricultural sectors.

The global warming potential (GWP) is the potential of a gas or aerosol to trap heat in the atmosphere. Individual GHG compounds have varying GWP and atmospheric lifetimes. The reference gas for the GWP is CO_2 ; CO_2 has a GWP of one. The calculation of the CO_2 equivalent (CO_2 e) is a consistent methodology for comparing GHG emissions since it normalizes various GHG emissions to a consistent metric. Methane's warming potential of 25 indicates that methane has a 25-times greater warming effect than CO_2 on a molecule per molecule basis. A CO_2 e is the mass emissions of an individual GHG multiplied by its GWP. GHGs are often presented in units called tonnes (t) of CO_2 e (t CO_2 e).¹²

Types of Greenhouse Gases

This analysis focused upon emissions of CO_2 , CH_4 , and N_2O . Other Kyoto Protocol GHGs, such as chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, are emitted in negligible quantities by project sources, so they are not discussed further.

Carbon Dioxide (CO_2): CO_2 is a colorless, odorless gas consisting of molecules made up of two oxygen atoms and one carbon atom. CO_2 is produced when an organic carbon compound (such as wood) or

¹² A tonne is a metric ton, or 1,000 kilograms.



fossilized organic matter (such as coal, oil, or natural gas) is burned in the presence of oxygen. Whereas the natural production and absorption of CO_2 is achieved through the terrestrial biosphere and the ocean, humankind has altered the natural carbon cycle by burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700s, each of these activities has increased in scale and distribution.

Methane (CH_4): CH_4 is a colorless, odorless non-toxic gas consisting of molecules made up of four hydrogen atoms and one carbon atom. CH_4 has both natural and anthropogenic sources. It is combustible, and it is the main constituent of natural gas—a fossil fuel. It is also released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropogenic sources include fossil-fuel combustion and biomass burning.

Nitrous Oxide (N_2O) : N_2O is a colorless, non-flammable gas with a sweetish odor, commonly known as "laughing gas," and sometimes used as an anesthetic. N_2O is produced naturally by microbial processes in soil and water, including those reactions that occur in nitrogen-containing fertilizer. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. N_2O is used as an aerosol spray propellant, e.g., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh, in rocket engines and in race cars.

GHG Emission Levels

Per the World Resources Institute (WRI, 2020) in 2014, total worldwide GHG emissions were estimated to be 44,204 million (M) t of CO_2e (MtCO₂e) and GHG emissions per capita worldwide were 6.13 tCO₂e. These emissions exclude GHG emissions associated with the land use, land-use change and forestry sector, and bunker fuels. The WRI reports that in 2014, total GHG emissions in the U.S. were 6,371 MtCO₂e, with average GHG emissions per capita of 20.00 tCO₂e and total GHG emissions in California were 454.5 MtCO₂e in 2014, with average GHG emissions per capita of 11.75 tCO₂e.

California has a larger percentage of its total GHG emissions coming from the transportation sector (56%) than does the U.S. (31%) and a smaller percentage of its total GHG emissions from the electricity generation sector; California has 13%, while the U.S. has 43%.

The 2016 Climate Action Plan (CAP) for La Cañada Flintridge (Cardine, 2016), included a GHG inventory of the major sources and quantities of GHG emissions produced in the city in 2014 and compared it with a baseline 2007 GHG inventory. According to the 2014 inventory the community generated approximately 203,775 tCO $_2$ e, of which 58 percent were from mobile sources and another 67,997 tCO $_2$ e (33%) were generated by electricity and natural gas usage. In comparison to the 2007 Inventory, the community showed a 33 percent decrease in GHG emissions. In addition, the city's per capita GHG emissions decreased from 14.3 tCO $_2$ e per person in 2007 to 9.4 tCO $_2$ e per person in 2014.

GHG Thresholds

To provide guidance to local lead agencies on determining significance of GHG emissions in their CEQA documents, the SCAQMD Board adopted an Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans (SCAQMD, 2008). The Interim Guidance uses a tiered approach to determining significance. Although this Interim Guidance was developed primarily to apply to stationary source/industrial projects where the SCAQMD is the lead agency under CEQA, in absence



of more directly applicable policy, the SCAQMD's Interim Guidance is often used as general guidance by local agencies to address the long-term adverse impacts associated with global climate change.

Although the proposed project does not fit the typical land use project, the use of the Tier 3 quantitative thresholds for residential and commercial projects is a reasonable metric. The SCAQMD proposes that if a project generates GHG emissions below 3,000 tCO₂e annually, it could be concluded that the proposed project's GHG contribution is not cumulatively considerable and is therefore less than significant under CEQA. If the proposed project generates GHG emissions above the threshold, the analysis must identify mitigation measures to reduce GHG emissions.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact

Construction GHG emissions were assessed using CalEEMod Version 2016.3.2. Estimated emissions were compared with SCAQMD Interim Thresholds to determine potential significance. Even though construction equipment would emit minor amounts of CH_4 and N_2O , the predominant GHG emission during construction would be CO_2 from construction equipment. **Table 4.8-1** shows the estimated CO_2 e emissions during each construction phase. GHG emissions by year are shown in **Table 4.8-2**. Total construction emissions would be **284** tCO_2 e. Since construction GHG emissions would be well below the SCAQMD threshold of 3,000 tCO_2 e annually, the proposed project's impacts from GHG contribution would be less than significant and no mitigation would be required.

Table 4.8-1
CONSTRUCTION GHG EMISSIONS, BY PHASE

Construction Phase	To	otal GHG Emi	ssions (tonn	(tonnes)	
Construction Phase	CO ₂	CH ₄	N ₂ O	CO ₂ e	
Demolition - 2021	32.71	0.0049	0.0000	32.83	
Site Preparation - 2021	4.52	0.0014	0.0000	4.56	
Grading - 2021	15.26	0.0040	0.0000	15.36	
Building Construction - 2021	50.33	0.0140	0.0000	50.68	
Building Construction - 2022	90.19	0.025	0.0000	90.82	
Inside Painting – 2022	20.99	0.0013	0.0000	21.03	
Inside Painting – 2023	20.80	0.0012	0.0000	20.83	
Parking Lot and Dropoff Area - 2023	48.08	0.012	0.0000	48.39	
Totals	282.89	0.064	0.0000	284.49	

Operational emissions were not calculated since changes in long-term impacts from the proposed project are not expected. However, following SCAQMD guidance, it is common practice to "amortize demolition and construction GHG emissions over 30 years" (SCAQMD, 2008b). The amortized value would be **9.5 tCO₂e** per year. Therefore, long-term GHG emissions due to the proposed project would have less than significant impacts, and no mitigation would be required.



<u>Table 4.8-2</u> CONSTRUCTION GHG EMISSIONS, BY YEAR

Year	Tonnes CO2e
2021	103.42
2022	111.85
2023	69.22
Total	284

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact

The City's 2016 CAP, which was adopted by the La Cañada Flintridge City Council on June 21, 2016 (Cardine, 2016), developed a robust list of climate action measures organized in six focus areas: (1) energy; (2) water; (3) transportation; (4) solid waste; (5) urban greening; and (6) adaptation. However, since changes in long-term, operational GHG emissions are not expected and the construction emissions are short-term, the project would not be expected to conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs. Therefore, the project would have a less than significant impact in this regard and no mitigation measures are required.



4.9 Hazards and Hazardous Materials

	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, use, or disposal of hazardous materials?		Х		
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		Х		
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		X		
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
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?				х
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		Х		
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

The analysis in this section is based in part upon the *Phase I Environmental Site Assessment* (Phase I ESA) prepared by Citadel EHS dated February 10, 2020 (Refer to **Appendix H1**). The Phase I ESA presents information conducted from a site reconnaissance of the project area, historical developments of the project site, and a comprehensive database search to determine if the project



site contains Recognized Environmental Conditions (RECs).¹³ This analysis is also based on the results of the *Asbestos Inspection Report* and the *Lead-Based Paint and Ceramic Tile Inspection Report*, both of which were prepared by Executive Environmental and dated March 6, 2020 (see **Appendices G2** and **G3**, respectively).

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

Less than Significant Impact with Mitigation Incorporated

The Phase I did not identify RECs on the project site. However, because all buildings on the project site, with exception of the Multipurpose Building, were built prior to 1978, additional focused site inspections were conducted. Accordingly, site inspections for Asbestos-Containing Materials (ACMs), Lead-Based Paint (LBP) and Ceramic Tiles were conducted in January 2020 to determine the presence or absence of these materials.

The focused site inspection report for ACMs identified, in both the Main House and Back House, the presence of potential RECs such as light ballasts (potentially) containing Polychlorinated Biphenyls (PCBs), fluorescent lightbulbs (potentially) containing mercury, and air conditioning units that may contain freon (Executive Environmental, 2020a, p. 20). These potential RECs will be treated as known RECs and dealt with as required by federal, state, and local regulations, and as specified by **MM HAZ-1**.

In addition, due to the age of onsite structures, with the exception of the Multipurpose Building, it is assumed that the original lead or lead-soldered water pipes remain in place, and lead may be present in the subsurface soils due to leaching or corrosion.

For the purpose of this analysis, the severity of potential impacts related to hazardous substances would be associated with the potential mobilization of hazardous materials through demolition processes, excavation of contaminated soil, or handling of hazardous materials, resulting in exposure to humans and the environment. Conditions of contamination could exist as either the result of previous land use residuals, or as the result of accidental releases related to demolition of the existing structures. Hazardous materials encountered during demolition and construction of the proposed project would require special handling to minimize risks of human and environmental exposure.

Excavated soil would be classified as hazardous waste if the soil contaminants exceeded criteria identified in CCR Title 22. Such soil would require remediation (treatment) onsite, would be transferred to an offsite processing facility, or transported to a disposal facility that is permitted to accept such wastes. Excavated areas would then be backfilled by clean imported soil.

When determining the severity of impacts, it was assumed that the project and all contractors would comply with all applicable federal, state, and local laws and regulations regarding hazardous materials. Specific mitigation measures are designed to minimize or avoid potential impacts resulting from construction and operation of the project, and are recommended when it is determined that project design or best management practices would not fully mitigate an impact. Many of the

¹³ The term Recognized Environmental Conditions is defined in Section 1.1.1 of the American Society of Testing and Materials (ASTM) Standard Practice as the presence or likely presence of any hazardous substances or petroleum products in, at or on a property due to any release to the environment; under conditions indicative of a release to the environment; under conditions that pose a material threat of a future release to the environment (Converse Consultants, 2019. p. 1).



recommended measures were proposed in the project's *Asbestos Inspection Report* (Environmental Executives, 2020a, p. 22) and *Lead-Based Paint and Ceramic Tile Inspection* (Environmental Executives, 2020b, p. 9).

Construction

Recognized Environmental Hazards

The potential RECs (e.g., PCBs, mercury, and freon) would be treated as known RECs and would be handled and removed from the project site as directed in **MM HAZ-1**.

Asbestos Containing Materials (ACMs)

The asbestos inspection identified ACMs in 40 of the 173 samples collected from throughout the project site; these ACMs were in the form of chrysotile, (e.g. white asbestos), and were present in quantities ranging from less than 1 percent to 40 percent of the sample (Executive Environmental, 2020a, pp. 2-19; see **Appendix H2**).

South Coast Air Quality Management District (SCAQMD) Rule 1403, Asbestos Emissions from Renovation/Demolition Activities, regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and cleanup procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of structures with asbestos-containing materials, asbestos storage facilities, and waste disposal sites. The federal Occupational Safety and Health Administration (OSHA) also regulates asbestos as a potential worker safety hazard.

Mandatory compliance with Rule 1403 and with OSHA regulations would reduce potential impacts to less than significant levels. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release friable asbestos fibers unless proper precautions are taken. ACMs identified within existing buildings would be removed prior to demolition, as required, and in accordance with applicable laws, including guidelines of OSHA. With removal of any existing hazardous materials prior to demolition as required by **MM HAZ-1** and in accordance with applicable laws, potential impacts resulting from the presence of ACMs would be less than significant.

Lead-Based Paint (LBP)

Lead is a highly toxic metal that affects virtually every system of the body. Lead-based paint is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm 2 (or 5,000 µg/g or 0.5% by weight) or more of lead. The *Lead-Based Paint and Ceramic Tile Inspection* for the proposed project identified LBP throughout the Main House, including the basement, exterior, and roof; the Back House interior, exterior, and crawlspace, and in the fountain southwest of the main building (Executive Environmental, 2020b, pp. 3-8).

Lead in Soil

Due to the age of the onsite structures, it is assumed that lead may be present in the subsurface soils due to leaching or corrosion of lead from drinking water pipes, and lead-contaminated soils and lead dust may be disturbed during ground-disturbing activities, during demolition or construction. If the original drinking water pipes are found in situ during demolition and soil samples from the project



site contain lead levels of 1,000 mg/kg (California Code of Regulations Title 17 § 35036) or greater, mitigation measure **HAZ-2** would be implemented.

With removal of any existing hazardous materials prior to demolition as required by **MM HAZ-1** and **MM HAZ-2**, and in accordance with applicable federal, state, and local laws, potential impacts resulting from the presence of LBP and lead-contaminated soils would be less than significant.

Common Construction Hazards

The proposed project would include the transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials commonly associated with construction activities. Chemical transport, storage, and use would comply with Resource Conservation and Recovery Act (RCRA); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); California Hazardous Waste Control Law;¹⁴ OSHA; and Los Angeles County Fire Authority requirements.

The Contractor would be required by the La Cañada Unified School District (District) to prepare and submit to the District a Construction Safety Management Plan, based on OSHA standards. This plan would include provisions for proper training of construction crews regarding the use, storage and disposal of any hazardous materials or waste. In addition, the plan would include safety procedures for implementation in the unlikely event of an unauthorized release of hazardous materials.

Mitigation Measures

MM HAZ-1

Due to the identification of the presence of ACMs and LBP on the project site, in addition to the potential RECs (light ballasts [potentially] containing Polychlorinated Biphenyls [PCBs], fluorescent lightbulbs [potentially] containing mercury, and air conditioning units that may contain freon) identified on page 20 of the *Asbestos Inspection Report* prepared by Executive Environmental dated March 6, 2020, testing shall be conducted prior to demolition and a Hazardous Material Abatement Plan shall be prepared which shall incorporate the test results.

Prior to the commencement of demolition, the project proponent shall retain a qualified environmental consultant to prepare a detailed Hazardous Material Abatement Plan; this plan shall be approved by the appropriate agencies prior to ground-disturbing activities. The Hazardous Material Abatement Plan shall be implemented prior to demolition activities to ensure that any hazardous materials on the proposed project site are properly identified, removed, and disposed of offsite at a landfill that can accept asbestos, and that any other hazardous materials including, but not limited to, PCBs, mercury, and freon, are removed from the site to prevent exposure to workers and the general public.

The Hazardous Material Abatement Plan shall include a site-specific scope of work and specifications for the proper disposal of hazardous materials. The Hazardous Material Abatement Plan shall be prepared and implemented in accordance with the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) and all other federal and state standards and regulations, including the California

¹⁴ Codified in California Health and Safety Code, Division 20, Chapter 6.5, Hazardous Waste Control.



Department of Toxic Substances Control (DTSC), California Department of Education (CDE), and Office of Public School Construction (OPSC).

A qualified environmental consultant shall be present on the project site during demolition activities and shall monitor compliance with the Hazardous Material Abatement Plan.

MM HAZ-2

Due to the potential presence of lead at the project site, a Soil Management Plan (SMP) shall be prepared. Prior to the commencement of grading and excavation, the Project Applicant shall retain a qualified environmental consultant to prepare a SMP that complies with all applicable regulatory requirements. The SMP shall be submitted to the City of La Cañada Flintridge Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The SMP shall contain the following:

- The recommendations of the Health Hazardous Materials Division (HHMD), Los Angeles County Certified Unified Program Agency (LACUPA) and Los Angeles County Fire Department (LACFD).
- The SMP shall require that the Project Applicant remove and properly dispose of impacted materials in accordance with applicable requirements of the DTSC, and the County of Los Angeles Fire Department.
- The SMP shall require that contaminated soils be transported from the project site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment.
- The SMP shall be implemented during excavation and grading activities.
- A qualified environmental consultant shall be present on the project site during
 grading and excavation activities in the known or suspected locations of
 contaminated soils, and shall be on call at other times as necessary, to monitor
 compliance with the SMP and to actively monitor the soils and excavations for
 evidence of contamination.

Level of Significance After Mitigation

After implementation of MM HAZ-1 and MM HAZ-2 above, potential impacts from ACMs and LBP, and other RECs during the project construction phase would be less than significant.

Operation

The project would replace or modernize classroom buildings and improve the parking lots at Palm Crest Elementary School. The project would require the transport, storage, use, and disposal of certain chemicals typically used for cleaning and landscaping supplies, such as commercial cleansers, paints, and lubricants for maintenance and upkeep of school grounds. The use of these materials would be subject to District guidelines and would be stored, handled, and disposed of in accordance with applicable regulations. The proposed project would not involve the routine transport, use, or



disposal of quantities of hazardous materials that may create a significant hazard to the public or environment.

Once the project is operational, the District's Maintenance and Operations Department has standards and management procedures for the handling of hazardous materials that require District employees be trained in the use, storage and disposal of hazardous materials or waste, and safety procedures to be implemented in the unlikely event of a release of hazardous materials.

Additionally, a Preliminary Environmental Assessment will be prepared for the project site. Therefore, potential impacts from the transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials to the public or the environment during the operational phase of the project would be less than significant, and mitigation is not proposed.

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

Less than Significant Impact with Mitigation Incorporated

Construction

As discussed in Section 4.9 a) above, the structures on the project site contain ACMs, LBPs, and potentially other RECs (Executive Environmental, 2020a, p20). Therefore, mitigation is warranted to reduce potential impacts from these materials during the construction phase of the project.

Operation

Once construction is complete and the project is operational, the District's Maintenance and Operations Department has standards and management procedures for the handing of hazardous materials that require District employees be trained in the use, storage and disposal of hazardous materials or waste, and safety procedures to be implemented in the unlikely event of a release of hazardous materials.

Level of Significance After Mitigation

After implementation of MM HAZ-1 and MM HAZ-2 above, potential impacts from ACMs, LBP, and other potential RECs¹⁵ during the project construction phase would be less than significant.

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

Less than Significant Impact with Mitigation Incorporated

Construction

There are no other schools within one-quarter of a mile of the project site. As analyzed in Section 4.9 a), the structures on the project site contain ACMs and LBPs. Therefore, mitigation is

light ballasts (potentially) containing Polychlorinated Biphenyls (PCBs), fluorescent lightbulbs (potentially) containing mercury, and air conditioning units that may contain freon (Executive Environmental 2020a, p. 20).



warranted to reduce potential impacts from these materials during the construction phase of the project. Mitigation Measures **HAZ-1** and **HAZ-2** would ensure that the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste during the construction phase of the proposed project.

Level of Significance After Mitigation

After implementation of **MM HAZ-1** and **MM HAZ-2** above, potential impacts from ACMs, LBP, and other RECs¹⁶ during the project construction phase would be less than significant.

Operation

Once construction is complete and the project is operational, the District's Maintenance and Operations Department has standards and management procedures for the handing of hazardous materials that require District employees be trained in the use, storage and disposal of hazardous materials or waste, and safety procedures to be implemented in the unlikely event of a release of hazardous materials. Therefore, impacts regarding release of hazards during operation would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 or a list of hazardous substance release sites identified by the state Department of Health Services pursuant to § 25356 of the Health & Safety Code and, as a result, would it create a significant hazard to the public or the environment?

No Impact

Government Code § 65962.5 requires the DTSC to compile and update, at least annually, lists of the following:

- Hazardous waste and substances sites from the DTSC EnviroStor database.
- Leaking underground storage tank (LUST) sites by county, and fiscal year from the State Water Resources Control Board (SWRCB) GeoTracker database.
- Solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit.
- SWRCB Cease and Desist Orders (CDOs) and Cleanup and Abatement Orders (CAOs). 17
- Hazardous waste facilities subject to corrective action by DTSC pursuant to Health and Safety Code (HSC) § 25187.5.¹⁸

¹⁶ Light ballasts (potentially) containing Polychlorinated Biphenyls (PCBs), fluorescent lightbulbs (potentially) containing mercury, and air conditioning units that may contain freon (Executive Environmental 2020a, p. 20).

¹⁷ CDOs and CAOs may be issued for discharges of domestic sewage, food processing wastes, or sediment that do not contain hazardous materials.

¹⁸ If corrective action is not taken on or before the date specified in a CDO or CAO, or if immediate corrective action is necessary to remedy or prevent an imminent substantial danger to the public health, domestic livestock, wildlife, or the environment, the DTSC may take, or contract for, corrective action and recover the cost from a responsible party.



These lists are collectively referred to as the "Cortese List." The project site is not listed on the Cortese List and there are no Cortese-listed properties located within 0.5 mile of the project site (EPA, 2020). Therefore, the project would have no impact in this regard.

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?

No Impact

An Airport Land Use Compatibility Plan (ALUCP) is a planning document that contains policies for promoting safety and compatibility between public use airports and the communities that surround them. There are 15 airports within the Los Angeles County Airport Land Use Commission's (ALUC's) jurisdiction. Five are county-owned, nine are owned by other public entities, and one is privately owned. The Los Angeles County ALUC has a countywide plan, the Los Angeles County Airport Land Use Compatibility Plan (LA County Department of Regional Planning ALUC, 2020). The Bob Hope Airport (previously named the Burbank Airport) is discussed on page 3 of the Los Angeles County ALUC document. This airport was established in 1930 as a private airfield and is now operated as a public airport on 435 acres. No master plan has been completed for this airport (Los Angeles County Department of Regional Planning, 2004, p. 4)

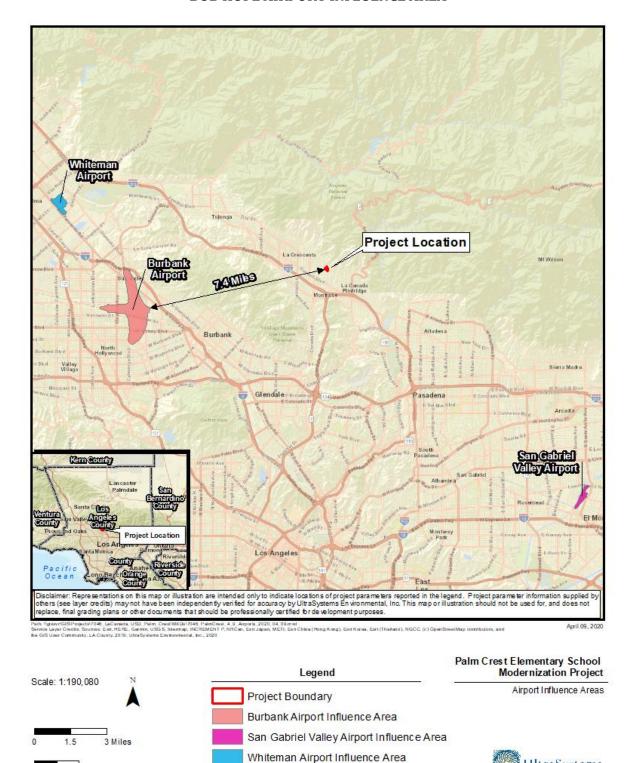
An Airport Influence Area (AIA) is the area in which current or future airport-related noise, overflight, safety, and/or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses. It includes airport owned property, Runway Protection Zones (RPZ), inner and outer safety zones and Community Noise Equivalent Level (CNEL) contours. According to Section 1.3.2 (page 25) of the State Airport Land Use Planning Handbook, "The planning boundary of the ALUCP is the airport influence area, and is established by the ALUC after a hearing and consultation with the involved agencies (PUC § 21675 [c]).

Airport Influence Area for the Bob Hope Airport

The Bob Hope Airport, the nearest public airport to the project site, is approximately 7.5 miles southwest of the project site. This airport is within the oversight of the Los Angeles County ALUC. The current Bob Hope Airport Influence Area Map was created in 2003 (LA County Airport Land Use Commission, 2003). The project site is not within the airport influence area and is not located within two miles of an existing airport (refer to **Figure 4.9-1**). Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the project area. The project would have no impact in this regard.



Figure 4.9-1 BOB HOPE AIRPORT INFLUENCE AREA



3 Kilometers

UltraSystems



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

Less than Significant Impact with Mitigation Incorporated

Regional emergency response plans relevant to the project site include the City's Local Hazard Mitigation Plan, the Los Angeles County Emergency Response Plan, and the County's All-Hazard Mitigation Plan. Additionally, the La Cañada Unified School District has a La Cañada Elementary School SB 187 Comprehensive School Safety Plan that covers all aspects of campus safety (LCUSD, 2016).

Construction

During the construction period, the proposed project would generate temporary construction-related truck and automobile traffic. Traffic during the construction phase would include construction workers traveling to and from the project site, trucks hauling construction materials to the site and transporting material away from the site on public roadways. Other than delivery of materials and supplies to the project site and the hauling of debris and soil from the project site, construction of the proposed project would be confined within the campus boundaries. As such, MM HAZ-3 is recommended to ensure that the project would have a less than significant impact regarding emergency response during the construction phase.

Mitigation Measure

MM HAZ-3

The General Contractor shall submit a detailed Construction Management Plan to be reviewed and approved by the La Cañada Unified School District. The Construction Management Plan shall specify that the Construction Manager will schedule truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as feasible for construction operations. All measures including identified truck routes and designated employee parking areas shall be included in the Construction Management Plan. The Plan shall include but is not limited to the following provisions:

- a) Identification of permitted hours for construction related deliveries and removal of heavy equipment and material;
- b) Identification of where construction workers would park their personal vehicles during project construction with a requirement that at no time shall construction worker vehicles block any driveways. If complaints are received by the project applicant regarding issues with construction worker vehicle parking, the project applicant shall identify alternative parking options for construction workers so as not to interfere with parking availability;
- c) Identification of how emergency access to and around the project site will be maintained during project construction;
- d) Identification of haul routes for delivery or removal of heavy and/or oversized equipment or material loads. Where feasible, delivery or removal of oversized equipment or material loads shall be conducted during off-peak hour traffic periods;



- e) Maintain pedestrian and bicycle connections around the project site and safe crossing locations shall be considered for all pedestrian detours; and
- f) Maintain the security of the project site by erecting temporary fencing during the construction phase of the project.

Level of Significance After Mitigation

After implementation of mitigation measure **HAZ-3** above, the project would have less than significant construction-phase impacts on pedestrian and bicycle facilities and less than significant impacts regarding emergency response during the construction phase.

Operation

The project site is an existing school campus that would continue to adhere to the District's and school's emergency response plans and policies. The project would not interfere with the school's evacuation routes or plans. Additionally, the project would modify the existing designated drop off/pick up area for students along Palm Drive to improve traffic flow and would add a new parking lot north of the existing parking lot along Palm Drive. The project would not add any new roads or impact any emergency access routes in the city. The City's Local Hazard Mitigation Plan states that the major arterial highways in the city are Foothill Boulevard, which runs east to west, and Angeles Crest Highway, which runs north to south and terminates at the intersection of Foothill Boulevard. Additional points of entry and exit to the city include Chevy Chase Drive, Oak Grove Drive, and Ocean View Boulevard. Impacts to any of these major points can render local roads unusable (City of La Cañada Flintridge, 2019, p. 28). Palm Crest Elementary School is not located on any of the aforementioned roadways. Therefore, project operation would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less than Significant Impact

The project site is located in a developed area with single-family residential development to the north, south, east, and west. As detailed in **Section 4.20**, the project site is located within a Very High Fire Hazard Severity Zone Local Responsibility Area. The City's General Plan states, "Properties located in these designated zones are subject to more stringent building code requirements than properties outside of these zones" (ICF Jones and Stokes, 2013, p. 5-15). Specifically, the project is required to meet Chapter 7a of the California Fire Code. The Division of State Architect is required to review plans for school buildings. The school district would implement the building and fire code provisions in the design of the project. During the plan review process, the Division of State Architect would review water flow and distribution requirements for the project to ensure adequate water pressure is available for fire protection systems in the building. The proposed project would be required to meet all applicable building and fire code provisions and would be designed with sprinkler and other fire-safety measures. Therefore, the project would have a less than significant impact regarding wildland fires.



4.10 Hydrology and Water Quality

	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 ground water quality?			X	
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			х	
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			х	
	 result in substantial erosion or siltation on- or off-site; 			X	
	ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
	iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
	iv. impede or redirect flood flows?				x
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				х
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

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

Less than Significant Impact

The goal of the Clean Water Act (CWA) is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters" (33 U.S.C §1251[a]). Under section 303(d) of the CWA states, territories and authorized tribes, are required to develop lists of impaired (polluted) waters.



These are waters for which technology-based regulations and other required controls are not stringent enough to meet the water quality standards set by states (e.g., the Basin Plan). The law requires that states establish priority rankings for waters on the lists and develop Total Maximum Daily Loads (TMDLs) for these waters (USEPA, 2020).

The TMDL is a number that represents the assimilative capacity of a receiving water to absorb a pollutant. The TMDL is the sum of the individual wasteload allocations for point sources, load allocations for nonpoint sources plus an allotment for natural background loading, with the addition of a margin of safety. TMDLs can be expressed in terms of mass per time (the traditional approach) or in other ways such as toxicity or a percentage reduction or other appropriate measure relating to a state water quality objective. A TMDL is implemented by reallocating the total allowable pollution among the different pollutant sources (through the permitting process or other regulatory means) to ensure that the water quality objectives are achieved (LARWQCB, 2020).

Waters in which a pollutant load exceeds its assigned TMDL are considered "impaired" and placed on the Section 303(d) List. In California, the State Water Resources Board (SWRCB) prepares and maintains the California 303(d) List of Water Quality Limited Segments (303[d] List). Verdugo Wash is on the current (2014-2016) 303(d) List due to the presence of copper, fecal indicator bacteria, and trash, originating from urban runoff of unknown (nonpoint) sources (SWRCB, 2017).

The proposed project site sits in a topographic depression relative to Palm Drive and Jessen Drive. Stormwater generated on the project site drains via sheet flow into the school, and is discharged into Halls Canyon Channel, approximately 775 feet west of the project site. Halls Canyon Channel discharges into Verdugo Wash approximately 1.7 miles southwest of the project site; Verdugo Wash discharges into the Los Angeles River which in turn drains into the Pacific Ocean at Long Beach Harbor.

Development of the proposed project may result in two types of water quality impacts: (1) short-term impacts due to construction-related discharges; and (2) long-term impacts from operation or changes in site runoff characteristics. Runoff during the construction process may carry onsite surface pollutants to water bodies such as streams, rivers, and channels that ultimately drain to the ocean, or to groundwater.

Construction Pollutants Control

Construction of the proposed project could potentially impact surface water quality through demolition, grading, and other construction-related activities. Stormwater runoff from the project site during construction could contain soils and sediments from these activities. Spills or leaks from heavy equipment and machinery, construction staging areas, and/or building sites can also enter runoff and typically include petroleum products such as fuel, oil and grease, and heavy metals.

The proposed project site is greater than one acre and would be required to obtain coverage from the SWRCB under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires dischargers of potential pollutants into waters of the State and waters of the U.S. to: (1) implement best management practices (BMPs) to eliminate or reduce point and non-point source discharges of pollutants; and (2) if one acre or more of soil is disturbed during construction, to prepare a site-specific Storm Water Pollution



Prevention Plan (SWPPP) to protect water quality and beneficial uses. The Construction General Permit establish enforceable limits on discharges, require effluent monitoring, designate reporting requirements, and require construction and post-construction BMPs to eliminate or reduce point and non-point source discharges of pollutants. With the implementation of the SWPPP potential construction related water quality impacts would be reduced to less than significant.

Operational Pollutant Controls

Under existing conditions, stormwater generated on the proposed project site discharges into Halls Canyon Channel. The proposed project would continue to discharge stormwater to Halls Canyon Channel; however, because the completed project would result in the addition of only eight new parking spaces, the operational increase in surface deposition of petroleum products and metals would be negligible.

The project would also involve the replacement of temporary classrooms with one new building and modernize several additional structures. Trash would continue to be collected and properly disposed of by janitorial crews, and the proposed project would not result in a significant addition of faculty or students as a result of project development.

Both construction and operational impacts would be less than significant and mitigation would not be required. The proposed project would not violate any water quality standards or waste discharge requirements, nor would the project otherwise substantially degrade surface or ground water quality. Impacts would be less than significant and mitigation is not required.

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

Less Than Significant Impact

As described in **Section 4.19**, water supplied to the project area comes from the La Cañada Irrigation District (LCID) (LCID, 2003). No additional staff, students, or transfer students would be generated as a result of the proposed project. The additional classrooms that would be built as part of the project would give the school flexibility in managing enrollment and are not intended to increase enrollment; the project is not intended to increase student enrollment and, by extension, water usage. Therefore, water services from LCID are not anticipated to increase from current needs.

The proposed project would not require or result in increased water usage and, therefore, would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant and mitigation is not required.



- c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - i) result in substantial erosion or siltation on- or offsite?
 - ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Less Than Significant Impact

The project site is located on the grounds of Palm Crest Elementary School. The portion of the project site where the old District Office is located is topographically higher than the elementary school but lower than Palm Drive or Jessen Drive. Stormwater generated on the project site is drained via sheet flow into two drainage swales paralleling the northwest and southwest borders of the properties; these drainage swales discharge into Halls Canyon Channel.

As detailed in Section 4.10 a), BMPs designed to minimize or avoid erosion on the construction site, and to minimize sediment from leaving the project site and entering receiving waters, would be implemented prior to ground disturbance and maintained throughout the construction process. With implementation of measures required by the project SWPPP (see Section 4.10 a]), the proposed project would not result in substantial erosion or siltation on- or offsite.

As designed, the proposed project would not result in the alteration of the existing drainage patterns, and would not result in substantial erosion or siltation on- of offsite. The project would continue to be drained by the aforementioned drainage swales which discharge into Halls Canyon Channel and would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.

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?

Less Than Significant Impact

As previously described in Section 4.10 a), the proposed project would not result in substantial additional sources of polluted runoff. As detailed in **Section 3.0**, the proposed project would result in the replacement of the existing old District Office and paved parking area with a new paved parking area, and a new classroom building would replace existing portable classrooms, resulting in the addition of impermeable area. The proposed project would continue to be served by the existing drainage swales, which discharge into Halls Canyon Channel, without exceeding the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant and mitigation is not required.

iv) impede or redirect flood flows?

No Impact

The project site is in an area that has been mapped by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) panel number 06037C1375F (FEMA, 2008) as Zone X,



an area that is "Areas determined to be outside the 0.2% annual chance [500-year] floodplain." See **Figure 4.10-1**.

The flood hazard zone nearest to the proposed project is the 100-year flood hazard zone associated with Halls Canyon Creek; the mapped lateral extent of this flood hazard zone is approximately 0.15 mile west of the project site, at an elevation approximately 125 feet lower than that of the project site. Therefore, the proposed project would not impede or redirect flood flows. No impact would occur and mitigation is not proposed.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact

As described in Section 4-10 c) iv), the proposed project site is above the 100- and 500-year flood hazard zones and it is not anticipated that the project site would become inundated due to flooding.

A tsunami is a sea wave (or series of waves) of local or distant origin that results from large-scale seafloor displacements associated with large earthquakes, major submarine slides, or exploding volcanic islands (California Seismic Safety Commission, 2019). The closest mapped zone is in the City of Santa Monica. A review of the Tsunami Inundation Map for the Beverly Hills, California quadrangle (CEMA, CGS, and USC, 2009) revealed that the tsunami inundation zone nearest to the proposed project site would be at Santa Monica State Beach, approximately 21 miles southwest of the project site. Therefore, it is not anticipated that the proposed project would become inundated due to a tsunami and no impacts would occur. Mitigation is not required.

A seiche is an oscillating wave caused by wind, tidal forces, earthquakes, landslides and other phenomena in a closed or partially closed water body such as a river, lake, reservoir, pond, and other large inland water body. A review of aerial imagery (Google Earth, 2020) revealed no water bodies large enough to support a seiche within a five-mile radius of the proposed project site. The proposed project would not be inundated by a seiche; therefore, no impacts would occur and mitigation is not required.

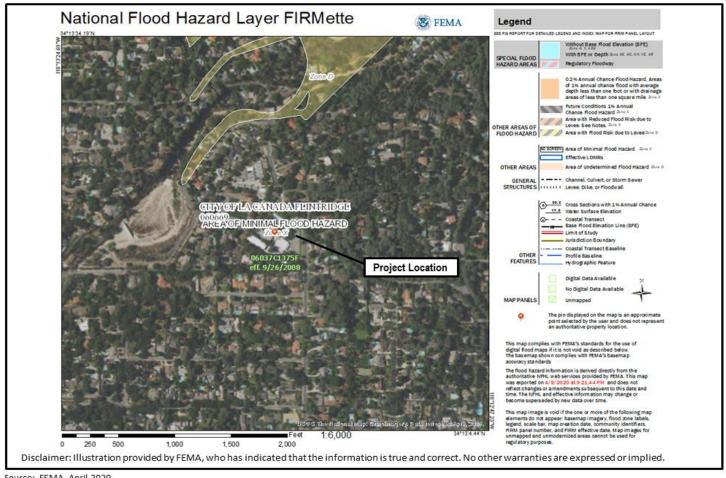
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact

As discussed in Sections 4.10 a) and b), BMPs would be implemented prior to construction to minimize or avoid potentially polluted stormwater runoff from leaving the project site. The proposed project would not result in impermeable surface areas substantial enough to interfere with infiltration of stormwater. Impacts would be less than significant and mitigation is not required.



Figure 4.10-1 FEMA FLOOD ZONES



Source: FEMA, April 2020



Palm Crest Elementary School Modernization Project

FEMA FIRM Map



4.11 Land Use and Planning

	Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Physically divide an established community?				X
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				Х

a) Would the project physically divide an established community?

No Impact

A significant impact would occur if the project was sufficiently large or configured in such a way as to create a physical barrier within an established community. The project proposes: the construction of one new two-story classroom building, comprised of an east and west wing; renovation and modernization of 18 existing classrooms; conversion of one classroom building to four specialty classrooms; demolition of the old District Office and adjacent garage and removal of trees/landscaping for construction of a new parking lot; alteration/improvement to the existing drop-off area; alteration/improvement to the existing west parking lot; installation of temporary portable classrooms for use during project construction; and repairs/improvements to site utilities, landscaping areas, and pedestrian walkways. The project site is located in a developed area with single-family residential development surrounding the project site, with the exception of the roadways to the east and north. The project would not alter the existing street grid surrounding the project site or surrounding area. Therefore, the project would not physically divide an established community and no impact would occur.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact

The project includes modernization and replacement of buildings and facilities on the Palm Crest Elementary School campus and therefore the project would not conflict with the project site's Public general land use or Public/Semi-public (PS) zoning designation policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect (IFC Jones & Stokes, 2013, Figure LUE-1) (City of La Cañada Flintridge, 2020a). The project does not propose any general plan land use or zone changes. Additionally, as discussed in **Sections 4.1** through **4.21** of this document, the project would be consistent with applicable plans, policies and regulations.

Furthermore, the California Supreme Court held that public school districts are a matter of statewide concern and that school districts, being local agencies of the state, are not subject to municipal



construction regulations when engaged in such sovereign activities as the construction of school buildings.¹⁹ It was subsequently held that school construction is regulated and inspected at the state level through the Division of State Architect (DSA) and the Field Act per the Education Code.²⁰ Therefore, the project would have no impact regarding conflict with existing state, regional, county, or local laws, policies, regulations, plans or guidelines.

¹⁹ See Hall v. City of Taft (1956) 47 Cal.2d 177 [302 P.2d 574].

²⁰ See Town of Atherton v. Superior Court (1958) 159 Cal.App.2d 417 [324 P.2d 328].



4.12 Mineral Resources

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
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?				X

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

No Impact

Assessment of mineral resources is based on the State of California's Mineral Land Classification/Designation Program established after the adoption of the Surface Mining and Reclamation Act (SMARA) in 1975. The SMARA provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized and that mined lands are reclaimed to a usable condition (SMARA, 2019). The primary objectives of SMARA are the assurance of adequate supplies of mineral resources important to California's economy and the reclamation of mined lands. These objectives are implemented through land use planning and regulatory programs administered by local government with the assistance of the Department of Conservation (DOC) and the California Geological Survey (CGS). Information on the location of important mineral deposits is developed by the CGS through a land use planning process referred to as mineral land classification.

As shown on **Figure 4.12-1**, the project site is located within Mineral Resource Zone (MRZ) 3, which is defined as areas containing mineral deposits, the significance of which cannot be evaluated with available data (Miller, 1994). However, no active mining operations or mineral recovery activities occur on or near the project site. Based on California Department of Conservation, Division of Oil, Gas and Geothermal Resources maps, the project site is not located within a known oil and gas field or in the vicinity of oil and gas wells (DOC, 2020). **Figure 4.12-2** shows that there is one plugged and abandoned oil and gas well located over one mile northwest of the project site. As shown on **Figure 4.12-3**, the closest geothermal well is located approximately 52 miles southeast of the project site. The project site is developed with an elementary school and the project site is not designated by the City of La Cañada Flintridge General Plan or zoning map as being in an area designated for mineral resources extraction activities. Therefore, no impacts would occur regarding the availability of known mineral resources or locally important mineral resource recovery sites.



Project Location MRZ-GENERALIZED MINERAL LAND CLASSIFICATION MAP OF LOS ANGELES COUNTY - SOUTH HALF

Figure 4.12-1
DESIGNATED MINERAL RESOURCE ZONES

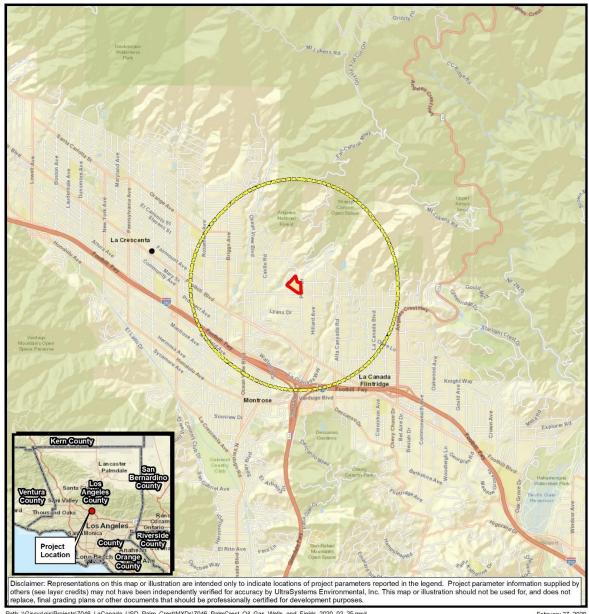
Disclaimer: Illustration provided by State of California Department of Conservation, who has indicated that the information is true and correct. No other warranties are expressed or implied. Source: Miller, Russel V. (State of California Department of Conservation), 1994.

Palm Crest Elementary School Modernization Project

Designated Mineral Resource Zones



Figure 4.12-2 OIL AND GAS WELLS AND FIELDS



Path: \\Gissvrigis\Projects\7046_LaCanada_USD_Palm_Crest\MXDs\7046_PalmCrest_Oil_Gas_Wells_and_Fields_2020_02_25.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c)
OpenStreetMap contributors, and the GIS User Community, CA Dept. of Conservation, December, 2017; UltraSystems Environmental, Inc., 2020

ebruary 27, 2020

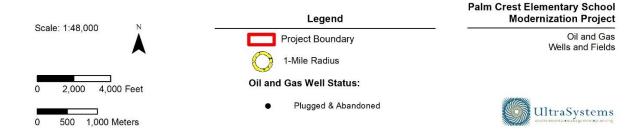
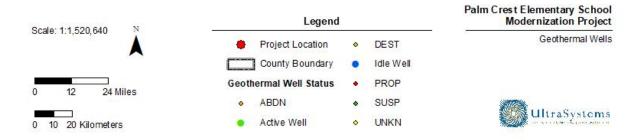




Figure 4.12-3 **GEOTHERMAL WELLS**



: I/GISSVR'gisiProjectsi7046_LaCanada_USD_Palm_Crest/MXDsi7046_PalmCrest_geothermal_2020_03_25.mxd ca Layer Credits: Sources: Est, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Est Japan, METI, Est Chira (Hong Kong), Est Korea, Est (Thailland), NGCC, (c) nStreetMap contributors, and the GIS User Community; CA Dept. of Conservation, December, 2017; UltraSystems Environmental, Inc., 2020





4.13 Noise

Would the project result in:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		х		
b) Generation of excessive groundborne vibration or groundborne noise levels?		X		
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?				х
d) Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the education program?				х

4.13.1 Noise Fundamentals

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The decibel (dB) scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Because the human ear is not equally sensitive to all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against upper and lower frequencies in a manner approximating the sensitivity of the human ear. The scale is based on a reference pressure level of 20 micropascals (zero dBA). The scale ranges from zero (for the average least perceptible sound) to about 130 (for the average human pain level).

4.13.2 Noise Measurement Scales

Several rating scales have been developed to analyze adverse effects of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise on people depends largely upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:



- L_{eq} , the equivalent noise level, is an average of sound level over a defined time period (such as 1 minute, 15 minutes, 1 hour or 24 hours). Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure.
- L₉₀ is a noise level that is exceeded 90 percent of the time at a given location; it is often used as a measure of "background" noise.
- CNEL, the Community Noise Equivalent Level, is a 24-hour average L_{eq} with a 4.77-dBA "penalty" added to noise during the hours of 7:00 p.m. to 10:00 p.m., and a 10-dBA penalty added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime (Hendriks et al., 2013, p. 2-48.). The logarithmic effect of these additions is that a 60-dBA 24-hour L_{eq} would result in a calculation of 66.7 dBA CNEL.
- L_{dn}, the day-night average noise, is a 24-hour average L_{eq} with an additional 10-dBA "penalty" added to noise that occurs between 10 p.m. and 7 a.m. The L_{dn} metric yields values within 1 dBA of the CNEL metric. As a matter of practice, L_{dn} and CNEL values are considered to be equivalent and are treated as such in this assessment.

4.13.3 Existing Noise

The project site is located in a highly urbanized area and is surrounded by single-family residential land uses to the north, south, east, and west. The principal source of noise in the general area of the project is traffic on the residential collector roadways, including Palm Drive, Jessen Drive, and Fairmount Drive; and on Solliden Lane, a private street owned by the school. The project area is far from the 60- and 65-dBA contours around local freeways and arterials, so it enjoys low noise levels. There are no existing noise sources near the school that have to be reduced. The only thing left to control is new development.

In order to characterize existing noise levels, UltraSystems conducted ambient noise sampling at eight locations in the general project area; these are shown in **Figure 4.13-1**. **Table 4.13-1** lists the measurement points, sampling locations, and measurement results. Details of the ambient sampling methods and results are provided in **Appendix I**.

The samples were taken between 12:03 p.m. and 3:12 p.m. on Thursday, January 23, 2020. The 15-minute L_{eq} values ranged from 49.8 to 63.6 dBA. The lowest of these values was measured at Point 7, which is located on campus on the southern portion of Solliden Lane, far from a public road and children's path of travel. The maximum ambient noise level was located at Point 4, which is on campus on the kindergarten's playground.



Figure 4.13-1 NOISE MONITORING LOCATIONS



Path: 1/10.0.1.37/gis/Projects/7046_LaCanada_USD_Palm_CrestMXDsiSMND/7046_PalmCrest_Noise_Sampling_2020_05_;12.mxd
Service_Layer_Credits_Sources_Est_HERE_Cammin_USGS_Intermap_. INCREMENT P. NACA_Est_Jack_NET_Est_Crina_Noise_Sampling_2020_05.

The Community_Sources_Est_(Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community_Sources_Est_(DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community_UltraSystems_Environmental, Inc., 2020

May 12, 2020

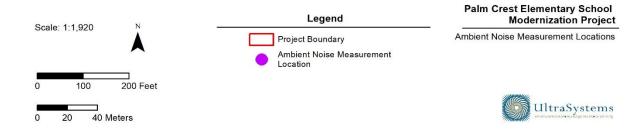




Table 4.13-1 MEASURED AMBIENT NOISE LEVELS

D. C.		Measureme	ent Results (d	BA)
Point	Sampling Location	15-Minute Leq	L _{max}	L ₉₀
1	5014 Palm Drive. Approximately 50 feet east of the project site, on the sidewalk of a single-family residence across Palm Drive.	62.7	72	58
2	5132 Jessen Drive. Approximately 50 feet east of the project site, on the sidewalk of a single-family residence across Jessen Drive.	55.3	70.9	43.4
3	5025 Palm Drive. On the southern portion of the project site between the basketball courts and the covered seating area, approximately 65 feet north of single-family residences.	58.9	71.7	48.8
4	5025 Palm Drive. On the project site's kindergarten playground, approximately 100 feet east of the project site's baseball field.	63.6	79.2	52.9
5	5025 Palm Drive. On the northern portion of the project site, located between the portable classrooms.	57.9	73.9	53.9
6	5025 Palm Drive. Located on the central portion of Solliden Lane on the project site, west of the project site's west parking lot, approximately 30 feet east of single-family residences.	50.5	61.8	45.4
7	5025 Palm Drive. Located on the southern portion of Solliden Lane on the project site, approximately 30 feet east of single-family residences.	49.8	62.6	45.7
8	5025 Palm Drive. Located on the northern portion of Solliden Lane on the project site, approximately 50 feet south of single-family residences.	54.1	77.9	43

Source: UltraSystems, with Google Earth, 2020.

4.13.4 Sensitive Land Uses

The City of La Cañada Flintridge General Plan Noise Element identifies noise-sensitive land uses as locations where the presence of noise could adversely affect the use of land. These typically include residences, schools, hospitals, libraries, golf courses, and passive recreation sites (ICF Jones & Stokes, 2013, p. 7-3). The existing sensitive receptors that are nearest to the proposed project site are listed in **Table 4.13-2**. These receivers would be exposed to noise during project construction and operations.



Table 4.13-2 NEAREST EXISTING SENSITIVE RECEIVERS

Sensitive Land Use	Location with Respect to Project Features	Distance to Property Line from Proposed Project (Feet)
School	On the project site	0
Single-family residences	North of the project site	50
Single-family residences	South of the project site	65
Single-family residences	East of the project site	50
Single-family residences	West of the project site	30

Source: UltraSystems with Google Earth, 2020.

4.13.5 Regulatory Setting

City of La Cañada Flintridge General Plan

"La Cañada Flintridge will continue to be a community that retains its quiet, small-town feeling and predominantly single-family residential character with a limited amount of local-serving commercial development. The Land Use Element does not propose changes to land use designations that would increase exposure of people to sources of noise. Therefore, implementation of the General Plan during the planning period will focus on three main efforts: 1) maintaining areas deemed currently acceptable in terms of noise exposure; 2) mitigating impacts from existing sources of noise on existing sensitive land uses; and 3) implementing planning policies and zoning to ensure that new development both is protected from unwarranted noise and does not contribute to unacceptable levels of noise within the community" (ICF Jones & Stokes, 2013, p. 7-13).

"The City currently [2013] does not have a comprehensive noise ordinance, although several individual ordinances place restrictions on specific types of noise, such as time restrictions placed on construction activities, barking dogs, and noise related to landscaping activities. During the 2030 planning period the City will develop and adopt a noise ordinance to address excessive noise sources (e.g., leaf blowers, construction noise) and nuisance noise in excess of that which is appropriate to residential living (e.g., loud parties, loud stereos, barking dogs). The noise ordinance also will codify application of the guidelines previously discussed" (ICF Jones & Stokes, 2013, p. 7-15).

The Noise Element contains several noise minimization policies, of which the following are potentially relevant to the project:

- Policy 2.2.1 Adopt and apply the Noise and Land Use Compatibility Matrix and the Interior and Exterior Noise Guidelines as guidelines to establish acceptable noise standards for various uses throughout the City, to avoid noise and land use conflicts, and to mitigate unacceptable levels of noise on new and existing development.
- **Policy 2.2.2** Require new development to minimize noise impacts on adjacent uses through site and building design, setbacks, berms, landscaping, and/or other noise abatement techniques.
- **Policy 2.2.3** Apply California Administrative Code Title 24 noise insulation standards to the construction of multi-family housing, residential portions of mixed-use development,



new single-family developments, and conversion of existing apartments into condominiums.

Policy 2.2.5 Require that an acoustical analysis be prepared by a qualified acoustical engineer in instances where noise-sensitive uses are proposed in noise-impacted areas. The recommendations of the acoustical analysis to mitigate noise will be considered during deliberations on the project.

Table 4.13-3, upon which Policy 2.2.1 is partially based, shows the compatibility of various land uses with outdoor noise levels. Its original purpose is to guide the siting of various land uses, to ensure that people are not exposed to excessive noise. However, this type of table is often used as well to determine whether a new noise source will adversely affect pre-existing land uses.

Table 4.13-3
LAND USE AND NOISE COMPATIBILITY MATRIX

LAND USES	EXISTING NOISE LEVEL (dBA CNEL)						
Example Land Uses	<	55	60	65	70	75	80>
Hillside, Estate, Very Low Density, Low Density, Medium Density Residential	A	A	A	В	С	С	D
Medium-High, High Density Residential	Α	Α	Α	В	В	С	D
Commercial/Office, Mixed Use 1 (DVSP), Mixed Use 2 (DVSP), Mixed Use (New), Mixed Use Overlay (New)	A	A	A	A	A	В	С
Commercial/Office	В	В	В	С	С	D	D
Institutional, Public	Α	Α	Α	В	С	С	D
Parks and Recreation	Α	Α	Α	Α	В	С	D
Open Space	A	A	A	A	A	В	С

Source: (City of La Cañada Flintridge, 2013).

Notes:

Community Noise Equivalent (CNEL). The energy-average of the A-weighted sound levels during a 24-hour period, with 5 dB added to the levels from 7:00 PM to 10:00 PM and 10 dB added from 10:00 PM to 7:00 AM.

Compatibility Zones. The following zones indicate the degree to which listed land uses are compatible with noise levels shown in the table.

Zone A. Clearly 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.

Zone B. Normally Acceptable. New construction or development should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Zone C. Normally Unacceptable. New construction or development should normally be discouraged. If new construction or development does proceed, a detailed analysis or noise reduction requirements must be made and needed noise insulation features must be included in the design.

Zone D. Clearly Unacceptable. New construction or development should generally not be undertaken.

City of La Cañada Flintridge Municipal Code

§ 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:

- 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.

§ 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 § 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. Standards are shown below in **Table 4.13-4**.

If the enforcing officer selects the alternative standard to using the dBA level standard, evidence of dBA levels within the permitted levels may be presented in defense of the charged violation



only if the proffered dBA reading was taken at the exact time and location and under identical conditions, including wind, and temperature, as those encountered by the enforcing officer encountered at the time he or she charged the violation and by a decibel meter with valid current calibration records and evidence of the training or expertise of the person offering the dBA reading as evidence of compliance with this chapter.

A. It is unlawful to maintain, permit, allow or suffer any use or activity that creates noise levels which exceed the following standards:

<u>Table 4.13-4</u>
NOISE STANDARDS BASED ON ZONING DISTRICT

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
Commercial (CPD & FCD)	70	60
Mixed Use	75	65
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)



§ 5.02.110 Temporary construction activities.

Where technically and economically feasible, temporary construction activity shall be conducted in such a manner that the one-hour average sound levels at affected properties shall not exceed the following dBA levels as shown in **Table 4.13-5**:

Table 4.13-5
NOISE RESTRICTIONS DURING CONSTRUCTION

	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. to 5:00 p.m.	60 dBA	65 dBA	70 dBA

^{*}During Daylight Savings Time, weekday hours shall be from 7:00 a.m. to 7:00 p.m.

The La Cañada Flintridge Municipal Code, Chapter 5.02.100 also has limits on noise from stationary sources. The allowable exposures at the receiver's property line depends upon land use. Noise limits are shown in **Table 4.13-6**.

Table 4.13-6
MAXIMUM ALLOWED EXTERIOR NOISE LEVELS FOR VARIOUS EXPOSURE PERIODS

Zoning District	Maximum allowed dBA between 7:00 a.m. and 7:00 p.m.	Maximum allowed dBA between 7:00 p.m. and 7:00 a.m.
Single-Family Residential (R-1)	60	50
Multifamily Residential (R-3 & RPD)	65	55
Commercial (CPD & FCD)	70	60
Mixed Use	75	65
Public/ Semi Public and Open Space	65	55

Source: City of La Cañada Flintridge Municipal Code, Chapter 5.02.100.

4.13.6 Thresholds of Significance for this Analysis

There are normally two criteria for judging noise impacts. First, noise levels generated by the proposed project must comply with all relevant federal, state and local standards and regulations. The second measure of impact used in this analysis is the significant increase in noise levels above existing ambient noise levels as a result of the introduction of a new noise source. An increase in noise level due to a new noise source has a potential to adversely impact people.

^{**}Construction, except emergency work, is not permitted on Sunday or holidays. (Ord. $450 \S 2, 2016$)



Based on the applicable noise regulations stated above, the proposed project would have a significant noise impact if it would:

- Conflict with applicable noise restrictions or standards imposed by regulatory agencies.
- Cause the **permanent** ambient noise level at the property line of an affected land use to increase by 5 dBA CNEL or more.
- Contribute to a significant cumulative noise impact.

4.13.7 Discussion of Impacts

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact with Mitigation Incorporated

Construction

Noise impacts from construction activities are a function of the noise generated by the operation of construction equipment and onroad delivery and worker commuter vehicles, the location of equipment, and the timing and duration of the noise-generating activities. For the purpose of this analysis, it was estimated that the proposed project would be built in six phases,²¹ which are listed in **Table 4.13-7**. Construction is anticipated to begin in early June 2021 and end in early October 2023.

The types and numbers of pieces of equipment to be deployed during each construction phase were determined as part of the air quality and greenhouse gas emissions analyses for this project.²² For each equipment type, the table shows an average noise emission level (in dB at 50 feet, unless otherwise specified) and a "usage factor," which is an estimated percentage of operating time that the equipment would be producing noise at the stated level. Equipment characteristics for the six phases are also shown in **Table 4.13.7**.

<u>Table 4.13-7</u> CONSTRUCTION EQUIPMENT CHARACTERISTICS

Construction Phase	Equipment Type	Horse- power	No. of Pieces	Usage Factor	dBA @ 50 Feet
1(E) - Demolition	Rubber-Tired Dozers	247	1	0.4	79
(Headquarters Building)	Tractor/Loader/Backhoe	Except	2	0.37	85
	Concrete/Industrial Saws	81	1	0.2	90
1(W) – Demolition (Parking Lot)	Rubber-Tired Dozers	247	1	0.4	79
(i ai king hot)	Tractor/Loader/Backhoe	97	2	0.37	85

²¹ A sixth phase, indoor painting, was not included in the noise analysis because of its low probability of adverse noise impact.

²² See Section 4.3 and Section 4.8.



Construction Phase	Equipment Type	Horse- power	No. of Pieces	Usage Factor	dBA @ 50 Feet
2 Cita Duanantian	Graders	187	1	0.41	85
2 - Site Preparation	Tractor/Loader/Backhoe	97	1	0.37	85
	Graders	187	1	0.41	85
3(E/W) - Grading	Rubber-Tired Dozers	247	1	0.4	79
	Tractor/Loader/Backhoe	97	2	0.37	85
4 - Building	Cranes	231	1	0.08	83
Construction	Forklifts	89	2	0.2	67
	Tractor/Loader/Backhoe	97	2	0.37	85
5 – Parking Lot and	Cement and Mortar Mixers	9	4	0.4	85
Dropoff Area	Pavers	130	1	0.5	77
	Rollers	80	1	0.1	74
	Tractor/Loader/Backhoe	97	1	0.37	85

Sources:

Knauer et al., 2006 unless otherwise noted.

Crane, cement and mortar mixer, and roller noise emissions data from County of Ventura, 2010. Usage factors for cranes, cement and mortar mixers, pavers, and rollers from County of Ventura, 2010. Forklift data from Port of Long Beach, 2009.

Using calculation methods published by the Federal Transit Administration,²³ UltraSystems estimated the average hourly exposures at three sensitive receivers, all single-family houses. The distances used for the calculation were measured from the receivers to the approximate center of activity of each construction phase, since that would be the average location of construction equipment most of the time. **Table 4.13-8** shows the relationships between the receivers, the noise sources, and the nearest ambient measurement points.

<u>Table 4.13-8</u> NOISE ANALYTICAL FRAMEWORK

Receiver	Description	Noise Sources ^a	Nearest Ambient Sampling Point(s)
A	House on Solliden Way, across from school	1W, 1W, 4	Average of 6 and 7
В	House on east side of Palm Drive, across from school	1E, 3E	1
С	House on west side of Palm Drive, south of school	2,5	1

^aSee **Table 4.13-5**.

²³ Transit Noise and Vibration Impact Assessment Manual. Federal Transit Administration, Office of Planning and Environment, Washington, DC, FTA Report No. 0123. September 2018. Internet: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.



Table 4.13-9 summarizes the estimated construction-related short-term noise exposures at eight combinations of sensitive receiver and construction phase. A three-foot-high masonry wall runs along the site's boundary along Palm Avenue, potentially providing some sound protection to the residences to the east and south. However, the direct line of sight between noise sources and receivers in this part of the project is above the wall, with the result that the noise attenuation by the wall is negligible. In no cases were there other intervening structures between a noise source and a receiver.

On the other hand, the topography of the northeast side of the project site blocks the line of sight from construction noise sources to the nearest receptors, thus acting like a wall. The topography cannot reflect or absorb all of the construction noise, since sound waves diffract as they pass over the it and move downward towards the residences on the other side. However, it can block about 91% of the construction noise.

The Fresnel number method (Foss, 1978) was used to estimate the topography's noise attenuation. The Fresnel number (N_0) is a dimensionless parameter calculated from the following formula:

 $N_0 = \pm 2f\delta_o/c$

where

f = Frequency of the sound radiated by the source (hertz).

 δ_0 = Path length difference determined from site geometry (feet).

C = Speed of sound (feet/second).

 $N_{\rm o}$ is positive when the line of sight between the source and receiver is lower than the top of the barrier (as is the case here). It was assumed that f = 1,000 hertz (representative of heavy construction equipment)²⁴ and that c = 1115.49 feet per second. The Fresnel number was determined to be 0.24. Using a graph²⁵ of attenuation as a function of $N_{\rm o}$, it was determined that the existing topography would provide 10.5 dB of attenuation.

Residential noise exposures (for the nearest row of houses to the school) due to construction activities would be about 67 to 87 dBA L_{eq} . These relatively high values are due mainly to the fact that the sensitive receivers are so close to the school, and most of the construction activities will be near the school boundary.

In three cases, the total unmitigated exposure (ambient plus construction contribution) would exceed the 75-dBA limit prescribed by Municipal Code § 5.02.110 and therefore be significant. Although the unmitigated noise increase due to construction would exceed 5 dBA, the increase would not be permanent, and thus would not be significant. Construction noises would be less than significant after implementation of the following measures.

²⁴ Noise frequency spectra for typical bulldozers and front-end loaders are presented in Vardhan et al., 2005.

²⁵ Propagation of Outdoor Sound - Partial Barriers. Available at https://www.engineeringtoolbox.com/outdoor-sound-partial-barriers-d_65.html. Verified June 13, 2019.



Table 4.13-9 ESTIMATED ONE-HOUR CONSTRUCTION NOISE EXPOSURES AT NEAREST SENSITIVE RECEIVERS

Receiver	Source	Distance (feet)	Ambient (dBA L _{eq})	Construction (dBA L _{eq})	New Total (dBA L _{eq})	Increase (dBA L _{eq})		
	1W	102	50.2	70.0^{a}	70.0	19.8		
A	3W	102	50.2	69.3 a	69.4	19.2		
	4	102	50.2	67.3a	67.4	17.2		
D	1E	180	62.7	73.1	73.5	10.8		
В	3E	180	62.7	74.8	75.1	12.4		
C	2	35	62.7	87.0	87.0	24.3		
С	5	80	62.7	84.1	84.1	21.4		
^a Reduced by 10.5 dBA by topography.								

Mitigation Measures

The objective of the construction noise mitigation is to limit the increase (above ambient) in one-hour average noise exposure at residential receivers to 75 dBA $L_{\rm eq}$. The La Cañada School District and/or the construction contractor will use whatever of the following measures is necessary to achieve the objective during construction.

- **MM N-1 Source Reduction:** Use as many of the following noise source reduction measures as are needed and feasible:
 - **Time Constraints.** No construction activity between 6:00 p.m. and 7:00 a.m.
 - **Substitute Methods.** Use the quietest methods and/or equipment available.
 - **Exhaust Mufflers.** Ensure that all equipment has quality mufflers installed.
 - **Lubrication & Maintenance.** Keep equipment well-maintained.
 - **Reduced Power Operation.** Use the smallest equipment size and lowest power rating that gets the job done.
 - Limit Equipment Onsite. Only have necessary equipment onsite.
 - **Noise Compliance Monitoring.** A technician tasked with verifying compliance will be onsite during active construction activities.
 - Quieter Backup Alarms. Backup alarms on forklifts and other equipment must be adjustable; use the lowest noise level compatible with ambient noise and other considerations.
- **MM N-2 Path Controls:** Use as many of the following noise path interruption measures as are needed and feasible:



- **Noise Barriers**. Use portable noise-absorbing barriers capable of reducing sound transmission by at least 12 dBA. Install barrier(s) as near as practicable to the noise-producing construction activity; if this is infeasible, install barriers at the school boundaries nearest to potential sensitive receivers.
- **Enclosure**. Surround the work activity with a flexible intervening noise barrier system hung from supports.
- **Strategic Storage.** Site temporary equipment and material supply storage and staging areas on the campus, as far as possible from onsite occupied buildings and offsite sensitive receivers. Travel routes from the storage and staging area to active construction areas will avoid classrooms and offsite sensitive receivers as much as possible.
- **MM N-3 Receiver Controls:** Use as many of the following receiver-end noise reduction measures as are needed and feasible:
 - Public Notification and Information. Advance notice of the start of construction shall be delivered to all noise-sensitive receivers adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the District.

Level of Significance After Mitigation

After implementation of mitigation measures **N-1** thorough **N-3** above, noise levels during construction would be reduced to a less than significant level.

Operation

The project would not increase the number of students, faculty or staff at Palm Crest Elementary School. There would be no increase in onsite noise-generating activities or in offsite traffic. Therefore, operational noise impacts would be less than significant.

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

Less than Significant Impact with Mitigation Incorporated

Vibration is sound radiated through the ground. Groundborne noise is the rumbling sound caused by the vibration of building interior surfaces. The ground motion caused by vibration is measured as peak particle velocity (PPV) in inches per second and is referenced as vibration decibels (VdB). Typical outdoor sources of perceptible groundborne vibration are construction equipment and traffic on rough roads.

The American National Standards Institute (ANSI, 1983) indicates that vibration levels in critical care areas, such as hospital surgical rooms and laboratories, should not exceed 0.2 inch per second of PPV. The Federal Transit Administration (FTA) also uses a PPV of 0.2 inch per second as a vibration damage threshold for fragile buildings and a PPV of 0.12 inch per second for extremely fragile historic buildings. The FTA criteria for infrequent groundborne vibration events (less than 30 events per day)



that may cause annoyance are 80 VdB for residences and buildings where people normally sleep, and 83 VdB for institutional land uses with primarily daytime use (Federal Transit Administration, 2006).

Construction

The project would not include any blasting, drilling, or pile driving. Construction equipment such as loaded trucks, vibratory rollers, and small bulldozers may temporarily increase groundborne vibration or noise at the project site.

The construction vibration analysis used formulas published by the Federal Transit Administration (FTA, 2018, p. 185). For a standard reference distance of 25 feet, peak particle velocity is found from:

$$PPV = PPV_{ref} x (25/D)^{1.5}$$

where

 PPV_{ref} = Reference source vibration at 25 feet D = Distance from source to receiver

The vibration level (VdB) for a standard reference distance of 25 feet is found from:

$$VdB = L_{vref} - 30 \log(D/25)$$

where

L_{vref} = Reference source vibration level at 25 feet

D = Distance from source to receiver

The FTA has published standard vibration levels for construction equipment operations, at a distance of 25 feet (FTA, 2018, p. 198). The smallest distance from construction activity to a residential receiver would be about 35 feet. The calculated vibration levels expressed in VdB and PPV for selected types of construction equipment at distances of 25 and 35 feet are listed in **Table 4.13-10**. The closest that a vibratory roller would come to a sensitive receiver would be 80 feet. Vibration levels for vibratory rollers at 80 feet are also shown in the table.

As shown in **Table 4.13-10**, the vibration level of construction equipment at the nearest sensitive receiver (35 feet) is at most 0.046 inch per second, which is less than the FTA damage threshold of 0.12 inch per second PPV for fragile historic buildings, and 82 VdB (for loaded trucks), which exceeds the FTA threshold for human annoyance of 80 VdB. Unmitigated vibration impacts would therefore be significant.



Table 4.13-10 VIBRATION LEVELS OF CONSTRUCTION EQUIPMENT

Equipment	PPV at 25 feet (in/sec)	Vibration Decibels at 25 feet (VdB)	PPV at 35 feet (in/sec)	Vibration Decibels at 35 feet (VdB)	PPV at 80 feet (in/sec)	Vibration Decibels at 80 feet (VdB)
Loaded Truck	0.076	86	0.046	82		
Small Bulldozer	0.003	58	0.0018	54		
Vibratory Roller	0.21	94			0.037	79

Essentially all of the heavily-loaded truck trips will occur during the grading and demolition phases. Increasing the distance between trucks and residences from 35 to 40 feet would bring the vibration level to below 80 VdB. Upon implementation of measures **MM N-4** through **MM N-6**, impacts would be less than significant.

Mitigation Measures

The objective of the construction vibration mitigation is to maximize the time that heavily loaded trucks are 40 feet or more from residences along construction travel routes.

- **MM N-4 Truck Vibration Mitigation:** Before starting either the demolition or grading phases, conduct a survey of potential haul routes and identify areas where the maximum distance between haul trucks and residences would be less than 40 feet.
- MM N-5 Truck Hauling Plan: Prepare a truck travel plan that (1) maximizes the distance between trucks and residences along road sections, and (2) minimizes travel through densely populated areas before 7:00 a.m. and after 7:00 p.m.
- **MM N-6 Public Notification and Information.** Advance notice of the start of heavy-loaded truck travel shall be delivered to all noise-sensitive receivers adjacent to the project area. The notice shall state specifically where and when loaded trucks will travel, and provide contact information for filing vibration complaints with the contractor and the District.

Level of Significance After Mitigation

After implementation of mitigation measures **N-4** thorough **N-6** above, groundborne vibration and groundborne noise levels during construction would be reduced to a less than significant level.

Operation

Operation of the proposed project would not involve significant sources of groundborne vibration or groundborne noise. Thus, operation of the proposed project would result in a less than significant impact.

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?

No Impact

As further discussed in **Section 4.9**, the nearest airport is Bob Hope Airport, approximately 7.5 miles southwest of the project site. The project site is not within the Bob Hope Airport influence area, nor is there an airport within two miles of the project site (LA County Airport Land Use Commission, 2003). Therefore, the project would not expose people residing or working in the project area to excessive noise levels and no impact would occur.

d) Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the education program?

No Impact

The nearest freeway, State Route 2, is approximately 0.75 mile south of the project site. Noise generated by freeway traffic would be attenuated so much by distance and by intervening structures that it would not adversely affect operations at the school. The largest roadway in the vicinity of the project site is Palm Drive, which is adjacent to the west boundary of the project site. Palm Drive is classified as a "Residential Collector" road in the General Plan and has a maximum operational daily roadway capacity of 12,600 vehicles, while a major roadway would have a capacity of 15,600 vehicles (La Cañada Flintridge General Plan, 2013, p. 6-7). Further, the City's General Plan mentions that major roadways need to provide a higher function than residential collectors (La Cañada Flintridge General Plan, 2013, p. 6-5). Therefore, none of the nearby roadways would be classified as a major arterial roadway. Therefore, no impact would occur.



4.14 Population and Housing

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				х
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact

The project proposes modernization of an existing elementary school campus. Existing infrastructure is in place at the elementary school and no extension of roads is proposed. The project does not propose new housing or an extension of roads or other infrastructure. The project would not directly or indirectly induce population growth in the project area because it involves improvements to an existing elementary school campus. Additionally, the District does not anticipate additional staff, students, or transfer students to be generated as a result of the proposed project. Outside of the normal increases and decreases due to normal grade fluctuations, the project is not intended to increase student enrollment. The additional classrooms that would be built as part of the project would give the school flexibility in managing enrollment. Therefore, no impact would occur.

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

No Impact

The project is located within an elementary school campus. A building is located on a site that used to be a residence. However, when the District purchased the property for use as an elementary school, the residence was converted to use by the school district. No one lives on the project site and no housing or persons would be displaced with development of the proposed project. The project would not result in the loss of housing nor would it displace people. Therefore, no impact would occur.



4.15 Public Services

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact		
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:						
a) Fire protection?						
b) Police protection?				X		
c) Schools?				X		
d) Parks?			X			
e) Other public facilities?				Х		

a) Fire protection?

No Impact

The Los Angeles County Fire Department (LACFD) provides fire protection and emergency medical services throughout La Cañada Flintridge. There are two fire stations that serve the City – Fire Station 19 and Fire Station 82 (City of La Cañada Flintridge, 2020c). The nearest fire station to the project site is Fire Station No. 19, located approximately 0.7 mile southeast of the project site at 1729 Foothill Boulevard. Fire Station No. 82 is located approximately 2.5 miles southeast of the project site, located at 352 Foothill Boulevard (Google Earth Pro, 2020).

The proposed project would not adversely affect demand for fire services as described below. An information request letter was sent to the Los Angeles County Fire Department asking about the potential impacts of the project to fire service (refer to **Appendix K**). Fire Captain Scott Pugh at Fire Station 19 of the Los Angeles County Fire Department stated that the project site would be served by Fire Station 19 of the Los Angeles County Fire Department (Pugh, 2020). The City of La Cañada Flintridge contracts its fire services from the Los Angeles County Fire Department and operates a substation in the City of La Cañada Flintridge. Substation 19 is approximately 0.75 mile southeast of the project site (Google Earth Pro, 2020). Response times for all of the City of La Cañada Flintridge are approximately six minutes on average for an emergency call for service (Pugh, 2020).

Fire Captain Pugh stated that based on the project location and description it does not appear that the proposed project would require the construction of new fire service facilities to meet the proposed project's demands, in addition to existing fire protection demands. Fire Captain Pugh responded average response times are being met at approximately six minutes and would not appear to change unless access, parking, turn-a-round, and located gate issues arose as a result of the new project. An identical information request letter was sent to Brenda Ta, an employee of the public records department of the Los Angeles County Fire Department, and she stated that the project site has passed pre-plan inspection on October 14, 2019.



The project would comply with all building standards applicable to public school structures set forth in Title 24 of California Code of Regulations (CCR), Part 2 Building Code, Part 3 Electrical Code, Part 4 Mechanical Code, Part 6 Energy Code, Part 11 Green Building Standards Code (CALGreen Code), and Part 12 Reference Standards Code requirements.

Additionally, the proposed project would not adversely affect the existing service capacity of the LACFD as little or no additional calls for service are anticipated to be generated by project implementation. The District does not anticipate additional staff, students, or transfer students to be generated as a result of the proposed project. Outside of the normal increases and decreases due to normal grade fluctuations, the project is not intended to increase student enrollment. The additional classrooms that would be built as part of the project would give the school flexibility in managing enrollment. Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire department facilities. No impact would occur and no mitigation is required.

b) Police protection?

No Impact

The closest station to the project site is the Crescenta Valley Sheriff's Station, located at 4554 Briggs Avenue, in the City of La Crescenta, approximately 0.7 mile west of the project site. The Sheriff's Department provides general law enforcement, traffic enforcement, crime investigation and special services throughout the city of La Cañada Flintridge (Los Angeles County Sheriff's Department, 2020).

The proposed project would not adversely affect demand for law enforcement services as described below. An information request letter was sent to the Sheriff's Department asking about the potential impacts of the project to law enforcement services (refer to **Appendix K** of this document). As detailed in the response from Captain Todd Deeds at the Crescenta Valley Sheriff's Station, Palm Crest Elementary School is under the jurisdiction of the Crescenta Valley Sheriff's Station of the Los Angeles County Sheriff's Department (Deeds, 2020). The City of La Cañada Flintridge contracts its law enforcement services with the Los Angeles County Sheriff's Department, which operates a substation in the City of La Crescenta, approximately 0.75 mile southwest of the project site (Google Earth Pro, 2020). Response times for the City of La Mirada as a whole are less than 3.5 minutes, on average, for an emergency call for service (Deeds, 2020). Captain Deeds stated that the proposed project would not require the construction of new law enforcement facilities to meet existing law enforcement demands, in addition to the proposed project's demands. Additionally, the Sheriff's Department does not anticipate any potential environmental impacts from the proposed project related to providing law enforcement services to the project site. Captain Deeds responded that the proposed project would not have a potentially significant impact on the Sheriff's Department level of service and/or response times (Deeds, 2020).

The District does not anticipate additional staff, students, or transfer students to be generated as a result of the proposed project. Outside of the normal increases and decreases due to normal grade fluctuations, the project is not intended to increase student enrollment. The project would not adversely affect existing service capacity of the Sheriff's Station because scheduled activities and the level of usage of the facilities would not change significantly compared to existing conditions. The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered law enforcement facilities. The project would have no adverse impacts



associated with demand for law enforcement services. Therefore, no impact would occur and no mitigation is required.

c) Schools?

No Impact

The project proposes construction of new classroom buildings within an elementary school campus. As discussed in **Section 4.13**, the proposed project would not directly or indirectly induce population growth in the project area. The proposed classrooms would replace some of the existing portable classrooms. Outside of the normal increases and decreases due to normal grade fluctuations, the project is not intended to increase student enrollment. Therefore, no impact would occur.

d) Parks?

Less than Significant Impact

The City of La Cañada Flintridge owns and manages five parks totaling 4.4 acres, including Glenhaven Park, Glenola Park, Mayors' Discovery Park, Memorial Park, and Olberz Park. In addition, the city has an agreement with Southern California Edison (SCE) to maintain a 1.69-acre portion of its right-of way west of Indiana Avenue as parkland. To maximize its recreation facilities, the city has joint-use agreements with the La Cañada Unified School District (LCUSD) to operate and maintain ball fields and other recreational facilities for use by the public during non-school hours. These facilities include: soccer, baseball, softball, and football fields; tennis and basketball courts; and a skateboard park. The city also has a joint-use agreement with the Church of Latter-Day Saints for its ball field (ICF Jones and Stokes, 2013, p. 3-3). **Figure 4.15-1** shows the parks in the vicinity of the project site.

Construction

During construction, temporary classrooms would be placed on the baseball field and one of the basketball courts, which would affect usage of the baseball field and some of the basketball courts. However, this would only be temporary. Alternative recreational options would be available, including the baseball field at the Church of Jesus Christ of Latter-Day Saints located at 1830 Foothill Boulevard, approximately 0.7 mile southeast of the project site. Basketball courts are available at Mountain Avenue Elementary School, located at 2307 Mountain Avenue, approximately 0.5 mile northwest of the project site. Therefore, during project construction alternative recreational options would be available and the baseball field and basketball courts would be made available after completion of project construction.

Operation

The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities nor would the project result in the need for new or physically altered park facilities. The project does not propose any modifications to the existing recreational facilities at the project site. The proposed project would modernize and replace existing buildings and facilities at Palm Crest Elementary School. The District does not anticipate additional staff, students, or transfer students to be generated as a result of the proposed project. Outside of the normal increases and decreases due to normal grade fluctuations, the project is not intended to increase student enrollment. Based on the analysis above, the project would have a less than significant impact regarding parks.



Figure 4.15-1
NEARBY PARKS AND RECREATIONAL FACILITIES



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Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan_Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c)

OpenStreetMap contributors, and the GIS User Community; Cal Fire 2007; National Park Service, 9/30/2016; California Department of Parks and Recreation, July 2015; County of Los Angeles

Department of Parks and Recreation, 2016; SCAG, 2018; UltraSystems Environmental, Inc., 2020

Palm Crest Elementary School Modernization Project Legend Scale: 1:42,000 Nearby Parks and Recreational Project Boundary Local Park Facilities Bike Routes Natural Areas Los Angeles County Regional Open Space 3,500 Feet 1,750 Regional Recreation CA State Parks Park UltraSystems Los Angeles County Park Facility 500 1,000 Meters



e) Other public facilities?

No Impact

The proposed project would modernize and replace existing buildings and facilities at Palm Crest Elementary School. Outside of the normal increases and decreases due to normal grade fluctuations, the project is not intended to increase student enrollment. Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities such as libraries and medical facilities. The project would have no impact in this regard.



4.16 Recreation

	Would the project:	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?			х	
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				Х

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?

Less Than Significant Impact

The project proposes the following improvements to the elementary school campus: the construction of one new two-story classroom building, comprised of an east and west wing; renovation and modernization of 18 existing classrooms; conversion of one classroom building to four specialty classrooms; demolition of the old District Office and adjacent garage and removal of trees/landscaping for construction of a new parking lot; alteration/improvement to the existing drop-off area; alteration/improvement to the existing west parking lot; installation of temporary portable classrooms for use during project construction; and repairs/improvements to site utilities, landscaping areas, and pedestrian walkways. The student body would continue to use the recreational facilities on campus. Temporary student classrooms would be placed on the school baseball field during construction of the new two-story building. The groups that currently use the baseball field on site under a joint-use agreement with the District would temporarily be unable to use the baseball field during construction of the new building. Upon construction of the new building on site, the school baseball field would again be available for use. Therefore, there would be a less than significant impact on existing neighborhood or regional parks and facilities.

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

No Impact

As described in threshold 4.16 a) above, the proposed project would replace and modernize facilities on the elementary school campus. The project does not propose any new recreational facilities or construction or expansion of recreational facilities. Therefore, no impact would occur.



4.17 Transportation

	Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		х		
b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				x
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			х	
d)	Result in inadequate emergency access?		X		

a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact with Mitigation Incorporated

Applicable Plans, Ordinances, and Policies

Statewide Transportation Improvement Program (STIP)

The Statewide Transportation Improvement Program (STIP) is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources. The proposed project development is not a transportation project and would not conflict with the STIP.

City of La Cañada Flintridge General Plan—Circulation Element

CE Policy 1.1.1: Establish and maintain a circulation network that supports the Land Use Element of the General Plan.

CE Policy 1.2.2: Require new developments to conform to LOS standards and project impact criteria of the City of La Cañada Flintridge and other mandated programs. This includes mitigation of traffic impacts to the surrounding street system.

CE Policy 4.1.1: Pursue the development of sidewalks and/or ADA compliant "walkable paths" in the vicinity of schools to provide adequate pedestrian access. The location of the sidewalks and/or ADA--compliant "walkable paths" will include consideration of the Suggested Routes to School Plans and connection to present or future bus or shuttle service in the area.



Congestion Management Program (CMP)

The CMP was created statewide because of Proposition 111 and was implemented locally by the Los Angeles County Metropolitan Transportation Authority (Metro). The CMP for Los Angeles County requires analysis of the traffic impact of individual development projects that involve either construction or addition of new square footage. A specific system of arterial roadways plus all freeways comprises the CMP system. Per CMP Transportation Impact Analysis (TIA) Guidelines (KOA, 2020, p. 26), a traffic impact analysis must be conducted:

- At CMP arterial monitoring intersections, including freeway on-ramps or off-ramps, where the proposed project will add 50 or more vehicle trips during either a.m. or p.m. weekday peak hours.
- At CMP mainline freeway-monitoring locations, where the Project will add 150 or more trips, in either direction, during the either the a.m. or p.m. weekday peak hours.

The nearest CMP arterial monitoring intersection is approximately 1.1 miles southeast of the Project site, at the intersection of Angeles Crest Highway (State Route 2) and the I-210 freeway ramps. Based on the trip generation for the proposed project, it is not expected that 50 or more new construction-related Project trips per hour would be added at this CMP intersection. Therefore, no further analysis of potential CMP impacts is required (KOA, 2020, p. 26).

Existing Conditions

KOA analyzed study intersection operations with and without project construction activities. The traffic study concluded that under existing conditions, project construction traffic would not cause any significant impacts. All three intersections analyzed in the traffic study (Palm Drive and Jessen Drive/Fairmont Avenue, Palm Drive and Orchard Lane, and Palm Drive and Foothill Boulevard) operate at level of service B or better under project construction conditions, and delay would increase negligibly between baseline and project construction conditions (KOA, 2020, p. 23).

Construction

The project would make repairs and improvements to site utilities, landscaping areas, and pedestrian walkways. This includes repairs to some pedestrian walkways for Americans with Disabilities Act (ADA) compliance and minor improvements to landscaping. Additionally, the proposed project would replace aging sewer, gas, water and storm drain lines. During the construction phase, there is the potential for existing pedestrian facilities, including the sidewalk along Palm Drive and the sidewalk along Jessen Drive to be temporarily disrupted by project construction, including the replacement of aging sewer, gas, and storm drain lines, which may entail work in the public right of way to connect new utility lines from the project site into existing lines in the adjacent streets. Preparation of a construction management plan, per mitigation measure **TRANS-1** below, would reduce the potential for disruptions to existing pedestrian/bicycle facilities during the project construction phase.

The proposed project would generate temporary construction-related truck and automobile traffic. Project construction period trip generation calculations included employee and truck trips during the a.m. and p.m. peak-hour periods. Project construction activity would peak during the demolition and site grading activities for construction of the new classroom buildings. This phase would take



place between June 2021 and August 2022, and would involve 30 to 35 construction workers and eight to ten debris-haul truck round trips on a typical day, as defined by the construction program manager at Linik Corporation. Although some carpooling would likely occur during Project construction activities, trip generation calculations conservatively assumed that each employee would commute in a single personal vehicle. Truck trips were multiplied by a passenger car equivalency factor of 2.5, to account for speed and size differences versus standard vehicles (KOA, 2020, p. 9)

The proposed project construction activities at the school site would generate a daily total of 70 employee vehicle trips, including 35 inbound employee vehicle trips during the a.m. peak hour and 35 outbound employee vehicle trips during the p.m. peak hour period. At the peak of the demolition and grading activities, as many as 10 truck trips per day (or 20 inbound and outbound trips) would be made to and from the site. Multiplying these 20 trips by the PCE factor of 2.5 results in a total of 50 PCE trips. With all construction employee and PCE truck trips considered, the project site would generate a daily total of 120 vehicle trips including a total of 40 vehicle trips during the a.m. peak hour period and 40 vehicle trips during the p.m. peak hour period (KOA, 2020, p. 9). Refer to **Table 4.17-1** below.

Table 4.17-1
PROJECT CONSTRUCTION TRIP GENERATION

Land Use	Average		AM Peak		PM Peak		
Land Ose	Daily	Total	In	Out	Total	In	Out
Personnel Trips	70	35	35	0	35	0	35
Truck Trips	20	2	1	1	2	1	1
	Passenger Car Equivalents						
Personnel	Personnel 1						
Trucks				2.5			
	Tri	ps with Pa	ssenger Co	ar Equivale	ents		
Personnel Trips	70	35	35	0	35	0	35
Truck Trips	50	5	3	2	5	2	3
Total	120	40	38	2	40	2	38

Source: KOA, 2020, p. 10.

The traffic generated during project construction would be temporary. The Traffic Study conducted for the proposed project states that conflicts between student pedestrian and construction trucks could result in significant impacts and recommends that construction truck trips should be scheduled outside of the school pick-up/drop-off times, to avoid conflicts and potential safety issues with student pedestrians on sidewalks at the campus perimeter on Palm Drive and Jessen Drive (KOA, 2020, p. 24). With mitigation measure **TRANS-1** below, the project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system.



Operation

Future with-Project Conditions

None of the intersections would experience significant impacts from project construction in the Project Peak Construction Year scenario. All three intersections would continue to operate at LOS A or B under Future with-Project construction conditions (KOA, 2020, p. 23).

The project would not directly or indirectly induce population growth in the project area because it involves improvements to an existing elementary school campus. Additionally, the District does not anticipate additional staff, students, or transfer students to be generated as a result of the proposed project. Outside of the normal increases and decreases due to normal grade fluctuations, the project is not intended to increase student enrollment. Therefore, operation of the proposed project would not result in an increase in vehicle trips compared to existing conditions.

Mitigation Measure

- MM TRANS-1 The General Contractor shall submit a detailed Construction Management Plan to be reviewed and approved by the La Cañada Unified School District. The Construction Management Plan shall specify that the General Contractor will schedule truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures including identified truck routes and designated employee parking areas shall be included in the Construction Management Plan. The plan shall include but is not limited to the following provisions:
 - a) Construction truck trips should be scheduled outside of school pick-up/drop-off times, to avoid conflicts and potential safety issues with student pedestrians on sidewalks at the campus perimeter on Palm Drive and Jessen Drive;
 - b) Identification of permitted hours for construction-related deliveries and removal of heavy equipment and material;
 - c) Identification of where construction workers would park their personal vehicles during project construction with a requirement that at no time shall construction worker vehicles block any driveways. If complaints are received by the School District or by the Principal of Palm Crest Elementary School regarding issues with construction worker vehicle parking, the project applicant shall identify alternative parking options for construction workers so as not to interfere with parking availability;
 - d) Identification of how emergency access to and around the project site will be maintained during project construction;
 - e) Identification of haul routes for delivery or removal of heavy and/or oversized equipment or material loads. Where feasible, delivery or removal of oversized equipment or material loads shall be conducted during off-peak hour traffic periods;



- f) Maintain pedestrian and bicycle connections around the project site and safe crossing locations shall be considered for all pedestrian/bicycle detours; and
- g) Maintain the security of the project site by erecting temporary fencing during the construction phase of the project. Any onsite night lighting used during the construction phase of the project shall be in compliance with City of La Cañada Flintridge lighting requirements.

Level of Significance After Mitigation

After implementation of mitigation measure **TRANS-1** above, the project would have less than significant construction-phase impacts.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

No Impact

CEQA Guidelines § 15064.3, subdivision (b) includes criteria for analyzing transportation impacts. For land use projects: "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact."

In response to Senate Bill 743 (SB 743), the Office of Planning and Research (OPR) has updated the CEQA guidelines to include new transportation-related evaluation metrics. Draft guidelines were developed in August 2014, with final guidelines published in November 2017 incorporating public comments from the August 2014 and January 2016 guidelines. In December 2018 the California Natural Resources Agency certified and adopted the CEQA Guidelines update package along with an updated Technical Advisory related to Evaluating Transportation Impacts in CEQA (December 2018). Full compliance with the guidelines is expected by July 2020, after which vehicle delay-based level of service calculations cannot be the sole metric used to evaluate a project's impacts on the transportation system, and instead the vehicle miles traveled (VMT) metric is to be evaluated

The frequency and intensity of use of the project facilities will not change from the current condition, and thus there will be no change in VMT associated with operation of the proposed project. Additionally, the project would not increase the student capacity at the school nor would it increase student enrollment, outside of normal fluctuations in student enrollment. Thus, there will be no impact or conflict with CEQA Guidelines § 15064.3, subdivision (b).

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact

The site has a main entrance on the east side of the campus off of Palm Drive, with a pick-up and drop-off area within the main parking lot. A second staff parking lot is provided off of Solliden Drive,



on the northwestern edge of the campus. The project would demolish the old District Office, to the north of the main entrance (bordering Jessen Drive) and construct a new northern parking lot that would be accessed separately from Palm Drive. This separate access would be in a location similar to the current separate access for the existing old District Office. By expanding parking facilities on campus, the project would expand access and create more access points to onsite parking availability. This would differentiate the access points for staff/faculty and other site vehicles, potentially reducing the activity at each driveway location where pedestrians and vehicles have conflict points at the sidewalk. Site access for staff/faculty and other vehicles with the proposed project would not change significantly from the current site configuration. The main parking lot and pick-up/drop-off area would remain in its current location, as would the northwestern parking area. The added northeastern lot would be in the current old District Office location (KOA, 2020 p. 24).

The proposed project would not expand the elementary school campus outside of its existing boundaries, which do not currently create hazards due to a geometric design or incompatible uses. The proposed improvements to the Palm Crest Elementary School campus would not create any hazards or dangerous intersections. The project proposes to improve traffic flow with a redesign of the existing parking lot along Palm Avenue and the staff parking lot adjacent to Solliden Lane. The project also proposes a new parking lot where the existing old District Office is currently located, which would expand the amount of parking compared to existing conditions. Therefore, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible use. The project would have a less than significant impact in this regard.

d) Would the project result in inadequate emergency access?

Less Than Significant with Mitigation Incorporated

Construction

During project demolition and construction activities, delivery truck trips and construction equipment could contribute additional traffic within the study area, which could in turn impact emergency access to the project site. Additionally, partial lane closures may be needed along Palm Avenue and Jessen Drive, which could potentially impact emergency vehicle access to the project site. Construction trip generation intensities would vary based on the construction phase, truck hauling patterns, and construction employment intensities. To ensure that there would be less than significant impacts to emergency access during the construction phase, mitigation measure **TRANS-1** (see above) is proposed.

Operation

The project would not alter or impact roads or sight lines. Existing entrance/exit points to the project site would remain largely unaltered with the exception of modifications to the parking lot along Palm Avenue, to promote traffic flow and safety. Therefore, project operation would have no impact on emergency access.

Mitigation Measure

Refer to mitigation measure **TRANS-1** above.



Level of Significance after Mitigation

Mitigation measure **TRANS-1** would reduce potential impacts regarding emergency access to a less than significant level because this mitigation measure requires identification of how emergency access to and around the project site would be maintained during project construction. After implementation of mitigation measure **TRANS-1**, potential impacts regarding emergency access would be reduced to a less than significant level.



4.18 Tribal Cultural Resources

	Would the Project:	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code § 5020.1(k)?			X	
b)	Cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be a significant resource to a California Native American tribe pursuant to the criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c)?				Х

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code § 5020.1(k)?

Less Than Significant Impact

A Cultural Resources analysis for the Palm Crest Elementary School Modernization Project site was prepared. The analysis includes a records and literature search at the California Historic Resources Inventory System (CHRIS) South Central Coastal Information Center, a request to the Native American Heritage Commission (NAHC) to conduct a search of their Sacred Lands File (SLF) for potential traditional cultural properties, as well as to provide a list of local Native American tribes and tribal representatives to contact, and the results of a field pedestrian survey (**Appendix E1**). The historical background investigation found that the campus and surrounding area has been a fully-developed urban landscape since the late 1950s, and that the buildings of the elementary school were constructed with deep cut-and-fill grading resulting in the removal of several feet of the native soil. Furthermore, the Cultural Resources investigation determined that there are no tribal cultural resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources within the project site or within a half-mile buffer surrounding the project site. There was no finding of prehistoric cultural resources within the project site. However, unknown or unrecorded resources may potentially be revealed during precise grading activities. This may occur if ground disturbance activities penetrate deeper than previous work performed.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be a significant resource to a California Native



American tribe pursuant to the criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c)?

No Impact

Assembly Bill (AB) 52 requires meaningful consultation with California Native American tribes on potential impacts on tribal cultural resources (TCRs), as defined in Public Resources Code § 21074. TCRs are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or a local register of historical resources.

The District initiated AB 52 outreach to local tribes for the Palm Crest Elementary School Modernization Project. For the proposed project, those tribes from which the District received a request for consultation were contacted per Public Resources Code § 21074, and the AB 52 consultation process was initiated.

The District prepared letters to the five tribes on the recommended list from the NAHC, informing them of the project. The letters were sent by Mark Evans, Assistant Superintendent of Business and Administrative Services, La Cañada Unified School District, with Harold J. Pierre, Measure LCF Program Manager, as the contact person (the Lead Agency) on April 8, 2020 via certified mail to: the Gabrielino/Tongva San Gabriel Band of Mission Indians, the Gabrieleño Band of Mission Indians – Kizh Nation (Gabrieleño – Kizh Nation), the Gabrielino-Tongva Tribe, the Gabrielino/Tongva Nation, the Gabrielino Tongva Indians of California Tribal Council, the San Fernando Band of Mission Indians, the Fernandeño Tataviam Band of Mission Indians, and the Gabrielino/Tongva San Gabriel Band of Mission Indians (H. Pierre, personal communication; April 9, 2020). The letters conveyed that the recipient had 30 days from the receipt of the letter to request AB 52 consultation regarding the project.

The Gabrieleño – Kizh Nation replied to the District on April 9, 2020 in a letter via email that they wished to have AB 52 consultation on the project. The District consulted with the tribe via conference call on April 15, 2020 with representatives of the tribe (including Chairperson Andrew Salas) and the District (including Harold Pierre, Project Manager) on the line. Details of the project construction plans were reviewed; the tribe described their traditional and modern associations with the project area as well as their concerns for potentially deeply buried cultural resources at the project site. The tribe requested information on past construction grading at the school site to help determine the potential for current construction subsurface work to encounter past fill and the original elevation surface. On May 19, 2020, the District mailed the Gabrieleno – Kizh Nation a letter describing past work at the site with the assessment that the current project would not encounter fill or the natural elevation.

A second consultation conference call between the Gabrielino-Kizh Nation and the District was conducted June 11, 2020. During this meeting detailed description of three phases of prior construction excavations at the school site was presented, which demonstrated that no native surface soil or fill remained on the site, and that there had been importation of new soil. An email from the tribe to Mr. Mark Evans, of the District, stated that "Since we have reached a mutual understanding and no protective measures have been request [by the tribe] for your ground disturbance work, we can conclude the AB 52 consultation for this project location."

No other tribes have replied within the AB 52 response period.



The project site has been previously disturbed (see **Section 4.5** above and **Appendix E1**). Accordingly, it is unlikely that any tribal resources exist on the site. Due to the developed nature of the project site, the school, and the surrounding area, the fact that the proposed project would require only minimal grading and excavation into previously disturbed ground, the absence of nearby recorded cultural resource sites, and the absence of traditional sites recorded in the NAHC's SLF, it is less than likely that significant tribal cultural resources would be encountered during construction of the proposed project. However, any tribal cultural resources accidentally discovered during construction would be evaluated and protected in compliance with State CEQA Guidelines § 15064.5(f). Therefore, there will be No Impact to a tribal cultural resource resulting from this project.



4.19 Utilities and Service Systems

	Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			Х	
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			Х	
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?			Х	
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?			х	
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X

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

Less than Significant Impact

The project would extend site utilities (water, sewer, communications) to the new two-story building addition and shall make improvements to landscaping areas, and pedestrian walkways. This includes repairs to some pedestrian walkways for Americans with Disabilities Act (ADA) compliance and minor improvements to landscaping. Additionally, the proposed project would replace existing aging sewer, water and storm drain lines.



Water

As detailed in the utility plan for the proposed project, an existing eight-inch water main runs from Jessen Drive partially down the access road on the west side of the campus. The project would install a new eight-inch water main in the access road on the west side of the campus which is connected to the existing water main on Jessen Road. A fire water line for the new building would be installed on site and would connect to the proposed eight-inch water main on the access road on the west side of campus. Domestic water for the proposed classroom building would be constructed to branch off from the proposed new eight-inch water main and would include a new water meter. Additionally, a new line for fire water would be constructed for the interim classroom buildings to feed the new fire hydrant. The fire water line would go from the access road on the west side of campus to the location of the proposed new fire hydrant and interim classroom buildings.

Water supplied to the project area comes from La Cañada Irrigation District (LCID, 2003). The District does not anticipate additional staff, students, or transfer students to be generated as a result of the proposed project. Outside of the normal increases and decreases due to normal grade fluctuations, the project is not intended to increase student enrollment. The additional classrooms that would be built as part of the project would give the school flexibility in managing enrollment. Therefore, the proposed project would not require or result in the relocation or construction of new or expanded water facilities. The project would have a less than significant impact in this regard.

Wastewater

An existing six-inch sewer main runs through the middle of the school, to the northeast of the existing baseball field. The project proposes a new six-inch sewer main which would run north of the existing sewer main to the courtyard between the two wings of the proposed new building.

The Sanitation District's 1,400 miles of main trunk sewers and 11 wastewater treatment plants convey and treat about 390 million gallons per day (mgd) of wastewater, of which approximately 130 mgd are available for reuse. The wastewater treatment plant that serves the city is the La Cañada Water Reclamation Plant, which has a wastewater capacity of 0.2 mgd (LASD, 2020). The District does not anticipate additional staff, students, or transfer students to be generated as a result of the proposed project. Outside of the normal increases and decreases due to normal grade fluctuations, the project is not intended to increase student enrollment. Therefore, the proposed project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. The project would have a less than significant impact in this regard.

Stormwater Drainage

The proposed project site sits in a topographic depression relative to Palm Drive and Jessen Drive. Stormwater generated on the project site drains via sheet flow toward the school, and is discharged through two existing drainage swales into Halls Canyon Channel, approximately 775 feet west of the project site. Halls Canyon Channel discharges into Verdugo Wash approximately 1.7 miles southwest of the project site; Verdugo Wash discharges into the Los Angeles River which in turn drains into the Pacific Ocean at Long Beach Harbor.

After project construction, the amount of impervious area within the Palm Crest Elementary School campus would increase slightly due to the addition of the upper parking lot and paving associated with the new two-story classroom building. This increase would not be expected to change the



amount of runoff from the project site significantly. The proposed project would include stormwater BMPs for construction and operations that would be adequately designed to accommodate site runoff so that it would not adversely impact downstream storm drain facilities or provide substantial additional sources of polluted runoff. In addition, California Government Code § 53097 requires school districts to comply with city and county ordinances regulating drainage improvements and requiring review and approval of grading plans as they relate to design and construction of onsite improvements that affect drainage. The District would comply with California Government Code § 53097 in implementing the proposed project. This compliance would ensure that the proposed project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities. Therefore, potential impacts would be considered less than significant.

Electric Power

The existing site is served by an 800A, 208V 3-Phase electrical service located on the north west end of the site and one 1200A, 208V, 3-Phase service located on the southeast corner of the site. These services will be consolidated and replaced with a 1600A 480V 3-Phase service to be located on the southeast corner of the site. The total average monthly electrical consumption is 18,000 kilowatt hours (kWh) for non-summer months, and 22,000 kWh for the summer months. It is expected that the new project would provide for energy efficient lighting and HVAC to result in overall reduction of energy usage.

Electric power for the City of La Cañada Flintridge is provided by Southern California Edison (SCE) (City of La Cañada Flintridge, 2020b). The proposed project is located in a developed area, and electricity infrastructure currently exists at the project site. SCE typically utilizes existing utility corridors to reduce environmental impacts, and has energy-efficiency programs to reduce energy usage and maintain reliable service throughout the year (Southern California Edison, 2018, p. 45). The project would be constructed in accordance with all applicable Title 24 regulations, and would not necessitate the construction or relocation of electric power facilities. Therefore, a less than significant impact would occur.

Natural Gas

The Southern California Gas Company (SoCalGas) is the primary distributor of retail and wholesale natural gas across Southern California, including the City of La Cañada Flintridge (City of La Cañada Flintridge, 2020b). SoCalGas provides services to residential, commercial, and industrial consumers, and also provides gas for electric generation customers.

In its 2018 California Gas Report, SoCalGas analyzed an 18-year demand period, from 2018-2035, to determine its ability to meet projected demand (California Gas and Electric Utilities, 2018, p. 63). SoCalGas expects total gas demand to decline 0.74 percent annually from 2018 to 2035 as a result of energy-efficiency standards and programs, renewable electricity goals, modest economic growth in its service region, and advanced metering infrastructure (California Gas and Electric Utilities, 2018, p. 66). Transportation-related industrial uses account for 2.7 percent of total industrial gas demand (California Gas and Electric Utilities, 2018, p. 73), and the proposed project is not of the size or scope to significantly increase this demand. Moreover, SoCalGas plans on implementing aggressive energy-efficiency programs that will result in natural gas savings across all sectors that will ensure longevity of its natural gas supplies and adequate generation rates (California Gas and Electric Utilities, 2018, p. 78). Therefore, anticipated natural gas supply is adequate to meet demand in the SoCalGas region, and the proposed project would not require or result in the relocation or



construction of new or expanded natural gas facilities. Thus, the project would have a less than significant impact in this regard.

Telecommunications Facilities

Cable services, including internet and television, are provided in the City of La Cañada Flintridge by Charter Spectrum (City of La Cañada Flintridge, 2020b). The proposed project would not interfere with operation of Charter Spectrum's facilities; therefore, no impact would occur.

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

Less than Significant Impact

The District does not anticipate additional staff, students, or transfer students to be generated as a result of the proposed project. Outside of the normal increases and decreases due to normal grade fluctuations, the project is not intended to increase student enrollment. The additional classrooms that would be built as part of the project would give the school flexibility in managing enrollment. Therefore, any changes in water demand would be negligible and project impacts would be less than significant.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact

As described above in Section 4.19 a), the wastewater generated by the project is not expected to change from existing conditions, and would be insignificant compared to the permitted capacity for the La Cañada Water Reclamation Plant that provides service to the project site and surrounding area. Therefore, the project would be within the existing capacity of the wastewater treatment provider, and a less than significant impact to wastewater treatment services would result from implementation of the proposed project.

d) Would the project 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?

Less Than Significant Impact

The California Department of Resources Recycling and Recovery (CalRecycle) provides Estimated Solid Waste Generation Rates as a forecasting tool for waste generated by development projects. This rate accounts for all waste materials that are disposed, and does not factor in recycling.

Solid waste would be generated temporarily from construction and demolition activities. Where possible, appropriate measures would be undertaken to recycle or reuse solid waste generated during project construction. The District does not anticipate additional staff, students, or transfer students to be generated as a result of the proposed project. Outside of the normal increases and decreases due to normal grade fluctuations, the project is not intended to increase student



enrollment. Therefore, the amount of solid waste generated by the proposed project would not significantly change compared to existing conditions. Solid waste from the proposed project would be deposited at the Scholl Canyon Landfill (LA County, 2020). The Scholl Canyon Landfill has a maximum permitted throughput of 3,400 tons per day and has 9,900,00 cubic yards (approximately 11,363,050 tons per day) (CalRecycle, 2019). Therefore, the landfill would have adequate landfill capacity to accommodate the project, and impacts would be less than significant.

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

No Impact

The proposed project would not result in a permanent increase in solid waste generation or a significant change in the characteristics of solid waste generated at the site because the project would not increase student or faculty population. Construction waste would include one-time disposal of material that cannot be recycled or reused. Where possible, appropriate measures would be undertaken to recycle or reuse solid waste generated during project construction. The project would comply with AB 939 (Zero Waste program) and other applicable local, state, and federal solid waste disposal standards, thereby ensuring that the solid waste stream to regional landfills is reduced in accordance with existing regulations. The proposed project would not conflict with federal, state, and local statutes and regulations related to solid waste. Therefore, no impacts would occur.



4.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
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?			х	
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?			X	
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?			х	

As shown in **Figure 4.20-1**, the project site is not located within a Fire Hazard Severity Zone State Responsibility Area (SRA) (CAL FIRE, 2007). However, as shown on **Figure 4.20-2**, the project site is located within a Very High Fire Hazard Severity Zone Local Responsibility Area (LRA) (CAL FIRE, 2011).

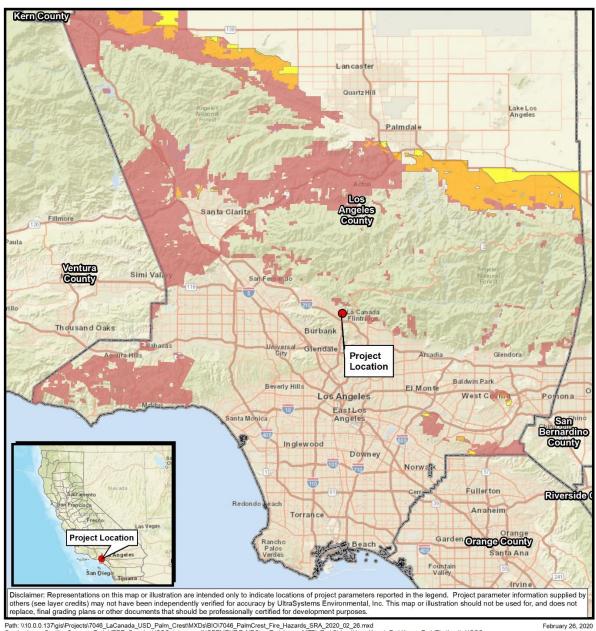
a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact

As detailed in the city's General Plan, "There are several factors that contribute to the susceptibility of wildfire danger in the City, including climate, winds, steep terrain, vegetation (e.g., chaparral), subdivision design, and water supply" (ICF Jones and Stokes, 2013. p. 5-7). However, the city's General Plan goes on to state, "Although the danger cannot be completely avoided, the City can take steps to reduce the impact that a wildfire could have on the community. The City's plan is to mitigate wildfire hazards to the extent possible and feasible through policies, regulation, public education and outreach, and implementing and updating regulations regarding fire-related hazards" (ICF Jones and Stokes, 2013. p. 5-15).



Figure 4.20-1 FIRE HAZARD SEVERITY ZONE - STATE RESPONSIBILITY AREA



Path: \\10.0.0.137\gis\Projects\7046_LaCanada_USD_Palm_Crest\MXDs\BIO\7046_PalmCrest_Fire_Hazards_SRA_2020_02_28.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; CAL FIRE, 2007; UltraSystems Environmental, Inc., 2020

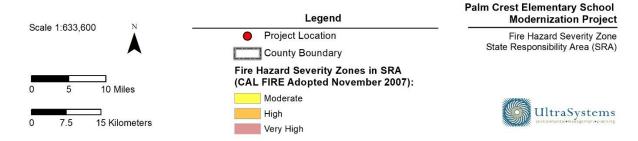
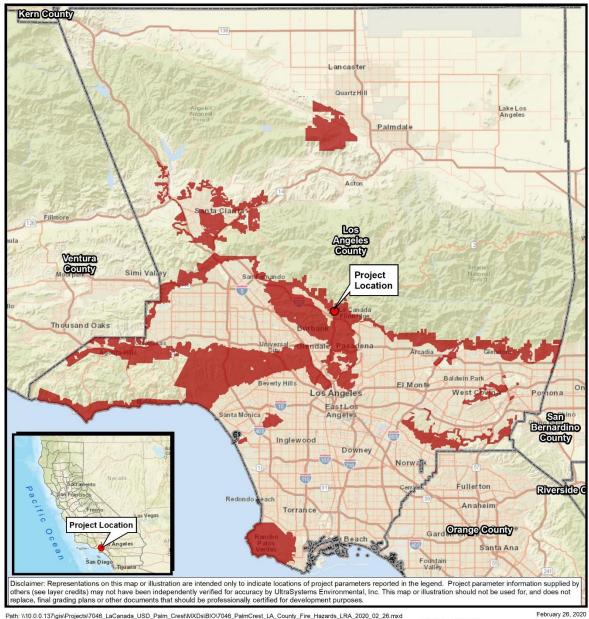




Figure 4.20-2 FIRE HAZARD SEVERITY ZONE - LOCAL RESPONSIBILITY AREA



Path: \\10.0.0.137\gis\Projects\7046 \LaCanada_USD_Palm_Crest\MXDs\BlO\7046 \PalmCrest\LA_County_Fire_Hazards_LRA_2020_02_26.mxd Service Layer Credits: Sources: \(\text{Enr}\), HERE, \(\text{Garmin}\), USGS, Intermap, \(\text{NORTHIN}\), NCRCM, Esri Japan, MET, \(\text{Esr}\) Crit China (Hong Kong), Esri Korea, Esri (Thailand), \(\text{NGCC}\), (c) OpenStreedMap contributors, and the GIS User Community: Call Fire, 2007/2012; \(\text{Utray}\) Usersystems Environmental, Inc., 2020



Palm Crest Elementary School Modernization Project

Fire Hazard Severity Zone Local Responsibility Area (LRA)





The project site is in a Very High Fire Hazard Severity Zone (VHFHSZ). "Properties located in these designated zones are subject to more stringent building code requirements than properties outside of these zones. The proposed project will be designed to meet the California Fire Code Chapter 7 and 7a. The Division of State Architect will review project plans to ensure compliance with the fire code provisions as appropriate. During the project design the project architect will review water flow and distribution requirements for the proposed project to ensure adequate water pressure is available for the fire protection systems of the new building (s). The proposed project would be required to meet all applicable building and fire code provisions and would be designed with sprinkler and other fire-safety measures. Therefore, the project would have a less than significant impact.

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less than Significant Impact

The project site is located in a VHFHSZ. The topography in the project area has slopes, which may exacerbate wildfire risks. However, the proposed project would redevelop an existing school site. Additionally, the campus is well maintained and poses a low risk regarding fire hazards. Furthermore, the project would follow strict building code requirements and would be reviewed by the LA County Fire Department (ICF Jones and Stokes, 2013. p. 5-15). As demonstrated in this document, neither construction nor operation of the project would, after implementation of mitigation, result in significant temporary or ongoing impacts to the environment. It would be constructed in compliance with applicable building and fire codes. Therefore, the proposed project would have a less than significant impact in this regard.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less than Significant Impact

As noted above, the project site is located in a VHFHSZ. The project would not 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. The project proposes replacement of aging sewer, gas, water and storm drain lines. The proposed improvements would be constructed in compliance with all applicable building, fire, and safety codes. Therefore, the project would have less than significant impact in this regard.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less than Significant Impact

The project site is located in a VHFHSZ. The topography in the project area contains slopes, which



may exacerbate wildfire risks. However, as discussed earlier, the proposed project is redeveloping an existing school site. The project would follow strict building code requirements. Project plans would be reviewed by the Division of State Architect. The proposed project would not 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. Compliance with all applicable building, fire, and safety codes would result in less than significant project impacts regarding 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.



4.21 Mandatory Findings of Significance

	Does the project have:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	The potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b)	Impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			Х	
c)	Environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		х		

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?

Less than Significant Impact with Mitigation Incorporated

Section 4.4 of this document addresses impacts on biological resources. The project site is located in an urbanized area that already has buildings, structures, sidewalks, and developed areas that would not support sensitive habitats or special-status plant or wildlife species.

After the implementation of mitigation measure **BIO-1**, potential project impacts to native bird species protected under the MBTA and the California Fish and Game Code would be reduced to a less than significant level. Implementation of mitigation measure **BIO-2** would reduce potential impacts to at least one highly aesthetic coast live oak tree to a less than significant level because these trees



would be preserved onsite. Implementation of mitigation measure **BIO-3** would add two new coast live oak trees thus reducing the impact of the removal of two coast live oak trees to a less than significant level.

Section 4.5 of this document addresses potential impacts on Cultural Resources. With implementation of **MM CUL-1** and **MM CUL-2**, potential impacts related to historic resources would be less than significant. Grading activities associated with development of the project would cause new subsurface disturbance and could result in the unanticipated discovery of unique archeological resources. With implementation of **MM CUL-3**, potential impacts related to archaeological resources would be less than significant. In the unlikely event of an unexpected discovery, implementation of **MM CUL-4** and adherence to all applicable codes and regulations would ensure that impacts related to the accidental discovery of human remains would be less than significant.

Grading activities associated with development of the project would cause new subsurface disturbance and could result in the unanticipated discovery of unique archeological resources. Mitigation measures CUL-1 and CUL-2 are recommended to reduce potential impacts regarding historic resources to a less than significant level. With implementation of mitigation measure CUL-3, potential impacts related to archaeological resources would be less than significant. In the unlikely event of an unexpected discovery, implementation of mitigation measure CUL-4 and adherence to all applicable codes and regulations would ensure that impacts related to the accidental discovery of human remains would be less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than Significant Impact

The proposed project would be consistent with regional plans and programs that address environmental factors such as air quality, water quality, and other applicable regulations that have been adopted by public agencies with jurisdiction over the project for the purpose of avoiding or mitigating environmental effects.

The project would generate new short-term construction jobs in the project area. Due to the relatively small size of this project, the nature of the project itself and its location within an existing urban area, the project is not expected to induce any growth in the region. The project does not include a housing component or otherwise support an increase in the resident population of the city and would utilize existing infrastructure for its operation. Therefore, indirect population growth resulting solely from the project is expected to be less than significant.

Because the project would not increase environmental impacts after mitigation measures are incorporated, the incremental contribution to cumulative impacts is anticipated to be less than significant with mitigation incorporated.



c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact with Mitigation Incorporated

As discussed in **Sections 4.1** through **4.20** of this document, potential project impacts were found to either be no impact, less than significant impact, or less than significant impact after mitigation. Therefore, the project would have a less than significant impact on human beings, both directly and indirectly.



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6.0 LIST OF PREPARERS

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7.0 MITIGATION MONITORING AND REPORTING PROGRAM

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with § 21081.6 of the Public Resources Code and § 15097 of the CEQA Guidelines, which require all state and local agencies to establish monitoring or reporting programs whenever approval of a project relies upon a Mitigated Negative Declaration (MND) or an Environmental Impact Report (EIR). The MMRP ensures implementation of the measures being imposed to mitigate or avoid the significant adverse environmental impacts identified through the use of monitoring and reporting. Monitoring is generally an ongoing or periodic process of project oversight; reporting generally consists of a written compliance review that is presented to the decision-making body or authorized staff person.

It is the intent of the MMRP to: (1) provide a framework for document implementation of the required mitigation; (2) identify monitoring/reporting responsibility; (3) provide a record of the monitoring/reporting; and (4) ensure compliance with those mitigation measures that are within the responsibility of the La Cañada Unified School District (District) to implement.

The following table lists impacts, mitigation measures adopted by the District in connection with approval of the proposed project, level of significance after mitigation, responsible and monitoring parties, and the project phase in which the measures are to be implemented.



<u>Table 7.0-1</u> MITIGATION MONITORING AND REPORTING PROGRAM

IMPACT	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE		
AESTHETICS	AESTHETICS					
Threshold 4.1 d): Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	MM AES-1: During project construction, the project applicant shall employ low level lighting so as to minimize to the maximum extent possible any potential lighting and/or glare impacts to nearby residences. The lighting used during project construction shall consist of the minimum amount of light necessary for safety and security on the project site.	Project Applicant	Field Verification	 La Cañada Unified School District La Cañada Unified School District During Project Construction 		
BIOLOGICAL RESOURCES						
Threshold 4.4a): Would the project 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 or U.S. Fish and Wildlife Service?	MM BIO-1: Pre-Construction Breeding Bird Survey If project construction occurs between February 1 and August 31, a qualified avian biologist shall conduct a preconstruction nesting bird survey no earlier than one week prior to construction. If any nests identified are still occupied, a buffer of 200 feet shall be maintained around any active nest, and the avian biologist shall visit the site once a week, until the avian biologist can determine that the young have fledged or the nest has become inactive.	Project Applicant	Field Verification	 La Cañada Unified School District La Cañada Unified School District During Project Construction 		
Threshold 4.4e): Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	MM BIO-2: Coast Live Oak Tree Protection Measure During project construction, the measures described below shall be taken to protect any oak trees designated to be preserved and for which the root systems are located near and vulnerable to damage by construction activities. The exposed tap root, main roots and any surface-feeding roots exceeding one inch in diameter shall be wrapped in protective moistened burlap during the excavation of existing pavement and buildings and during the re-grading phase and installation of the new parking lot. The roots zone (under dripline) should be excavated with a mini-excavator and/or hand tools, using a probe (metal rod or stick) to locate and unearth roots, leaving them in their natural orientation. Work will be done as quickly as possible to expose the roots for as little time as possible	Project Applicant	Field Verification	 La Cañada Unified School District La Cañada Unified School District During Project Construction 		



IMPACT	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	and the roots will be reburied with clean fill as soon as is feasible (no longer than a day or so, if possible). The burlap will be kept moist. If roots are cut, they will be cut with sharpened, clean, disinfected tools (10% bleach solution) with every effort to avoid tearing the root and to avoid tearing the root surface. A minimum distance of eight feet should be maintained of the root (distance from the root crown to terminal end of root), where possible. If the current elevation of the two tree's existing root collars differs by more than one foot from the grade of the new parking lot grade then a 10-foot radius of soil at the root collar grade shall be placed around each tree.			
Threshold 4.4e): Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	MM BIO-3: Coast Live Oak Planting Measure To offset the loss of native trees scheduled for removal during construction and project operations, two coast live oak trees shall be planted in the courtyard area of the new two-story building that will be erected in the northwest region of the project site. The container stock of these oak trees will be acquired from a plant nursery and will be 48" box trees as a minimum size (or as directed by the landscape architect or certified arborist).	Project Applicant	Field Verification	 La Cañada Unified School District La Cañada Unified School District During Project Construction
CULTURAL RESOURCES				
Threshold 4.5 a): Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	MM CUL-1: If historical or unique archaeological resources are discovered during construction activities, the contractor shall halt construction activities in the immediate area and notify the La Cañada Unified School District. The on-call qualified archaeologist shall be notified and afforded the necessary time to recover, analyze, and curate the find(s). The qualified archaeologist shall recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area and afforded the necessary time and funds to recover, analyze, and curate the find(s). Construction activities may continue on other parts of the project site while evaluation and treatment of historical or unique archaeological resources takes place.	La Cañada Unified School District	Field Verification	 La Cañada Unified School District La Cañada Unified School District During Construction
Threshold 4.5 a): Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	MM CUL-2: The Bullock House/Viewpoint shall be recorded in a Department of California Parks and Recreation Primary Record Form 523A to be submitted to the SCCIC. The house shall also be evaluated for potential significance under CEQA. The recordation and the evaluation have been completed (see Attachment E in Appendix E1, and Tang [2020] in Appendix E2). It is also recommended that, prior to scheduling its demolition, the District consult with the Lanterman House History Center and Archives and the Historical Society of Crescenta Valley to explore the feasibility of salvaging the Batchelder fireplace	La Cañada Unified School District	Field Verification	 La Cañada Unified School District La Cañada Unified School District During Construction, prior to demolishing the Bullock House/Viewpoint



IMPACT	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	and the Huntington Iron Works entry gate for long term preservation. If no entities come forward to salvage and maintain these features prior to demolition, then the District should undertake to salvage and store the Batchelder fireplace mantel and the Huntington Iron Works entry gate until such time as an entity can be found to permanently maintain them for the public good.			
Threshold 4.5 b): Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	MM CUL-3: If historical or unique archaeological resources are discovered during construction activities, the contractor shall halt construction activities in the immediate area and notify the La Cañada Unified School District. The on-call qualified archaeologist shall be notified and afforded the necessary time to recover, analyze, and curate the find(s). The qualified archaeologist shall recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area and afforded the necessary time and funds to recover, analyze, and curate the find(s). Construction activities may continue on other parts of the project site while evaluation and treatment of historical or unique archaeological resources takes place.	La Cañada Unified School District	Field Verification	 La Cañada Unified School District La Cañada Unified School District During Construction
Threshold 4.5 c): Disturb any human remains, including those interred outside of formal cemeteries?	MM CUL-4: If human remains are encountered during excavations associated with this project, all work shall stop within a 30-foot radius of the discovery and the Los Angeles County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the NAHC. The NAHC will be responsible for designating the Most Likely Descendant (MLD). The MLD (either an individual or sometimes a committee) will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of their notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code).	La Cañada Unified School District	Field Verification	 La Cañada Unified School District La Cañada Unified School District During Construction



IMPACT	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
GEOLOGY AND SOILS				
Threshold 4.7 f): Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	MM GEO-1: If paleontological resources are uncovered during construction activities, the contractor shall halt construction activities in the immediate area and notify the La Cañada Unified School District. The on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). Subsequently, the monitor shall remain onsite for the duration of the ground disturbance to ensure the protection of any other resources that may be in the area.	La Cañada Unified School District	Field Verification	 La Cañada Unified School District La Cañada Unified School District Prior to demolition
HAZARDS & HAZARDOUS MAT	ERIALS			
Threshold 4.9 a): Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	MM HAZ 1: Due to the identification of the presence of ACMs and LBP on the project site, in addition to the potential RECs (light ballasts (potentially) containing Polychlorinated Biphenyls (PCBs), fluorescent lightbulbs (potentially) containing mercury, and air conditioning units that may contain freon) identified on page 20 of the Asbestos Inspection Report prepared by Executive Environmental dated March 6, 2020 testing shall be conducted prior to demolition and a Hazardous Material Abatement Plan shall be prepared which shall incorporate the test results. Prior to the commencement of demolition, the project proponent shall retain a qualified environmental consultant to prepare a detailed Hazardous Material Abatement Plan; this plan shall be approved by the appropriate agencies prior to ground-disturbing activities. The Hazardous Material Abatement Plan shall be implemented prior to demolition activities to ensure that any hazardous materials on the proposed project site are properly identified, removed, and disposed of offsite at a landfill that can accept asbestos, and that any other hazardous materials including, but not limited to, PCBs, mercury, and freon, are removed from the site to prevent exposure to workers and the general public. The Hazardous Material Abatement Plan shall include a site-specific scope of work and specifications for the proper disposal of hazardous materials. The Hazardous Material Abatement Plan shall be prepared and implemented in accordance with the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) and all other federal and state standards and regulations, including the California Department of Toxic Substances Control (DTSC), California Department of Education (CDE), and Office of Public School Construction (OPSC).	La Cañada Unified School District	Field Verification	 La Cañada Unified School District La Cañada Unified School District Prior to demolition



IMPACT	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	A qualified environmental consultant shall be present on the project site during demolition activities and shall monitor compliance with the Hazardous Material Abatement Plan.			
Threshold 4.9 a): Create a	 MM HAZ 2: Due to the potential presence of lead at the project site, a Soil Management Plan (SMP) shall be prepared. Prior to the commencement of grading and excavation, the Project Applicant shall retain a qualified environmental consultant to prepare a SMP that complies with all applicable regulatory requirements. The SMP shall be submitted to the district's environmental consultant for review and approval prior to the commencement of excavation and grading activities. The SMP shall contain the following: The recommendations of the Health Hazardous Materials Division (HHMD), Los Angeles County Certified Unified Program Agency (LACUPA) and Los 			
significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	 Angeles County Fire Department (LAFD). The SMP shall require that the Project Applicant remove and properly dispose of impacted materials in accordance with applicable requirements of the California Department of Toxic Substances Control (DTSC), and the County of Los Angeles Fire Department. The SMP shall require that contaminated soils be transported from the project site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment. The SMP shall be implemented during excavation and grading activities. A qualified environmental consultant shall be present on the project site during grading and excavation activities in the known or suspected locations of contaminated soils, and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations for evidence of contamination. 	La Cañada Unified School District	Field Verification	 La Cañada Unified School District La Cañada Unified School District Prior to construction
Threshold 4.9 b): Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Refer to MM HAZ-1 and MM HAZ-2 Above	La Cañada Unified School District	Field Verification	 La Cañada Unified School District La Cañada Unified School District Prior to the commencement of grading and excavation



IMPACT	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
Threshold 4.9 c): Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Refer to MM HAZ-1 and MM HAZ-2	La Cañada Unified School District	Field Verification	 La Cañada Unified School District La Cañada Unified School District Prior to the commencement of grading and excavation
Threshold 4.9 f): Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	 MM HAZ-3: The General Contractor shall submit a detailed Construction Management Plan to be reviewed and approved by the La Cañada Unified School District. The Construction Management Plan shall specify that the Construction Manager will schedule truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as feasible for construction operations. All measures including identified truck routes and designated employee parking areas shall be included in the Construction Management Plan. The Plan shall include but is not limited to the following provisions: a) Identification of permitted hours for construction related deliveries and removal of heavy equipment and material; b) Identification of where construction workers would park their personal vehicles during project construction with a requirement that at no time shall construction worker vehicles block any driveways. If complaints are received by the project applicant regarding issues with construction worker vehicle parking, the project applicant shall identify alternative parking options for construction workers so as not to interfere with parking availability; c) Identification of how emergency access to and around the project site will be maintained during project construction; d) Identification of haul routes for delivery or removal of heavy and/or oversized equipment or material loads. Where feasible, delivery or removal of oversized equipment or material loads shall be conducted during off-peak hour traffic periods; e) Maintain pedestrian and bicycle connections around the project site and safe crossing locations shall be considered for all pedestrian detours; and f) Maintain the security of the project site by erecting temporary fencing during 	General Contractor	Field Verification	 La Cañada Unified School District La Cañada Unified School District Prior to construction



IMPACT	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
NOISE				
	MM N-1 Source Reduction : Use as many of the following noise source reduction measures as are needed and feasible:			
Threshold 4.13 a): Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	 Time Constraints. No construction activity between 6:00 p.m. and 7:00 a.m. Scheduling. Perform noisy work during less sensitive time periods (on campus, delay the loudest noise generation until class instruction at the nearest classrooms has ended when practicable; for residential receivers, work only between 7:00 a.m. and 6:00 p.m.). Substitute Methods. Use the quietest methods and/or equipment available. Exhaust Mufflers. Ensure that all equipment has quality mufflers installed. Lubrication & Maintenance. Keep equipment well maintained. Reduced Power Operation. Use the smallest equipment size and lowest power rating that gets the job done. Limit Equipment Onsite. Only have necessary equipment onsite. Noise Compliance Monitoring. A technician tasked with verifying compliance will be onsite during active construction activities. Quieter Backup Alarms. Backup alarms on forklifts and other equipment must be adjustable; use the lowest noise level compatible with ambient noise and other considerations. 	General Contractor	Field Verification	 La Cañada Unified School District La Cañada Unified School District During project construction
Threshold 4.13 a): Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	 MM N-2 Path Controls: Use as many of the following noise path interruption measures as are needed and feasible: Noise Barriers. Use portable noise-absorbing barriers capable of reducing sound transmission by at least 12 dBA. Install barrier(s) as near as practicable to the noise producing construction activity and/or the nearest sensitive receiver. Enclosure. Surround the work activity with a flexible intervening noise barrier system hung from supports. Strategic Storage. Site temporary equipment and material supply storage and staging areas on the campus, as far as possible from onsite occupied buildings and offsite sensitive receivers. Travel routes from the storage and staging area to active construction areas will avoid classrooms and offsite sensitive receivers as much as possible. 	General Contractor	Field Verification	 La Cañada Unified School District La Cañada Unified School District During project construction



IMPACT	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE	
Threshold 4.13 a): Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	 MM N-3 Receiver Controls: Use as many of the following receiver end noise reduction measures as are needed and feasible: Public Notification and Information. Advance notice of the start of construction shall be delivered to all noise-sensitive receivers adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the District. 	General Contractor	Field Verification	 La Cañada Unified School District La Cañada Unified School District During project construction 	
Threshold 4.13 b): Generation of excessive groundborne vibration or groundborne noise levels?	MM N-4 Truck Vibration Mitigation: Before starting either the demolition or grading phases, conduct a survey of potential haul routes and identify areas where the maximum distance between haul trucks and residences would be less than 40 feet.	General Contractor	Field Verification	 La Cañada Unified School District La Cañada Unified School District During project construction 	
Threshold 4.13 b): Generation of excessive groundborne vibration or groundborne noise levels?	MM N-5 Truck Hauling Plan: Prepare a truck travel plan that (1) maximizes the distance between trucks and residences along road sections, and (2) minimizes travel through densely populated areas before 7:00 a.m. and after 7:00 p.m.	General Contractor	Field Verification	 La Cañada Unified School District La Cañada Unified School District During project construction 	
Threshold 4.13 b): Generation of excessive groundborne vibration or groundborne noise levels?	MM N-6 Public Notification and Information. Advance notice of the start of heavy-loaded truck travel shall be delivered to all noise-sensitive receivers adjacent to the project area. The notice shall state specifically where and when loaded trucks will travel, and provide contact information for filing vibration complaints with the contractor and the District.	General Contractor	Field Verification	 La Cañada Unified School District La Cañada Unified School District During project construction 	
TRANSPORTATION					
Threshold 4.17 a): Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway,	MM TRANS-1: The General Contractor shall submit a detailed Construction Management Plan to be reviewed and approved by the La Cañada Unified School District. The Construction Management Plan shall specify that the General Contractor will schedule truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures including identified truck routes and designated employee parking	General Contractor	Field Verification	 La Cañada Unified School District La Cañada Unified School District Prior to commencement of project construction 	



IMPACT	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
bicycle and pedestrian facilities?	areas shall be included in the Construction Management Plan. The plan shall include but is not limited to the following provisions:			
	 a) Construction truck trips should be scheduled outside of school pick-up/drop-off times, to avoid conflicts and potential safety issues with student pedestrians on sidewalks at the campus perimeter on Palm Drive and Jessen Drive; b) Identification of permitted hours for construction-related deliveries and removal of heavy equipment and material; c) Identification of where construction workers would park their personal vehicles during project construction with a requirement that at no time shall construction worker vehicles block any driveways. If complaints are received by the School District or by the Principal of Palm Crest Elementary School regarding issues with construction worker vehicle parking, the project applicant shall identify alternative parking options for construction workers so as not to interfere with parking availability; d) Identification of how emergency access to and around the project site will be maintained during project construction; e) Identification of haul routes for delivery or removal of heavy and/or oversized equipment or material loads. Where feasible, delivery or removal of oversized equipment or material loads shall be conducted during off-peak hour traffic periods; f) Maintain pedestrian and bicycle connections around the project site and safe crossing locations shall be considered for all pedestrian/bicycle detours; and g) Maintain the security of the project site by erecting temporary fencing during the construction phase of the project. Any onsite night lighting used during the construction phase of the project shall be in compliance with City of La Cañada Flintridge lighting requirements for security lighting. 			
Threshold 4.17 d) : Result in inadequate emergency access?	Refer to MM TRANS-1 above	General Contractor	Field Verification	 La Cañada Unified School District La Cañada Unified School District Prior to commencement of project construction