

**DRAFT**  
**New Outdoor Pool Facility and**  
**South of Campus Improvement Project**  
**Initial Study/Mitigated Negative Declaration**  
**City of La Cañada Flintridge, Los Angeles County, California**

Prepared for:  
**La Cañada Unified School District**  
4490 Cornishon Avenue  
La Cañada, CA 91011  
818.952.8300

Contact: Mark Evans, Associate Superintendent of Business and Administrative Services

Prepared by:  
**FirstCarbon Solutions**  
250 Commerce, Suite 250  
Irvine, CA 92606  
714.508.4100

Contact: Kerri Tuttle, Project Director  
Angela Wolfe, Project Manager

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## ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ADA	Americans with Disabilities Act
AFY	acre-feet/year
APN	Assessor's Parcel Number
ARB	California Air Resources Board
AYSO	American Youth Soccer Organization
BGS	below ground surface
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Occupational Health and Safety Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CCTV	closed circuit television
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CRHR	California Register of Historical Resources
CSTMP	Construction Staging and Traffic Management Plan
dB	decibel
dBA	A-weighted decibel
DPR	Department of Parks and Recreation
DSA	California Division of the State Architect
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FIRM	Flood Insurance Rate Map
FMWD	Foothill Municipal Water District
FTA	Federal Transit Administration

**Acronyms and Abbreviations**

GAI	Geo-Advantec, Inc.
GHG	greenhouse gas
gpm	gallons per minute
HRE	Historic Resources Evaluation
HRER	Historic Resources Evaluation Report
I-210	Interstate 210
ICU	Intersection Capacity Utilization
in/sec	inch per second
IS/MND	Initial Study/Mitigated Negative Declaration
JV	Junior Varsity
LACoFD	Los Angeles County Fire Department
LASD	Los Angeles County Sheriff's Department
LCUSD	La Cañada Unified School District
LCHS	La Cañada High School
L <sub>dn</sub>	day/night sound level
LED	light-emitting diode
L <sub>eq</sub>	equivalent continuous sound level
LID	Low Impact Development
L <sub>max</sub>	maximum instantaneous noise level
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendant
MM	Mitigation Measure
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSL	mean sea level
MUTCD	California Manual on Uniform Traffic Control Devices for Streets and Highways
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NFHS	National Federation of State High School Associations
NOI	Notice of Intent
NOP	Notice of Preparation
NPDES	National Pollutant Discharge and Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
mph	miles per hour
PCE	Passenger Car Equivalency

PPV	peak particle velocity
PS	Public/Semi-Public
psi	pounds per square inch
RAP	recycled asphalt pavement
RCP	Reinforced Concrete Pipe
rms	root mean square
RPC	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SCE	Southern California Edison
SCCIC	South Central Coastal Information Center
SEA	Significant Ecological Area
SoCalGas	Southern California Gas Company
SRA	Source Receptor Area
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
State Water Board	California State Water Resources Control Board
TCR	Tribal Cultural Resource
TIA	Traffic Impact Analysis
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VdB	vibration in decibels
VMT	vehicle miles traveled
VOC	volatile organic compound

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## SECTION 1: INTRODUCTION

### 1.1 - Purpose

The purpose of this Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) is to identify any potential environmental impacts that would result from implementation of the New Outdoor Pool Facility and South of Campus Improvement Project (proposed project) at La Cañada High School, located in the City of La Cañada Flintridge, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the La Cañada Unified School District (LCUSD) has discretionary authority over the proposed project and is the Lead Agency in the preparation of this Draft IS/MND and any additional environmental documentation required for the project. The intended use of this document is to determine the level of environmental analysis required to adequately analyze the project pursuant to the requirements of CEQA and to provide the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section provides a brief description of the project location and the primary project characteristics. Section 2 includes an environmental checklist that provides an overview of the potential impacts that may result from project implementation, elaborates on the information contained in the environmental checklist, and provides justification for each checklist response. Section 3 contains the List of Preparers.

### 1.2 - Project Location

The project site is located in the City of La Cañada Flintridge, in Los Angeles County, California (Exhibit 1). The campus encompasses 31.64 acres, of which the proposed project activities and project site would encompass 3.59 acres. La Cañada High School is located at 4463 Oak Grove Drive, on the northwest corner of Oak Grove Drive and Berkshire Place (Exhibit 2). The project site is located on Assessor's Parcel Number (APN) 5823-001-901.

The project site is located within the *Pasadena, California*, United States Geological Survey (USGS) 7.5-minute topographic quadrangle map, La Cañada Land Grant (34°11'29.22"N, 118° 10'44.40"W). The project site is 1,090 feet above mean sea level (MSL). Regional access to the site is provided via Interstate 210 (I-210), via Foothill Boulevard, and local access is provided via Oak Grove Drive and Berkshire Place.

### 1.3 - Environmental Setting

The proposed project is located on the existing La Cañada High School Campus and would relocate existing athletic facilities to allow for the construction of a new pool, an expanded parking lot, and relocated basketball courts. The project site is located within the southeastern corner of the existing La Cañada High School Campus. The proposed project would affect the following areas or existing campus facilities: the Junior Varsity (JV) baseball field, the student parking lot, the basketball court, the existing locker rooms in the North Gym, and the existing 25-meter pool and pool equipment

building. The project site is designated as Public<sup>1</sup> (Exhibit 3), and the site is zoned as Public/Semi-public (PS)<sup>2</sup> (Exhibit 4). The project site is located within a developed area of the City and is surrounded by Crestview Preparatory School, Foothill Boulevard, and a single-family residential neighborhood to the north; Oak Grove Drive and the Hahamongna Watershed Park to the east; I-210 to the west; and Berkshire Place, La Cañada United Methodist Church, and the Hillside School and Learning Center to the south.

La Cañada High School serves students in grades 7–12. According to the La Cañada High School Profile for the 2019/2020 school year, approximately 2,069 students are currently enrolled.<sup>3</sup>

## **1.4 - Existing Facilities**

### **1.4.1 - Pool and Surrounding Deck**

The existing 4,800-square-foot, 25-meter, L-shaped pool accommodates the swimming and water polo teams. These programs schedule staggered practices and meets at the campus due to the smaller pool size. The existing pool and associated equipment are outdated and in need of replacement, requiring continuous maintenance at a high cost to the school.

### **1.4.2 - North Gymnasium**

Constructed in 1962, the lower level of the north gymnasium is aligned with the level of the existing pool deck and contains boys' and girls' restrooms and locker room facilities.

### **1.4.3 - South Gymnasium**

Constructed in 1969, the lower level of the south gymnasium sits at grade with the parking lot to the east, basketball courts to the south, and baseball fields to the west, and contains a basketball court with bleachers, a large wrestling/exercise room, a weight lifting room, and restroom, shower, and locker room facilities.<sup>4</sup>

### **1.4.4 - Baseball and Soccer Field**

Constructed in 1962, and upgraded in 1988, 2000, and 2016, the northern baseball field is utilized for Varsity practice and JV/Varsity games. The southern baseball field is used by the school for JV and by multiple community leagues. Additionally, the American Youth Soccer Organization (AYSO) uses the outfield grass areas for both practice and games. Removal of the portable outfield fencing allows for utilization of the fields for soccer practices. These field areas are lighted by existing pole-mounted stadium-type fixtures.

<sup>1</sup> City of La Cañada Flintridge. 2013. General Plan Land Use Element. Website: [https://cityoflcf.org/wp-content/uploads/2019/09/General\\_Plan\\_Land\\_Use.pdf](https://cityoflcf.org/wp-content/uploads/2019/09/General_Plan_Land_Use.pdf). Accessed October 18, 2019.

<sup>2</sup> City of La Cañada Flintridge. 2016. Zoning Map. Website: [https://cityoflcf.org/wp-content/uploads/2020/02/LCF\\_Zoning\\_Map\\_2016.pdf](https://cityoflcf.org/wp-content/uploads/2020/02/LCF_Zoning_Map_2016.pdf). Accessed October 18, 2019.

<sup>3</sup> California Department of Education. 2020. 2019-20 Enrollment by Grade La Cañada High Report. Website: <https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=19646591934611&agglevel=School&year=2019-20>. Accessed January 31, 2020.

<sup>4</sup> Note: Code requires that restroom facilities be provided within 300 feet of a pool. Because the restroom facilities within the South Gymnasium cannot accommodate the needs of the new pool, the new pool facility is being designed to include restroom facilities.



### 1.4.5 - South Parking Lot

Constructed in 1969, the south parking lot provides angled parking for approximately 110 student cars during regular school hours (Monday through Friday, 7 a.m.-4 p.m.) and community access to the southern baseball field and batting cages.

## 1.5 - Project Description

The proposed project would demolish the existing basketball courts to construct a 40-meter pool facility with a 1,176-square-foot pool equipment area, 1,620-square-foot outdoor pool storage area, 218-square-foot girls restroom, 218-square-foot boys restroom, two 378-square-foot locker rooms, a 284-square-foot indoor concrete storage area, a 411-square-foot office, and 19 outdoor showers. The existing on-campus baseball field would be shifted west to expand the student parking lot, and the existing 25-meter pool and 750-square-foot pool equipment building would be replaced with new basketball courts with associated steps/seating (Exhibit 5) that would provide extended emergency vehicle access to this area of campus.

### 1.5.1 - Pool and Accompanying Facilities

The existing outdoor basketball courts would be demolished, and a new 40-meter pool with moveable bulkhead would be built. Accompanying facilities would include a ticket/announcer facility; pool deck for use by swimmers, coaching staff, competition organizers, officials, and spectators;<sup>5</sup> equipment storage including a 1,176-square-foot pool equipment area and 1,620-square-foot outdoor pool storage area; 328-square-feet for public restrooms; two 378-square-foot locker rooms; a 284-square-foot indoor concrete storage area; and a 411-square-foot coaches office. Approximately five rows of bleacher seating would be constructed, with shade covers, in addition to pool deck lighting, a scoreboard, and new electrical service from the main campus to the pool. Three existing light poles currently lighting the baseball field would be moved to the north and west to accommodate the parking lot expansion. Fire Department access to the new pool buildings would be provided in accordance with Division of the State Architect and Los Angeles County Fire Department requirements. The pool would be enclosed by security fencing in accordance with local safety regulations. The pool area would also include two new sports lighting poles and bleachers.

The competition swimming pool would support ongoing competitive and instructional water programs geared toward high school education in one body of water. This body of water would include a 136-foot by 75-foot competitive multi-purpose pool with moveable bulkhead for greater program separation and configuration of aquatic competitions. The swimming pool would accommodate:

- A National Federation of State High School Associations (NFHS) floating water polo course in 8-foot or deeper water.
- A 25-yard, 25-meter, and 30-meter floating water polo game course.

<sup>5</sup> As student and staff numbers are not increasing, there would be no increase in the number of visitors and spectators compared to current numbers.

**Introduction**

- Fourteen 25-yard competitive swimming lanes with starting blocks mounted at the north side of the pool.
- Eight lanes for competitive racing in 25-yard or 25-meter (82 feet) configuration running east to west in conjunction with the movable bulkhead.
- Long course starting blocks at the deep/east end of the pool.
- A stainless-steel bulkhead with composite plastic material above the waterline to prevent corrosion, capable of being moved to optimize the pool for several different competitive events or practice as well as for optimal viewing relative to spectator seating location.

The Competition Pool would be 25 yards wide (75 feet, 1.25 inches) and 40 meters long (136 feet, 4 inches). The floating bulkhead would be 6 feet 8 inches wide and 75 feet long. There would be four or five locations in the pool where the bulkhead can be fastened securely to the pool structure. There would be a 10-foot by 75-foot shallow area with entry stairs, with depths between 3 feet 6 inches, and 4 feet 6 inches, for recreational and educational programs. The remainder of the pool would slope directly to 8 feet and shortly thereafter to an 8-foot 3-inch deep end, providing optimal space for competitive water polo and swimming.

The pool would support the following programs:

1. Fitness swimming
2. Lap swimming
3. Competitive High School swimming (both 25-yard and 25-meter)
4. Masters swimming
5. Recreational water polo
6. Competitive High School water polo
7. Club water polo and club swimming
8. Lifeguard training
9. Red Cross training
10. Public safety training
11. Physical education programs
12. Physiology programs
13. Recreational programs (aerobics, aqua, etc.)

Starting blocks would be provided to allow for short course 25-yard or 25-meter swim events, with blocks at the deep/east end and north wall of the pool. Pool water depth would range from 3 feet 6 inches to 8 feet 3 inches to accommodate competitive swimming and water polo. The perimeter overflow system would be a cantilever deck deep trough gutter system with the water level 12 inches below the pool deck.

Americans with Disabilities Act (ADA) access would be provided with one permanently installed accessible lift and one ADA compliant pool stair with handrails. Five ladders with recessed steps would be located around the pool, in accordance with California Code of Regulations Section 3111B,

Title 24.<sup>6</sup> The pool would also have a recessed toe ledge 4 feet below water level for swimmers to support themselves in deep water while receiving instruction and would feature underwater light-emitting diode (LED) lights.

The new aquatics building would incorporate materials currently used on campus, including concrete masonry units, metal paneling, and glazing units accented with screened overlays.

### **1.5.2 - North Gymnasium**

- In compliance with requirements of the Division of the State Architect, the north gymnasium would include minor modifications and upgrades in compliance with ADA regulations that could include the following: Reconfiguration of the existing restroom facilities to include enlarging the accessible toilet stall, the addition of grab bars, and installation of a new accessible hand wash sink, mirror, hair dryer, drinking fountains, and miscellaneous toilet accessories.
- Addition of accessible shower fixtures and related folding benches, grab bars, and towel hooks.
- Reconfiguration of a small number of lockers in each locker room to accommodate accessible changing benches and appropriate latching and locking hardware.

### **1.5.3 - South Gymnasium**

No improvements are planned for the south gymnasium.

### **1.5.4 - Southern Junior Varsity Baseball Field**

The existing southern baseball field would be shifted west to make room for the parking lot expansion and pool construction. Baseball field improvements would include the relocation of the backstop, dugouts, bleachers, and right field lighting. The three existing right field lighting poles and footings would be demolished and relocated to new right field lighting poles to the west. In addition, two of the existing batting cages with lighting would be demolished to allow for more parking spaces, and one existing batting cage would remain on-site. One additional batting cage with lighting would be constructed.

### **1.5.5 - Basketball Courts and Adjacent Hardscaped Area**

The existing pool facility would be demolished and replaced with two new 45-foot by 90-foot basketball courts at the eastern portion of the site between the north and south gymnasiums. The basketball courts would include two full-size courts with additional backstops for Physical Education and recreational usage, hardscaping and landscaping at the west side of the courts, a shaded seating and gathering area for students, and a continuation of the main campus circulation axis to the new

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<sup>6</sup> Title 24 Section 3111B of the California Code of Regulations states that “[a] means of entry and exit to and from the pool shall consist of steps, recessed steps, ladders, stairs, ramps or a combination of these. Stairs or ramps shall be provided in the shallowest portion of a pool if the vertical distance from the bottom of the pool to the deck is over 1 foot (305 mm). In pools with more than one shallow end, stairs or ramps shall be provided at a minimum at one shallow end. A second means of entry and exit shall be provided in the deep portion of a pool having a depth greater than 4 ½ feet (1372 mm). Where the width of the pool exceeds 30 feet (9144 mm), such means of entry and exit shall be provided at each side, not more than 100 feet (30,480 mm) apart.”

pool location. The existing pool and accompanying facilities would be demolished prior to construction of the new basketball courts. On campus basketball courts are currently open to the public for free play, and the replacement courts would continue to be open to the public.

The relocation of the existing basketball courts would include removal of the existing fencing along the west side of the proposed basketball court area to allow for extension of the main campus north-south circulation spine. The removal of the existing pool equipment building would make this area more open to facilitate gathering and provide connecting views from north to south. One field lighting pole that stands near the existing pool equipment building on the northeast corner of the baseball field would be shifted west to allow for better circulation and emergency vehicle access.

### **1.5.6 - South Parking Lot Expansion**

The south parking lot expansion would include shifting the southern JV baseball field comprised of the backstop fencing, infield diamond, dugouts, bleachers, the two field (one infield and one outfield) lighting poles that stand along the west edge of the parking lot. The two existing light poles and fixtures would be relocated to new footing and their existing footings would be demolished. The landscaping would be modified to widen the parking lot, existing 45-degree parking spaces would be converted to 90-degree spaces, and additional spaces would be added for a total of 147 parking spaces that would continue to serve as student parking.<sup>7</sup> Access to the parking lot would continue to be available via three existing driveways along Oak Grove Drive. In addition, a drywell infiltration system would be constructed at the southern portion of the south parking lot to allow water to infiltrate the soil.<sup>8,9</sup>

### **1.5.7 - Access and Circulation**

The need for additional student parking on the La Cañada High School campus would be accommodated by widening the south lot and adding approximately 30 spaces to the expanded south parking lot.

Emergency vehicle access would be provided in accordance with Division of the State Architect and Los Angeles County Fire Department requirements.

Athlete and student access to the new pool would occur via extension of the main campus circulation spine along the west side of the existing south gymnasium. Visiting athletes and the general public would access the pool deck and bleachers via a new gated entry at the east side of the pool, adjacent to the coach's office. The public restrooms would also be accessible from the JV baseball field via a new separate gate, allowing for their use while the pool facility is closed.

Pool deck fencing would be arranged so as not to block the existing south gymnasium fire exits.

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<sup>7</sup> Parking within the student parking lot will continue to be regulated through parking permits administered to students.

<sup>8</sup> Gonzalez Goodale Architects. 2019. Basis of Design Report and Schematics. Accessed October 5, 2020.

<sup>9</sup> Gonzalez Goodale Architects. 2019. Schematic Design Submittal. Accessed October 5, 2020.

## 1.6 - Landscaping

Proposed plans for incorporating hardscape and planting into the project site are described below.

### Hardscape and Planting

Existing on-site paving consists of asphalt, natural colored concrete, and decomposed granite. Existing paving would be removed and replaced with new paving, decomposed granite, or pavers according to the suggested design. The existing damaged split face block planter walls and screen walls would be removed. In addition to the new pavement features, walkways, planting areas, and seating, stairs, ramps, and pavers would be installed to provide access to various portions of the project site. These features would be constructed in compliance with ADA regulations, similar to gymnasium improvements. Furthermore, there are 10 trees within the project site with the potential to be impacted by the proposed project. These include two eucalyptus (*Citriodo*), five southern magnolia (*Magnolia grandiflora*), two coast live oak (*Quercus agrifolia*), and one Mexican fan palm (*Washingtonia robusta*). The two coast live oak trees are protected according to the City of La Cañada Tree Preservation and Protection Guidelines. The project proposes to remove eight of the existing trees (five southern magnolia, one Mexican fan palm, and two eucalyptus) within the project boundary. The coast live oak trees would not be removed.

## 1.7 - Construction

Construction is anticipated to start around March 2021, with a final buildout date of October 2022. Construction would be completed in three phase(s), lasting approximately 18-20 months. Construction phasing is as follows:

- Phase 1 (May 2021 through July 2022): Construction of new pool and accompanying facilities.
- Phase 2 (April 2022 - October 2022): South parking lot and baseball field improvements.
- Phase 3 (May 2022 through October 2022): Filling of old pool, construction of new basketball courts and adjacent plaza, and ADA improvements to existing North Gym locker rooms.

The school would remain in operation during the construction period. The new pool would be completed first, and then the existing pool would be demolished, and the new basketball courts would be constructed. There may be some overlap between operation of the new pool and the start of Phase 2 of construction. The Varsity baseball field would be operational during Phase 1 of construction. However, the JV baseball field would not, as it is expected to be completed during Phase 2. The JV field may be operational during Phase 3 of construction, depending on when Phase 2 is completed. In addition, the Varsity baseball field would be in operation during Phase 3 of construction. La Cañada High School would continue to operate during normal operating hours Monday through Friday, 8:00 a.m. to 3:00 p.m., during the normal school year, with the exception of the parking lot. The parking lot would be closed during demolition, earthwork, and grading. Following completion of the aforementioned work, the parking lot would be partially open for student use, with approximately 50 percent of the existing spaces available for use. The parking lot would be closed and restricted from use from approximately June 2022 until August 2022 for construction. Full use of the lot is expected to be available on or about

August 2022. Project construction would occur during the hours of 7:00 a.m. to 4:00 p.m., Monday through Friday. Additional construction would likely occur on Saturday from 8:00 a.m. to 5:00 p.m.

## **1.8 - Operation**

Once the proposed facilities are constructed, the site would operate normally, supporting the current population of 2,069 students spread across grades 7 to 12 (2018-19),<sup>10</sup> in addition to visitors and staff. There would be no increase in the number of students or staff associated with the proposed project. Scale of programs and competitions would remain the same that are currently operating.

## **1.9 - Existing Facilities**

### **1.9.1 - Domestic and Fire Department Water**

An existing water main runs in the north-south direction along the east side of the campus that could serve as a point of connection for the water lines. The water main has a 10-foot-wide easement granted to the Valley Water Company. At least two new water connections would be required to accommodate the new pool facilities. Therefore, coordination with the water purveyor may be necessary to connect to new water lines.<sup>11</sup>

New domestic water connections would service the proposed pool and proposed adjacent buildings. Points of connection would be needed to service the restroom and locker rooms within the proposed buildings. Water service connections to the water main would be coordinated with the Valley Water Company. Capacity for the domestic water line has been assessed based upon the flow test conducted in June 2019.

The results of the flow test demonstrate that the water line tested on campus has a capacity of 3,000 gallons per minute (gpm) at 20 pounds per square inch (psi). Assuming the construction type of the building to be Type IIB and the gross square footage to be approximately 6,000 square feet (per current site plan), the required fire flow, per Appendix BB Table BB105.1, of the California Fire Code is 1,750 gpm at 20 psi. Therefore, the required flow for the buildings is less than the capacity of the existing water line, therefore the existing line on campus should be sufficient.

Fire Department water connections are not required as a part of the proposed project.

### **1.9.2 - Sanitary Sewer**

According to City of Pasadena Record Drawings, a sanitary sewer line is located south of the south gymnasium that appears to connect to the 10-inch sewer main in Oak Grove Drive.

The sewer point of connection for the proposed pool and adjacent buildings would utilize existing on-site sewer lines. Existing sewer lines within the footprint of the proposed project would be replaced to accommodate the proposed pool, locker rooms, and restrooms located on the southeast side of the pool area.

<sup>10</sup> California Department of Education. 2019. 2018-19 Enrollment by Grade La Cañada High School Report. Website: <https://dq.cde.ca.gov/dataquest/dqcensus/enrgdlevels.aspx?agglevel=School&year=2018-19&cde=19646591934611>. Accessed January 31, 2020.

<sup>11</sup> Giselle Harkous. 2019. Personal Communication with KPFF Engineering. November.

### 1.9.3 - Storm Drain

Storm drain lines are located west and south of the south gymnasium. The southern and western lines intersect at the southwest corner of the south gymnasium. The size, slope, and diameter of the lines are yet to be determined and would continue to be explored during the upcoming design phases. Based on available survey and as-built information, there appears to be a 27-inch Reinforced Concrete Pipe (RCP) storm drain line that runs through the field to the west. The majority of the storm drain system added would be routed to the deep infiltration drywell, where the stormwater would be infiltrated into the ground. The overflow of the drywell system, in the case that the system experiences a flow higher than what it has been designed for, may connect into the 27-inch line or discharge to the curb face if possible.<sup>12</sup>

Additional utilities serving the project site are listed below.

- Electricity: Southern California Gas Company (SoCalGas)
- Natural Gas: SoCalGas
- Television/Internet: Charter Spectrum
- Water: Valley Water Company
- Waste Disposal: Republic Services, Inc., or NASA Services, Inc.

### 1.10 - Required Discretionary Approvals

As mentioned previously, the LCUSD has discretionary authority over the proposed project and is the CEQA Lead Agency for the preparation of this Draft IS/MND. In order to implement the proposed project, the District would need to secure the following approvals:

- Site Plan and Design Review from LCUSD
- La Cañada Board of Education (LCUSD Board) Approval
- Review and approval of project plans by California Division of the State Architect (DSA)

### 1.11 - Intended Uses of this Document

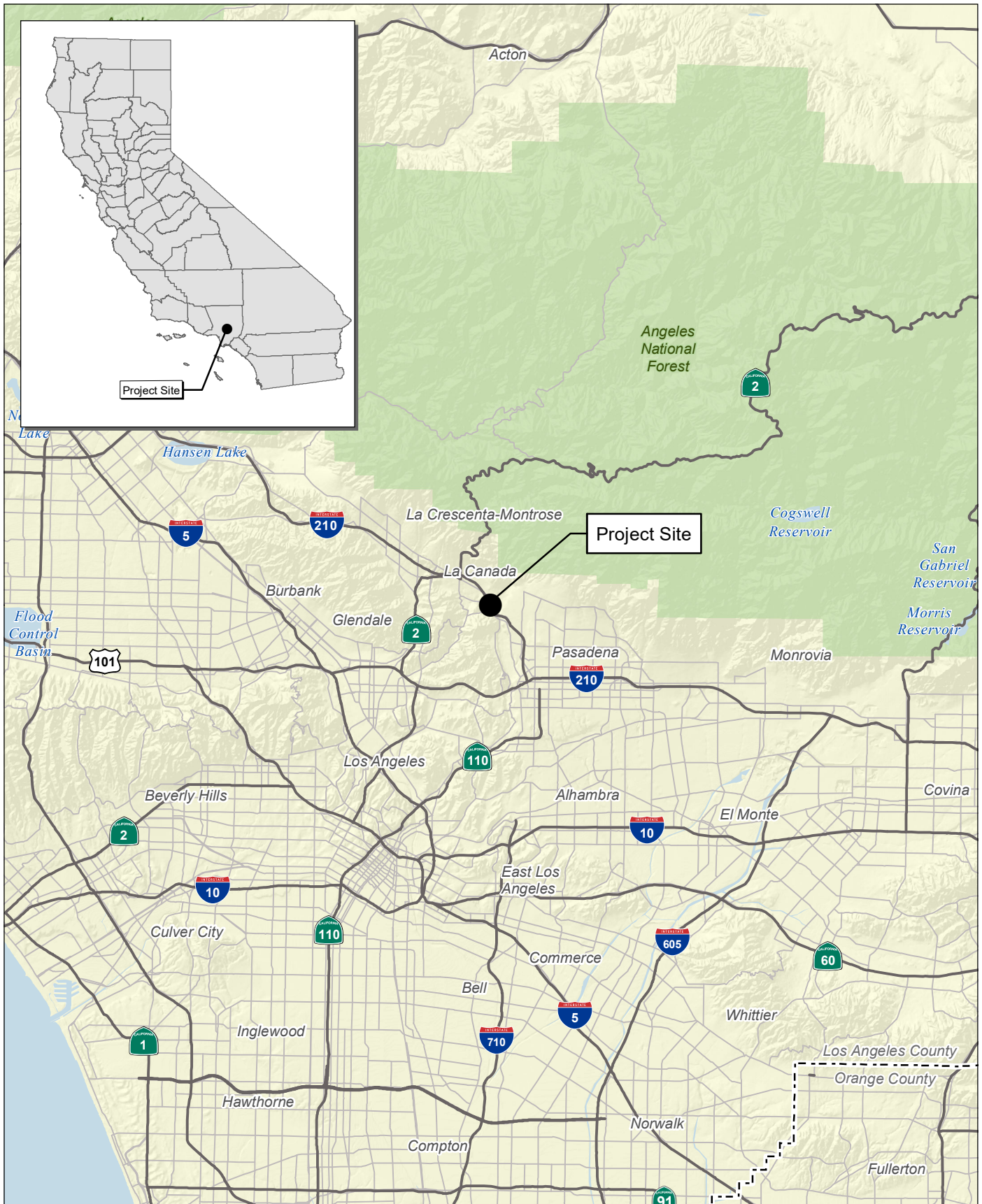
This Draft IS/MND has been prepared to determine the appropriate scope and level of detail required in completing the environmental analysis for the proposed project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed project. The Draft IS/MND will be circulated for a minimum of 30 days, during which time comments concerning the analysis contained herein should be sent to:

Mark Evans, Associate Superintendent  
La Cañada Unified School District  
4490 Cornishon Avenue  
La Cañada, CA 91011  
Email: Mevans@lcsd.net

<sup>12</sup> Giselle Harkous. 2019. Personal Communication with KPFF Engineering. November.

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Source: Census 2000 Data, The CaSIL

**FIRSTCARBON**  
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Exhibit 1

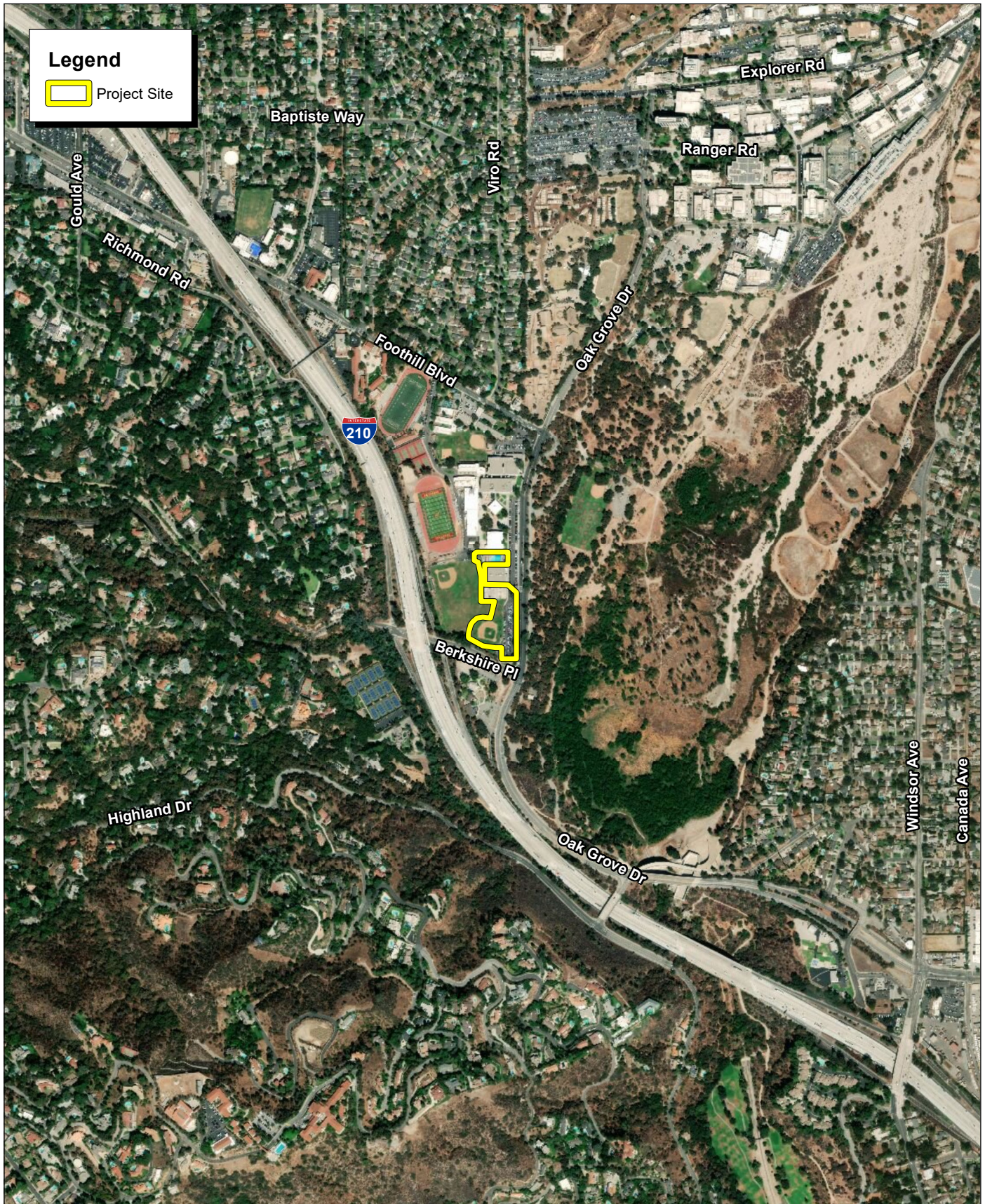
Regional Location Map

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LA CAÑADA UNIFIED SCHOOL DISTRICT  
NEW OUTDOOR POOL FACILITY AND SOUTH OF CAMPUS IMPROVEMENT PROJECT  
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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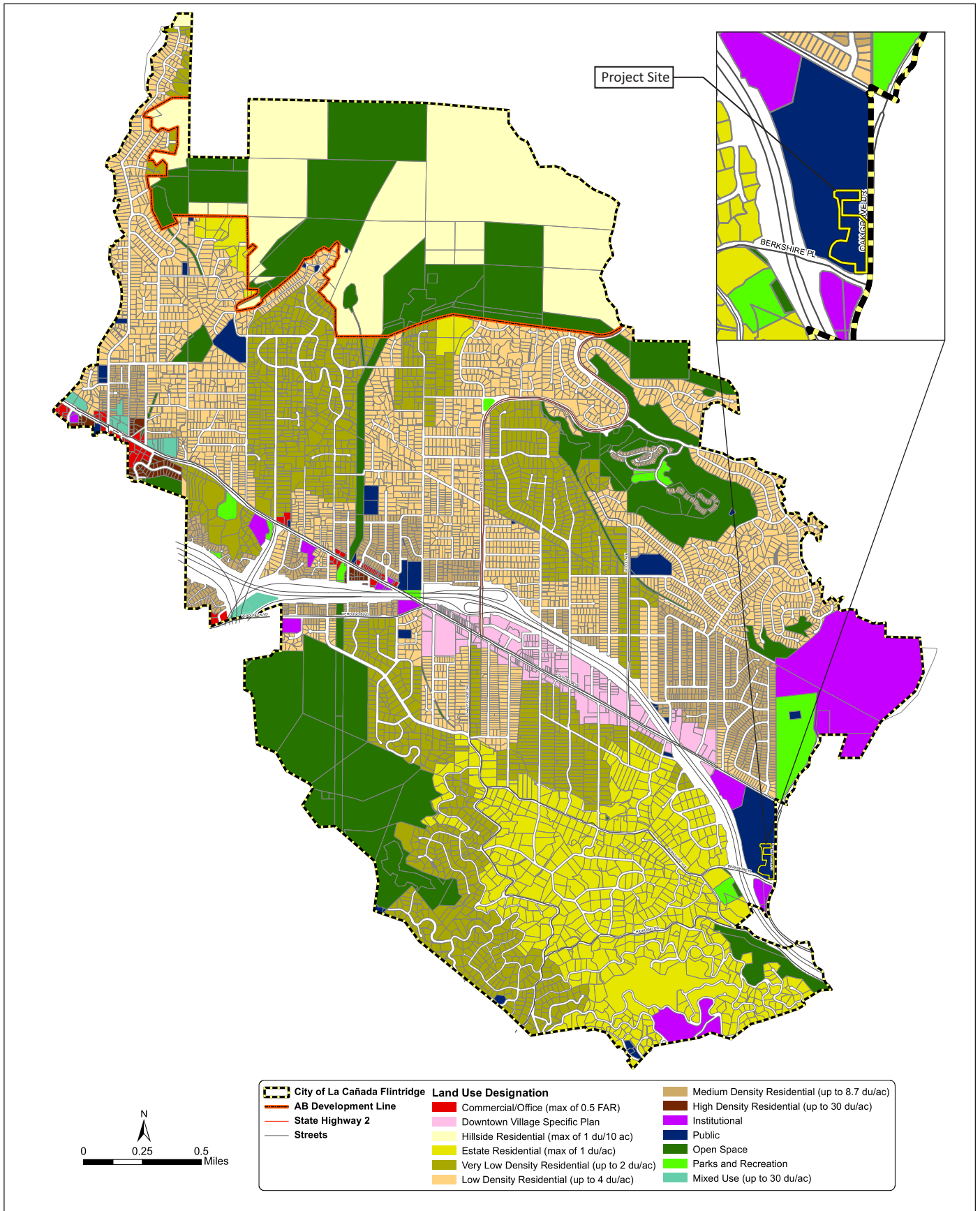


Source: ESRI Aerial Imagery.



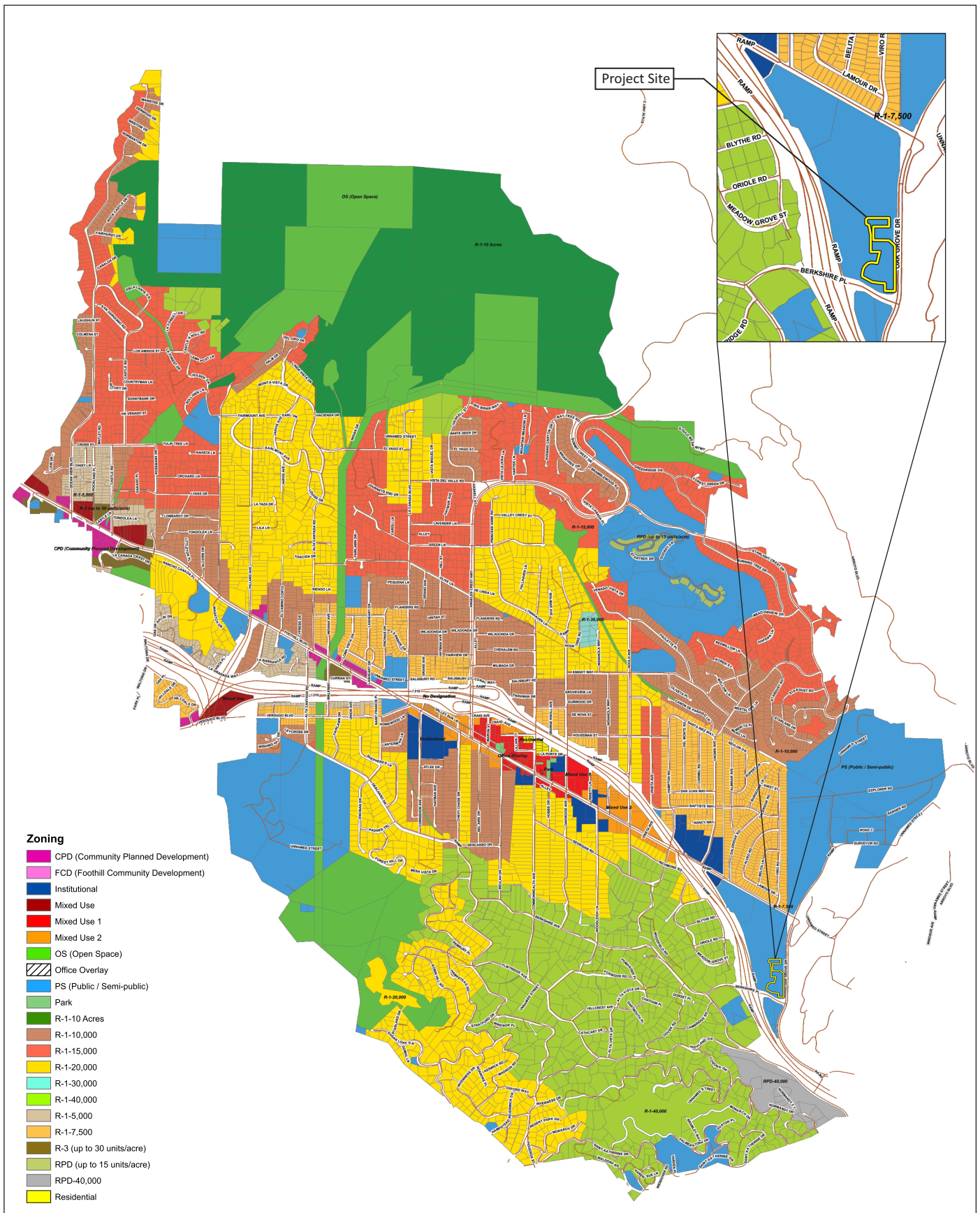


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Source: City of La Cañada Flintridge, July 25, 2008.

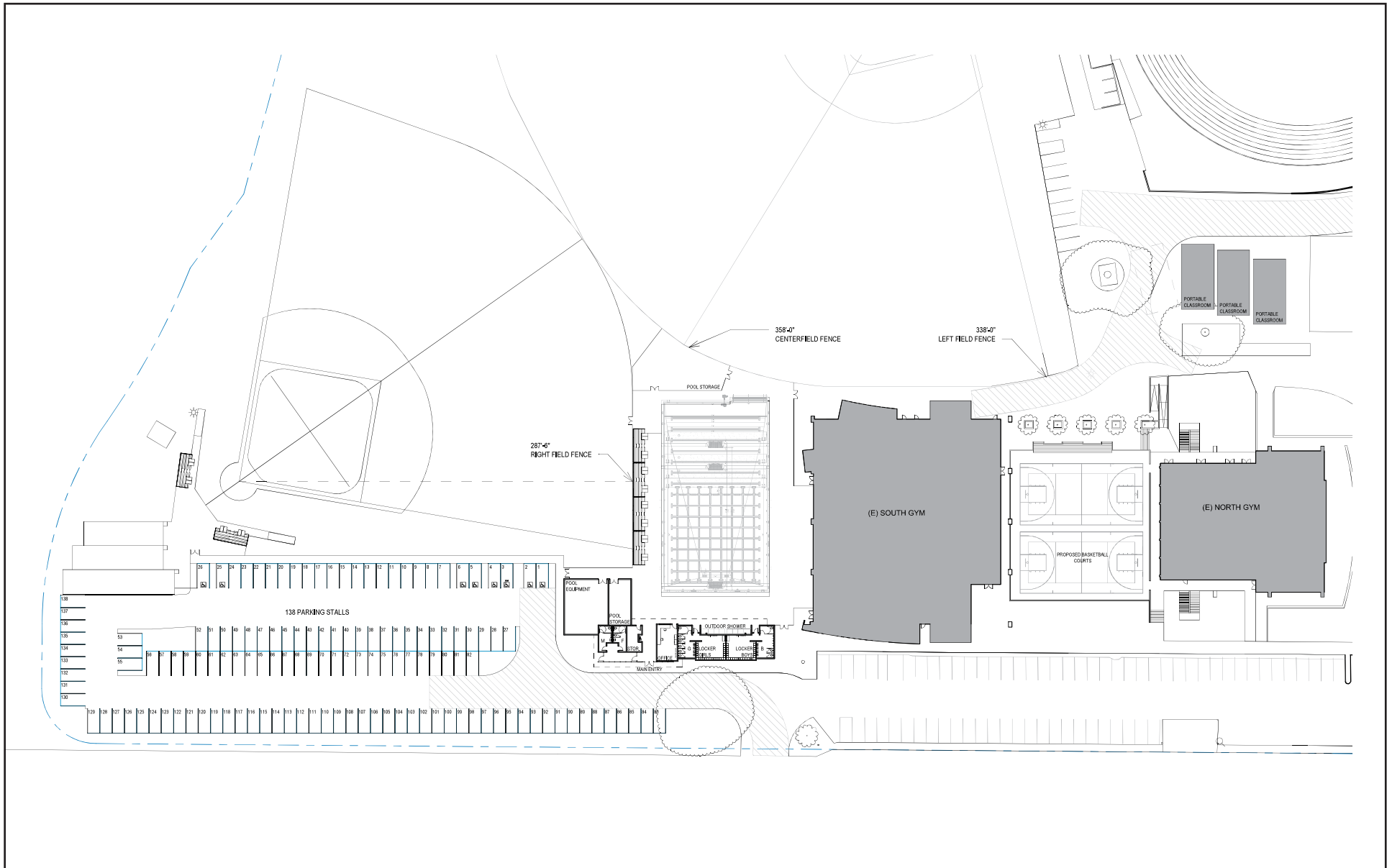
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Source: City of La Cañada Flintridge Zoning Map, April 2016.

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Source: Gonzalez Goodale Architects, 7/12/2019.



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## SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

### 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" as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input checked="" type="checkbox"/> Air Quality
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Cultural Resources/Tribal Cultural Resources	<input type="checkbox"/> Energy
<input checked="" type="checkbox"/> Geology/Soils	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards/Hazardous Materials
<input type="checkbox"/> Hydrology/Water Quality	<input type="checkbox"/> Land Use/Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population/Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input checked="" type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Mandatory Findings of Significance
<input type="checkbox"/> Utilities/Services Systems	<input type="checkbox"/> Wildfire	

### Environmental Determination

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measure based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: 10/8/2020

Signed: Mark E. [Signature]

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.1 Aesthetics</b> <i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Would the project:

**a) Have a substantial adverse effect on a scenic vista?**

**No impact.** The proposed project includes the relocation and improvement of a pool, locker rooms, basketball courts, batting cages, and a baseball field. According to the Conservation Element of the City of La Cañada Flintridge General Plan, no scenic vistas are present on or near the project site.<sup>13</sup> Because the proposed project would be consistent with the current usage of the school, and views of the surrounding area are not considered to be scenic vistas by the City, the proposed project would not adversely impact scenic vistas, and therefore no impacts would occur.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?**

**No impact.** While the proposed project is not located near a State Scenic Highway, the project site is located adjacent to Interstate I-210, which is designated as a scenic corridor by the City of La Cañada Flintridge.<sup>14</sup> Scenic views from the I-210, when facing north, are primarily of the pronounced ridgelines

<sup>13</sup> City of La Cañada Flintridge. 2013. General Plan Conservation Element. January. Website: [https://cityoflcf.org/wp-content/uploads/2019/09/General\\_Plan\\_Conservation.pdf](https://cityoflcf.org/wp-content/uploads/2019/09/General_Plan_Conservation.pdf). Accessed January 20, 2020.

<sup>14</sup> City of La Cañada Flintridge. 2013. General Plan Conservation Element. January. Website: [https://cityoflcf.org/wp-content/uploads/2019/09/General\\_Plan\\_Conservation.pdf](https://cityoflcf.org/wp-content/uploads/2019/09/General_Plan_Conservation.pdf). Accessed January 20, 2020.

that exist on the northern side of the City and the mature trees adjacent to I-210. The proposed project involves the removal of trees in the southeastern portion of the project site. However, because of the presence of mature trees that line the eastern side of I-210, the project site is not visible from I-210. Therefore, removal of trees in the southeastern portions of the project site would not impact scenic views from a scenic corridor. No scenic rock outcroppings, historic buildings, or other scenic resources of significance visible from a State Scenic Highway or a city-designated scenic corridor would be impacted by the proposed project. Therefore, there would be no impact related to scenic resources within a State Scenic Highway.

- c) **In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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?**

**No impact.** The project site is located in an urbanized and developed area within the City of La Cañada Flintridge. According to the City of La Cañada Flintridge General Plan and zoning designations, the project site is zoned for public development. Because the proposed project only includes the relocation and upgrade of existing facilities, the proposed project would not degrade existing visual character or violate applicable zoning or other regulations governing scenic quality. As such, no impacts would occur.

- d) **Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

**Less than significant impact.** The proposed project includes the relocation and improvement of a pool, locker rooms, basketball courts, batting cages, and a baseball field. Area lighting for the improved facilities would be required and would be installed in locations that would not affect the visual character of the area surrounding the project site. According to the proposed lighting plan, 10 lighting fixtures would be located on the project site at project build-out. Lights on the southeastern side of the batting cages would be removed to make way for the expanded parking areas, while new lighting would be installed on the western side of the proposed batting cage. Six existing light poles and fixtures would be relocated to new footings, and their existing footings would be demolished. In addition, two new sports lighting poles would be upgraded with LED bulbs surrounding the pool. Additional LED lights would also be installed surrounding the basketball courts and baseball fields. The proposed lighting plans are included as Appendix A. Furthermore, because the proposed project involves the improvement and relocation of existing facilities, conditions following the completion of the proposed project would be similar to existing conditions. Because the lights on campus would be constructed to illuminate the upgraded facilities and would not be directed towards sensitive receptors such as the residential homes across I-210 to the west, the addition of new lights would not be expected to impact surrounding land uses. Therefore, impacts associated with the construction of new sources of light and glare would be less than significant.

## Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.2 Agriculture and Forestry Resources</b> <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

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

Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (ARB).

Would the project:

- 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?**

**No impact.** The project site is entirely located on the existing La Cañada High School campus. Furthermore, according to the City of La Cañada Flintridge General Plan, the project site is zoned for Public use by the City.<sup>15</sup> According to the Farmland Mapping and Monitoring Program Maps, no agricultural lands of importance are identified within the City of La Cañada Flintridge.<sup>16</sup> As such, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses and there would be no impacts.

- b) **Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No impact.** As discussed above in Impact 2(a), the City of La Cañada Flintridge does not contain any farmland or agricultural resources that would be considered to be of Statewide importance. The project site is zoned for Public development and is located on the existing La Cañada High School campus. As such, no Williamson Act contracts are identified within the project vicinity and no impacts would occur.

- 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))?**

**No impact.** As discussed in Impact 2(a) and 2(b), the project site is located entirely on the existing La Cañada High School campus. The proposed project would relocate existing recreational facilities including basketball courts, a baseball field, a pool, and expand a parking lot on campus. The project site is zoned Public, and all current land uses on the project site comply with the City of La Cañada Flintridge Zoning Code. No forestlands, timberlands, or agricultural lands are located adjacent to or near the project site. Based on the nature of the proposed development and the current zoning of the property, there would be no impacts.

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

**No impact.** As discussed in Impact 2(c), no forested lands are located adjacent to or near the project site. Based on the nature of the proposed project, no conversion of forested lands to non-forested uses would occur and there would be no impacts.

<sup>15</sup> City of La Cañada Flintridge. 2013. General Plan Land Use Element. Website: [https://cityoflcf.org/wp-content/uploads/2019/09/General\\_Plan\\_Land\\_Use.pdf](https://cityoflcf.org/wp-content/uploads/2019/09/General_Plan_Land_Use.pdf). Accessed November 12, 2019.

<sup>16</sup> California Department of Conservation. 2016. Los Angeles County Important Farmland 2016. Website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>. Accessed November 12, 2019.

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

**No impact.** The proposed project does not involve alterations to the environment such that the conversion of farmland to non-agricultural uses would occur. The project proposes alterations to existing facilities on the La Cañada High School Campus in a manner that does not affect local conditions or zoning regulations and no impacts would occur.

### Mitigation Measures

None required.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.3 Air Quality</b> <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i> <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

The analysis in this section is based, in part, on project-specific emissions modeling completed using California Emissions Estimator Model (CalEEMod) (Version 2016.3.2). The modeling data is provided in its entirety in Appendix B. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

### Air Pollutants

Air pollutants relevant to the CEQA checklist questions for Air Quality are briefly described below.

- Ozone is a gas that is formed when reactive organic gases (ROGs) and nitrogen oxides (NO<sub>x</sub>)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are conducive to its formation. Health effects can include, but not be limited to irritated respiratory system, reduced lung function, and aggravated chronic lung diseases.
- ROGs, or volatile organic compounds (VOCs), are defined as any compound of carbon—excluding carbon monoxide (CO), carbon dioxide (CO<sub>2</sub>), carbonic acid, metallic carbides or carbonates, and ammonium carbonate—that participates in atmospheric photochemical reactions. Although there are slight differences in the definition of ROGs and VOCs, the two terms are often used interchangeably.

- Nitrogen dioxide (NO<sub>2</sub>) forms quickly from NO<sub>x</sub> emissions. Health effects from NO<sub>2</sub> can include the following: potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; contribution to atmospheric discoloration; increased visits to hospital for respiratory illnesses.
- CO is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during the winter morning, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines—unlike ozone—and motor vehicles operating at slow speeds are the primary source of CO in the project region, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Potential health effects from CO depends on exposure and can include slight headaches; nausea; aggravation of angina pectoris (chest pain) and other aspects of coronary heart disease; decreased exercise tolerance in persons with peripheral vascular disease and lung disease; impairment of central nervous system functions; possible increased risk to fetuses; death.
- Sulfur dioxide (SO<sub>2</sub>) is a colorless, pungent gas. At levels greater than 0.5 parts per million (ppm), the gas has a strong odor, similar to rotten eggs. Sulfur oxides (SO<sub>x</sub>) include SO<sub>2</sub> and sulfur trioxide. Sulfuric acid is formed from sulfur dioxide, which can lead to acid deposition and can harm natural resources and materials. Although SO<sub>2</sub> concentrations have been reduced to levels well below State and federal standards, further reductions are desirable because SO<sub>2</sub> is a precursor to sulfate and PM<sub>10</sub>.
- Respirable Particulate Matter (PM<sub>10</sub>) and Fine Particulate Matter (PM<sub>2.5</sub>) consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. Health effects from short-term exposure (hours/days) can include the following: irritation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravate existing lung disease, causing asthma attacks and acute bronchitis; those with heart disease can suffer heart attacks and arrhythmias. Health effects from long-term exposure can include the following: reduced lung function; chronic bronchitis; changes in lung morphology; or death.
- Toxic Air Contaminants (TACs) refer to a diverse group of air pollutants that can affect human health but have not had ambient air quality standards established for them. Diesel particulate matter (DPM) is a toxic air contaminant that is emitted from construction equipment and diesel fueled vehicles and trucks. Some short-term (acute) effects of DPM exposure include eye, nose, throat, and lung irritation, coughs, headaches, light-headedness, and nausea. Studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems. Human studies on the carcinogenicity of DPM demonstrate an increased risk of lung cancer, although the increased risk cannot be clearly attributed to diesel exhaust exposure.

The project site is located in the South Coast Air Basin (SoCAB) within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD has developed regional and localized significance thresholds to evaluate construction and operational emissions within its jurisdiction.

## Regional Thresholds

The SCAQMD recommends that its quantitative air pollution thresholds be used to determine the significance of project emissions. Projects in the SoCAB would generate significant emissions if daily emissions would exceed the regional thresholds of significance shown in Table 1.

**Table 1: SCAQMD Regional Thresholds of Significance**

Pollutant	Construction	Operations
<b>Regional Thresholds</b>		
NO <sub>x</sub>	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM <sub>10</sub>	150 lbs/day	150 lbs/day
PM <sub>2.5</sub>	55 lbs/day	55 lbs/day
SO <sub>x</sub>	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Notes: CO=carbon monoxide lbs=pounds NO <sub>x</sub> =nitrogen oxides PM <sub>10</sub> =particulate matter with an aerodynamic resistance diameter of 10 micrometers or less PM <sub>2.5</sub> =particulate matter with an aerodynamic resistance diameter of 2.5 micrometers SO <sub>x</sub> =sulfur oxides VOC=volatile organic compound Source of regional thresholds: South Coast Air Quality Management District (SCAQMD). 2019. South Coast AQMD Air Quality Significance Thresholds. April. Website: <a href="http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf">http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf</a> . Accessed January 13, 2020.		

## Localized Air Quality Significance Thresholds

The SCAQMD recommends that all air quality analyses include a localized assessment of both construction and operational emissions on nearby sensitive receptors. The SCAQMD has developed localized significance thresholds (LSTs) to be implemented at the discretion of local public agencies acting as a lead agency pursuant to CEQA. LSTs represent the maximum mass emissions from a project site that would not result in pollutant concentrations that exceed National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS). LSTs are based on the ambient concentrations of that pollutant within the Source Receptor Area (SRA) where a project is located, the distance to the nearest sensitive receptor, and the size of the project site, all of which are the primary factors that influence pollutant concentrations.

The SCAQMD provided the Final Localized Significance Threshold Methodology<sup>17</sup> for guidance. The LST Methodology assists lead agencies in analyzing localized air quality impacts, particularly CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The SCAQMD also provided screening look up tables<sup>18</sup> for projects that disturb less than or equal to 5 acres in size. Specifically, LSTs are provided for 1-, 2-, and 5-acre sites. These LST look-up values are used as a screening tool for identifying whether a more detailed analysis of localized impacts is needed. The appropriate LSTs can be determined based on the project's SRA, size, and distance to nearest sensitive receptor.

The appropriate SRA for the localized significance screening thresholds is West San Gabriel Valley (SRA 8) since this area includes the project site. LSTs apply to CO, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The school would be operational throughout the construction period. Therefore, the nearest off-site sensitive receptor would be the school itself. LSTs were obtained for sensitive receptors located 25 meters from the source area, which is closest distance available.

The project site is approximately 3.59 acres; therefore, LSTs for operations were obtained for 2-acre and 5-acre sites. The daily maximum disturbed area during construction serves as a factor in determining the project size value of the applicable LSTs for construction. Based on the maximum daily disturbed acreage during dust-generating construction activities, LSTs were obtained for a 1-acre site for construction. Table 2 below shows the LSTs for NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> for both construction and operational activities. If a project exceeds an applicable LST, then the SCAQMD recommends that project-specific air quality modeling be performed.

**Table 2: SCAQMD Local Air Quality Screening Thresholds of Significance**

Activity	Allowable Emissions (pounds/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Construction</b>				
Construction (1 acre)	69	535	4	3
<b>Operation</b>				
Operation (2 acres)	98	812	2	1
Operation (5 acres)	148	1,540	3	2
Operation (3.59-acre site) <sup>1</sup>	124.5	1,197.8	2.5	1.5
Notes:				
<sup>1</sup> The SCAQMD-provided LSTs for 2-acre and 5-acre sites were linearly interpolated to provide operational LSTs for a 3.59-acre site.				
Source: SCAQMD Mass Rate Look-Up Tables in SRA 8 (West San Gabriel Valley) for sensitive receptors located 25 meters from the project site.				

<sup>17</sup> South Coast Air Quality Management District (SCAQMD). 2003 (Revised 2008). Final Localized Significance Threshold Methodology. Website: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>. Accessed October 30, 2019.

<sup>18</sup> South Coast Air Quality Management District (SCAQMD). 2009. Appendix C - Mass Rate LST Look-up Table. September. Website: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds#appc>. Accessed October 10, 2019.

## South Coast Air Basin Attainment Status

The United States Environmental Protection Agency (EPA) and the ARB designate air basins where ambient air quality standards are exceeded as “nonattainment” areas. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered “unclassified.” National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards.

Each standard has a different definition, or “form” of what constitutes attainment, based on specific air quality statistics. For example, the federal 8-hour CO standard is not to be exceeded more than once per year; therefore, an area is in attainment of the CO standard if no more than one 8-hour ambient air monitoring values exceeds the threshold per year. In contrast, the federal annual PM<sub>2.5</sub> standard is met if the 3-year average of the annual average PM<sub>2.5</sub> concentration is less than or equal to the standard.

With respect to the CAAQS, the Los Angeles County portion of the SoCAB is nonattainment for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>, and attainment for all other pollutants.<sup>19</sup> With respect to the NAAQS, the Los Angeles County portion of the SoCAB is nonattainment for ozone, PM<sub>2.5</sub>, and lead, and attainment or unclassified for all other pollutants.<sup>20</sup>

Would the project:

### a) Conflict with or obstruct implementation of the applicable air quality plan?

**Less than significant impact.** The *SCAQMD CEQA Air Quality Handbook*<sup>21</sup> states that there are two key indicators to evaluate whether or not a project conflicts with, or obstructs the implementation of the applicable air quality plan, which would be the 2016 Air Quality Management Plan<sup>22</sup> adopted by the SCAQMD on March 3, 2017. These indicators are: (1) whether the project would 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 a project is inconsistent with the growth assumptions incorporated into the air quality plan, and thus, whether it would interfere with the region’s ability to comply with federal and California air quality standards.

Considering the recommended indicators in the CEQA Handbook, this analysis uses the following criteria to address this potential impact:

<sup>19</sup> California Air Resource Board (ARB). 2019. Area Designation Maps/State and National. Website: <https://ww3.arb.ca.gov/desig/adm/adm.htm>. Accessed October 31, 2019.

<sup>20</sup> Ibid

<sup>21</sup> South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. Website: [https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed October 30, 2019.

<sup>22</sup> South Coast Air Quality Management District (SCAQMD). 2017. Final 2016 Air Quality Management Plan. March. Website: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>. Accessed October 25, 2019.

- **Criterion 1:** Project's contribution to air quality violations (SCAQMD's first indicator);
- **Criterion 2:** Assumptions in AQMP (SCAQMD's second indicator); and
- **Criterion 3:** Compliance with applicable emission control measures in the AQMPs.

### **Criterion 1: Project's Contribution to Air Quality Violations**

According to the SCAQMD, the project is consistent with the AQMP if 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.

If a project's emissions exceed the SCAQMD regional thresholds for NO<sub>x</sub>, VOC, PM<sub>10</sub>, or PM<sub>2.5</sub>, it follows that the emissions could cumulatively contribute to an exceedance of a pollutant for which the basin is in nonattainment (ozone, PM<sub>10</sub>, PM<sub>2.5</sub>). As discussed in Impact 3b), the project would not exceed the SCAQMD's regional thresholds of significance. Therefore, the project meets this criterion. 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.

### **Criterion 2: Assumptions in AQMP**

According to Chapter 12 of the SCAQMD CEQA Air Quality Handbook,<sup>23</sup> the purpose of the General Plan consistency finding is to determine whether a project is inconsistent with the growth assumptions incorporated into the air quality plan and thus, whether it would interfere with the region's ability to comply with federal and California air quality standards. The proposed project would demolish the existing basketball courts to construct a 40-meter pool facility with restrooms, locker rooms, and an office, shift the existing on-campus baseball field west to expand the student parking lot, and demolish the existing pool and pool equipment building to construct new basketball courts with associated steps/seating. Additional minor improvements consisting of interior paint and remodeling, hardscaping, and replacement of bleachers and grass with AstroTurf on the baseball and softball fields, are also included in the project. There would be no expansion of services or increase in the number of students or staff associated with the proposed project. In addition, the project is not residential in nature and would not result in an increase in the population in the project area. Thus, implementation of the project would not result in growth that was not accounted for this in the AQMP. Therefore, the project meets this criterion.

### **Criterion 3: Control Measures**

The project would also comply with all applicable rules and regulations of the AQMP.<sup>24</sup> Because of the nature of the proposed project, which includes earthmoving activity, SCAQMD Rule 403<sup>25</sup> would

<sup>23</sup> South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. Website: [https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed October 30, 2019.

<sup>24</sup> South Coast Air Quality Management District (SCAQMD). 2017. Final 2016 Air Quality Management Plan. March. Website: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>. Accessed October 25, 2019.

<sup>25</sup> South Coast Air Quality Management District (SCAQMD). 2005. Rule 403, Fugitive Dust. June. Website:

apply during construction. Rule 403 governs emissions of fugitive dust during construction and operation activities. The rule requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Compliance with this rule is achieved through application of standard Best Management Practices (BMPs). These BMPs include application of water or chemical stabilizers to disturbed soils; covering haul vehicles; restricting vehicle speeds on unpaved roads to 15 miles per hour; sweeping loose dirt from paved site access roadways; cessation of construction activity when winds exceed 25 miles per hour; and establishing a permanent ground cover on finished sites. The project's compliance with all applicable SCAQMD rules and regulations would result in consistency with the applicable AQMP control measures and meets this criterion.

### **Summary**

In summary, the project would meet all three criteria used to address this potential impact. The project would not result in a cumulatively considerable net increase of any criteria pollutant and would not exceed the growth assumptions in the AQMP. The project would comply with all applicable SCAQMD rules and regulations, including compliance with SCAQMD Rule 403. Accordingly, the project would not conflict with or obstruct implementation of the applicable air quality plans, and therefore, the impact would be less than significant.

**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?**

**Less than significant impact.** This impact is related to the cumulative effect of a project's regional criteria pollutant emissions. As described above, the region is currently nonattainment for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The nonattainment status of regional pollutants is a result of past and present development within the SoCAB, and this regional impact is a cumulative impact. In other words, new development projects (such as the proposed project) within the SoCAB would contribute to this impact only on a cumulative basis. No single project would be sufficient in size, by itself, to result in nonattainment of regional air quality standards. Instead, a project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. All new development that would result in an increase in air pollutant emissions above those assumed in regional air quality plans would contribute to cumulative air quality impacts.

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the CEQA Guidelines, the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the project's incremental effects would be cumulatively considerable.

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<https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>. Accessed October 31, 2019.

Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether the project would result in regional emissions that exceed the SCAQMD regional thresholds of significance for construction and operations on a project level. Projects that generate emissions below the SCAQMD significance thresholds would be considered consistent with regional air quality planning efforts would not generate cumulatively considerable emissions.

The project's regional construction and operational emissions, which include both on- and off-site emissions, are evaluated separately below. Construction and operational emissions from the project were estimated using CalEEMod (Version 2016.3.2). A detailed description of the assumptions used to estimate emissions and the complete CalEEMod output files are contained in Appendix B.

### Construction Regional Emissions

Construction emissions are described as “short-term” or temporary in duration; however, they have the potential to represent a significant impact with respect to air quality. Construction of the project would result in the temporary generation of VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from construction activities such as site preparation, grading, building construction, architectural coating, and asphalt paving. Fugitive particulate matter dust emissions are primarily associated with earth disturbance and grading activities, and vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles on-site and off-site. Construction-related NO<sub>x</sub> emissions are primarily generated by exhaust emissions from heavy-duty construction equipment, material and haul trucks, and construction worker vehicles. VOC emissions are mainly generated by exhaust emissions from construction vehicles, off-gas emissions associated with architectural coatings, and asphalt paving.

As shown in Table 3, the proposed project is assumed to begin construction in May 2021 and would be completed in October 2022. The construction schedule used in the analysis represents a reasonable worst-case analysis scenario since a delay in construction dates into the future would result in using emission factors for construction equipment that decrease as the analysis year increases, due to improvements in technology and the need to meet more stringent regulatory requirements. Therefore, construction emissions would likely decrease if the construction schedule moves to later years. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA guidelines. In addition, it was assumed 9,700 cubic yards of material would be exported and 2,500 cubic yards of material would be imported. For a more detailed description of the construction emissions modeling parameters and assumptions, please refer to Appendix B.

**Table 3: Conceptual Construction Schedule**

Construction Activity	Conceptual Construction Schedule		Working Days per Week	Total Number of Working Days
	Start Date	End Date		
Phase 1				
Demolition	5/3/2021	5/14/2021	5	10



Construction Activity	Conceptual Construction Schedule		Working Days per Week	Total Number of Working Days
	Start Date	End Date		
Site Preparation (removal of utilities, hauling, re-compaction)	5/15/2021	8/13/2021	5	65
Grading	8/14/2021	8/24/2021	5	7
Building Construction	8/25/2021	7/11/2022	5	229
Paving	7/12/2022	7/18/2022	5	5
Architectural Coating	7/19/2022	7/25/2022	5	5
<b>Phase 2</b>				
Demolition	4/1/2022	5/5/2022	5	25
Site Preparation	5/6/2022	5/17/2022	5	8
Grading	5/18/2022	6/9/2022	5	17
Building Construction (includes relocation of light poles, dugouts, batting field and lighting)	6/10/2022	7/4/2022	5	17
Paving	7/5/2022	8/31/2022	5	42
Architectural Coating	9/1/2022	10/28/2022	5	42
<b>Phase 3</b>				
Demolition	5/2/2022	5/13/2022	5	10
Site Preparation	5/14/2022	5/16/2022	5	1
Grading	5/17/2022	5/18/2022	5	2
Building Construction (includes seating construction and north gymnasium reconfigurations)	5/19/2022	9/19/2022	5	88
Paving	9/20/2022	9/26/2022	5	5
Architectural Coating	9/27/2022	10/3/2022	5	5
<b>Additional Miscellaneous Construction Activities (new pavement features, walkways, planting areas, and seating, stairs, ramps, and pavers to be installed on-site)</b>				
Demolition	6/11/2022	6/22/2022	6	10
Site Preparation	6/23/2022	7/15/2022	6	20
Grading	7/16/2022	8/8/2022	6	20
Paving	8/9/2022	9/23/2022	6	40
Source: Appendix B.				

Table 4 presents the project’s maximum daily construction emissions for each construction year during the entire construction duration using the worst-case summer or winter daily construction-related criteria pollutant emissions for each phase of construction. Complete CalEEMod output files are included as part of Appendix B.

**Table 4: Regional Construction Emissions by Construction Activity (Unmitigated)**

Construction Year	Regional Pollutant Emissions (pounds per day) <sup>1</sup>					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Phase 1—2021	0.9	12.9	8.1	0.0	0.9	0.6
Phase 1—2022	19.6	7.6	7.7	0.0	0.5	0.4
Phase 2—2022	1.8	16.9	14.5	0.0	3.0	1.7
Phase 3—2022	2.0	45.8	18.1	0.1	3.6	1.4
Entire Site—2022	0.8	7.9	8.2	0.0	1.1	0.5
<b>Maximum Daily Emissions<sup>2</sup></b>	<b>24.2</b>	<b>78.2</b>	<b>48.5</b>	<b>0.2</b>	<b>8.2</b>	<b>4.0</b>
<b>SCAQMD Significance Threshold</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Notes: <sup>1</sup> Assumes compliance with SCAQMD Rule 403. <sup>2</sup> Assumes overlap of construction activities based on schedule presented in Table 3. VOC=volatile organic compound; NO <sub>x</sub> =oxides of nitrogen; CO=carbon monoxide; SO <sub>x</sub> =sulfur oxides; PM <sub>10</sub> =particulate matter with aerodynamic diameter less than 10 microns; PM <sub>2.5</sub> =particulate matter with aerodynamic diameter less than 2.5 microns Source of emissions: Appendix B. Source of thresholds: South Coast Air Quality Management District (SCAQMD). 2015. SCAQMD Air Quality Significance Thresholds. March. Website: <a href="http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook">http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook</a> . Accessed May 1, 2020.						

As shown in above in Table 4 emissions generated during construction of the project would not exceed the applicable significance threshold for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> emissions. Therefore, the project would have a less than significant impact related to air quality during project construction. Furthermore, all construction activities would comply with applicable SCAQMD rules and regulations, including Rule 403, to minimize fugitive PM dust emissions. Therefore, the project would not result in a cumulatively considerable net increase of construction emissions. The cumulative impact from construction of the project would be less than significant.

### Operational Regional Emissions

Following construction of the project, long-term emissions would be generated resulting from the day-to-day operations of the project. Operational emissions for land use development projects are typically distinguished as mobile-, area-, and energy-source emissions. Mobile-source emissions are those associated with vehicles that would travel to and from the project site. As previously discussed, the project proposes improvements to the existing La Cañada High School and would not

substantially change existing operations. Overall, operations at the project site would be similar to existing operations. Project operations would not result in an increase in vehicle trips or traffic within the project area, which is typically the source of the majority of air pollutant emissions from land development projects. Although no mobile-source emissions are anticipated, there could be a slight net increase in operational emissions generated from area-, and energy-source emissions. Area-source emissions are those associated with natural gas combustion for space and water heating, landscape maintenance activities, and periodic architectural coatings. Energy-source emissions are those associated with electricity consumption and are more pertinent for greenhouse gas (GHG) emissions than air quality pollutants. Table 5 presents the project's maximum daily operational emissions. Full assumptions used to estimate emissions are included in Appendix B.

**Table 5: Operational Regional Pollutants**

Operational Activity	Regional Pollutant Emissions (pounds per day) <sup>1</sup>					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area	0.3	0.0	0.0	0.0	0.0	0.0
Energy	0.0	0.0	0.0	0.0	0.7	0.0
Mobile	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total Operational Emissions</b>	<b>0.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.7</b>	<b>0.0</b>
<b>SCAQMD Significance Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Notes: <sup>1</sup> Emissions shown represent the maximum daily emissions from summer and winter seasons for each operational emission source and pollutant. Therefore, total daily operational emissions represent maximum daily emissions that could occur throughout the year. VOC=volatile organic compound; NO <sub>x</sub> =oxides of nitrogen; CO=carbon monoxide; SO <sub>x</sub> =sulfur oxides; PM <sub>10</sub> =particulate matter with aerodynamic diameter less than 10 microns; PM <sub>2.5</sub> =particulate matter with aerodynamic diameter less than 2.5 microns Source of emissions: Appendix B. Source of thresholds: South Coast Air Quality Management District (SCAQMD). 2015. SCAQMD Air Quality Significance Thresholds. March. Website: <a href="http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook">http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook</a> . Accessed December 3, 2018.						

As shown in Table 5, the project's regional daily operational emissions would not exceed any of the SCAQMD thresholds of significance. Considering that the project's long-term operational emissions would not exceed any significance thresholds, the project would not result in a cumulatively considerable net increase of operational emissions. The cumulative impact from long-term operation of the project would be less than significant.

**c) Expose sensitive receptors to substantial pollutant concentrations?**

**Less than significant impact with mitigation incorporated.** This impact evaluates the potential for the project's construction and operational emissions to expose sensitive receptors to substantial pollutant concentration. Sensitive receptors are defined as those individuals who are sensitive to air

pollution including children, the elderly, and persons with preexisting respiratory or cardiovascular illness. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities.<sup>26</sup> Commercial and industrial facilities are not included in the definition because employees do not typically remain on-site for 24 hours. However, when assessing the impact of pollutants with 1-hour or 8-hour standards (such as NO<sub>2</sub> and CO), commercial and/or industrial facilities would be considered sensitive receptors.

To result in a less than significant impact, the following criteria must be true:

- **Criterion 1:** LST assessment: emissions and air quality impacts during project construction or operation must be below the applicable LSTs to screen out the need for a more detailed air quality analysis. If the project exceeds any applicable LST when the mass rate look-up tables are used as a screening analysis, then project-specific air quality modeling may be performed to determine significance.
- **Criterion 2:** A CO hotspot assessment must demonstrate that the project would not result in the development of a CO hotspot that would result in an exceedance of the CO ambient air quality standards.
- **Criterion 3:** A TAC analysis must demonstrate that the project would not result in significant health risk impacts to sensitive receptors.

## Criterion 1: LST Analysis—Criteria Pollutants

### Localized Construction Analysis

The LST Methodology only applies to on-site emissions and states that “off-site mobile emissions from the project should not be included in the emissions compared to LSTs.”

Table 6 presents the project’s maximum daily on-site emissions compared with the applicable LSTs. The LSTs have been obtained from the LST Methodology for a project located in SRA 8, a 1-acre construction area, for sensitive receptors being 25 meters away. As noted in Table 6, emission estimates account for implementation of SCAQMD Rule 403. It should be noted that the emissions in Table 6 show maximum daily on-site emissions.

**Table 6: Construction Localized Screening Significance Analysis (Unmitigated)**

Construction Year	Emissions (pounds per day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Maximum Daily On-site Construction Emissions—2021	8.0	7.6	0.7	0.6

<sup>26</sup> South Coast Air Quality Management District (SCAQMD). 2003 (Revised 2008). Final Localized Significance Threshold Methodology. Website: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>. Accessed October 30, 2019.

Construction Year	Emissions (pounds per day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Maximum Daily On-site Construction Emissions—2022	38.0	36.1	4.9	3.0
<b>Maximum Daily On-site Construction Emissions</b>	<b>38.0</b>	<b>36.1</b>	<b>4.9</b>	<b>3.0</b>
<b>Localized Screening Significance Threshold</b>	<b>69</b>	<b>535</b>	<b>4</b>	<b>3</b>
<b>Exceeds Screening Threshold?</b>	<b>No</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Notes: VOC=volatile organic compound; NO <sub>x</sub> =nitrogen oxides; CO=carbon monoxide; PM <sub>10</sub> =particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; PM <sub>2.5</sub> =particulate matter with an aerodynamic resistance diameter of 2.5 micrometers The PM <sub>10</sub> and PM <sub>2.5</sub> emissions reflect the combined exhaust and mitigated fugitive dust emissions in accordance with SCAQMD Rule 403. Source of emissions: Appendix B. Source of thresholds: South Coast Air Quality Management District (SCAQMD). 2008. Final Localized Significance Threshold Methodology. Revised July 2008. Website: <a href="http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds">http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds</a> . Accessed February 1, 2020. (See Table 2 of this IS/MND.)				

As shown in Table 6, the project's unmitigated maximum daily on-site emissions would not exceed the applicable SCAQMD LSTs for NO<sub>x</sub> or CO and localized construction impacts related to these air pollutants would be less than significant. However, the project's maximum daily on-site emissions would exceed the applicable SCAQMD LSTs for PM<sub>10</sub>. As previously discussed, the LSTs are screening criteria developed by the SCAQMD to provide lead agencies and project applicants with a conservative indication of whether the proposed project could result in a potentially significant air quality impact. If a project exceeds an applicable LST, then the SCAQMD recommends that project-specific air quality modeling be performed to determine localized impacts. To determine localized impacts related to construction-generated PM<sub>10</sub>, a project-specific construction health risk assessment was performed. As detailed within the Health Risk Assessment addressed in Criterion 2 below, localized impacts from the project's generation of PM during construction would be less than significant after incorporation of MM AIR-1. Accordingly, the project's construction-related criteria air pollutant and ozone precursor concentrations would not expose sensitive receptors to substantial pollutant concentrations after incorporation of mitigation. This impact would be less than significant with incorporation of mitigation.

### Localized Operational Analysis

Similar to the construction LST analysis above, the applicable operational LSTs were obtained for a project located in SRA 8 with the nearest sensitive receptor being 25 meters away. Long-term operations would occur for the proposed project on the 3.59-acre project site. Because LSTs are provided for 1-, 2-, and 5-acre sites, LSTs were obtained for 2-acre and 5-acre sites. The SCAQMD-provided LSTs for 2-acre and 5-acre sites were linearly interpolated to provide operational LSTs for a 3.59-acre site (see Table 2).

As described above, the LST Methodology recommends that only on-site emissions are evaluated using LSTs; however, on-site and off-site emissions are included in this analysis as a conservative

approach. As previously mentioned, project operations would not result in an increase in vehicle trips or traffic within the project area; therefore, only the area- and energy- source emissions were included in this analysis. Table 7 presents the project's maximum daily emissions compared with the appropriate LSTs.

**Table 7: Operational Localized Significance Analysis (Unmitigated)**

Emissions Source	Emissions (pounds per day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Area	0.0	0.0	0.0	0.0
Energy	0.0	0.0	0.7	0.0
<b>Maximum Daily On-site Operational Emissions</b>	<b>0.0</b>	<b>0.0</b>	<b>0.7</b>	<b>0.0</b>
<b>Localized Screening Significance Threshold (3.59-acre site)</b>	<b>124.5</b>	<b>1,197.8</b>	<b>2.5</b>	<b>1.5</b>
<b>Exceed Screening Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Notes: NO <sub>x</sub> =nitrogen oxides; VOC=volatile organic compound; CO=carbon monoxide; PM <sub>10</sub> =particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; PM <sub>2.5</sub> =particulate matter with an aerodynamic resistance diameter of 2.5 micrometers Source of Emissions: Appendix B. Source of thresholds: See Table 2 of this IS/MND.				

As shown in Table 7, the project's maximum daily operational emissions would not exceed any of the applicable SCAQMD LSTs. Therefore, the project's operational activities would not cause or contribute substantially to an existing or future ambient air quality standard violation. Accordingly, the project's operational criteria air pollutant and ozone precursor concentrations would not expose sensitive receptors to substantial pollutant concentrations. Therefore, this impact would be less than significant.

### **Criterion 2: Carbon Monoxide Hotspot Analysis**

A CO hotspot represents a condition wherein high concentrations of CO may be produced by motor vehicles accessing a congested traffic intersection under heavy traffic volume conditions. The largest contributor of CO emissions during long-term operations of a school development project is typically from motor vehicles (passenger vehicles and heavy-duty trucks). However, implementation of the project would not result in an increase in vehicle trips or traffic within the project area during long-term operations. Therefore, the project would not result in a significant impact to air quality for local CO.

### **Criterion 3: Toxic Air Contaminant Analysis**

The State of California has determined that DPM from diesel-fueled engines poses a chronic health risk with chronic (long-term) inhalation exposure. DPM was identified as a TAC by the ARB in 1998.

## TACs—On-site Workers

A variety of state and national programs protect workers from safety hazards, including high air pollutant concentrations California Occupational Health and Safety Administration<sup>27</sup> and Center for Disease Control and Prevention.<sup>28</sup>

On-site workers are not required to be addressed through this health risk assessment process. A document published by the California Air Pollution Control Officers Association,<sup>29</sup> Health Risk Assessments for Proposed Land Use Projects, indicates that on-site receptors are included in risk assessments if they are persons not employed by the project. Persons not employed by the project would not remain on-site for any significant period. Therefore, a health risk assessment for on-site workers is not required or recommended.

## TACs—Construction

DPM has been identified by the ARB as a carcinogenic substance. Major sources of DPM include off-road construction equipment and heavy-duty delivery truck activities. A health risk assessment (HRA) was prepared to determine if construction of the project would result in an exceedance of the applicable health risk thresholds. Detailed assumptions of the construction HRA are included in Appendix B. For purposes of this analysis, DPM is represented as exhaust emissions of PM<sub>10</sub>.

The results of the HRA prepared for project construction, for cancer risk and long-term chronic cancer risk, are summarized below. Air dispersion modeling was utilized to assess the project's potential health risks using the current version of AERMOD (version 19191) air dispersion model, which is the air dispersion model accepted by the EPA and the SCAQMD for preparing HRAs. Exhaust emissions of DPM were estimated using CalEEMod (Version 2016.3.2). Full assumptions used to estimate DPM emissions and estimated health risks and hazards are included as part of Appendix B.

Based on the analysis presented in this section, emissions were estimated for the unmitigated scenario and a scenario with clean engines (Tier IV Final mitigated). Equipment tiers refer to a generation of emission standards established by the EPA and ARB that apply to diesel engines in off-road equipment. The “tier” of an engine depends on the model year and horsepower rating; generally, the newer a piece of equipment is, the greater the tier it is likely to have. Excluding engines greater than 750 horsepower, Tier 1 engines were manufactured generally between 1996 and 2003. Since Tier 1 emission standards were established by the EPA in 1994, increasingly more stringent Tier 2, Tier 3, and Tier 4 (interim and final) standards were adopted by EPA, as well as by ARB. Construction exhaust emissions of DPM, both unmitigated and Tier IV Final mitigated, are shown in Table 8.

<sup>27</sup> California Occupational Health and Safety Administration (Cal/OSHA). Website: <https://www.dir.ca.gov/dosh/>. Accessed October 28, 2019.

<sup>28</sup> Center for Disease Control and Prevention (CDC). Center for Disease Control and Prevention. Website: <https://www.cdc.gov/>. Accessed October 28, 2019.

<sup>29</sup> California Air Pollution Control Officers Association (CAPCOA). 2009. Health Risk Assessments for Proposed Land Use Projects. Website: [http://www.capcoa.org/wpcontent/uploads/2012/03/CAPCOA\\_HRA\\_LU\\_Guidelines\\_8-6-09.pdf](http://www.capcoa.org/wpcontent/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf). Accessed October 28, 2019.

**Table 8: Diesel Particulate Matter Construction Emissions**

Construction Scenario	On-site DPM (tons/year)	Off-site DPM (tons/year) <sup>(1)</sup>
Construction Emissions—Unmitigated	0.12536	0.00005
Construction Emissions—Mitigated	0.00963	0.00005
<sup>(1)</sup> The off-site emissions are estimated over four construction vehicle travel routes from within approximately 1,000 feet of the project site (each modeled route is between 0.38 mile and 0.78 mile). Source: CalEEMod Output and Construction HRA Calculations; see Appendix B).		

The estimated health and hazard impacts at the maximum impacted sensitive receptor from the project's unmitigated construction emissions are provided in Table 9.

**Table 9: Estimated Health Risks and Hazards—Project Construction (Unmitigated)**

Scenario	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index <sup>1</sup>
Infant	79.0	0.09
Child	16.5	0.09
Adult	1.8	0.09
<b>Highest from Any Scenario</b>		
<b>Risks and Hazards from any Scenario</b>	<b>79.0</b>	<b>0.09</b>
<b>Significance Threshold</b>	<b>10</b>	<b>1</b>
<b>Exceeds Individual Source Threshold?</b>	<b>Yes</b>	<b>No</b>
Notes: <sup>1</sup> Chronic non-cancer hazard index was estimated by dividing the maximum annual DPM concentration (as PM <sub>10</sub> exhaust) by the REL of 5 µg/m <sup>3</sup> . Source: Appendix B.		

As shown in Table 9, the project's construction DPM emissions would not exceed the non-cancer hazard index significance threshold; however, the project's construction DPM emissions would exceed the cancer risk significance threshold prior to the application of mitigation. Therefore, the project is required to implement Mitigation Measure (MM) AIR-1. Table 10, below, summarizes the health and hazard impacts at the maximum impacted sensitive receptor from construction of the project after the implementation of MM AIR-1, which would require the use of off-road construction equipment that meet emissions standards for Tier IV Final engines.



**Table 10: Estimated Health Risks and Hazards—Project Construction (Mitigated)**

Scenario	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index <sup>1</sup>
Infant	7.1	0.008
Child	1.5	0.008
Adult	0.2	0.008
<b>Highest from Any Scenario</b>		
<b>Risks and Hazards from any Scenario</b>	<b>7.1</b>	<b>0.008</b>
<b>Significance Threshold</b>	<b>10</b>	<b>1</b>
<b>Exceeds Individual Source Threshold?</b>	<b>No</b>	<b>No</b>
Notes: <sup>1</sup> Chronic non-cancer hazard index was estimated by dividing the maximum annual DPM concentration (as PM <sub>10</sub> exhaust) by the REL of 5 µg/m <sup>3</sup> . Source: Appendix B.		

As noted in Table 10, construction of the project would not exceed the cancer risk and non-cancer hazard index significance thresholds after incorporation of mitigation. Therefore, the proposed project would not result in a significant impact on nearby sensitive receptors from toxic air contaminants during construction after the implementation of MM AIR-1.

#### *Toxic Air Pollutants—Operations*

Common sources of TACs include high traffic freeways, distribution centers, large gas dispensing facilities, and dry cleaners. Operation of the project would not include those uses and therefore would not be considered a major source of TACs. In addition, the project would not result in an increase number of trips to the project site during operations and would operate similarly compared to existing operations. No stationary sources are proposed as part of the project. Considering the nature of the project and the negligible change in operations, the project would not be considered a source TACs during operations and no further evaluation is necessary.

The project involves improvements to the existing La Cañada High School. The project would not add or relocate existing sensitive receptors. As such, implementation of the project would not locate sensitive receptors near existing sources of TACs during project operations.

#### **d) Result in other emission (such as those leading to odors) adversely affecting a substantial number of people?**

**Less than significant impact.** Odors can cause a variety of responses. The impact of an odor is dependent on interacting factors such as frequency (how often), intensity (strength), duration (in time), offensiveness (unpleasantness), location, and sensory perception. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies. Odor-related symptoms reported in a number of studies include nervousness, headache, sleeplessness, fatigue, dizziness, nausea, loss of

appetite, stomachache, sinus congestion, eye irritation, nose irritation, runny nose, sore throat, cough, and asthma exacerbation.<sup>30</sup>

The SCAQMD's role is to protect the public's health from air pollution by overseeing and enforcing regulations.<sup>31</sup> The SCAQMD's resolution activity for odor compliance is mandated under California Health and Safety Code Section 41700, and falls under SCAQMD Rule 402.<sup>32</sup> This rule on Public Nuisance Regulation states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

The SCAQMD does not provide a suggested screening distance for a variety of odor-generating land uses and operations. However, the San Joaquin Valley Air Pollution Control District (Valley Air District) does have a screening distance for odor sources. Those distances are used as a guide to assess whether nearby facilities could be sources of significant odors. Projects that would site a new receptor farther than the applicable screening distances from an existing odor source would not be likely to have a significant impact. These screening distances by type of odor generator are listed in Table 11.

**Table 11: Screening Levels for Potential Odor Sources**

Odor Generator	Screening Distance
Wastewater Treatment Facilities	2 miles
Sanitary Landfill	1 mile
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	1 mile
Chemical Manufacturing	1 mile
Fiberglass Manufacturing	1 mile
Painting/Coating Operations (e.g., auto body shop)	1 mile
Food Processing Facility	1 mile
Feed Lot/Dairy	1 mile
Rendering Plant	1 mile
Source: San Joaquin Valley Air Pollution Control District (Valley Air District). 2015. Guide for Assessing and Mitigated Air Quality Impacts. March. Website: <a href="http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf">http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf</a> . Accessed September 30, 2020.	

<sup>30</sup> South Coast Air Quality Management District (SCAQMD). 2007. Odor Detection, Mitigation and Control Technology Forum and Roundtable Discussion. 2007. Website: [www.aqmd.gov/tao/conferencesworkshops/OdorForum/OdorForumSummary.pdf](http://www.aqmd.gov/tao/conferencesworkshops/OdorForum/OdorForumSummary.pdf).

<sup>31</sup> Ibid.

<sup>32</sup> South Coast Air Quality Management District (SCAQMD). Rule 402 Nuisance. Website: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>. Accessed October 28, 2019.

## Construction-related Odors

Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions, the intermittent nature of construction activities, and the highly diffusive properties of DPM exhaust, nearby receptors would not be affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area surrounding the proposed project site. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. As such, construction odor impacts would be less than significant.

## Operational-related Odors

The proposed project includes the construction and development of a new swimming pool and supporting facility, new basketball court, expand parking lot and shift the existing baseball field for a high school. Land uses that are typically identified as sources of objectionable odors include landfills, transfer stations, sewage treatment plants, wastewater pump stations, composting facilities, feedlots, coffee roasters, asphalt batch plants, and rendering plants. The project would not engage in any of these activities and would not be considered an odor generator as identified in Table 11. Therefore, the project would not be considered to be a generator of objectionable odors during operations. Minor sources of odors, such as exhaust from mobile sources and chlorine from sports pools, are not typically associated with numerous odor complaints. These minor sources of odor are known to have temporary and less concentrated odors. Furthermore, these minor sources of odor would remain localized. In summary, the project's long-term operational activities would not have any substantial odor sources that would expose nearby receptors. Considering the low intensity of potential odor emissions, the project's operational activities would not expose receptors to objectionable emissions, such as odors. Impacts would therefore be less than significant.

## The Project as a Sensitive Receptor

The proposed project operations would be similar to existing operations and would not add or relocate any new sensitive receptors. Therefore, the uses in the vicinity of the project would not cause substantial odor impacts to the project.

## Mitigation Measures

**MM AIR-1** During construction activities, all off-road equipment with engines greater than 50 horsepower shall meet either EPA or ARB Tier IV Final off-road emission standards. The construction contractor shall maintain records concerning its efforts to comply with this requirement, including equipment lists. Off-road equipment descriptions and information may include but are not limited to equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, and engine serial number.

If engines that comply with Tier IV Final off-road emission standards are not commercially available, then the construction contractor shall use the next cleanest

piece of off-road equipment (e.g., Tier IV Interim) available. For purposes of this mitigation measure, “commercially available” shall mean the availability of Tier IV Final engines taking into consideration factors such as critical-path timing of construction and geographic proximity to the project site of equipment. The contractor shall maintain records for equipment that is not commercially available by providing letters from at least two rental companies for each piece of off-road equipment where the Tier IV Final engine is not available.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.4 Biological Resources</b> <i>Would the project:</i>				
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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

Would the project:

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

**Less than significant impact with mitigation incorporated.** The project site is located within the Pasadena, California, USGS 7.5-minute Topographic Quadrangle Map. Descriptions and analysis in

this section are based, in part, on results from the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) and the United States Fish and Wildlife Service (USFWS) database searches. Supporting information is provided in Appendix C.

For the purpose of this analysis, special-status species refers to all species formally listed as threatened and/or endangered under the Federal Endangered Species Act (FESA) or the California Endangered Species Act (CESA); California Species of Special Concern; designated as Fully Protected by CDFW; given a status of 1A, 1B, or 2 by the California Native Plant Society (CNPS); or designated as special-status by city, county, or other regional planning documents. Federal and State listed threatened and/or endangered species are legally protected under FESA/CESA. The designated special-status species listed by the CNPS have no direct legal protection, but require an analysis of the significance of potential impacts under CEQA Guidelines.

Special-status plant and wildlife species typically occur in undeveloped areas. Although it is less likely, it is also possible for them to occur within developed areas. The project site contains characteristics of land that has been developed or disturbed, including impervious surfaces, on-site buildings and structures, and disturbed soils.

Based on the absence of suitable habitat, it was determined that all five special-status plant species are unlikely to occur on the project site. The project site contains no undeveloped natural land capable of supporting natural vegetation. Impacts to special-status plant species would be less than significant and no further studies are necessary.

A total of 15 special-status wildlife species were identified and evaluated for their potential to occur on the project site based on their habitat requirements. Of these 15 species, three have the potential to occur on-site due to the presence of marginal nesting and roosting habitat in the trees located on and adjacent to the site. These species include southwestern willow flycatcher (*Empidonax traillii extimus*), western mastiff bat (*Eumops perotis californicus*), and western yellow bat (*Lasiurus xanthinus*). The site is completely built-out and lacks sensitive habitat, but has the potential to support habitat for bird species protected under the Migratory Bird Treaty Act (MBTA) in addition to roosting bats.

Construction activities could disturb nesting birds and roosting bats in trees within and around the construction site. Potential impacts on migratory birds resulting from project construction and operation include the destruction of eggs or occupied nests, mortality of young, and the abandonment of nests with eggs or young birds prior to fledging. If MBTA and/or nesting bird species were found to be present, impacts to these species would be significant.

Implementation of MM BIO-1 and MM BIO-2 is required to reduce potential impacts to migratory and nesting birds and raptors and roosting bats. As such, with implementation of MM BIO-1 and MM BIO-2, the proposed project would not have a substantial adverse effect, either directly or indirectly or through habitat modification, on any species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Impacts would therefore be less than significant with the implementation of mitigation.

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

**No impact.** Riparian habitats are those on, relating to, or near the banks of a river, stream, creek, spring, seep, pond or lake. The project site is developed and completely dry and does not support aquatic features, natural or man-made water bodies, wetlands, or jurisdictional areas necessary to support riparian vegetation. The proposed project is located on the existing La Cañada High School campus and includes paved areas, a swimming pool, and basketball courts. The project site does not contain riparian habitat or other sensitive natural communities. Therefore, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur.

- 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?**

**No impact.** The project site is fully developed and located on the existing La Cañada High School campus. The site does not contain any wetlands or other areas designated as waters of the United States or State. The proposed project would not have a substantial adverse effect on State or federally protected wetlands. As such, no impact would occur.

- 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 wildlife nursery sites?**

**No impact.** The proposed project is located on the existing La Cañada High School campus, and is surrounded by roadways and the I-210 Freeway. While the Hahamongna Watershed Park is located immediately east of the site, it is unlikely that the project site itself serves as a wildlife corridor due to the existing development and activity within the school campus. The project site does not support resident or migratory fish species or wildlife nursery sites; therefore, the proposed project is not anticipated to have direct or indirect impacts on wildlife nursery sites. The proposed project is not expected to interfere with the movement of native resident or migratory fish or wildlife species or impede the use of wildlife nursery sites. As such, no impact would occur.

- e) **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**Less than significant impact.** The City adopted official City Tree Preservation and Protection Guidelines in March 2014. The City Tree Preservation and Protection Guidelines define protected trees as oak or sycamore trees with a diameter of 12 inches or greater growing in the R-1 Single Family Residential Zones of the City, deodar cedars within the Historic Deodar District, any tree over 5 feet in height in a non-R-1 Single Family Residential zone, and all trees on public property.<sup>33</sup> There

<sup>33</sup> City of La Cañada Flintridge. 2014. Tree Preservation and Protection Guidelines. Website: : [http://cityoflcf.org/wp-content/uploads/2019/08/Pres\\_Prevention\\_Guide.pdf](http://cityoflcf.org/wp-content/uploads/2019/08/Pres_Prevention_Guide.pdf). Accessed December 10, 2019.

are 10 trees located within the project site, including two eucalyptus, five southern magnolia, two coast live oak, and one Mexican fan palm. The two coast live oak trees are protected according to the Tree Preservation and Protection Guidelines, and the project would not remove these trees. The project proposes to remove the remaining eight trees (five southern Magnolia, one Mexican fan palm, and two eucalyptus). Because the project would voluntarily comply with the City of La Cañada Flintridge Tree Preservation and Protection Guidelines by leaving the protected trees in place, impacts to trees on-site are considered less than significant. As such, impacts would be less than significant.

**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?**

**No impact.** The City of La Cañada is not located within a Habitat Conservation Plan. However, Los Angeles County contains Significant Ecological Areas (SEAs) throughout the County. SEAs are areas within Los Angeles County containing irreplaceable biological resources.<sup>34</sup> The nearest SEA to the project site is located within La Hahamongna Watershed Park, located immediately east of the project site. However, the project site is not located within an SEA. Therefore, the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan. As such, no impact would occur.

## Mitigation Measures

- MM BIO-1 Nesting Birds.** If construction activity associated with development of the property is to occur during nesting bird season (February 1 through August 31), a qualified Biologist shall conduct a pre-construction survey for nesting birds to identify any potential nesting activity. The pre-construction surveys for nesting birds shall be conducted within 14 days prior to any construction-related activities (grading, ground clearing, etc.). If nesting birds are identified on-site, a buffer (e.g., 250 feet for raptors, 100 feet for native songbirds) shall be maintained around the nests; no construction-related activities shall be permitted within the buffer. A qualified Biologist shall monitor the nests, and construction activities may commence within the buffer area at the discretion and in the presence of the Biological Monitor. This mitigation measure is not required if construction activities occur outside of the nesting bird season (September 1 through January 31).
- MM BIO-2 Roosting Bats.** Prior to demolition, and no less than 7 days and no more than 14 days prior to beginning ground disturbance and/or construction, a qualified wildlife Biologist shall conduct surveys for special-status bats during the appropriate time of day to maximize detectability to determine if bat species are roosting near the project site. Survey methodology may include visual surveys of bats (e.g., observation of bats during foraging period), inspection for suitable habitat, bat sign (e.g., guano), or use of ultrasonic detectors (Anabat, etc.). Visual surveys shall

<sup>34</sup> Los Angeles County Department of Regional Planning. Significant Ecological Areas (SEAs) Program. Website: <http://planning.lacounty.gov/site/sea/home/>. Accessed November 7, 2019.



include trees within 0.25 mile of project construction activities. The type of survey shall depend on the condition of the potential roosting habitat. If no bat roosts are found, then no further study is required.

If evidence of bat use is observed, the number and species of bats using the roost would be determined. Bat detectors may be used to supplement survey efforts.

If roosts are determined to be present and must be removed, the bats would be excluded from the roosting site before the facility is removed. A mitigation program addressing compensation, exclusion methods, and roost removal procedures would be developed prior to implementation. Exclusion methods may include the use of one-way doors at roost entrances (bats may leave but cannot not reenter), or sealing roost entrances when the site can be confirmed to contain no bats. Exclusion efforts may be restricted during periods of sensitive activity (e.g., during hibernation or while females in maternity colonies are nursing young).

If roosts cannot be avoided or it is determined that construction activities may cause roost abandonment, such activities may not commence until permanent, elevated bat houses have been installed outside of, but near to, the construction area. Placement and height would be determined by a qualified wildlife Biologist, but the height of the bat house would be at least 15 feet. Bat houses would be multi-chambered and would be purchased or constructed in accordance with California Department of Fish and Wildlife (CDFW) standards. The number of bat houses required would be dependent upon the size and number of colonies found, but at least one bat house would be installed for each pair of bats (if occurring individually), or of sufficient number to accommodate each colony of bats to be relocated.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.5 Cultural Resources and Tribal Cultural Resources</b>				
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>				
d) 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 Section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

This section describes the existing conditions as they pertain to cultural resources and evaluates the potential effects on cultural resources that could result from project construction and implementation. Descriptions and analysis in this section are based on information provided by the California Native American Heritage Commission (NAHC), South Central Coastal Information Center (SCCIC), National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historic Landmarks list, California Points of Historical Interest list, and California Historical Resources Inventory, and a Historic Resources Evaluation Report (HRER) prepared by Daly & Associates. Non-confidential records search results and other correspondence pertaining to cultural resources is included in Appendix D.

## **South Central Costal Information Center**

A records search and literature review for the project site and a 0.50-mile radius surrounding it were conducted on July 2, 2020, at the SCCIC, California State University, Fullerton. The purpose of this review was to access existing cultural resource survey reports, archaeological site records, historic aerial photographs, and historic maps and evaluate whether any previously documented prehistoric or historic archaeological sites, architectural resources, cultural landscapes, or other resources exist within or near the project area.

The results from the SCCIC indicate that one resource is located within a 0.50-mile radius of the project site, but no resources are located within the project site. In addition, 23 survey reports are on file within the SCCIC for the 0.50-mile search radius. Of the 23 reports, four reports (LA 12779, LA 05233, LA 06950, and LA 05249) are located within the project boundaries. Survey reports LA 122779 and LA 05249 are partially within the project boundaries; however, LA 05233 and LA 06950 are entirely within the project boundaries, indicating that the project site has previously been surveyed for cultural resources. A records search map identifying the project boundaries and the 0.5-mile search radius, along with relevant non-confidential records search results, are located in Appendix D.

## **Site Visit and Historic Resource Evaluation Report**

On August 21, 2020, Pamela Daly, Principal Architectural Historian, conducted a site visit and Historic Resources Evaluation (HRE) for the campus. The area of the campus containing the project is located within the La Cañada High School (LCHS) Campus Historic District (HD), which also includes Building A (academic classrooms), B (auditorium and fine arts), C (classroom building), D (Information Resource Center), E (multi-purpose classroom building), F (library), the South Gym, and the main quad/courtyard landscaping. The property and buildings were surveyed and evaluated for their historical significance. Under Criterion A of the NRHP, and Criterion 1 of the CRHR, the LCHS HD buildings and associated landscape do appear to have significance for having been the first high school in the history of La Cañada. The LCHS Campus HD is directly associated with events that made a significant contribution to the broad pattern of history of education and schools in the City of La Cañada.

Three buildings within the LCHS Campus HD appear to be eligible for listing in the CRHR under Criterion 1 and 3, in addition to their eligibility as contributors to the LCHS Campus HD. The three buildings are each individually significant under Criterion 1 (being representative of the first high school constructed in La Cañada in 1963) and Criterion 3 (being excellent examples of Mid-Century Modern Style architecture with abstract architectural details, designed for use as high school educational buildings). The buildings include:

- Building A: Classroom; assigned California Historical Resource Status Code 3CB
- Building F: Library; assigned California Historical Resource Status Code 3CB
- North Gym: assigned California Historical Resource Status Code 3CB

The proposed project calls for the demolition/removal of the swimming pool and basketball courts associated with the South Gym at LCHS. These structures have not been identified as being contributors to the LCHS Campus HD, nor have they been identified as being considered individually eligible for listing in the NRHP or CRHR. The full Historic Resources Evaluation Report can be found in Appendix D.

### Native American Heritage Commission

In April 2020, FCS contacted the NAHC to determine whether any sacred sites were located within the site or project vicinity. A response was received on May 4, 2020, indicating that the results of the Sacred Lands record search were positive. The NAHC recommended that FCS contact the Gabrieleño Band of Mission Indians—Kizh Nation, in addition to six other Native American tribes on a list provided by the NAHC. NAHC letters were mailed to the seven tribes on May 11, 2020. No responses have been received at this time. NAHC correspondence and copies of the NAHC letters can be found in Appendix D.

### Cultural Resources

Would the project:

- a) **Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?**

**Less than significant impact.** CEQA Guidelines Section 15064.5 defines “historic resources” as resources listed in the CRHR, or determined to be eligible by the California Historical Resources Commission for listing in the CRHR. The criteria for eligibility are generally set by the Historic Sites Act of 1935, which established the NRHP and which recognizes properties that are significant at the national, State, and local levels. To be eligible for listing in the NRHP, a district, site, building, structure, or object must possess integrity of location, design, setting, materials, workmanship, feeling, and association relative to American history, architecture, archaeology, engineering, or culture.<sup>35</sup> In addition, unless the property possesses exceptional significance, it must be at least 50 years old to be eligible.

The SCCIC records search for the project site determined that one historic resource is located within 0.50-mile of the site. The closest historical resource is the Jet Propulsion Laboratory. Additionally, an HRER for the site was conducted by Pam Daly on August 21, 2020, which evaluated the campus property and buildings for historical significance. It was determined that three buildings on the high school campus are individually eligible for listing as a historic resource in the CRHR; however, the project does not propose to demolish or adversely affect any of the three eligible buildings. The HRER determined that the existing swimming pool and basketball courts are not contributors to the LCHS Campus HD and have not been identified to be individually eligible for listing in the NRHP or CRHR. As such, the demolition and removal of the swimming pool and basketball courts would not result in an adverse change to the LCHS Campus HD and would not cause a loss of significance to the

<sup>35</sup> National Register of Historic Places. 2020. Publications of the National Register of Historic Places. Website: <https://www.nps.gov/subjects/nationalregister/publications.htm>. Accessed May 1, 2020.

LCHS Campus HD. No mitigation measures are required for the proposed project because impacts to historical resources would be less than significant.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

**Less than significant impact with mitigation incorporated.** Section 15064.5 of the CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories.

Results from the SCCIC indicate that one historic site is located within 0.50 mile of the project site. There are no recorded prehistoric or historic archaeological resources located within or near the project site. The project site consists of developed land within the La Cañada High School campus. Given the highly disturbed condition of the site, the potential to impact an unidentified archeological resource is considered low. However, it is possible that earthmoving activities associated with project construction could encounter previously undiscovered archaeological resources. Archaeological resources can include but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Damage or destruction of these resources would be a potentially significant impact. Implementation of MM CUL-1 will reduce this potential impact to a less than significant level.

With the implementation of MM CUL-1, the proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Impacts would be less than significant with mitigation incorporated.

**c) Disturb any human remains, including those interred outside of formal cemeteries?**

**Less than significant impact with mitigation incorporated.** As noted above, the project site has been significantly disturbed and developed. Therefore, the potential for the disturbance of any human remains is considered low. While it is highly unlikely that the presence of human remains exists within or near the project site, there is always the possibility that subsurface construction activities associated with the proposed project, such as grading or trenching, could potentially damage or destroy previously undiscovered human remains. In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and 5097.98 must be followed. MM CUL-2 further specifies the procedures to follow in the event human remains are uncovered. Along with compliance with these guidelines and statutes, implementation of this mitigation would reduce potential impacts related to human remains to a less than significant level.

### **Tribal Cultural Resources**

Would the proposed project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural

landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- d) **Cause a substantial adverse change in the significance of a tribal cultural resource 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 Section 5020.1(k), or**

**Less than significant impact with mitigation incorporated.** A review of the CRHR, local registers of historic resources, a records search conducted at the SCCIC, and an NAHC sacred lands file search failed to identify any listed Tribal Cultural Resources (TCRs) that may be adversely affected by the proposed project. As such, no eligible or potentially eligible TCRs will adversely be affected by the proposed project. Should any undiscovered TCRs be encountered during project construction, implementation of MM CUL-1 and MM CUL-2 would reduce potential impacts to a less than significant level.

- e) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**Less than significant impact with mitigation incorporated.** Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change to a defined Tribal Cultural Resources (TCRs) may result in a significant effect on the environment. AB 52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a Lead Agency of such interest and to request notification of future projects subject to CEQA prior to determining if a Negative Declaration (ND), Mitigated Negative Declaration (MND), or Environmental Impact Report (EIR) is required for a project. The Lead Agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the proposed project. AB 52 identifies examples of mitigation measures that would avoid or minimize impacts to TCRs. AB 52 makes the above provisions applicable to projects that have a Notice of Preparation (NOP) or a Notice of Intent (NOI) to adopt an ND/MND circulated on or after July 1, 2015. AB 52 amends Public Resource Code Section 5097.94 and adds Public Resource Code Sections 21073, 21074, 2108.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3, relating to Native Americans.

Tribal consultation efforts conducted by LCUSD and FCS pursuant to AB 52 failed to identify additional significant TCRs meeting the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. As such, no additional significant TCRs will be adversely affected by the proposed project. Should any undiscovered TCRs be encountered during project construction, implementation of MM CUL-1 and MM CUL-2 will reduce potential impacts to a less than significant level.

## Mitigation Measures

**MM CUL-1      Inadvertent Discovery of Cultural Resources.** In the event that significant cultural resources are discovered during construction activities, operations shall stop within a 100-foot radius of the find and an Archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology shall be consulted to determine whether the resource requires further study. The Lead Agency shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Potentially significant cultural resources consist of but are not limited to stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. The qualified Archaeologist shall make recommendations to the lead agency concerning appropriate measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with CEQA Guidelines, Section 15064.5. Any previously undiscovered resources found during construction within the project area should be recorded on appropriate Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA Guidelines.

**MM CUL-2      Accidental Discovery of Human Remains.** In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 must be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance within 100 feet of the remains until the County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the Coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, for appropriate treatment and disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.
2. Where the following conditions occur, the landowner or his or her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD or on the project site in a location not subject to further subsurface disturbance:
  - The NAHC is unable to identify a MLD or the MLD failed to make a recommendation within 48 hours after being notified by the commission.

- The descendant identified fails to make a recommendation.
- The landowner or his authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

Additionally, California Public Resources Code Section 15064.5 requires the following relative to Native American Remains:

When an initial study identifies the existence of, or the probable likelihood of, Native American Remains within a project site, a lead agency shall work with the appropriate Native Americans as identified by the NAHC as provided in Public Resources Code Section 5097.98. The Lead Agency may develop a plan for treating or disposing of, with appropriate dignity, the human remains, and any items associated with Native American Burials with the appropriate Native Americans as identified by the NAHC.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.6 Energy</b> <i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

### Energy

Energy sources include electricity, natural gas, and other fuels. Energy is generally transmitted either in the form of electricity, measured in kilowatts (kW)<sup>36</sup> or megawatts (MW),<sup>37</sup> or natural gas measured in therms or cubic feet.<sup>38</sup> Fuel, such as gasoline or diesel, is measured in gallons. Energy usage is typically quantified using the British Thermal Unit (BTU). The BTU is the amount of energy that is required to raise the temperature of one pound of water by one-degree Fahrenheit. As points of reference, the approximate amount of energy contained in a gallon of gasoline, 100 cubic feet (1 therm) of natural gas, and a kilowatt-hour of electricity are 123,000 BTUs, 100,000 BTUs, and 3,400 BTUs, respectively.

The proposed project would be served with electricity provided by Southern California Edison (SCE) and with gas provided by SoCalGas.

All supporting information for this section is included as part of Appendix B.

Would the project:

- a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

**Less than significant impact.** A significant impact would occur if the project would result in the wasteful, inefficient, or unnecessary use of energy. Construction and operations are discussed separately below.

<sup>36</sup> 1 kW=1,000 watts; a watt is a derived unit of power that measure rate of energy conversion. 1 watt is equivalent to work being done at a rate of 1 joule of energy per second. In electrical terms, 1 watt is the power dissipated by a current of 1 ampere flowing across a resistance of 1 volt.

<sup>37</sup> 1 MW=1 million watts

<sup>38</sup> A therm is a unit for quantity of heat that equals 100,000 BTU. A BTU is the quantity of heat required to raise the temperature of 1 pound of liquid water 1 degree Fahrenheit at a constant pressure of 1 atmosphere.

## Construction

During construction, the project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for temporary buildings, lighting, and other sources.

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site preparation, grading, paving, and building construction. The types of equipment could include gasoline- and diesel-powered construction and transportation equipment, including bulldozers, tractors, frontend loaders, backhoes, scrapers, forklifts, pavers, rollers, and cranes.

Based on CalEEMod estimations within the modeling output files used to estimate GHG emissions associated with the proposed project, construction-related vehicle trips would result in approximately 171,110 vehicle miles traveled and consume an estimated 6,833 gallons of gasoline and diesel combined during the construction phase. Additionally, on-site construction equipment would consume an estimated 35,205 gallons of diesel fuel (Appendix B).

Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations, Title 13, Sections 2449 and 2485, limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. In addition, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of fuel during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. The City's permissible hours for construction are 7:00 a.m. to 6:00 p.m. (7:00 a.m. to 7:00 p.m. during Daylight Savings Time), Monday through Friday, and 9:00 a.m. to 5:00 p.m. on Saturdays; and no construction would be permitted on Sundays and holidays. As on-site construction activities would be restricted between these hours, it is anticipated that the use of construction lighting would be minimal. Singlewide mobile office trailers, which are commonly used in construction staging areas, generally range in size from 160 square feet to 720 square feet. A typical 720-square-foot office trailer would consume approximately 13,914 kilowatt hours (kWh) during construction of the project, which is anticipated to last approximately 1.49 years.<sup>39</sup> Due to the temporary nature of construction and the financial incentives for developers and contractors to use energy-consuming resources in an efficient manner, the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Construction-related energy impacts would therefore be less than significant.

## Operation

The operational phase of the project would consume energy as part of field, pool, parking lot, and building operations. The proposed operations would not add any new vehicle trips to existing operations. Operations for the project would involve energy consumption for multiple purposes including, but not limited to, building heating and cooling, lighting, and electronics, as well as

<sup>39</sup> Energy use was estimated using CalEEMod for a 720-square-foot general office building served by SCE in the SCAQMD portion of Los Angeles County; see Appendix B.

parking lot lighting. Based on CalEEMod estimations within the modeling output files used to estimate GHG emissions associated with the proposed project, operations would consume approximately 73,799 kWh of electricity per year, and an estimated 52,508 kilo-British Thermal Units (kBtu) per year of natural gas (Appendix B). The proposed project's buildings would be designed and constructed in accordance with Title 24 energy efficiency standards.

The proposed project would comply with Title 24 energy efficiency standards. Compliance with these standards would ensure that building energy consumption would not be wasteful, inefficient, or unnecessary.

**b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?**

**Less than significant impact.** A significant impact would occur if the project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Title 24 energy efficiency standards and Renewable Portfolio Standard (RPS) are discussed below, as well as the City of La Cañada Flintridge Energy Action Plan<sup>40</sup> and the City of La Cañada Flintridge Climate Action Plan.<sup>41</sup> Impacts related to the project's construction and operations are discussed separately below.

**Construction**

As described above, the proposed project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for temporary buildings, lighting, and other sources. California Code of Regulations, Title 13, Sections 2449 and 2485, limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. The project would be required to comply with these regulations. Therefore, it is anticipated that the construction phase of the project would not conflict with State or local renewable or energy efficiency objectives. Construction-related energy impacts would be less than significant.

**Operation**

The proposed project would be served with gas provided by SoCalGas. SoCalGas has set a voluntary goal to reduce their own electricity usage. Their energy conservation program seeks to reduce GHG emissions, advance new technologies in energy-efficiency and emerging, renewable energy, and lower estimated electricity consumption at company facilities through comprehensive energy-efficiency retrofits and by incorporating energy-efficient measures into new construction (SoCalGas 2019). Therefore, the proposed project would be served by a gas company that strives for increased use of renewable energy sources and energy conservation.

The proposed project would be served with electricity provided by SCE, which is required to meet standards outlined in California's RPS Program. SCE's 2017 power mix included 32 percent eligible renewable (biomass and waste, geothermal, eligible hydroelectric, solar, and wind), 8 percent large

<sup>40</sup> City of La Cañada Flintridge. 2013. Energy Action Plan. March. Website: [https://3d8ab810-a053-45e1-bce4-3869a5ffd636.filesusr.com/ugd/f815d4\\_450c20948aa347d8aa792add05041e29.pdf](https://3d8ab810-a053-45e1-bce4-3869a5ffd636.filesusr.com/ugd/f815d4_450c20948aa347d8aa792add05041e29.pdf). Accessed January 14, 2020.

<sup>41</sup> La Canada, Flintridge. 2016. Climate Action Plan. Website: [https://cityoflcf.org/wp-content/uploads/2020/01/LCF\\_Env\\_Action\\_Plan\\_2016.pdf](https://cityoflcf.org/wp-content/uploads/2020/01/LCF_Env_Action_Plan_2016.pdf). Accessed January 14, 2020.

hydroelectric, 20 percent natural gas, 6 percent nuclear, and 34 percent unspecified sources of power.<sup>42</sup> The 2017 SCE Green Rate 50 percent option includes 66 percent eligible renewable (geothermal, eligible hydroelectric, solar, and wind), 4 percent large hydroelectric, 10 percent natural gas, 3 percent nuclear, and 17 percent unspecified sources of power. The 2017 SCE Green Rate 100 percent option includes 100 percent solar.

Furthermore, as previously discussed, energy conservation policies and standards have been established at the State and City level. The project's buildings would be designed and constructed in accordance with Title 24 energy efficiency standards. These standards, widely regarded as the most advanced energy efficiency standards, would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation.

The City of La Cañada Flintridge Energy Action Plan contains electricity-related energy efficiency targets, goals, policies, and actions to help the community become more energy efficient.<sup>43</sup> Energy conservation policies are to be implemented at the city-level and are not applicable to individual development projects. In addition, the energy efficiency policies contained in the City of La Cañada Flintridge Energy Action Plan that go beyond compliance with existing regulations are voluntary. Neither construction nor operations of the project would impede implementation of these policies. Therefore, the project would not conflict with or obstruct any energy efficiency measures included in the City's Energy Action Plan.

The City of La Cañada Flintridge Climate Action Plan<sup>44</sup> contains the following energy efficiency measures that further promote energy conservation.

## **E-2 Community-wide Renewable Energy**

- Where feasible, provide financial incentives for renewable energy projects (e.g., reduced fees), creative financing (e.g., subsidized or other low-interest loans and/or the option to pay for system installation through long term assessments on individual property tax bills), as well as other support for community members or developers seeking funding for such projects.
- Update building standards to encourage all new construction to incorporate renewable energy and/or be solar ready.
- Encourage solar shade structures as a condition of approval for all new parking lots where appropriate and identify existing public and private parking structures to install solar shade structures.

As described above, the City of La Cañada Flintridge Climate Action Plan contains several energy efficiencies measures that require action from the City of La Cañada Flintridge and, therefore, cannot be implemented by an individual development project. Neither construction nor operations of the project would impede implementation of these measures. Therefore, the proposed project would

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<sup>42</sup> Southern California Edison (SCE). 2018. 2017 Power Content Label. July. Website: [https://www.sce.com/sites/default/files/inline-files/2017PCL\\_0.pdf](https://www.sce.com/sites/default/files/inline-files/2017PCL_0.pdf). Accessed November 15, 2019.

not conflict with or obstruct any energy efficiency measures included in the City's Climate Action Plan.

The proposed project would be required to comply with any mandatory regulations and design guidelines. The project would be required to comply with the State's Renewables Portfolio Standard and Title 24 energy efficiency standards. The proposed project would not obstruct or conflict with any of the voluntary policies or measures in the City's Energy Action Plan or Climate Action Plan. As such, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Operational energy impacts would therefore be less than significant.

### **Mitigation Measures**

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.7 Geology and Soils</b> <i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Would the project:

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

**Less than significant impact.** Seismically induced ground rupture is defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. Ground rupture is most likely to occur along active faults, and typically occurs during earthquakes of magnitude 5.0 or higher. Ground rupture only affects the area immediately adjacent to a fault.

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo (AP) Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet).

Southern California is known for having seismically active regions that may be susceptible to seismic activity at any point in time. This is due to active faults that traverse the seismically active areas. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a State-designated Alquist-Priolo Earthquake Fault Zone.

The proposed project includes the redevelopment of recreational facilities on the existing La Cañada High School Campus within the City of La Cañada Flintridge. The City of La Cañada Flintridge has active faults, which pass beneath the City. The nearest fault to the project site is identified as the Sierra Madre Fault, which passes through the City of La Cañada Flintridge in an east to west direction approximately 0.5 mile to the north of the project site.<sup>45</sup> According to the Geo-Advantec, Inc. (GAI) October 10, 2019, Geotechnical and Geohazards Investigation Report (Appendix E), surface rupture is not considered to be a potential hazard at the project site.

Design and construction of the proposed project would be required to comply with all applicable California Building Standards Codes for seismic design standards. Compliance with all applicable regulations would ensure that the structural integrity of the proposed structures and improvements could withstand seismic shaking. In addition, adherence to all recommendations outlined under MM

<sup>45</sup> California Department of Conservation. 2010. Fault Activity Map of California. Website: <http://maps.conservation.ca.gov/cgs/fam/>. Accessed December 2, 2019.



GEO-1 from the Geotechnical and Geohazards Investigation Report would further reduce impacts to a less than significant level. Therefore, impacts would be less than significant.

**ii) Strong seismic ground shaking?**

**Less than significant impact.** The project site is located within 1 mile of the Sierra Madre Fault line, which passes through the City of La Cañada Flintridge on an east to west direction. However, as mentioned above in Impact 7(a)(i), the proposed project would be required to comply with the California Building Standards Code, which would reduce risks associated with strong seismic shaking if an earthquake were to occur. Furthermore, none of the proposed improvements to the high school campus recreational facilities consist of housing. Additionally, implementation of the recommendations outlined under MM GEO-1 would further reduce impacts to a less than significant level. Based on the compliance of the project with applicable codes, policies, and goals, and the nature of the proposed upgrades, impacts with regard to strong seismic shaking would be less than significant.

**iii) Seismic-related ground failure, including liquefaction?**

**Less than significant impact.** Liquefaction describes the behavior of soils that, when loaded, suddenly suffer a transition from a solid state to a liquefied state, or having the consistency of a heavy liquid. Liquefaction can occur during vibratory conditions such as those induced by seismic event, under saturated conditions in soils, such as sand, in which the strength is purely frictional.

According to the GAI Geotechnical and Geohazards Investigation Report the project site is not within a seismic hazard zone of liquefaction and is not at risk for liquefaction. Based on the location of the project site, the low potential for liquefaction, and the compliance with California Building Standard Codes, impacts associated with the potential for seismic related ground failure are less than significant.

**iv) Landslides?**

**Less than significant impact.** As discussed in the Geotechnical and Geohazards Investigation Report, the site is relatively flat and is not located in an earthquake-induced landslide zone. No evidence of land sliding was observed in the immediate vicinity of the site. The Geotechnical and Geohazards Investigation Report indicates that landslides are not a potential hazard on the project site. Furthermore, compliance with California Building Standard Codes, would reduce the at risk for landslides. As such, impacts related to the potential for landslides are less than significant.

**b) Result in substantial soil erosion or the loss of topsoil?**

**Less than significant impact.** Implementation of the proposed project would require ground-disturbing activities, such as demolition, excavation, and grading, that could potentially result in soil erosion or loss of topsoil. The proposed project's grading plan would be designed by a registered Civil Engineer to ensure that the proposed earthwork and stormwater structures are designed to avoid soil erosion. Construction of the proposed project would be required to comply with the

Construction General Permit, through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). Best Management Practices (BMPs) included in the SWPPP would minimize soil erosion during construction. The proposed project would also be required to comply with the City Ordinance Number 416, subsection 4.23.110, which states that a grading plan shall be submitted as a part of the Landscape Documentation Package. The Lead Agency shall submit a landscape grading plan that minimizes soil erosion, runoff, and water waste. Therefore, impacts associated with the potential for substantial soil erosion or the loss of topsoil would be less than significant.

- 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?**

**Less than significant impact.** Soils may be considered unstable if they are comprised of clays, silts, or sediments with a high shrink/swell potential, or are located on steep slopes. Soils on the project site are identified by the United States Department of Agriculture, Natural Resources Conservation Service (NRCS) Soil Map as Urban Land-Soboba Complex with slopes ranging from zero to 5 percent. These soils, according to the NRCS, are comprised primarily of gravelly, cobbly, or extremely cobbly sand, and are rarely subject to flooding.<sup>46</sup> Furthermore, according to the GAI Geotechnical and Geohazards Investigation Report, the soils underlying the project site are not considered to be unstable and would not be subject to liquefaction, lateral spreading, or subsidence. Therefore, the Urban Land-Soboba Complex soils are not considered to be unstable due to their composition. Therefore, impacts with relation to unstable soils beneath the project site are less than significant.

- 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?**

**Less than significant impact.** Expansive soils are soils with a significant amount of clay particles that have the ability to give up water (shrink) or take on water (swell). Fine-grained soils, such as silts and clays, may contain variable amounts of expansive clay minerals. When these soils swell, the change in volume exerts significant pressures on loads that are placed on them. This shrink/swell movement can adversely affect building foundations, often causing them to crack or shift, with resulting damage to the buildings they support.

As discussed in Impact 7(c), soils beneath the project site are categorized as Urban Land-Soboba Complex. The Urban Land-Soboba Complex soil profile consists of approximately 45 percent Urban Land, 40 percent Soboba and similar soils, with the remaining 15 percent being minor components. The typical soil profile is described as gravelly sand, very cobbly sand, and extremely cobbly sand. Silt, clay, and other common expansive soil types are not identified beneath the project site. According to the GAI Geotechnical and Geohazards Investigation Report, soil borings taken from the project site are considered to have a very low expansion potential. Therefore, impacts with relation to expansive soils are less than significant.

<sup>46</sup> United States Department of Agriculture (USDA). 2019. Natural Resources Conservation Service. Web Soil Survey. Website: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed December 2, 2019.

**e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**No impact.** The proposed project does not include the use of septic systems or alternative wastewater disposal systems; however, sewer lines may potentially be installed beneath the surface to accommodate the new locker rooms and pool facilities. According to the GAI Geotechnical and Geohazards Investigation Report, the soils beneath the project site consist of silty sand with gravel. No soil types beneath the project site were identified as incapable of supporting the installation of sewer lines. Therefore, because the project site does not propose the use of septic tanks, and because imported soils may be utilized for the proposed project, no impact would occur.

**f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less than significant impact with mitigation incorporated.** The proposed project is located on the existing La Cañada High School Campus and would relocate existing athletic facilities to allow for the construction of a new pool, an expanded parking lot, and relocated basketball courts. No unique paleontological or geologic features are currently identified in the project area. However, it is possible that subsurface disturbance would occur at a level not previously disturbed (e.g. deeper excavation than previous disturbance). With the performance of grading and excavation comes the possible discovery of unique paleontological or geological resources such as fossils not previously discovered. Given the proposed uses of the project, only shallow excavations would be conducted to relocate the baseball field, expand the parking lot, and relocate the basketball courts. Such grading activities would likely occur at a shallow depth over engineered fill, which would not be expected to contain fossilized remains or geological resources. However, excavation with relation to the pool may potentially uncover unique geological or paleontological resources not previously known. Implementation of MM GEO-2 would reduce impacts related to the potential for destruction of unique paleontological resources or unique geologic features by requiring paleontological monitoring on-site. According to the paleontological records search response received from Dr. Samuel McLeod on May 28, 2020, there are no vertebrate fossil localities that lie directly within the project boundaries. However, localities are located somewhat nearby from sedimentary deposits that are similar to those that may occur at depth within the project site. Dr. McLeod also indicated that surficial deposits in the entire project area consist of younger Quaternary Alluvium derived as alluvial fan deposits from the San Gabriel Mountains to the northeast. While these sedimentary deposits typically do not contain significant vertebrate fossils in the uppermost layers, underlying older and finer-grained Quaternary deposits may contain significant vertebrate fossils. Records indicate that the nearest fossil locality in older Quaternary deposits is located southeast of the project area, and an older Quaternary locality is located southwest of the project site.<sup>47</sup> While there are no localities directly within the project site, implementation of MM GEO-3 would further reduce impacts to paleontological resources to a less than significant level, if found within the project site. A copy of the paleontological records search results can be found in Appendix E.

<sup>47</sup> Dr. Samuel McLeod. 2020. Natural History Museum of Los Angeles County. Paleontological Records Search. Accessed June 4, 2020.

## Mitigation Measures

- MM GEO-1**      **Implement Project-specific Geotechnical Report Recommendations.** Prior to issuance of any grading permits, all recommendations and specifications set forth in the project-specific Geotechnical and Geohazards Investigation Report related to grading of fill materials and import, seismic coefficients, foundations, floor slab, basketball court slab, concrete flatwork, pavement for parking lot, utility trench backfilling, excavations, infiltration rate determination, soil corrosivity, and soil expansivity of project features shall be implemented as part of the project.
- MM GEO-2**      **Paleontological Monitoring.** Impacts to significant paleontological resources in undisturbed surface or subsurface sediments is considered to be unlikely. However, in areas containing older Quaternary deposits where earth-disturbing activities are at depths greater than 10 feet, or proposes a total cut amount of 1,000 cubic yards or more, full-time paleontological monitoring is required. The Lead Agency shall provide written proof that a qualified Paleontologist has been retained to observe all earth-disturbing activities. If buried paleontological resources are discovered during grading or trenching, operations shall stop in the immediate vicinity of the find and a qualified Paleontologist shall be consulted to determine whether the resource requires further study. The qualified Paleontologist and shall make recommendations to the Lead Agency on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. If the resources are determined to be unique resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the qualified Paleontologist and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include but are not limited to avoidance, data recovery, and excavations of the finds, collection, identification, preparation, and preservation of the fossilized materials, curation in an appropriate establishment, and preparation of an itemized findings report. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any paleontological materials recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the Lead Agency where they would be afforded long-term preservation to allow future scientific study. All fossil materials recovered during mitigation monitoring shall be cleaned, identified, cataloged, and analyzed in accordance with standard professional practices. The results of the field work and laboratory analysis shall be submitted in a technical report and the entire collection transferred to an approved fossil curation facility.
- MM GEO-3**      **Inadvertent Paleontological Discovery.** Any substantial excavations within the project site shall be monitored to professionally recover any fossil remains discovered while not impeding development. Sediment samples shall be collected and processed to determine the small fossil potential in the project area. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.8 Greenhouse Gas Emissions</b> <i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

This section evaluates the possible impacts related to GHG emissions that could result from construction and operation of the project. Information included in this section is based, in part, on project-specific GHG emissions modeling results utilizing CalEEMod (Version 2016.3.2). The modeling data is provided in its entirety in Appendix B.

### Greenhouse Gas Emissions

Gases that trap heat in the atmosphere are referred to as GHGs. The effect is analogous to the way a greenhouse retains heat. There have been significant legislative and regulatory activities that directly and indirectly affect climate change and GHGs in California. The primary climate change legislation in California is AB 32, the California Global Warming Solutions Act of 2006, and Senate Bill (SB) 32, focusing on reducing GHG emissions in California. The project would generate a variety of GHG emissions during construction and operation, including several defined by AB 32 such as carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O).

To describe how much global warming a given type and amount of GHG may cause, the CO<sub>2</sub> equivalent (CO<sub>2</sub>e) is used. The calculation of the CO<sub>2</sub>e is a consistent methodology for comparing GHG emissions since it normalizes various GHG emissions to a consistent reference gas, CO<sub>2</sub>. For example, CH<sub>4</sub>'s warming potential of 25 indicates that CH<sub>4</sub> has 25 times greater warming effect than CO<sub>2</sub> on a molecule-per-molecule basis. A CO<sub>2</sub>e is the mass emissions of an individual GHG multiplied by its global warming potential.

### Thresholds of Significance for this Project

Section 15064.4(b) of the CEQA Guideline amendments for GHG emissions state that a lead agency may consider the following three considerations in assessing the significance of impacts from GHG emissions.

- **Consideration #1:** The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.

- **Consideration #2:** Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration #3:** The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of GHG emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an Environmental Impact Report must be prepared for the project.

The SCAQMD developed interim recommended significance thresholds<sup>48</sup> for GHGs for local lead agency consideration; however, the SCAQMD Board has not approved the thresholds as of the date of this analysis. The current interim thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to a project's operational emissions. If a project's emissions are under one of the following screening thresholds, then the project is less than significant:
  - All land use types: 3,000 MT CO<sub>2</sub>e per year
  - Based on land use type: residential: 3,500 MT CO<sub>2</sub>e per year; commercial: 1,400 MT CO<sub>2</sub>e per year; industrial: 10,000 MT CO<sub>2</sub>e; or mixed use: 3,000 MT CO<sub>2</sub>e per year
- Tier 4 has the following options:
  - Option 1: Reduce emissions from Business as Usual (BAU) by a certain percentage; this percentage is currently undefined
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
  - Option 3: 2020 target for service populations (SP), which includes residents and employees: 4.8 MT CO<sub>2</sub>e/SP/year for projects and 6.6 MT CO<sub>2</sub>e/SP/year for plans;
  - Option 4, 2035 target: 3.0 MT CO<sub>2</sub>e/SP/year for projects and 4.1 MT CO<sub>2</sub>e/SP/year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

<sup>48</sup> South Coast Air Quality Management District (SCAQMD). 2008. Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. December. Website: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2). Accessed October 30, 2019.

The SCAQMD provided substantial evidence in support of its threshold approach. The SCAQMD discusses its draft thresholds in the following excerpt:<sup>49</sup>

The overarching policy objective with regard to establishing a GHG significance threshold for the purposes of analyzing GHG impacts pursuant to CEQA is to establish a performance standard or target GHG reduction objective that will ultimately contribute to reducing GHG emissions to stabilize climate change. Full implementation of the Governor's Executive Order S-3-05 would reduce GHG emissions 80 percent below 1990 levels or 90 percent below current levels by 2050. It is anticipated that achieving the Executive Order's objective would contribute to worldwide efforts to cap GHG concentrations at 450 ppm, thus, stabilizing global climate.

As described below, staff's recommended interim GHG significance threshold proposal uses a tiered approach to determining significance. Tier 3, which is expected to be the primary tier by which the AQMD will determine significance for projects where it is the lead agency, uses the Executive Order S-3-05 goal as the basis for deriving the screening level. Specifically, the Tier 3 screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects. A 90 percent emission capture rate means that 90 percent of total emissions from all new or modified stationary source projects would be subject to some type of CEQA analysis, including a negative declaration, a mitigated negative declaration, or an environmental impact.

Therefore, the policy objective of staff's recommended interim GHG significance threshold proposal for projects where the SCAQMD is the lead agency is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that staff estimates that these GHG emissions would account for less than one percent of future 2050 statewide GHG emissions target (85 MMT CO<sub>2</sub>e/yr). In addition, these small projects would be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory.

In summary, the SCAQMD's draft threshold uses the Executive Order S-3-05 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide

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<sup>49</sup> South Coast Air Quality Management District (SCAQMD). 2008. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold. October. Website: [https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2](https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2). Accessed October 10, 2019.

efforts to cap CO<sub>2</sub> concentrations at 450 ppm, thus stabilizing global climate. To determine whether the proposed project would have a significant impact with respect to the generation of GHG emissions at project buildout, this analysis utilizes the SCAQMD's draft local agency Tier 3 threshold of 3,000 MT CO<sub>2</sub>e per year for all land use types.

To determine whether the proposed project would have a significant impact with respect to the generation of GHG emissions, this analysis utilizes the SCAQMD's draft local agency Tier 3 threshold of 3,000 MT CO<sub>2</sub>e per year. The second CEQA Checklist question would be evaluated by assessing the project's consistency with the ARB's adopted 2017 Scoping Plan Update.

Would the project:

**a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Less than significant impact.** Both construction period and operational period activities have the potential to generate GHG emissions. The project would generate GHG emissions during temporary (short-term) construction activities such as site preparation, construction equipment engines, on-site heavy duty construction vehicles, vehicles hauling materials to and from the project site, asphalt paving, and motor vehicles used by the construction workers. On-site construction activities would vary depending on the level of construction activity.

As described below, operations at the project site, with the implementation of the proposed project, would continue to operate similar to existing operations. As mentioned in Section 1.5, Project Description, there would be no increase in the number of students or staff associated with the proposed project. In addition, project operations would not result in an increase in vehicle trips or traffic within the project area. However, the area of the proposed pool facilities would be larger than the area of the existing pool facilities, which would result in a long-term net increase of operational GHG emissions from off-site generation of electrical power over the life of the project.

The following changes proposed as part of the project are estimated to result in a net increase in the generation of GHG emissions during operations:

- The project proposed to demolish the existing 25-meter pool and replace it with larger 40-meter pool.
- The existing 750-square-foot pool equipment building would be demolished and replaced with over 4,000 square feet of new pool facilities (1,176-square-foot equipment area, 1,620-square-foot outdoor pool storage area, 218-square-foot girls restroom, 218-square-foot boys restroom, two 378-square-foot locker rooms, 284-square-foot indoor concrete storage area, 411-square-foot office, and 19 outdoor showers).

The following changes proposed as part of the project would result in no increase or a negligible increase in the generation of GHG emissions during operations:



- The project would demolish basketball courts and construct new ones.
- The project would move the existing baseball fields, expand an existing parking lot, and move existing lighting for baseballs fields and parking. As previously noted, the project would not result in an increase of students or staff; therefore, the project would not result in an increase in vehicle trips or traffic within the project area.

GHG emissions generated from construction and operations of the project are addressed below.

## Construction Emissions

The project would generate GHG emissions during construction activities resulting from emission sources such as construction equipment, haul trucks, and construction worker vehicles. Although these emissions would be temporary and short-term in nature, they could represent a substantial contribution of GHG emissions. Construction emissions were modeled using CalEEMod (Version 2016.3.2). See Appendix B for detailed modeling parameters and assumptions.

Table 12 presents the project's total construction emissions, which are amortized over the assumed lifetime of the project and added with annual operational emissions.

**Table 12: Estimated Construction-related GHG Emissions**

Construction Activity	Total GHG Emissions (MT CO <sub>2</sub> e per year)
Phase 1—2021	145
Phase 1—2022	88
Phase 2—2022	100
Phase 3—2022	93
Entire Site—2022	51
<b>Total Construction Emissions</b>	<b>477</b>
<b>Emissions Amortized Over 30 Years<sup>1</sup></b>	<b>16</b>
Notes: MT CO <sub>2</sub> e=metric tons of carbon dioxide equivalent Totals may not appear to sum exactly due to rounding. <sup>1</sup> Construction GHG emissions are amortized over the 30-year lifetime of the project. Source: Appendix B.	

## Operational Emissions

Operational or long-term emissions occur over the life of the project. Project operations were modeled for the 2022 operational year (the earliest year following the completion of construction). Sources for operational emissions are summarized below and are described in more detail in Appendix B. Sources for operational GHG emissions include:

- **Motor Vehicles:** These emissions refer to GHG emissions contained in the exhaust from the cars and trucks that would travel to and from the project site. Vehicle travel would include primarily employee trips, student trips, and truck deliveries associated with project operations. Consistent with the project-specific Transportation Assessment, the proposed project would not generate additional operational trips.<sup>50</sup>
- **Stationary Sources:** These emissions refer to those generated by equipment on the project site such as generators.
- **Natural Gas:** These emissions refer to the GHG emissions that occur when natural gas is burned on the project site. Natural gas uses could include heating water, space heating, dryers, or other uses associated with the proposed pool facilities. As indicated in Section 1.4-Project Description, Southern California Gas Company would provide natural gas to the project.
- **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the project. Electricity uses could include lighting, appliances, and other uses associated with the proposed pool facilities. As indicated in Section 1.4-Project Description, Southern California Edison would provide electricity service to the project.
- **Area Sources:** These emissions refer to those produced during activities such as landscape maintenance. The land uses of the proposed project would be similar to existing land uses, resulting in a similar amount of area source emissions at the site.
- **Water Transport:** These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site. The proposed project operations would be similar to existing operations, resulting in a similar amount of water use at the site. As a conservative estimate, GHG emissions from the proposed land uses were included to estimate the project's generation of GHG emissions during operations.
- **Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the project. The proposed project operations would be similar to existing operations, resulting in a similar amount of waste generation at the site. However, GHG emissions associated with waste from the proposed project were included to estimate the project's generation of GHG emissions during operations.

Table 13 presents the estimated annual GHG emissions from the project's operational activities. As previously indicated, the analysis includes construction emissions amortized over the project's life. As shown in Table 13, the project would generate approximately 78 MT CO<sub>2</sub>e per year in the 2022 year after the inclusion of 16 MT CO<sub>2</sub>e per year from project construction.

<sup>50</sup> Linscott, Law & Greenspan. 2020. Transportation Assessment: New Outdoor Pool Facility and South Campus Improvement Project. City of La Cañada Flintridge, California. April 10.

**Table 13: Operational Greenhouse Gas Emissions**

GHG Emissions Source	Year 2022 Total Emissions (MT CO <sub>2</sub> e per year)
Area	0
Energy	21
Mobile	0
Stationary	0
Waste	32
Water	9
Amortized Construction Emissions	16
<b>Total Annual Project Emissions</b>	<b>78</b>
<b>Applicable Threshold of Significance</b>	<b>3,000</b>
<b>Exceeds Threshold of Significance?</b>	<b>No</b>
Notes: MT CO <sub>2</sub> e=metric tons of carbon dioxide equivalent Source of Emissions: CalEEMod Output (Appendix B).	

As shown in Table 13, annual operational GHG emissions would not exceed the applicable threshold in the earliest full buildout operational year.

### Summary

As shown in Table 13, the project's combined amortized construction and annual operational GHG emissions would not exceed the applicable threshold of significance of 3,000 MT CO<sub>2</sub>e per year in 2022. Thus, the project's construction and operational GHG emissions would not result in a significant impact on the environment.

#### **b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Less than significant impact.** This impact is addressed by assessing the project's consistency with applicable policies or regulations adopted for the purpose of reducing GHG emissions contained in ARB's adopted 2017 Scoping Plan Update.

### **SB 32 2017 Scoping Plan Update**

The 2017 Climate Change Scoping Plan Update addressing the SB 32 targets was adopted on December 14, 2017. Table 14 provides an analysis of the project's consistency with the 2017 Scoping Plan Update measures. As shown in Table 14, many of the measures are not applicable to the project, while the project is consistent with strategies that are applicable after incorporation of mitigation.

**Table 14: Consistency with SB 32 2017 Scoping Plan Update**

2017 Scoping Plan Update Reduction Measure	Project Consistency
<b>SB 350 50 percent Renewable Mandate.</b> Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020 to 50 percent in 2030.	<b>Not applicable.</b> This measure would apply to utilities and not to individual development projects. The project would purchase electricity from a utility subject to the SB 350 Renewable Mandate. Specifically, SCE would provide electricity service to the project. SCE was required to increase its percent of power supply from renewable sources to 33 percent by the year 2020 pursuant to various regulations. Furthermore, SCE would be required to increase its renewable energy mix to 60 percent by year 2030, beyond what is required by SB 350.
<b>SB 350 Double Building Energy Efficiency by 2030.</b> This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.	<b>Not applicable.</b> This measure applies to existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency over time. The project would comply with the applicable Title 24 Energy Efficiency Standards in effect at the time building permits are received.
<b>Low Carbon Fuel Standard.</b> This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	<b>Not applicable.</b> This is a Statewide measure that cannot be implemented by a project applicant or lead agency. However, vehicles accessing the project site would benefit from the standards. As previously noted, the proposed project would not generate additional trips during long-term operations.
<b>Mobile Source Strategy (Cleaner Technology and Fuels Scenario).</b> Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million ZEVs on the road by 2030 and increasing numbers of ZEV trucks and buses.	<b>Not applicable.</b> This measure is not applicable to the project; however, vehicles accessing the project site would benefit from the increased availability of cleaner technology and fuels. As previously noted, the proposed project would not generate a net increase in trips during project operations.
<b>Sustainable Freight Action Plan</b> The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	<b>Not applicable.</b> The proposed project is development of a new pool facility and campus improvements for La Cañada High School that would not support large truck and freight operations.
<b>Short-Lived Climate Pollutant (SLCP) Reduction Strategy.</b> The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	<b>Not applicable.</b> The proposed project would not include major sources of black carbon.

2017 Scoping Plan Update Reduction Measure	Project Consistency
<b>SB 375 Sustainable Communities Strategies.</b> Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita vehicle miles traveled.	<b>Not applicable.</b> The proposed project does not include the development of a Regional Transportation Plan.
<b>Post-2020 Cap-and-Trade Program.</b> The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	<b>Not applicable.</b> The proposed project is not one targeted by the cap-and-trade system regulations, and, therefore, this measure does not apply to the project.
<b>Natural and Working Lands Action Plan.</b> The ARB is working in coordination with several other agencies at the federal, State, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the governor's Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California's natural and working land.	<b>Not Applicable.</b> The proposed project site is in a built-up urban area and would not be considered natural or working lands.
Source of ARB 2017 Scoping Plan Update Reduction Measures: California Air Resource Board (ARB). 2017. California's 2017 Climate Change Scoping Plan. November. Website: <a href="https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf">https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf</a> .	

As discussed in Table 14, the project would not conflict with any applicable 2017 Scoping Plan Update.

## Summary

As discussed above, implementation of the proposed project would not conflict with the reduction measures proposed in SB 32. Considering this information, the proposed project would not significantly hinder or delay the State's ability to meet GHG reduction targets or conflict with implementation of the reduction measures proposed in SB 32.

## Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.9 Hazards and Hazardous Materials</b> <i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Would the project:

- a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Less than significant impact.** During the construction phase of the project, limited amounts of hazardous materials would be used, including standard construction materials (e.g., paints and

solvents) and petroleum-based products (e.g., vehicle fuel and degreasers). The proposed project would be required to comply with all federal, State, and local standards and regulations while handling, storing, and disposing of these hazardous materials.

A school facility does not typically store large amounts of hazardous materials on-site, and only retail-size quantities needed for daily maintenance, including those for pool cleaning and sports courts upkeep, would be stored on-site. The proposed project would require the use of limited quantities of potentially hazardous substances, the use of which would not result in a significant hazard to the public or the environment. As such, impacts would be less than significant.

**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?**

**Less than significant impact.** As discussed in Impact 9(a), the construction and operation of the proposed project would require the use of limited quantities of hazardous substances, including but not limited to automotive chemicals, paint and solvents, and other related substances. In addition, chemicals needed for pool maintenance such as chlorine, would be used on-site. While the potential exists for releases to the environment to occur during construction and operations, the limited quantities of the potentially hazardous materials present on-site precludes significant impacts to the environment. As such, impacts would be less than significant.

**c) 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.** The proposed project is located on the campus of La Cañada High School. Because of the nature of the proposed project, which would relocate athletic facilities on campus, the use of potentially hazardous substances would be required due to the presence of a pool. Although these hazardous substances would be located on the campus, the nature of use, being directly related to the operation of a pool, would not result in a significant hazard to public health. Furthermore, no direct emissions from these new facilities would occur. As such, impacts associated with hazardous emissions 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 Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**No impact.** La Cañada High School is not listed within the California Environmental Protection Agency (Cal/EPA) Cortese list of Hazardous Water and Substances sites from the Department of Toxic Substances Control (DTSC) EnviroStor database. Although the property is identified as a chemical storage and hazardous waste generator site within the California Environmental Reporting System,<sup>51</sup> the nature of these listings is directly related to typical operations at a school with recreational facilities, such as a pool. Because the site is not identified as a Cortese site, no impacts would occur.

<sup>51</sup> California Environmental Protection Agency (Cal/EPA). 2020. Regulated Site Portal. Website: <https://siteportal.calepa.ca.gov/nsite/site/128671>. Accessed September 2, 2020.

- 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.** The nearest public airport to the project site is the Burbank-Bob Hope Airport, located approximately 9.79 miles west of the project site and approximately 11 miles northwest of the San Gabriel Airport. No private airstrips are identified within 2 miles of the project site. Therefore, no impacts would occur as a result of the proposed project.

- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**No impact.** The proposed project includes the redevelopment of recreational facilities located on the La Cañada High School Campus. No construction or operation of the updated facilities would occur in a manner that would interfere with an emergency response or evacuation plan. As such, no impacts would occur.

- 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.** According to the CAL FIRE wildland fire hazards maps for La Cañada Flintridge, the project site and surrounding areas are identified within the very high fire hazard zone. The Local Responsibility Area Map identifies the entire City of La Cañada Flintridge as either a high or very high fire hazard zone. However, the construction and use of athletic facilities on a high school campus would not increase fire hazards in the school and surrounding areas. In addition, the proposed project does not include residential development. Users of the recreational facilities would occupy the area for limited time periods and could readily avoid the area in the event of wildfires.

Design and construction of the proposed project would comply with all applicable regulations set forth in the California Fire Code. The proposed project would be reviewed by the Division of the State Architect for compliance with the California Fire Code. Compliance with all applicable regulations would reduce the potential for exposing people or structures to wildland fires. As such, impacts would be less than significant.

## Mitigation Measures

None required.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.10 Hydrology and Water Quality</b> <i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Would the project:

- a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

**Less than significant impact.** The proposed project is located on the La Cañada High School Campus within the City of La Cañada Flintridge. The existing facilities include basketball courts, a pool, baseball fields, and a student parking lot. Project-related impacts to water quality could occur over four different periods: during demolition of the existing facilities when risk of pollution exposure is present; during the earthwork phase and construction phase when the potential for erosion, siltation, and sedimentation would be greatest; following construction, before the establishment of ground cover, when erosion potential may remain relatively high; and after project completion, when impacts related to sedimentation would decrease substantially, but those associated with urban runoff would remain similar to existing conditions.

#### *National Pollutant Discharge Elimination System*

Under Section 402 of the Clean Water Act, the United States Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct stormwater discharges from construction activities disturbing 1 acre or more of land. In California, the State Water Resources Control Board (State Water Board) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The State Water Board works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The La Cañada Unified School District is located within the jurisdiction of the Los Angeles RWQCB.

#### *Short-term Construction*

Dischargers whose projects disturb one or more acres of soil (or whose projects disturb less than 1 acre, but are a part of a larger common plan of development that in total disturbs one or more acres), are required to obtain coverage under the General Permit of Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ.<sup>52</sup> 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. To obtain coverage for discharges under the General Construction Permit, dischargers are required to electronically file the Permit Registration Documents, which include an NOI, SWPPP, and other compliance-related documents required by the General Permit and mail the appropriate permit fee to the State Water Board.

A SWPPP typically includes both source-control and treatment-control BMPs to reduce water quality impacts. The BMPs that are most often used during construction include watering exposed soils; covering stockpiles of soil; installing sandbags to minimize off-site runoff; creating temporary desilting basins; and timing grading to avoid the rainy season (November through April). In addition, coverage under the Construction Permit would also include implementation of post-construction standards to achieve the pre-project volume and rate of stormwater runoff from the project area.

<sup>52</sup> California State Water Resources Control Board (State Water Board). 2010. 2009-0009-DWQ Construction General Permit. July 1. Website: [https://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml). Accessed November 13, 2019.

The proposed project would disturb approximately 3.59 acres on the La Cañada High School campus. Overall, the project's demolition and construction activities would be subject to compliance with NPDES requirements, which include obtaining coverage under the General Construction Permit by filing the Permit Registration Documents. Compliance with the NPDES requirements would ensure that the project's construction-related impacts to water quality are less than significant.

#### *Long-term Operations*

Implementation of the proposed project might result in an increase of impervious surfaces, which would increase stormwater runoff that would contain contaminants that are typical in urbanized areas. Post-construction, stormwater pollutants that may be generated by the proposed expanded school parking lot and recreational uses of the project site would remain similar to existing conditions and would include heavy metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oil and greases associated with the parking spaces and proposed ball field areas of the project site.

During the design phase of the proposed project, LCUSD will ensure that the Architect has incorporated design elements to meet the Post-Construction requirement of the Construction General Permit Order 2009-0009-DWQ. Accordingly, the project design shall include the following:

- Consideration of BMPs to implement as part of the proposed project to minimize impact.
- Consideration of BMPs to reduce water volume leaving the site and slow or absorb stormwater runoff.
- Maintenance of post-construction measures.

Given compliance with the Construction General Permit Order 2009-0009-DWQ for post-construction measures related to surface water quality, the proposed project as designed is anticipated to result in a less than significant impact directly, indirectly or cumulatively to any water quality standards or waste discharge.

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

**No impact.** The proposed project includes the development of a pool, basketball courts, an expanded parking lot, and the relocation of a baseball field. No groundwater use would be required as a part of the proposed project. Furthermore, although limited groundwork would be required to relocate the pool and expand the parking lot, data obtained through the California State GeoTracker database indicates the depth to groundwater to be greater than 45 feet BGS.<sup>53</sup> Therefore, because of the depth to groundwater and the lack of groundwater use associated with the proposed project, there would be no impacts with regard to sustainable groundwater management of the basin.

<sup>53</sup> California State Water Resources Control Board (State Water Board). 2014. ARCO #1684 Case Number T0603763485. Website: [https://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T0603763485](https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603763485). Accessed December 2, 2019.

- c) **Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

- (i) **result in substantial erosion or siltation on- or off-site;**

**Less than significant impact.** The project site is located in a relatively flat area with a slight gradient towards the south. As a part of the project, construction activities including demolition, grading, paving, and site improvements may result in loose sediment, which may be picked up by surface water or wind into nearby storm drains and into waterways.

The preconstruction and post construction drainage patterns would be designed to remain similar to existing conditions. Furthermore, no stream or river traverses the project site or is located in the immediate project vicinity. As such, impacts related to the alteration of existing drainage patterns in the area that would result in substantial erosion or siltation on- or off-site would be less than significant.

- (ii) **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**

**Less than significant impact.** The proposed project includes the development of an expanded parking and newly constructed basketball courts with impervious surfaces. As a part of the project design, drainage patterns on the project site would direct water flows to the southeast towards Oak Grove Drive. Runoff from the expanded parking lot would be collected and directed to the drywell that would be constructed on the project site in the southern portion of the south parking lot. Impacts would therefore be less than significant.

- (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**

**Less than significant impact.** The proposed project would continue to be served by the City's stormwater drainage system. Construction activities such as demolition, grading, and paving could introduce additional pollutants and sediment into water runoff and flow into nearby storm drains. The project is over 1 acre in size and compliance with the SWPPP would be required. Furthermore, water flows from the project site would not increase in volume as a result of the proposed project. As such, the proposed project would not exceed the capacity of existing stormwater drainage systems and impacts would be less than significant.

- (iv) **impede or redirect flood flows?**

**Less than significant impact.** The proposed project would relocate a baseball field, basketball courts, and a pool, and result in the expansion of a parking lot. As a part of the project design, water runoff from the project site would be directed to the drywell that would be constructed as part of the proposed project. According to the Federal Emergency Management Agency (FEMA) Flood Insurance

Rate Map (FIRM), the project site is not located within a flood hazard zone. As such, impacts with relation to impeded or redirected flood flows would be less than significant.

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

**No Impact.** According to topographic map interpretation of the region, the project site is located approximately 1,090 feet above MSL and would not be subject to tsunami flood hazards if a tsunami were to occur. Furthermore, the project site is not located within a flood hazard or seiche zone because no open water body or topographic low points occur on the project site. Furthermore, the Hahamongna Watershed Park and Devils Gate Reservoir are located directly east of the project site. Water flow from the surrounding area would be directed away from the project site towards the Hahamongna Watershed Park and Devils Gate Reservoir depression. Therefore, since the project site is not located within a flood hazard zone, the proposed project would not risk the release of pollutants if a flood were to occur, and there would be no impact.

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

**Less than significant impact.** The proposed project includes the demolition of the existing 25-meter pool, and the construction of a new 40-meter pool. Following construction, water uses would be restricted to irrigation of the baseball field, water to fill the pool, and landscaping. At most, the new pool would result in approximately 584,215 gallons of water. This does not represent a significant increase compared to the volume of the existing 25-meter pool, which is estimated to contain around 239,000 gallons of water.<sup>54,55</sup> Furthermore, the proposed project would require compliance with the SWPPP and Construction General Permit. The proposed project would not conflict with any applicable water quality management plans or sustainable groundwater management policies, and, as such, impacts would be less than significant.

## Mitigation Measures

None required.

<sup>54</sup> Pentair. Pool Volume Calculator. Website: <https://www.pentair.com/en/knowledge-base/pool-spa-equipment/pentair-pool-calculators/pool-volume-calculator.html>. Accessed May 29, 2020.

<sup>55</sup> This calculation is based on the conversion of a length and width of approximately 82 feet, with a shallow end depth of 3 ½ feet and a deep end depth of 6 feet.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.11 Land Use and Planning</b> <i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

Would the project:

**a) Physically divide an established community?**

**No impact.** The proposed project would be completed entirely on the La Cañada High School Campus. Facility upgrades include the redevelopment and relocation of basketball courts, the construction of a swimming pool, a shift of the existing baseball fields to allow for the expansion of a student parking lot, and the construction of locker rooms and an office. No features of the proposed project would alter or physically divide the community. As shown in Exhibit 4, the project site is zoned Public/Semi-public and uses of the upgraded facilities would not alter the existing character of the surrounding area.<sup>56</sup> As such, there would be no impact.

**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?**

**No impact.** The proposed project would occur on an existing school campus and would not conflict with applied land use, zoning, or regulatory requirements. As discussed above in Impact 11(a), the project site is zoned as Public/Semi-public and uses of the property would be in compliance with the City of La Cañada Flintridge Zoning Code. The project would not require a General Plan Amendment or rezone. Because the facility upgrades would not conflict with the City of La Cañada Flintridge Zoning Code or applicable General Plan policies, there would be no impact.

## Mitigation Measures

None required.

<sup>56</sup> City of La Cañada Flintridge. 2016. City of La Cañada Flintridge Zoning Map. April 15. Website: <https://sites.google.com/a/lcf.ca.gov/city-of-la-canada-flintridge-site/community-development/community-development-files/Zoning%20Map.pdf>. Accessed November 13, 2019.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.12 Mineral Resources</b> <i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

Would the project:

- a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?**

**No impact.** According to the California Department of Conservation Mines and Mineral Resources Maps, La Cañada High School is located within Mineral Resource Zone (MRZ) -3, an area containing mineral resources the significance of which cannot be evaluated from available data.<sup>57</sup> La Cañada High School is currently a developed area primarily paved over with asphalt and concrete surfaces. As such, mineral resources beneath the school are not available for mining. Furthermore, according to the City of La Cañada Flintridge Zoning Map, the project site is not zoned for mining or industrial activities.<sup>58</sup> Consequently, the project would not 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. Therefore, no impacts associated with mineral resources would occur.

- 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?**

**No impact.** The project site is not delineated within the City of La Cañada Flintridge General Plan as an area of local importance with regard to mineral resources. According to the City of La Cañada Flintridge General Plan, the land use of project site is designated as Public, which represents any developed facilities that are intended for public use and are subject to public oversight and control.<sup>59</sup> This includes any public schools, libraries, fire and police facilities, city hall, and other public use

<sup>57</sup> Department of Conservation. 1982. Mineral Lands Classification Map. Website: [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR\\_143/PartIV/Plate\\_4-5.pdf](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIV/Plate_4-5.pdf). Accessed November 6, 2019.

<sup>58</sup> City of La Cañada. 2019. Zoning Map. Website: <https://energocitizenaccess.tylertech.com/LaCañadaFlintridgeCA/SelfService#/map>. Accessed November 6, 2019.

<sup>59</sup> City of La Cañada. 2013. General Plan Land Uses Element. January. Website: [https://cityoflcf.org/wp-content/uploads/2019/09/General\\_Plan\\_Land\\_Use.pdf](https://cityoflcf.org/wp-content/uploads/2019/09/General_Plan_Land_Use.pdf). Accessed November 6, 2019.

facilities. In addition, as addressed in Impact 12a) above, no known mineral resources are located on or around the project site, and thus, no mineral extraction operation occur on or near the site. Therefore, no impacts associated with mineral resources would occur.

## **Mitigation Measures**

None required.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.13 Noise</b> <i>Would the project result in:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. A change of 3 dB is the lowest change that can be perceptible to the human ear in outdoor environments. While a change of 5 dBA is considered to be the minimum readily perceptible change to the human ear in outdoor environments.

Since the human ear is not equally sensitive to sound at all frequencies, the A-weighted decibel scale (dBA) was derived to relate noise to the sensitivity of humans, it gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for a number of various sound level metrics, including the day/night sound level ( $L_{dn}$ ) and the Community Noise Equivalent Level (CNEL), both of which represent how humans are more sensitive to sound at night. In addition, the equivalent continuous sound level ( $L_{eq}$ ) is the average sound

energy of time-varying noise over a sample period and  $L_{\max}$  is the maximum instantaneous noise level occurring over a sample period.

## Regulatory Framework

The project site is located within the City of La Cañada Flintridge, in Los Angeles County, California. The City of La Cañada Flintridge addresses noise in the Noise Element of the City of La Cañada Flintridge General Plan 2030 and in the City's Municipal Code.<sup>60,61</sup> Even though the proposed project is not subject to the City of La Cañada Flintridge General Plan 2030 or the City's Municipal Code, for purpose of this environmental analysis provision of the City's Municipal Code are used as the regulatory framework.

### ***City of La Cañada Flintridge General Plan 2030***

The City of La Cañada Flintridge adopted its General Plan in January 2013. The objective of the General Plan's Noise Element is to achieve noise levels consistent with acceptable standards and to reduce or eliminate objectionable noise sources. The policies of the Noise Element establish the City's land use compatibility and noise standards for new land use development. However, the proposed project is not considered a new land use development, but rather an expansion of an existing land use in accordance with current zoning and land use planning.

### ***City of La Cañada Flintridge Municipal Code***

The City of La Cañada Flintridge also addresses noise in the City's Municipal Code. The City of La Cañada Flintridge Municipal Code Section 15.02, Regulations of Community Noise, addresses noise applicable to the proposed project in the following provisions summarized below:

#### *Section 5.02.060: Persistent noises*

According to this ordinance, failure to comply with the following provisions shall constitute a nuisance and violation of the City's ordinance for persistent noise:

- All construction equipment powered by internal combustion engines shall be properly muffled and maintained.
- Unnecessary idling of internal combustion engines is prohibited.
- 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.
- Quiet construction equipment, particularly air compressors, are to be selected whenever possible. (Ord. 450 § 2, 2016)

#### *Section 5.02.100: Alternative use of maximum noise limits by dBA levels*

According to this ordinance, it shall be unlawful to maintain, permit, allow or suffer any use or activity that creates noise levels which exceed the established 1-hour average noise limits. For

<sup>60</sup> City of La Cañada Flintridge. 2013. City of La Cañada Flintridge General Plan 2030. January 22. Website: <https://sites.google.com/a/lcf.ca.gov/city-of-la-canada-flintridge-site/planning/general-plan>.

<sup>61</sup> City of La Cañada Flintridge. 2019. La Cañada Flintridge Municipal Code. August. Website: <http://qcode.us/codes/lacanadaflintridge/>.

example, operational noise levels shall not exceed 60 dBA  $L_{eq}$  (1-hour) between the hours of 7:00 a.m. and 7:00 p.m., or exceed 50 dBA  $L_{eq}$  (1-hour) between 7:00 p.m. and 7:00 a.m. as measured at the property line of a receiving residential land use. If the measured ambient noise level exceeds this limit, the allowable one-hour average sound level shall be the one-hour average ambient noise level, plus three decibels.

*Section 5.02.110: Temporary construction activity*

According to this ordinance, where technically and economically feasible, temporary construction activity shall be conducted in such a manner that the 1-hour average noise levels at affected properties shall not exceed the established thresholds. For example, construction noise levels should not exceed 75 dBA  $L_{eq}$  (1-hour) between the weekday hours of 7:00 a.m. and 6:00 p.m., or exceed 60 dBA  $L_{eq}$  (1-hour) on Saturdays between 9:00 a.m. and 5:00 p.m. as measured at the property line of a receiving residential land use. Construction activities, except emergency work, is not permitted outside of these hours, including all day on Sundays or holidays.

## Existing Noise Levels

### *Ambient Noise*

The existing noise environment in the project vicinity was documented through a noise monitoring effort performed at the project site. Noise measurement data sheets are contained in Appendix F. A total of three short-term noise measurements (15 minutes each) were taken on Wednesday, October 23, 2019, starting at 10:45 a.m. and ending at 12:00 p.m., during the midday peak noise hour. These measurements provide a baseline of existing noise conditions.

### *Short-term Noise Measurements*

The short-term noise measurement results are summarized in Table 15. The noise measurements determined that daytime ambient noise levels range from 60.6 dBA to 70.2 dBA  $L_{eq}$  in the project vicinity. The noise measurements indicate that noise within the project vicinity is generally characterized by vehicle traffic on Berkshire Road, Oak Grove Drive, and I-210.

**Table 15: Existing Ambient Noise Levels in the Project Vicinity**

Site Location	Location Description	$L_{eq}$ (dBA)	Primary Noise Sources
ST-1	Approximately 25 feet from the corner of Berkshire and Oak Grove Drive	67.4	Traffic on Berkshire and Oak Grove Drive, passing street sweepers, pedestrians
ST-2	On Berkshire Place sidewalk approximately 100 feet from I-210 on-ramp	70.2	Traffic on Berkshire Place and I-210
ST-3	Between La Cañada High School basketball courts 1 and 2.	60.6	Traffic from I-210
Source: FCS 2019.			

Would the project result in:

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

### Short Term Construction Impacts

**Less than significant impact.** For purposes of this analysis, a significant impact would occur if noise generated by project-related construction activities would generate a substantial temporary increase in ambient noise levels in excess of the maximum sound level standards for construction activities established by Section 5.02.110 of the of La Cañada Flintridge Municipal Code as measured at any receiving noise-sensitive land use. For example, construction noise levels should not exceed 75 dBA  $L_{eq}$  (1-hour) between the weekday hours of 7:00 a.m. and 6:00 p.m., or exceed 60 dBA  $L_{eq}$  (1-hour) on Saturdays between 9:00 a.m. and 5:00 p.m. as measured at the property line of a receiving residential land use.

### Construction-related Traffic Noise

Noise impacts from construction activities associated with the project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. One type of short-term noise impacts that could occur during project construction would result from the increase in traffic flow on local streets, associated with the transport of workers, equipment, and materials to and from the project site.

The transport of workers, construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the site. According to the traffic study prepared for the proposed project,<sup>62</sup> the construction activities would generate peak truck trip of 156 truck trips per day (78 inbound trucks and 78 outbound trucks). Assuming a hauling period of 9 hours per day (beginning at 7:00 a.m., with the last exiting truck to occur prior to 4:00 p.m.), this corresponds to a total of roughly 9 haul trucks per hour. Table 16 shows a summary of the traffic noise levels for existing conditions compared to conditions during peak construction trip conditions. The noise level results are calculated as measured at 50 feet from the centerline of the outermost travel lane of the indicated roadway segments.

**Table 16: Construction Traffic Noise Increase Summary**

Roadway Segment	Existing (dBA) CNEL	Existing Plus Construction Trips (dBA) CNEL	Increase over Existing (dBA)
Foothill Boulevard-west of Oak Grove Drive	61.3	61.4	0.1
Oak Grove Drive-Foothill Boulevard to Berkshire Place	61.2	61.3	0.1
Berkshire Place-west of Oak Grove Drive	62.0	62.2	0.2
Source: FCS 2020.			

<sup>62</sup> Linscott, Law & Greenspan, Engineers (LLG). 2020. Transportation Assessment New Outdoor Pool Facility and South Campus Improvement Project. April 10.

As shown in Table 16, the highest traffic noise level increase during construction of the project would occur along Berkshire Place west of Oak Grove Drive. Along this roadway segment, the worst-case construction trip conditions would result in traffic noise levels ranging up to 62.2 dBA CNEL as measured at 50 feet from the centerline of the nearest travel lane, representing an increase of 0.2 dBA over existing conditions for this roadway segment. This increase in traffic noise levels would not result in even a perceptible increase (defined to be a 3 dBA increase for outdoor environments). Therefore, short-term construction-related noise impacts associated with worker commute and equipment transport to the project site would not result in a substantial temporary increase in ambient noise levels in the project vicinity and the impact would be less than significant.

### **Construction Equipment Operational Noise**

The second type of short-term noise impact is related to noise generated during construction on the project site. Construction noise levels are rarely steady in nature and, often, fluctuate depending on the type and number of equipment being used at any given time. In addition, there could be times where large equipment is not operating and noise would be at or near normal ambient levels. Construction is completed in discrete steps, each of which has its own mix of equipment and its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction related noise ranges to be categorized by work phase.

The site preparation phase, which includes excavation and grading activities, tends to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery and compacting equipment, such as bulldozers, draglines, backhoes, front loaders, roller compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 or 4 minutes at lower power settings.

Construction of the proposed project is expected to require the use of front-end loaders, backhoes, haul trucks, water trucks, concrete mixer trucks, and pickup trucks. The maximum noise level generated by each backhoe is assumed to be 80 dBA  $L_{max}$  at 50 feet from this equipment.<sup>63</sup> Each front-end loader would also generate 80 dBA  $L_{max}$  at 50 feet. Each doubling of sound sources with equal strength increases the noise level by 3 dBA.

A conservative but reasonable assumption is that this equipment would operate simultaneously and continuously over at least a 1-hour period in the vicinity of the closest existing residential receptors, but would move linearly over the project site as they perform their earth moving operations, spending a relatively short amount of time adjacent to any one receptor. Assuming that each piece of construction equipment operates at some distance from the other equipment, a reasonable worst-case combined noise level during this phase of construction would be 85 dBA  $L_{max}$  at a distance of 50 feet from the acoustic center of a construction area. The acoustical center reference is used

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<sup>63</sup> Federal Highway Administration (FHWA). 2006. Highway Construction Noise Handbook. August.

because construction equipment must operate at some distance from one another on a project site, and the combined noise level as measured at a point equidistant from the sources (acoustic center) would be the worst-case maximum noise level. These operations would be expected to result in a reasonable worst-case hourly average of 81 dBA  $L_{eq}$  at a distance of 50 feet from the acoustic center of a construction area.

The closest sensitive receptor to proposed areas of construction is the La Cañada High School classroom, at the west corner of the project site. The façade of this closest noise sensitive receptor would be located approximately 157 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would potentially operate at the project site. At this distance, worst-case construction noise levels could range up to approximately 75 dBA  $L_{max}$ , intermittently, and could have an hourly average of up to 71 dBA  $L_{eq}$ , at the façade of the nearest portable classroom when multiple pieces of equipment operate simultaneously at the nearest center of construction activity. These reasonable worst-case construction noise levels would occur for only a short period, as noise levels would drop off at a rate of 6 dB per doubling of distance as construction equipment moves across the site. This would be below the City's weekday hourly-average construction noise standard for Public/Semi Public land uses (the school land use category) of 85 dBA  $L_{eq}$ . La Cañada High School would not operate on weekends and would therefore not be considered a noise sensitive receptor for Saturday construction noise standards.

The closest residential receptor to the proposed areas of construction are the single-family residences to the west, across I-210. At the receiving property line of this residence, approximately 600-feet from the nearest construction footprint, construction noise levels would attenuate due to distance and terrain shielding to below 60 dBA  $L_{eq}$ . This is well below the weekday construction noise threshold of 70 dBA  $L_{eq}$  (1-hour), and would also be below the Saturday construction noise threshold of 60 dBA  $L_{eq}$  (1-hour) for single-family residences.

Another noise sensitive receptor is the La Cañada Methodist Church, at 104 Berkshire Place, located approximately 600 feet from the nearest construction footprint where heavy construction equipment would operate. At this distance, reasonable worst-case hourly-average construction noise levels could range up to approximately 61 dBA  $L_{eq}$ , intermittently. This is well below the City's weekday construction noise threshold of 85 dBA  $L_{eq}$  (1-hour), and would also be below the Saturday construction noise threshold of 70 dBA  $L_{eq}$  (1-hour) for this land use. No construction would occur on Sundays.

Additionally, Hahamongna Watershed Park is located approximately 175 feet east of the nearest proposed project construction footprint. At this distance, reasonable worst-case construction noise levels would be below the weekday construction noise standard for Public/Semi Public land uses of 85 dBA  $L_{eq}$  and the Saturday construction noise standard of 70 dBA  $L_{eq}$ .

Therefore, noise generated by project-related construction activities would not exceed the applicable standards, and the impact would be less than significant.

## Operational/Stationary Source Noise Impacts

**Less than significant impact.** A significant impact would occur if operational noise levels generated by stationary noise sources at the project site would exceed the following levels:

- 65 dBA  $L_{eq}$  (1 hour average) at the property line of any Public/Semi Public and Open Space land use for daytime hours between 7:00 a.m. and 7:00 p.m.; or
- 55 dBA  $L_{eq}$  (1 hour average) at the property line of any Public/Semi Public and Open Space land use for nighttime hours between 7:00 p.m. and 7:00 a.m.

The proposed project would include new stationary noise sources such as parking lot activities. These would be potential point sources of noise that could affect noise-sensitive receptors in the project vicinity.

### ***Parking Lot Activities***

The proposed project includes the westward expansion of the student parking lot located at the southeast end of the project site to include 147 parking stalls. The closest noise sensitive receptor is the La Cañada Methodist Church, at 104 Berkshire Place, 260 feet south of the student parking lot. Representative parking activities, such as vehicles cruising at slow speeds, door slamming, or cars starting, would generate approximately 60 dBA to 70 dBA  $L_{max}$  at 50 feet.<sup>64</sup> Typical parking events take an average of less than 1 minute. Assuming a reasonable worst-case scenario that each of the parking spaces at the southern portion of the project site would incur one parking event in a single hour, the combined parking lot activity would generate an hourly average noise levels of up to 31 dBA  $L_{eq}$  as measured at the nearest receptor. These noise levels from parking lot activities would not exceed the City's noise performance standard of 65 dBA  $L_{eq}$  for daytime hours or 55 dBA  $L_{eq}$  for nighttime hours for this type of land use. Therefore, parking lot activity noise levels would not result in a substantial permanent increase in noise levels in excess of established standards and this impact would be less than significant. The impact of project-related parking lot activities on sensitive off-site receptors would be less than significant.

## Operational/Mobile Source Noise Impacts

**Less than significant impact.** A significant impact would occur if project-generated traffic would result in a substantial increase in ambient noise levels compared with those that would exist without the project.

According to the traffic study (see Appendix G) prepared for the proposed project, implementation of the proposed project would not add any new daily trips to roadway segments in the project vicinity. Thus, implementation of the proposed project would not result in any increase in traffic noise levels on any of the local roadways in the project vicinity. Therefore, project-related traffic noise impacts on off-site receptors would be less than significant.

<sup>64</sup> This discussion relates to the noise from the nearest parking area, which are not included in the construction footprint in the earlier discussion in this section.

**b) Generation of excessive groundborne vibration or groundborne noise levels?**

**Less than significant impact.** A significant impact would occur if the proposed project would generate groundborne vibration or groundborne noise levels in excess of established standards. The City of La Cañada Flintridge has not established its own vibration impact criteria. Therefore, for purposes of this analysis, the Federal Transit Administration's (FTA) damage criteria was utilized to evaluate the potential impact of groundborne vibration levels, associated with project-related construction activities, on structures in the project vicinity. A significant impact would occur if structures in the project vicinity would be exposed to groundborne vibration levels in excess of the levels established by the FTA's Transit Noise and Vibration Impact Assessment Manual, dated September 2018.

Groundborne noise is an effect of groundborne vibration and only exists indoors, since it is produced from noise radiated from the motion of the walls and floors of a room, and may also consist of the rattling of windows or dishes on shelves. In general, if groundborne vibration levels do not exceed levels considered to be perceptible, then groundborne noise levels would not be perceptible in most interior environments. Therefore, this analysis focuses on determining exceedances of groundborne vibration levels.

Although groundborne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects such as the shaking of a building can be notable. When assessing annoyance from groundborne vibration, vibration is typically expressed as root mean square (rms) velocity in units of dBs of 1 micro-inch per second. To distinguish these vibration levels referenced in dBs from noise levels referenced in dBs, the unit is written as "VdB." In extreme cases, excessive VdB has the potential to cause structural damage to buildings. Common sources of VdB include construction activities such as blasting, pile driving and operating heavy earthmoving equipment. However, construction vibration impacts on building structures are generally assessed in terms of peak particle velocity (PPV). For purposes of this analysis, project related impacts are expressed in terms of PPV.

**Short-term Construction Vibration Impacts**

A significant impact would occur if existing structures at the project site or in the project vicinity would be exposed to groundborne vibration levels in excess of levels established by the FTA Construction Vibration Impact Criteria for the type of structure.

Of the variety of equipment used during construction, the front-end loaders and the backhoe that are anticipated to be used in the site preparation phase of construction would produce the greatest VdB levels. Both front-end loaders and the backhoe would produce VdB levels ranging up to 0.051 inch per second (in/sec) PPV at 25 feet from the operating equipment.

The nearest off-site receptor to the project site is the La Cañada High School North Gym located at the northeast corner of the project site. The façade of this building would be located approximately 13 feet from the nearest construction footprint where the heaviest construction equipment would potentially operate. At this distance, VdB levels would range up to 0.136 PPV from operation of the



types of equipment that would produce the highest vibration levels. This is well below the FTA Construction Vibration Impact Criteria of 0.2 PPV for buildings of non-engineered timber and masonry. Therefore, the impact of short-term VdB associated with construction to off-site receptors would be less than significant.

### **Operational Vibration Impacts**

A significant impact would occur if the proposed project would generate excessive VdB levels at sensitive receptors in the project vicinity.

Implementation of the proposed project would not include any permanent sources of vibration that would expose persons in the project vicinity to VdB levels that could be perceptible without instruments at any existing sensitive land use in the project vicinity. Therefore, operational groundborne vibration impacts would be less than significant.

- 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.** A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport.

The project site is not located within the vicinity of a private airstrip. The nearest public airport to the project site is the Burbank-Bob Hope Airport, located approximately 9.79 miles west of the project site. The project site is located outside of the 65 dBA CNEL airport noise contours of this closest airport. While aircraft noise is occasionally audible on the project site from aircraft flyovers, aircraft noise associated with nearby airport activity would not expose people residing or working near the project site to excessive noise levels. Therefore, implementation of the project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for the proposed land use development, and no impact would occur.

### **Mitigation Measures**

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.14 Population and Housing</b> <i>Would the project:</i>				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

Would the project:

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

**No impact.** The project consists of the demolition of the existing pool and basketball courts for construction of new basketball courts and pool with associated facilities within the La Cañada High School campus. In addition, the existing JV baseball field would be shifted to accommodate the expansion of the south parking lot. The proposed project does not include the construction of homes or businesses or the extension of roads or other infrastructure. Furthermore, the proposed project would not result in an increase of students or staff. As such, the proposed project would not induce substantial unplanned population growth in the area, either directly or indirectly. No impact would occur.

- b) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No impact.** The project consists of the demolition of the existing pool and basketball courts for construction of new basketball courts and pool with associated facilities within the La Cañada High School campus. In addition, the existing JV baseball field would be shifted to accommodate the expansion of the south parking lot. Housing does not exist on the project site, and therefore the proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. As such, no impact would occur.

## Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.15 Public Services</b> <i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

### a) Fire protection?

**Less than significant impact.** Fire protection services are provided to the City by LACoFD. The nearest station to the project site is Station 82, located at 352 Foothill Boulevard, approximately 0.62 mile northwest of the site. The project consists of improvements to facilities on campus at La Cañada High School, and would not result in an increase in students or staff. In addition, all buildings would be required to comply with provisions of the 2019 California Building Standards Code and 2018 International Fire Code. Project plans would be reviewed and approved by the Division of State Architect, which would ensure adequate emergency access. Fire Department access would be provided via an extension of the existing emergency vehicle lane that currently terminates at the southeast corner of the track and field. Impacts related to fire protection services would be less than significant.

### b) Police protection?

**Less than significant impact.** Police protection services are provided to the City by the Los Angeles County Sheriff's Department (LASD), which maintains a contract with the City. The Department serves the La Cañada Flintridge community, as well as unincorporated areas of La Crescenta,

Montrose, Lopez Canyon, and the mountainous areas north of these communities.<sup>65</sup> The La Crescenta Valley Station is the closest station to the site, located approximately 3.62 miles northwest. The proposed project would not result in increase in student population, or require construction of new or physically altered police protection facilities. In addition, the project plans would be reviewed and approved by the LCUSD with consultation with the District's safety committee to ensure that adequate safety and crime prevention measures are provided. Compliance with the District safety standards would ensure that the proposed project would result in a less than significant impact to police services.

**c) Schools?**

**No impact.** School services to the City of La Cañada Flintridge are provided by the LCUSD. The LCUSD operates three elementary schools (La Cañada Elementary, Palm Crest Elementary, and Paradise Canyon Elementary), a middle school (La Cañada High School 7/8), and a comprehensive high school (La Cañada High School 9-12).<sup>66</sup> The project proposes the construction of a new pool facility, basketball courts, and other minor campus improvements to the La Cañada High School campus. As previously mentioned, there would be no increase in students or staff as part of the proposed project. Project facilities would be utilized by existing students, staff, parents, and visitors. The proposed project would better serve the needs of the High School and ensure the efficient allocation of school resources. Therefore, no impact would occur.

**d) Parks?**

**No impact.** Park services are provided by the City of La Cañada Flintridge Recreation and Facilities Department. The City operates, maintains, and schedules various parks, athletic fields/courts, and facilities. The City's athletic fields/courts are through a joint use agreement with the LCUSD and the Church of Jesus Christ of Latter Day Saints to operate their field.<sup>67</sup> The City has approximately 938 acres of public and private land devoted to parkland.<sup>68</sup> The nearest park to the project site is Hahamongna Watershed Park, located 0.04 mile east of the site, and Charles White Park, located 1.5 miles east of the site. Additionally, Olberz Park is located 1.43 miles northwest of the site. As previously mentioned, there would be no increase in students or staff as part of the proposed project. Project facilities would be utilized by existing students, staff, parents, and visitors. Therefore, the proposed project would not result in substantial adverse impacts to existing park facilities or require the expansion of existing or construction of new park facilities. No impact would occur.

<sup>65</sup> City of La Cañada Flintridge. 2010. General Plan Update. Draft Program Environmental Impact Report. Safety. Accessed October 23, 2019.

<sup>66</sup> La Cañada Unified School District (LCUSD). About LCUSD. Website: [https://www.lcusd.net/apps/pages/index.jsp?uREC\\_ID=376518&type=d&pREC\\_ID=850879](https://www.lcusd.net/apps/pages/index.jsp?uREC_ID=376518&type=d&pREC_ID=850879). Accessed October 23, 2019.

<sup>67</sup> City of La Cañada Flintridge. 2019. Recreation and Facilities. Website: <https://cityoflcf.org/parks-and-recreation/recreation-facilities/>. Accessed October 23, 2019.

<sup>68</sup> City of La Cañada Flintridge. 2013. City of La Cañada Flintridge General Plan 2030. Open Space and Recreation Element. Accessed November 25, 2019.

**e) Other public facilities?**

**No impact.** The existing on campus library would provide library services to students and staff. In addition, library services are also provided to the City by the Los Angeles County Public Library System. The La Cañada Flintridge Public Library is located at 4545 North Oakwood Avenue, and provides services to residents.<sup>69</sup> City residents also have access to the Information Resource Center located on the La Cañada High School campus. Because the proposed project consists of improvements to the High School campus and would not result in an increase in students or staff, increased use of existing facilities would not occur. Therefore, the proposed project would not result in a need for new or expanded library facilities. As such, no impact would occur.

There are no major hospitals or medical facilities within the boundaries of the City. The nearest facility to the City of La Cañada Flintridge is Verdugo Hills Hospital, located within the City of Glendale, approximately 2.33 miles northwest of the project site. The proposed project would not result in an increase of students or staff, and therefore would not result in a need for new or expanded medical facilities. As such, no impact would occur.

## Mitigation Measures

None required.

<sup>69</sup> City of La Cañada Flintridge. General Plan Update. Draft Program Environmental Impact Report. Public Services. Accessed October 23, 2019.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.16 Recreation</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

- 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?**

**No impact.** Significant impacts would occur if the proposed project resulted in an increase in population, necessitating the construction or expansion of recreational facilities. The proposed project consists of improvements to existing facilities within the La Cañada High School Campus. As previously mentioned, the proposed project would not result in an increase in students or staff, and therefore would not result in an increase of neighborhood or regional parks or other recreational facilities. As such, no impact would occur.

- 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?**

**Less than significant impact.** Significant impacts would occur if the proposed project resulted in an increase in population, necessitating the construction or expansion of recreational facilities. The project consists of improvements to existing facilities within the La Cañada High School Campus. The project includes the expansion of recreational facilities, including demolition of the existing basketball courts and pool area to construct new courts and a new pool with associated facilities. In addition, the JV baseball field would be shifted to make room for the expansion of the south parking lot.

Environmental impacts associated with implementation of these project amenities is accounted for in the discussion of Air Quality, GHG Emissions, Energy, Noise, and Transportation-related impacts within this Draft IS/MND, which are explained in more detail as follows:

**Air Quality:** Less than significant impact with mitigation incorporated.

**Biological Resources:** Less than significant impact with mitigation incorporated.

**Cultural and Tribal Cultural Resources:** Less than significant impact with mitigation incorporated.

**GHG Emissions:** Less than significant impact.

**Energy:** Less than significant impact.

**Noise:** Less than significant impact.

**Transportation/Traffic:** Less than significant with mitigation incorporated.

Because no additional students or staff would result from the proposed project, the project is not growth inducing and would not result in any increase in population. Therefore, there would not be an increased use in parks in the City of La Cañada Flintridge. In addition, the proposed project would continue to provide community access to southern baseball field and batting cages and the new basketball courts. Therefore, impacts would be less than significant.

## Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.17 Transportation</b> <i>Would the project:</i>				
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

A Traffic Impact Analysis (TIA) was prepared for the project by Linscott, Law & Greenspan, Engineers (LLG), dated April 10, 2020, and is included in this Draft IS/MND as Appendix G.

The TIA follows City of La Cañada Flintridge traffic study procedures, and evaluates potential construction-related transportation impacts at three key intersections in the project vicinity.

The Traffic Impact Analysis (TIA) presents analyzes existing traffic volumes, forecasts existing plus construction (project) traffic volumes, determines proposed construction (project) related impacts, and identifies mitigation measures where necessary.

Three intersections were selected for the traffic analysis. These intersections include:

- Oak Grove Drive/Foothill Boulevard
- Oak Grove Drive/La Cañada High School Driveway
- Oak Grove Drive/Berkshire Place

All study intersections are currently controlled by traffic signals.

### Traffic Impact Analysis Methodology

The study intersections were evaluated using the Intersection Capacity Utilization (ICU) method of analysis which determines Volume-to-Capacity (V/C) ratios and corresponding Levels of Service



(LOS). The ICU method is intended for signalized intersection analysis and determines the V/C ratios on a critical lane basis (i.e., based on the individual V/C ratios for key conflicting traffic movements).

The overall intersection V/C ratio is subsequently assigned a LOS value to describe intersection operations. Level of Service varies from LOS A (free flow) to LOS F (jammed condition). A description of the ICU method and corresponding Level of Service is provided in Appendix B of the TIA. The ICU calculations use a lane capacity of 1,600 vehicles per hour for left-turn, through, and right-turn lanes, and a dual turn-lane capacity of 2,880 vehicles per hour. A clearance interval of 0.10 also is included in the ICU calculations.

### Impact Criteria and Thresholds

The relative impact of the added traffic volumes expected to be generated during construction of the proposed project during the weekday AM, school, and PM peak-hours was evaluated based on analysis of existing operating conditions at the study intersections, without and with the project's peak construction traffic. The previously discussed capacity analysis procedures were utilized to evaluate the future V/C or delay relationships and service level characteristics at each study intersection.

The significance of the potential impacts of project construction-generated traffic at each study intersection was identified using City of La Cañada Flintridge guidelines. According to the City of La Cañada Flintridge's methodology for calculating the level of impact due to traffic generated by a proposed project, a significant transportation impact is determined based on the following:

- A significant impact occurs if traffic generated by the project causes an intersection to worsen from LOS D or better to LOS E or worse, or
- For an intersection operating at LOS E or LOS F conditions, the addition of project traffic increases the V/C by 0.02 or greater.

The City's method requires mitigation whenever the traffic generated by a project (i.e., in this case, by the peak construction activities associated with the proposed project) exceeds the criteria above.

### Traffic Impact Analysis Scenarios

Traffic impacts at the study intersections were analyzed for the following conditions:

- (a) Existing Conditions.
- (b) Existing With Construction Traffic ("Project") Conditions.
- (c) Existing With Construction Traffic ("Project") and Mitigation Conditions, if necessary.

The traffic volumes for each condition were added to the volumes in the prior condition to determine the change in capacity utilization at the study intersections.

## Traffic Analysis

Summaries of the V/C ratios and LOS values for the study intersections evaluated during the AM, PM, and school peak-hours are shown in Table 17. The ICU data worksheets for the analyzed intersections are contained in Appendix G.

## Transit Services

Public bus transit service within the project study area is currently provided by the Glendale Beeline Transit, Los Angeles County Metropolitan Transportation Authority (Metro) and City of Pasadena (Pasadena Transit).

## Traffic Counts

Manual traffic counts of vehicular turning movements were conducted in November 2019 (i.e., when local schools were in session) at each of the three study intersections during the weekday morning (AM) and afternoon (PM) commuter periods as well as the La Cañada High School PM peak-hour (school hours are 7:00 a.m.–4:00 p.m.) to determine the peak-hour traffic volumes. The manual counts were conducted by an independent traffic count subconsultant (City Traffic Counters) at the study intersections from 7:00 a.m. to 9:00 a.m. to determine the weekday AM peak commuter hour, from 2:30 p.m. to 4:00 p.m. to determine the school PM peak-hour, and from 4:00 p.m. to 6:00 p.m. to determine the weekday PM peak commuter hour. In conjunction with the turning movement vehicle counts, a count of bicycle and pedestrian volumes also were collected during the peak periods for informational purposes. The intersection manual traffic count data were adjusted by one percent per year to reflect year 2020 existing conditions.

The existing weekday AM peak-hour, commuter PM peak-hour and school PM peak-hour manual counts of turning vehicles at the study intersections are summarized in Table 17. Summary data worksheets of the manual traffic counts at the study intersections are contained in Appendix G.

**Table 17: Existing Traffic Volumes**

No.	Intersection	Date	Dir	AM Peak-hour		PM Peak-hour		School Peak-hour	
				Began	Volume	Began	Volume	Began	Volume
1	Oak Grove Drive/Foothill Boulevard	11/13/2019	NB	7:30 a.m.	1,032	4:30 p.m.	245	3:00 p.m.	239
			SB		73		1,144		562
			EB		705		374		431
			WB		145		69		132
2	Oak Grove Drive/La Cañada High School	11/13/2019	NB	7:30 a.m.	1,238	4:45 p.m.	290	3:00 p.m.	330
			SB		562		1,132		783
			EB		4		14		1
			WB		0		0		0
3	Oak Grove Drive/Berkshire Place	11/13/2019	NB	7:30 a.m.	567	4:30 p.m.	262	3:00 p.m.	256
			SB		812		1,222		1,022
			EB		1,258		250		422
			WB		0		0		0

**Notes:**

Counts conducted by City Traffic Counters (2019).

The most intensive period of overall construction activity and construction traffic generation during the weekday AM and school PM peak-hour is expected to occur during Phase 3 (i.e., when grading activities occur), and the most intensive period of overall construction activity and construction traffic generation during the weekday PM peak-hour is expected to occur during Phase 2, however, at a different point in construction (i.e., when the building construction activities are expected to occur). Other activities such as architectural coatings are expected to be less intensive in terms of overall construction traffic generation. At this time, it is not known if any temporary lane closures would be necessary throughout the course of the project construction. Any such lane closures are expected to occur outside of the weekday AM, school PM, and PM commute peak-hours, however, so as to maintain roadway capacity when the street system is typically most heavily constrained.

## **Construction Traffic Trip Generation**

### ***AM and School Peak-hour Trip Generation***

The most intensive period of overall construction activity and construction traffic generation during the weekday AM and school PM peak-hour is expected to occur during Phase 3 (i.e., when grading activities occur). Heavy construction equipment would be located on-site during construction and would not travel to and from the project site on a daily basis. However, truck trips would be generated so as to remove material from the site as well as to deliver material to the site. During the peak construction activity, a maximum of 78 trucks per day are anticipated to be generated to/from the project site during peak construction hauling activities. Therefore, the anticipated peak truck trip generation would total 156 truck trips per day (78 inbound trucks and 78 outbound trucks). Assuming a hauling period of 9 hours per day (beginning at 7:00 a.m., with the last exiting truck to occur prior to 4:00 p.m.), this corresponds to a total of roughly nine haul trucks per hour. When a Passenger Car Equivalency (PCE) factor of 2.5 is applied to the haul trucks, a total of 46 PCE-adjusted truck trips per hour is forecast (i.e., 23 PCE-adjusted inbound trips and 23 PCE adjusted outbound trips).

### ***PM Peak-hour Generation***

The most intensive period of overall construction activity and construction traffic generation during the weekday PM peak-hour is expected to occur during Phase 2 (i.e., when the building construction activities are expected to occur). A total of 13 construction workers can be expected during the peak days and these workers are expected to be able to park their trucks/vehicles on-site. It is anticipated that construction workers would primarily remain on-site throughout the day. Therefore, approximately 26 daily vehicle trips would be generated to/from the site by the construction workers during this peak phase (13 workers x 2 trips [inbound and outbound]=26 daily construction worker trips).

Assuming the typical workday ends at 4:00 p.m., 25 percent of the workers are assumed to leave the site between 4:00 p.m. and 4:30 p.m., 25 percent between 4:30 p.m. and 5:00 p.m., 25 percent between 5:00 p.m. and 5:30 p.m. and the remaining 25 percent after 5:30 p.m. (including supervisors). Thus, 50 percent of the work force (i.e., roughly 7 workers) has been assumed to overlap with the weekday commute PM peak-hour (i.e., between 5:00 p.m. and 6:00 p.m.) in order to provide a conservative forecast of construction traffic generation.

With 50 percent of workers conservatively assumed to overlap with the weekday PM peak-hour, this would result in a maximum of 7 outbound construction worker vehicle trips (i.e.,  $13 \times 50\% = 7$  outbound vehicle trips) during the 5:00 p.m. - 6:00 p.m. peak-hour.

In general, it is anticipated that construction-related traffic would be largely freeway-oriented. Construction workers would likely arrive and depart via nearby on- and off-ramps serving the I-210 Freeway. The most commonly used freeway ramps would be nearest the project site, including the I-210 Freeway ramps at Berkshire Place and Foothill Boulevard. The construction work force would be generated from all parts of the greater Los Angeles region and would arrive from all directions (i.e., the I-210 Freeway and local streets).

In addition to construction worker vehicles, additional trips may be generated by miscellaneous trucks traveling to and from the project site. These trucks may consist of trucks delivering equipment and/or construction materials to the project site and smaller pick-up trucks or four-wheel drive vehicles used by construction supervisors and/or City inspectors. During the Phase 2 peak building construction phase, it is estimated that up to five vendor trucks per day (i.e., five inbound truck trips and five outbound truck trips) would be generated to and from the site based on the provided modeling. To conservatively estimate the equivalent number of vehicles associated with the trucks, a PCE factor of 2.0 was utilized based on standard traffic engineering practice. Therefore, assuming five daily trucks per day, it is estimated that the trucks would generate approximately 20 daily truck PCE vehicle trips (i.e., five trucks  $\times$  2.0 PCE = 10 inbound truck PCE trips and 10 outbound truck PCE trips). It is also estimated that no more than four PCE-adjusted vehicle trips (two PCE-adjusted inbound trips and two PCE-adjusted outbound trips) would occur during each of the weekday AM peak-hour, school PM peak-hour, and PM peak-hours, assuming a 9 hour construction workday. It is noted that vendor trips are not anticipated during Phase 3 under the grading/excavation phase, thus these vendor trips are not considered in the analysis for the weekday AM and school PM peak-hours. Taken together, the construction worker vehicles and miscellaneous trucks during the peak phase of building construction during Phase 2 are forecast to generate up to 11 weekday PM peak-hour vehicle trips (i.e., 2 inbound trips and 9 outbound trips) as shown in Table 17 below.

### ***Peak Construction Traffic Generation Summary***

During peak construction activities at the site, construction trucks are forecast to generate 156 truck trips per day (78 inbound trucks and 78 outbound trucks). Assuming a construction period of roughly 9 hours per day (beginning no earlier than 7:00 a.m. with the last truck exiting the site prior to 3:30 p.m. prior to the commuter PM peak-hour) and a PCE factor of 2.5, this corresponds to roughly 46 PCE-adjusted truck trips per hour is forecast (i.e., 23 PCE-adjusted inbound trips and 23 PCE-adjusted outbound trips). The number of construction workers during this period totals 13 workers, which is forecast to result in an increase of seven outbound worker vehicle trips during the weekday PM peak-hour. The workers are expected to arrive to the site prior to the AM peak-hour. A full summary of the traffic generation associated with peak construction activities for the three traffic analysis time periods is provided in Appendix G.

Over a 24-hour period, the construction of the proposed project is expected to generate 436 daily trip ends during the peak construction activities. A summary of the traffic generation associated with peak construction activities for the three traffic analysis time periods is provided in Table 18. A full summary can be found in Appendix G.

**Table 18: Construction Peak-hour Trip Generation**

Generator Type	Daily	AM Peak-hour			PM Peak-hour			School Peak-hour		
		Volumes <sup>2</sup>			Volumes <sup>2</sup>			Volumes <sup>2</sup>		
		IN	OUT	TOTAL	IN	OUT	TOTAL	IN	OUT	TOTAL
Workers <sup>3</sup>	26	—	—	—	0	7	7	—	—	—
Haul Truck Trips <sup>4</sup>	156	9	9	18	—	—	—	9	9	18
PCE-Adjusted Haul Truck Trips <sup>5</sup>	390	23	23	46	—	—	—	23	23	46
Miscellaneous Truck Trips <sup>6</sup>	10	—	—	—	1	1	2	—	—	—
PCE-Adjusted Misc. Truck Trips <sup>7</sup>	20	—	—	—	2	2	4	—	—	—
<b>Total PCE Adjusted Trips</b>	<b>436</b>	<b>23</b>	<b>23</b>	<b>46</b>	<b>2</b>	<b>9</b>	<b>11</b>	<b>23</b>	<b>23</b>	<b>46</b>
<sup>1</sup> Project construction information provided by First Carbon Solutions (FCS) and LCUSD representatives. <sup>2</sup> Trips are one-way traffic movements, entering or leaving. The peak construction traffic for the AM peak-hour occurs during the Grading activities for Phase 3 while for the PM peak-hour the peak construction traffic occurs during the Building Construction activities for Phase 2. <sup>3</sup> A total of 13 workers is anticipated at the project site during the building construction phase for Phase 2. Workers are expected to arrive before the 7:00 a.m. shift start time (outside of the AM peak-hour). During the PM peak-hour, it is assumed that 50 percent of the workers will depart the site, therefore a total of seven outbound trips are anticipated to occur (13 workers x 50%=seven outbound trips). <sup>4</sup> Daily, AM, and School peak-hour haul truck trips were derived based on the following: - Daily Truck Trips=312 total trips/2 days=156 round-trip truck trips per day - Peak -hour truck trips=156 round-trips per day/9 hours=18 round-trips per hour <sup>5</sup> A passenger car equivalency (PCE) factor of 2.5 was employed for analysis purposes. This accounts for the assumption that a haul truck has the same overall effect on intersection traffic operations as 2.5 passenger cars. <sup>6</sup> A total of five miscellaneous trucks per day is anticipated during Phase 2. Based on a 9-hour workday, one miscellaneous truck per hour is anticipated. <sup>7</sup> A PCE factor of 2.0 was employed for analysis purposes. This accounts for the assumption that a miscellaneous truck has the same overall effect on intersection traffic operations as 2.0 passenger cars.										

## Existing Conditions

As indicated in column [1] of Table 19 below, all of the study intersections are presently operating at LOS D or better during the weekday AM, PM, and school PM peak-hours under existing conditions.

## Existing With Construction Traffic Conditions

To determine the operating conditions of the street system under existing with project construction activities, traffic expected to be generated during peak construction activities was added to existing traffic conditions for the study intersections. As shown in Table 19 application of the City's significance criteria to the existing plus construction activity scenario indicates that none of the study intersections are expected to be significantly impacted by the peak construction activities of the proposed project during any of the analyzed time periods. Therefore, no formal, permanent traffic mitigation measures are required or recommended.

**Table 19: Summary of Volume to Capacity Ratios and Levels of Service: Weekday AM, PM, and School Peak-hours**

				Existing with Project v/c or LOS Delay <sup>a</sup>	Change v/c or Delay [(2)-(1)]	Significant Impact <sup>b</sup>
1	Oak Grove Drive/Foothill Boulevard	AM PM School	0.674 B 0.796 C 0.618 B	0.678 B 0.798 C 0.626 B	0.004 0.002 0.008	No No No
2	Oak Grove Drive/La Cañada High School	AM PM School	0.429 A 0.480 A 0.400 A	0.433 A 0.482 A 0.406 A	0.004 0.002 0.006	No No No
3	Oak Grove Drive/Berkshire Place	AM PM School	0.843 D 0.614 B 0.629 B	0.853 D 0.616 B 0.638 B	0.010 0.002 0.009	No No No
<sup>a</sup> Level of Service (LOS) is based on the reported ICU value for signalized intersections. <sup>b</sup> According to the City of La Canada - Flintridge thresholds of significance, a transportation impact at a signalized intersection shall be deemed significant in accordance with the following: <ul style="list-style-type: none"> <li>- Addition of project trips cause the peak hour level of service of the intersection to change from LOS D or better to LOS E or F.</li> <li>- Addition of project trips cause an increase in the volume/capacity ratio of 0.02 or greater at LOS E or F.</li> </ul>						

Would the project:

- a) **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.** According to the General Plan Circulation Element, Oak Grove Drive and Berkshire Place are designated as Major Roadways. Foothill Boulevard is designated as a Special Major Roadway. The TIA indicates that the proposed project would not cause a significant impact to any of the study intersections.

According to Figure CE-5, Existing and Planned Bikeway System, of the General Plan Circulation Element, an existing Class II bike path is located along Oak Grove Drive and a portion of Berkshire Place. In addition, Foothill Boulevard contains a planned Class II bike path. Existing sidewalks are located along the eastern portion of Oak Grove Drive, nearest to La Cañada High School. The proposed project would include improvements to the parking lot near the existing sidewalk, but the sidewalk would not be affected by project construction or implementation. The existing bike paths along Oak Grove Drive and Berkshire Place would not be affected by the proposed project.

Glendale Beeline Transit, Metro, and Pasadena Transit have routes within the project area, and there are four transit stops within 0.5-mile of the project site. As there would be no increase in students or staff, these bus routes would not be affected by the proposed project. Construction activities would result in 436 daily vehicle trips. However, all three study area intersections are projected to operate at an acceptable LOS (LOS D or better) under Existing and Existing with Construction Traffic conditions. While traffic impacts associated with construction were determined to be less than

significant at study intersections during AM, PM, and school peak-hours, a Construction Staging and Traffic Management Plan (MM TRANS-1) shall be prepared to further ensure adequate flow of traffic in the project area and reduce impacts related to construction trips. With implementation of a Construction Staging and Traffic Management Plan outlined in MM TRANS-1, impacts related to any program plan, ordinance, or policy addressing the circulation system would be less than significant.

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

**Less than significant impact.** Section 15064.3 of the CEQA Guidelines provides specific considerations for evaluating a project's transportation impacts. Per Section 15064.3, analysis of vehicle miles traveled (VMT) attributable to a project is the most appropriate measure of transportation impacts. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in Section 15064.3(b)(2) regarding roadway capacity, a project's effect on automobile delay does not constitute a significant environmental impact under CEQA. Currently, the provisions of Section 15064.3 and the determination of impacts based on VMT is not required Statewide until July 1, 2020. Moreover, the LCUSD has not adopted VMT thresholds. Therefore, there is no conflict with Section 15064.3. Per Section 15064.3(b)(3), a lead agency may analyze a project's VMT qualitatively based on the availability of transit, proximity to destinations, consistency with air quality goals, etc.

As explained in the Technical Advisory issued by State of California Office of Planning and Research, land use projects within 0.5-mile of a major transit stop or a stop along a high-quality transit corridor should be presumed to have a less than significant transportation impact. "Major transit stop" means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the AM and PM peak commute periods. A "high-quality transit corridor" is a corridor with fixed route bus service with service intervals that do not exceed 15 minutes during peak commute hours (Public Resource Code [PRC] §§ 21064.3, 21155).

As mentioned above, Glendale Beeline Transit, Metro, and Pasadena Transit offer have routes in the project area. There are four transit stops within 0.5-mile of the project site. As such, the proposed project would have a less than significant impact on VMT.

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

**No impact.** The project consists of improvements to the existing La Cañada High School campus, including expansion of the student parking lot. No additional changes would be made to the existing circulation within the parking lot. The project does not include geometric design features such as sharp curves or dangerous intersections. As such, no impact would occur.

**d) Result in inadequate emergency access?**

**Less than significant impact.** The project consists of demolition and improvements to features located on the La Cañada High School campus. As mentioned in Section 15, Public Services, emergency access would be provided via an extension of the emergency vehicle lane that currently terminates at the southeast corner of the track and field. This extension would require the removal of an existing portable classroom building. Furthermore, the project would require compliance with LACoFD for adequate access and upon review of the project site plan, the City would ensure that the project would have adequate emergency access. Therefore, impacts would be less than significant.

## Mitigation Measures

**MM TRANS-1 Prepare a Construction Staging and Traffic Management Plan.** A Construction Staging and Traffic Management Plan (CSTMP) shall be prepared by the Construction Contractor such that details with respect to hours of construction, haul route(s), potential lane closures, contact person for construction questions, construction worker parking, etc. can be reviewed and approved. If formal travel lane closures are required, a detailed traffic control (fotor) striping plan may also need to be provided. Additionally, any impacts would be short-term in nature and could be further reduced through implementation of the following design features and traffic controls:

- Provide advanced notification to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction, to the extent feasible. Provide a posted sign on the site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on-and-off-site locations;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the site and neighbors;
- Coordinate with public transit agencies to provide advanced notifications of any temporary stop relocations and durations and follow all safety required procedures required by the concerned agency, if applicable;
- Limit any potential roadway lane closure/s to off-peak travel periods, to the extent feasible;
- Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation;
- To the extent feasible, store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated area) and within the public right-of way, that area must comply with City-approved detour/traffic control plans;



- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Identify the routes that construction vehicles would utilize for the delivery of construction materials (i.e., lumber, tiles, piping, windows, etc.), to access the site, traffic controls and detours, and proposed construction phasing plan for the project;
- Require the Construction Contractor to keep all haul routes adjacent to the site clean and free of debris including, but not limited to, gravel and dirt as a result of its operations;
- Schedule delivery of construction materials and hauling/transport of oversize loads to nonpeak travel periods, to the extent possible. No hauling or transport shall be allowed during nighttime hours, Sundays, or federal holidays unless required by the California Department of Transportation (Caltrans) or the City;
- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed;
- Haul trucks entering or exiting public streets shall at all times yield to public traffic;
- Construction-related parking and staging of vehicles shall occur on-site to the extent possible;
- Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times;
- Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within the site; and
- The CSTMP shall summarize the above items. If any formal travel lane closures are required, a detailed traffic control (detour) striping plan may also need to be provided and shall meet the standards established in the current California Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD) as well as City of La Cañada Flintridge requirements. Further, the traffic control (detour) striping plan would identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of said lane closure.

The City of La Cañada Flintridge shall review and be responsible for approval of the CSTMP as well as a traffic control (detour) striping plan, if required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.18 Utilities and Service Systems</b> <i>Would the project:</i>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Would the project:

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Less than significant impact.** The City of La Cañada Flintridge currently has sewage facilities able to serve the proposed project and project site. Furthermore, projects that comply with NPDES requirements would not result in a significant impact related to changes in the quantity, rate, or quality of stormwater runoff from the site. The proposed project would not require the construction of new stormwater drainage facilities or the expansion of existing facilities. No telecommunications facilities or expanded natural gas infrastructure would be required as a result of the proposed

project. Because the proposed project would not require the expansion of water, wastewater, electrical, natural gas, or telecommunications facilities, impacts would be less than significant.

**b) 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 proposed project would require the use of water during both construction and operations. The City of La Cañada Flintridge is served by the Metropolitan Water District of Southern California (MWD) and the Foothill Municipal Water District (FMWD). According to the 2015 Urban Water Management Plan (2015 UWMP) for the FMWD, water supplied to the local vicinity is comprised of groundwater, surface water, recycled water, and imported water supplied from the MWD.<sup>70</sup> As shown in Table 20, demand projections from 2015 through 2040 provided in the 2015 UWMP reflect the FMWD's projected demand since the FMWD is 100 percent reliant on the MWD for imported water.

**Table 20: Foothill Municipal Water District Supply and Demand Projections (AFY)**

Supply Sources	2015	2020	2025	2030	2035	2040-opt
Imported from MWD	7,657	8,085	8,596	8,880	9,160	9,466
Direct Use	7,656	8,084	8,595	8,880	9,160	9,466
Unaccounted-for Losses	1	1	1	1	1	1
Recycled Water	79	90	90	90	90	90
<b>Total</b>	<b>7,736</b>	<b>8,175</b>	<b>8,686</b>	<b>8,971</b>	<b>9,251</b>	<b>9,557</b>
Source: FMWD 2015 UWMP.						

Furthermore, as discussed in the 2015 UWMP, no groundwater supplies are utilized within the FMWD jurisdiction. Water supplied to the project site is sourced from the Colorado River Aqueduct, the Los Angeles Aqueduct, and the Sacramento-San Joaquin River Delta via the State Water Project Aqueduct. Because of the nature of the project, the relocation of the baseball field and the expansion of the pool on campus would not require a significant increase in water consumption during the operational phases of the proposed project. Furthermore, because the City has projected future water usage within the City through the project buildout date, the existing projections depicted in Table 20 above would include the proposed project. As such, impacts with relation to potential impacts on planned water supplies would be less than significant.

<sup>70</sup> Foothill Municipal Water District (FMWD). 2016. 2015 Urban Water Management Plan. June. Website: <https://www.fmwd.com/uploads/files/FMWD-2015-FINAL-UWMP.pdf>. Accessed November 12, 2019.

- 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?**

**Less than significant impact.** Conditions on the project site with relation to the quantity and quality of wastewater would be very similar to existing conditions at project build-out. Once the project is operational, water uses would be similar to existing conditions. The new restrooms would connect to existing water and wastewater connections. As mentioned previously, the water used to fill the new 40 meter pool would result in a nominal increase compared to the volume of the existing pool. No additional sources of wastewater or stormwater would be included with the project, as there would be no increase in students or staff. As such, impacts relating to the production of wastewater as a result of the project would be less than significant.

- 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?**

**Less than significant impact.** Based on the total student body of 2,069 students and a waste generation rate of 0.6 pounds per person per day, the proposed project would result in the production of approximately 0.62 tons of solid waste per day as a result of the relocation of the baseball field, basketball courts, pool, and the expansion of the parking lot.<sup>71</sup> Solid waste generated by the proposed project would be required to comply with all applicable goals and policies set forth within the City of La Cañada Flintridge General Plan. Waste produced by the proposed project would be directed to the Scholl Canyon Landfill, managed by the Los Angeles County Department of Public Health. According to the California Department of Resources Recycling and Recovery (CalRecycle) Solid Waste Information System, the Scholl Landfill has a permitted capacity of 58,900,000 cubic yards and a remaining capacity of 9,900,000 cubic yards. The maximum daily throughput at the Scholl Landfill is 3,400 tons per day, with an anticipated closure date of April 1, 2030.<sup>72</sup> Because the proposed project operations would be similar to existing operations, the quantity of waste produced by the site would remain similar to existing conditions. During construction, however, waste produced from the demolition of the existing facilities and existing lighting foundations would be collected and diverted to the proper waste processing facility near the project site. Therefore, impacts with relation to the generation of solid waste from the project site would be less than significant.

- e) **Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?**

**Less than significant impact.** As discussed in Impact 18(d) above, the City of La Cañada Flintridge General Plan sets forth regulations relating to solid waste produced within the City. The proposed project and all contractors who handle solid waste related to the project would be required to

<sup>71</sup> California Department of Resources Recycling and Recovery (CalRecycle). 2019. Estimated Solid Waste Generation Rates. Institutional Sector. Website: <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed May 4, 2020.

<sup>72</sup> California Department of Resources Recycling and Recovery (CalRecycle). 2019. Solid Waste Information System Facility Detail Scholl Canyon Landfill (19-AA-0012). Website: <https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-0012>. Accessed November 12, 2019.

comply with solid waste diversion requirements as well as industry best practices. Furthermore, consistent with provisions stated in the 2019 California Green Building Code, any hazardous materials collected on the project site during either construction or operation of the proposed project would be transported and disposed of by a permitted and licensed hazardous materials service provider at a facility permitted to accept such hazardous materials. Therefore, the proposed project would comply with federal, State, and local management and solid waste reduction goals and impacts would be less than significant.

## **Mitigation Measures**

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.19 Wildfire</b> <i>If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:</i>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Would the project:

**a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

**Less than significant impact.** The City of La Cañada Flintridge has developed an extensive emergency response plan with regard to wildfire risk within the City. According to the CAL FIRE hazard maps of the City, the entire City of La Cañada Flintridge is subject to high or very high fire hazards, including the project site.<sup>73</sup>

Project plans and water flow and distribution requirements would be reviewed by the Division of State Architect to ensure adequate water pressure for firefighting. A fire flow test was conducted for the proposed project and the water line on campus have a capacity of 3,000 gallons per minute (gpm) at 20 pounds per square inch (psi). The required fire flow for the project building is 1,750 gpm at 20 psi.<sup>74</sup> The existing water line on campus meets the required flow for the building in case of fire.

<sup>73</sup> California Department of Forestry and Fire Protection (CAL FIRE). 2011. Very High Fire Hazard Severity Zones in Local Responsibility Area as Recommended by CAL FIRE. September. Website: [https://osfm.fire.ca.gov/media/5826/La\\_Cañada\\_flintridge.pdf](https://osfm.fire.ca.gov/media/5826/La_Cañada_flintridge.pdf). Accessed November 11, 2019.

<sup>74</sup> Per the California Fire Code Appendix BB Table BB 105.1, the construction type of the building is assumed to be Type IIB. The gross square footage of the proposed building is approximately 6,000 square feet.

The proposed project does not involve the development of structures or the redevelopment of any streets that could potentially impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. With adherence to the California Fire Code, the proposed upgrades to existing facilities on the existing high school campus would not result in a significant increase in fire risks to the surrounding community. Therefore, impacts would be less than significant.

- 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?**

**Less than significant impact.** The project site and surrounding area are already fully developed. Although slopes in the project vicinity are oriented towards the southeast at a shallow gradient, the proposed project is located on generally flat land. The proposed project would be completed in accordance with local, State, and federal regulations.; however, no residential occupancy is planned as a part of this development. Furthermore, the proposed construction and upgrades of the existing facilities on the project site would not exacerbate fire risks within the local community as a result of the upgrades to the existing facilities because operations on the project site would remain similar to existing conditions. The project site and surrounding area is served by the Los Angeles County Fire Department. As discussed in Impact 19(a), the Division of State Architect would complete a review of the proposed development to ensure adequate firefighting resources are present on-site during and after construction. Therefore, impacts with regard to exacerbated fire risks and pollutant concentrations on the project site would be less than significant.

- 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?**

**Less than significant impact.** The proposed project includes upgrades to and relocation of existing facilities on an existing high school campus. No improvements to roadways, power lines, or other utilities are included as a part of the proposed project. Furthermore, no new fire hazards would be created as a result of the proposed project. Because no upgrades to roadways or maintenance of associated infrastructure is included with the proposed project, impacts would be less than significant.

- 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?**

**Less than significant impact.** The proposed project is located on generally flat land. Slopes in the project vicinity are oriented towards the southeast at a shallow gradient. Water flow from the project site would be directed towards Oak Grove Drive on the east side of the campus. As discussed above in Section 2.7, Geology and Soils, the project site is not susceptible to landslides. Furthermore, no alterations to drainage patterns on the project site are included as a part of the proposed project. Construction of the proposed facility upgrades would be performed in compliance with the California Building Standards Code, which would serve to minimize the potential for slope

instability or damage to structures if a fire were to occur. Based on the topography of the project site, the limited construction required, and the nature of the facility relocations, impacts with regard to the risk of exposure to flooding, landslides, post-fire instability, and drainage would be less than significant.

### **Mitigation Measures**

None required.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.20 Mandatory Findings of Significance</b>				
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

- 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.** With project implementation, development would be concentrated within the 3.59-acre site. The proposed project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten or eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Implementation of MM BIO-1 and MM BIO-2 would reduce potential impacts to sensitive species including nesting birds and roosting bats. With implementation of MM CUL-1, MM CUL-2, and MM GEO-3, the project would not eliminate important examples of major periods of California history or prehistory. Therefore, impacts would be less than significant with the incorporation of mitigation.

- 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 with mitigation incorporated.** The project would result in potentially significant impacts to air quality, biological resources, cultural resources, geology and soils, and transportation. However, mitigation measures have been identified that reduce impacts to a less than significant level. MM AIR-1, MM BIO-1, MM BIO-2, MM CUL-1, MM CUL-2, MM GEO-1, MM GEO-2, MM GEO-3, and MM TRANS-1 would be required to be implemented as part of the project to reduce impacts to a less than significant level.

All other impacts of the project were determined either to have no impact or to be less than significant without the need for mitigation. Cumulatively, the project would not result in any significant impacts that would substantially combine with impacts of other current or probable future impacts. Therefore, the project, in conjunction with other future development projects, would not result in any cumulatively considerable impacts.

- 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.** All potential impacts of the proposed project have been identified. Compliance with existing applicable laws and regulations and implementation of listed mitigation measures would ensure that the project would not result in substantial adverse effects on human beings either directly or indirectly. Therefore, impacts would be less than significant with the implementation of mitigation. No additional mitigation measures are required.

## Mitigation Measures

Implement MM AIR-1, MM BIO-1, MM BIO-2, MM CUL-1, MM CUL-2, MM GEO-1, MM GEO-2, MM GEO-3, and MM TRANS-1.

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## SECTION 3: LIST OF PREPARERS

FirstCarbon Solutions  
250 Commerce, Suite 250  
Irvine, CA 92602  
Phone: 714.508.4100  
Fax: 714.508.4110

Project Director .....	Kerri Tuttle
Project Manager .....	Angela Wolfe
Assistant Project Manager .....	Tsui Li
Noise and Air Quality Scientist .....	Phil Ault
Air Quality Analyst .....	Kimber Johnson
Biologist .....	Alec Villanueva
Environmental Services Analyst.....	Eric Soycher
Environmental Services Analyst.....	Kevin Bolland
Environmental Services Analyst.....	Brittany Hagen
Senior Editor .....	Susie Harris
Word Processor .....	Melissa Ramirez
GIS/Graphics .....	Karlee McCracken
Reprographics .....	Octavio Perez

Linscott, Law & Greenspan (LLG), Engineers—Technical Subconsultant  
600 South Lake Avenue Suite 500  
Pasadena, CA 91106  
Phone: 626.796.2322  
Fax: 626.792.0941

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