SULPHUR SPRINGS UNION SCHOOL DISTRICT

Empowering all Students

NOTICE OF PROPOSED ADOPTION OF A NEGATIVE DECLARATION FOR THE PINETREE COMMUNITY SCHOOL IMPROVEMENT PROJECT

NOTICE IS HEREBY GIVEN that the Governing Board of the Sulphur Springs Union School District will consider input from the public on the proposed adoption of a Negative Declaration for the proposed improvements at Pinetree Community School.

Public Resources Code Section 21092 and Cal. Code of Regulations Title 14, Section 15072 (the Guidelines for the California Environmental Quality Act) require a local agency to provide a notice of intent to adopt a negative declaration (ND) or mitigated negative declaration (MND) to the public, responsible agencies, trustee agencies, and the county clerk of each county within which the proposed project is located, sufficiently prior to adoption by the lead agency of the negative declaration or mitigated negative declaration to allow the public and agencies the review period provided under Section 15105 of the Guidelines.

Project Title: Pinetree Community School Improvement Project

Project Location: 29156 Lotusgarden Drive, Canyon Country, CA 91387

Project Description: The initial phase of work will be construction of a new one-story, 16,175-square-foot classroom building, remaining sitework, and modernization of existing classrooms. The next phase incorporates construction of a new 5,500-square-foot Student Support Services building, improvements related to the Americans with Disabilities Act (ADA) accessibility including paths of travel and bathroom accessibility, upgrades to utilities and site infrastructure, upgrades to the fire alarm system, and upgrades to the public address system. All of these improvements are considered to be part of the proposed Project for the purposes of the CEQA process. No significant impacts are anticipated to result from the proposed project.

Lead Agency: Board of Trustees of the Sulphur Springs Union School District, 27000 Weyerhaeuser Way, Santa Clarita, CA 91351

Public Review: The ND is available for a 30-day public review period beginning on November 11, 2020 and ending December 11, 2020. Copies of the ND are available for review on the District's website at www.sssd.k12.ca.us/SSSD.

Agency/Public Comments: Agencies and members of the public are invited to comment in writing on or before December 11, 2020. Send comments by mail to the Lead Agency above, or by email to Dr. Catherine Kawaguchi at ckawaguchi@sssd.k12.ca.us.

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Pinetree Community School Project

Lead Agency: Sulphur Springs Union School District | Contact Person: Dr. Catherine Kawaguchi
Mailing Address: 2700 Weyerhaeuser Way | Phone: 661-252-5131
City: Santa Clarita | Zip: 91351 | County: Los Angeles

Project Location: County: Los Angeles | City/Nearest Community: Canyon Country
Cross Streets: Lotusgarden Dr. & Flowerpark Dr. | Zip Code: 91387
Longitude/Latitude (degrees, minutes and seconds): 34 ° 26 ′ 09.8 ″ N / 118 ° 24 ′ 11.1 ″ W Total Acres: 10
Assessor's Parcel No.: 2837-012-900 | Section: 13 | Twp.: 4 N | Range: 15 W | Base:
Within 2 Miles: State Hwy #: SR-14 | Waterways: Santa Clara River
Airports: | Railways: Metrolink Antelope Valley Line | Schools: Mitchell Community School

Document Type:

CEQA: ☐ NOP ☐ Early Cons ☒ Neg Dec ☐ Mit Neg Dec | ☐ Draft EIR ☐ Supplement/Subsequent EIR (Prior SCH No.) ☐ Other:
NEPA: ☐ NOI ☐ EA ☐ Draft EIS ☐ FONSI
Other: ☐ Joint Document ☐ Final Document ☐ Other:

Local Action Type:

☐ General Plan Update ☐ General Plan Amendment ☐ General Plan Element ☐ Community Plan
☐ Specific Plan ☐ Master Plan ☐ Planned Unit Development ☐ Site Plan
☐ Rezone ☐ Prezone ☐ Use Permit ☐ Land Division (Subdivision, etc.)
☐ Annexation ☐ Redevelopment ☐ Coastal Permit ☒ Other: School

Development Type:

☐ Residential: Units ____ Acres ____
☐ Office: Sq.ft. ____ Acres ____ Employees ____
☐ Commercial: Sq.ft. ____ Acres ____ Employees ____
☐ Industrial: Sq.ft. ____ Acres ____ Employees ____
☒ Educational: 21,675 sf (16,175 sf classroom, 5,500 sf admin building)
☐ Recreational:
☐ Water Facilities: Type ____ MGD ____
☐ Transportation: Type
☐ Mining: Mineral
☐ Power: Type ____ MW
☐ Waste Treatment: Type ____ MGD
☐ Hazardous Waste: Type
☐ Other:

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☒ Agricultural Land ☒ Air Quality ☒ Archeological/Historical ☒ Biological Resources ☐ Coastal Zone ☒ Drainage/Absorption ☐ Economic/Jobs
☐ Fiscal ☐ Flood Plain/Flooding ☒ Forest Land/Fire Hazard ☒ Geologic/Seismic ☒ Minerals ☒ Noise ☒ Population/Housing Balance ☒ Public Services/Facilities
☒ Recreation/Parks ☒ Schools/Universities ☐ Septic Systems ☒ Sewer Capacity ☒ Soil Erosion/Compaction/Grading ☒ Solid Waste ☒ Toxic/Hazardous ☒ Traffic/Circulation
☐ Vegetation ☒ Water Quality ☒ Water Supply/Groundwater ☐ Wetland/Riparian ☐ Growth Inducement ☒ Land Use ☐ Cumulative Effects ☐ Other:

Present Land Use/Zoning/General Plan Designation:

Public/Institutional

Project Description: *(please use a separate page if necessary)*

The initial phase of work will be construction of a new one-story, 16,175-square-foot classroom building, remaining sitework, and modernization of existing classrooms. The next phase incorporates construction of a new 5,500-square-foot Student Support Services building, improvements related to the Americans with Disabilities Act (ADA) accessibility including paths of travel and bathroom accessibility, upgrades to utilities and site infrastructure, upgrades to the fire alarm system, and upgrades to the public address system. All of these improvements are considered to be part of the proposed Project for the purposes of the CEQA process. No significant impacts are anticipated to result from the proposed project.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "**X**".
If you have already sent your document to the agency please denote that with an "**S**".

X	Air Resources Board	X	Office of Historic Preservation
	Boating & Waterways, Department of	X	Office of Public School Construction
X	California Emergency Management Agency		Parks & Recreation, Department of
	California Highway Patrol		Pesticide Regulation, Department of
X	Caltrans District # 7	X	Public Utilities Commission
	Caltrans Division of Aeronautics	X	Regional WQCB # 4
	Caltrans Planning		Resources Agency
	Central Valley Flood Protection Board		Resources Recycling and Recovery, Department of
	Coachella Valley Mtns. Conservancy		S.F. Bay Conservation & Development Comm.
	Coastal Commission		San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
	Colorado River Board		San Joaquin River Conservancy
X	Conservation, Department of		Santa Monica Mtns. Conservancy
	Corrections, Department of		State Lands Commission
	Delta Protection Commission		SWRCB: Clean Water Grants
X	Education, Department of		SWRCB: Water Quality
	Energy Commission		SWRCB: Water Rights
X	Fish & Game Region # 5		Tahoe Regional Planning Agency
	Food & Agriculture, Department of		Toxic Substances Control, Department of
X	Forestry and Fire Protection, Department of		Water Resources, Department of
	General Services, Department of		
	Health Services, Department of		Other:
	Housing & Community Development		Other:
X	Native American Heritage Commission		

Local Public Review Period (to be filled in by lead agency)

Starting Date November 11, 2020 Ending Date December 11, 2020

Lead Agency (Complete if applicable):

Consulting Firm: Impact Sciences
Address: 811 W. 7th St.
City/State/Zip: Los Angeles, CA 90017
Contact: John Anderson
Phone: 408-516-1440

Applicant: Dr. Catherine Kawaguchi
Address: 27000 Weyerhaeuser Way
City/State/Zip: Santa Clarita, CA 91351
Phone: 661-252-5131

Signature of Lead Agency Representative: _____ **Date:** 11/9/2020

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Sulphur Springs Union School District
ENVIRONMENTAL CHECKLIST FORM

NOTE: The following is a sample form and may be tailored to satisfy individual agencies' needs and project circumstances. It may be used to meet the requirements for an initial study when the criteria set forth in CEQA Guidelines have been met. Substantial evidence of potential impacts that are not listed on this form must also be considered. The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance.

1. Project title: Pinetree Community School
2. Lead agency name and address:
   Sulphur Springs Union School District
   27000 Weyerhaeuser Way
   Santa Clarita, CA 91351
3. Contact person and phone number: Dr. Catherine Kawaguchi, 661-252-5131
4. Project location: 29156 Lotusgarden Dr., Canyon Country, CA 91387
5. Project sponsor's name and address:
6. General plan designation: Public/Institutional 7. Zoning: PI
8. Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)
   See Section 2.0, Project Description
9. Surrounding land uses and setting: Briefly describe the project's surroundings:
   See Section 2.0, Project Description
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun? No

    Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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.

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

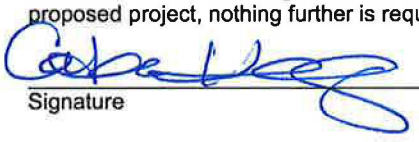
☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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



Signature

11/9/2020

Date

Signature

Date

1.0 INTRODUCTION

1.1 INTRODUCTION

The subject of this Initial Study (IS) is the proposed Pinetree Community School Improvement Project ("proposed Project" or "Project"). Dr. Catherine Kawaguchi, Superintendent ("Applicant") has applied to the Board of Trustees of the Sulphur Springs Union School District (Board or District) for approval of the Project plan and related entitlements. The initial phase of the Project would be construction of a new one-story, 16,175-square-foot classroom building, remaining sitework, and modernization of existing classrooms. The next phase incorporates construction of a new 5,500-square-foot Student Support Services building, improvements related to the Americans with Disabilities Act (ADA) accessibility including paths of travel and bathroom accessibility, upgrades to utilities and site infrastructure, upgrades to the fire alarm system, and upgrades to the public address system.

Pinetree Community School is located in the Canyon Country community of the City of Santa Clarita, Los Angeles County. The school site is approximately 28 miles north of downtown Los Angeles and 0.25 miles north from the Antelope Valley Freeway. Pinetree Community School is situated on a 10-acre site, constructed in 1988, at 29156 Lotusgarden Drive. Single-family residential development surrounds the campus on all sides. The site is zoned Public/Institutional.

1.2 PROJECT INFORMATION

Project Title: Pinetree Community School Improvement Project

Project Location: 29156 Lotusgarden Drive
Santa Clarita, CA 91387

Project Applicant: Dr. Catherine Kawaguchi, Superintendent

Lead Agency: Board of Trustees of the Sulphur Springs Union School District
27000 Weyerhaeuser Way
Canyon Country, CA 91351

1.3 PURPOSE AND ORGANIZATION OF THE INITIAL STUDY

An Initial Study is a preliminary analysis prepared by and for the Sulphur Springs Union School District (SSUSD) as Lead Agency to determine whether an Environmental Impact Report or a Negative Declaration or Mitigated Negative Declaration must be prepared for a proposed Project.

California Environmental Quality Act (CEQA) Guidelines Section 15063 states:

(a) The Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.

(1) All phases of project planning, implementation, and operation must be considered in the Initial Study of the project.

(2) The lead agency may use an environmental assessment or a similar analysis prepared pursuant to the National Environmental Policy Act.

(3) An initial study may rely upon expert opinion supported by facts, technical studies or other substantial evidence to document its findings. However, an initial study is neither intended nor required to include the level of detail included in an EIR.

(b) Results.

(1) If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall do one of the following:

(A) Prepare an EIR, or

(B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or

(C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration. Another appropriate process may include, for example, a master EIR, a master environmental assessment, approval of housing and neighborhood commercial facilities in urban areas, approval of residential projects pursuant to a specific plans described in section 15182, approval of residential projects consistent with a community plan, general plan or zoning as described in section 15183, or an environmental document prepared under a State certified regulatory program. The lead agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration.

(2) The Lead Agency shall prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

(c) Purposes. The purposes of an Initial Study are to:

(1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.

(2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.

(3) Assist in the preparation of an EIR, if one is required, by:

(A) Focusing the EIR on the effects determined to be significant,

(B) Identifying the effects determined not to be significant,

(C) Explaining the reasons for determining that potentially significant effects would not be significant, and

(D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

(4) Facilitate environmental assessment early in the design of a project;

(5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) Eliminate unnecessary EIRs;

(7) Determine whether a previously prepared EIR could be used with the project.

(d) Contents. An Initial Study shall contain in brief form:

(1) A description of the project including the location of the project;

(2) An identification of the environmental setting;

(3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to

another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.

(4) A discussion of the ways to mitigate the significant effects identified, if any;

(5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls;

(6) The name of the person or persons who prepared or participated in the Initial Study.

(e) Submission of Data. If the project is to be carried out by a private person or private organization, the Lead Agency may require such person or organization to submit data and information which will enable the Lead Agency to prepare the Initial Study. Any person may submit any information in any form to assist a Lead Agency in preparing an Initial Study.

(f) Format. Sample forms for an applicant's project description and a review form for use by the lead agency are contained in Appendices G and H. When used together, these forms would meet the requirements for an initial study, provided that the entries on the checklist are briefly explained pursuant to subsection (d)(3). These forms are only suggested, and public agencies are free to devise their own format for an initial study. A previously prepared EIR may also be used as the initial study for a later project.

(g) Consultation. As soon as a Lead Agency has determined that an Initial Study will be required for the project, the Lead Agency shall consult informally with all Responsible Agencies and all Trustee Agencies responsible for resources affected by the project to obtain the recommendations of those agencies as to whether an EIR or a Negative Declaration should be prepared. During or immediately after preparation of an Initial Study for a private project, the Lead Agency may consult with the applicant to determine if the applicant is willing to modify the project to reduce or avoid the significant effects identified in the Initial Study.

This Initial Study is organized into four sections as follows:

Section 1.0, Introduction: This section provides introductory information such as the Project title, the Project applicant, and the lead agency for the proposed Project.

Section 2.0, Project Description: This section provides a detailed description of the proposed Project including the Project setting, Project characteristics, Project objectives, landscaping, and construction phasing.

Section 3.0, Environmental Analysis: This section contains an assessment and discussion of impacts for each environmental issue identified in the Initial Study Checklist.

Section 4.0, List of Preparers: This section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

As shown in the following environmental analysis contained in this IS, impacts on the environment resulting from the Project are anticipated to be less than significant, and no mitigation measures are required. Consequently, this IS concludes that a Negative Declaration shall be prepared for the proposed Project.

2.0 PROJECT DESCRIPTION

2.1 INTRODUCTION

This chapter presents the details of the Pinetree Community School Improvement Project ("proposed Project" or "Project") in terms of the Project's location and setting, Project objectives and characteristics, and construction schedule and activities. Dr. Catherine Kawaguchi, Superintendent ("Applicant") has applied to the Board of Trustees of the Sulphur Springs Union School District ("Board" or "District") for approval of the Project plan and related entitlements.

The District was established in 1872 and is the second oldest school district in Los Angeles County. The District presently serves more than 5,300 students in transitional kindergarten through grade 6 at nine schools, covering a region that includes the southeastern Santa Clarita Valley and Canyon Country. More specifically, the District includes approximately 75 square miles of land that is primarily within the jurisdiction of the City of Santa Clarita with the remainder located within unincorporated Los Angeles County.[1]

2.2 PROJECT SETTING

2.2.1 Project Location and Surrounding Land Uses

Pinetree Community School is located in the Canyon Country community of the City of Santa Clarita, Los Angeles County. The school site is approximately 28 miles north of downtown Los Angeles and 0.25 miles north from the Antelope Valley Freeway. Pinetree Community School is situated on a 10-acre site, constructed in 1988, at 29156 Lotusgarden Drive (see **Figure 2.0-1)**. The school site is flat, while the surrounding developments and open space are situated on hills. Single-family residential development surrounds the campus on all sides. The site is zoned Public/Institutional. Surrounding residential developments are zoned UR2 (Urban Residential, 5 dwelling units per acre) interspersed with Open Space to the northeast, northwest, southwest and south, across the Antelope Valley Freeway.

[1] Sulphur Springs Union School District. District History. Available online at: https://www.sssd.k12.ca.us/Page/24#:~:text=Sulphur%20Springs%20School%20District%20is,on%20the%20Mitchell%20Ranch%20property, accessed September 22, 2020.

2.2.2 Current Educational Setting and Facilities

Pinetree Community School is a traditional public school (non-Charter) serving students in grades K-6. For the 2019-2020 school year, enrollment was 607 students, up from 574 in 2016-2017.[2] The school has 18 permanent classrooms and 10 relocatable classrooms.

The campus includes five main buildings connected by covered walkways and courtyards in the center of the site. An eight-classroom building sits on the north side of the campus and a 10-classroom building is on the south side. A total of 10 portable classrooms sit on the southeast part of the property (see **Figure 2.0-2)**.

Classroom buildings feature access to a shared common area. This allows the site to accommodate evolving program needs. The multipurpose room is located on the east of the campus, with the front office near the center of the property. A small amphitheater sits on the eastern property boundary, near the multipurpose room. A kindergarten playground is sited among the western-most relocatable classrooms and a large, open playfield and dirt track occupies remaining land further to the west. Additionally, solar panels were installed on the site in 2016 as a part of a larger District-wide solar program.

In 2014, a modernization effort was started, including approved architectural plans for Pinetree Community School, but was placed on hold pending adjustments to reduce construction costs. The design was then re-evaluated and modified to better fit the anticipated needs of the District and phased to minimize the disruption to student services. The Project remains essentially the same: a 12-classroom building, although relocated; a Student Support Services building; and two classrooms for lower grades. The lower-grade classrooms are being included as a modernization to the current administration building instead of being built as new construction as originally planned.

2.3 PROJECT OBJECTIVES

In 2017, the District produced a Facilities Assessment and Implementation Plan (Plan)[3] to assess educational, facility, and infrastructure needs in the District's nine school sites and guide a facilities improvement and financing program to accommodate those needs. The District's Plan assumed a growth of approximately 1,000 students by 2024 as new housing developments within the District built out. Several

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2 Ed Data. *Pinetree Community Elementary.* Available online at: http://www.ed-data.org/school/Los-Angeles/Sulphur-Springs-Union/Pinetree-Community-Elementary, accessed September 24, 2020.

3 Sulphur Springs Union School District. September 2017. *Facilities Assessment & Implementation Plan.* Available online at: https://www.sssd.k12.ca.us/cms/lib/CA02205826/Centricity/Domain/32/Facilities_Assessment_Implementation_Plan_Small.pdf, accessed September 24, 2020.

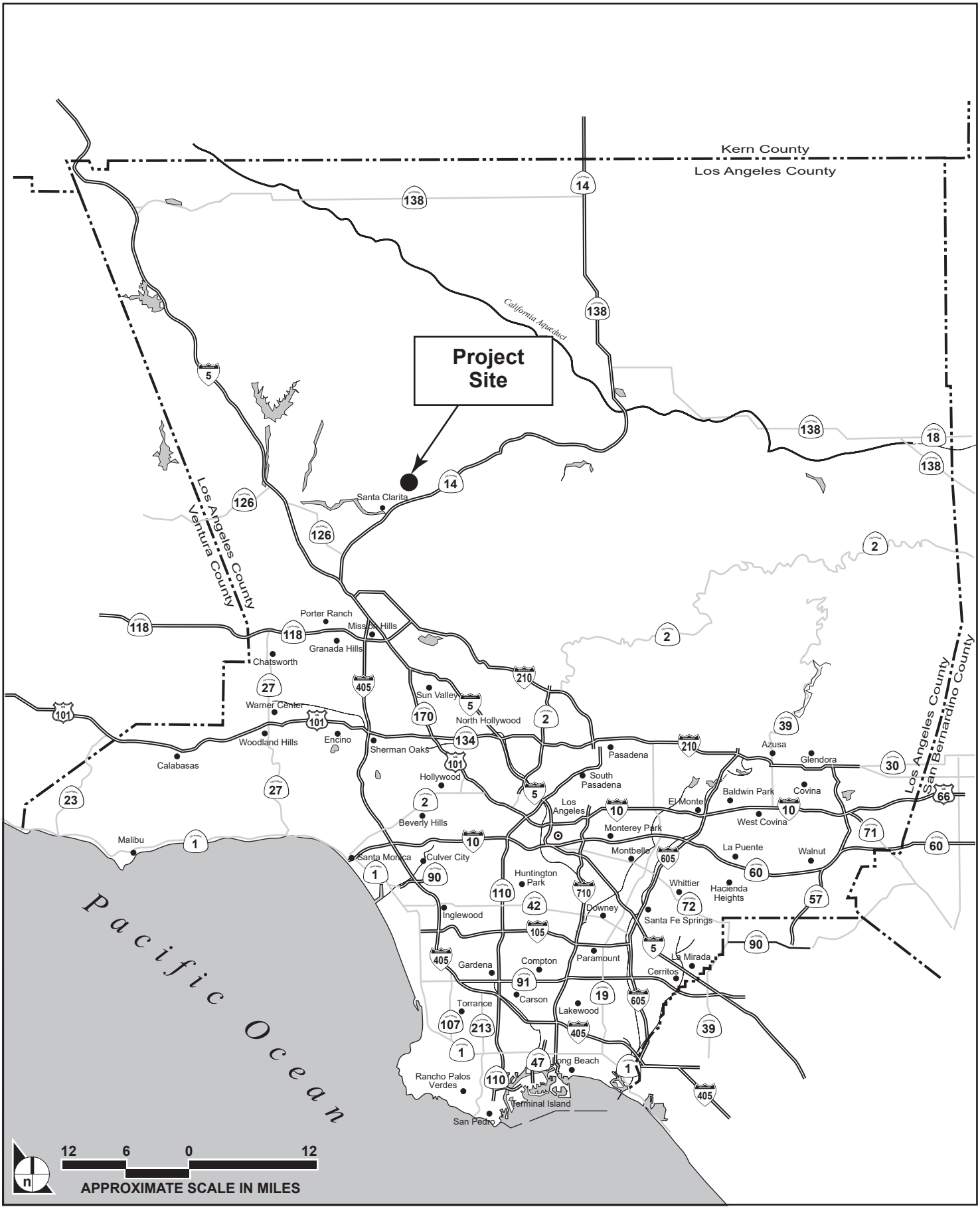
campuses in the District, including Pinetree Community School, added relocatable classrooms to address interim capacity needs, but many of these facilities are aging and approaching the end of their useful life. In other words, the proposed Project has been designed to accommodate a similar number of students as the current (aka, baseline) facilities.

In general, the objectives for the District's program are to develop a modernized, safe environment conducive to learning. More specifically, key objectives for the proposed Project are to:

- Construct new permanent classrooms to replace aging portable classrooms that are reaching the end of their useful life;
- Leverage state aid eligibility and local funds, including developer fees, to improve facilities and minimize the impact on local taxpayers; and
- Improve academic achievement by supporting the District's education program goals with corresponding school facility improvements that provide 21st century learning environments at all District schools.

An important premise of program implementation is the realization of facility improvements and projects that support the implementation of the proposed education program. Consideration of the following program components contributed to this process:

- Integration of technology into the instruction within the classroom
- Implementation of the Next Generation Science Standards (NGSS)
- Coding instruction for all Kindergarten-6th grade students
- Science, Technology, Engineering, Arts and Mathematics (STEAM) Robotics instruction for all 6th grade students
- Art and music instruction for all students
- 21st century state-of-the-art learning environments to promote collaboration, communication, creativity and critical thinking, and support instructional needs for the District's educational vision



SOURCE: Impact Sciences, 2020

FIGURE **2.0-1**

IMPACT SCIENCES

Project Regional Location Map

SOURCE: Google Earth, 2020

FIGURE **2.0-2**

IMPACT SCIENCES

Project Site Location Map

1342.001•09/2020

2.4 PROJECT CHARACTERISTICS

2.4.1 Pinetree Community School

The initial phase of work will be construction of a new one-story, 16,175-square-foot classroom building, remaining sitework, and modernization of existing classrooms. The next phase incorporates construction of a new 5,500-square-foot Student Support Services building, improvements related to the Americans with Disabilities Act (ADA) accessibility including paths of travel and bathroom accessibility, upgrades to utilities and site infrastructure, upgrades to the fire alarm system, and upgrades to the public address system (see **Figure 2.0-3**). All of these improvements are considered to be part of the proposed Project for the purposes of the CEQA process. These improvements are described in additional detail below.

Construct a New Administration Building, Restore Existing Library, and Upgrade ADA/Fire Life Safety

The preexisting challenges present at the administration building, as noted in the 2017 Facilities Assessment, were addressed by 2014 modernization plans through the proposed reconstruction of a Student Support Services building at the "front" of the campus adjacent to the parking and drop-off area.

In anticipation of a single-phased new construction and modernization project at the school, the District vacated the library with the intention of housing an interim administration office during construction of the new administration building. As an alternative, it is was recommended and ultimately decided by the District that initial construction would proceed on the new administration facility alone, leaving the original administration intact to the south during construction. This revised phasing is a result of the need to accommodate availability of funding, a desire to eliminate the relocation of office functions more than once, and an opportunity to return the library to use by children at its permanent, purpose-built location, while also receiving enhancements beyond its original condition.

The proposed new phasing of the Project allows for the District to immediately restore the library area for student learning. It also presents the opportunity to create a new modern library. The library restoration project consists of removing non-load bearing walls, replacing carpet throughout and creating a variety of unique learning spaces with the use modern furnishings and technology. The new library will also include a Makerspace lab that can accommodate STEAM and/or robotics lessons.

The library will feature soft seating, collaboration spaces and small group settings to support and enhance the learning occurring in the classroom. The creation of the new enhanced library identified above has been completed by District staff. Concurrently with the initial work at the administration building and library restoration enhancement, modernization work may proceed addressing fire/life safety and ADA upgrades,

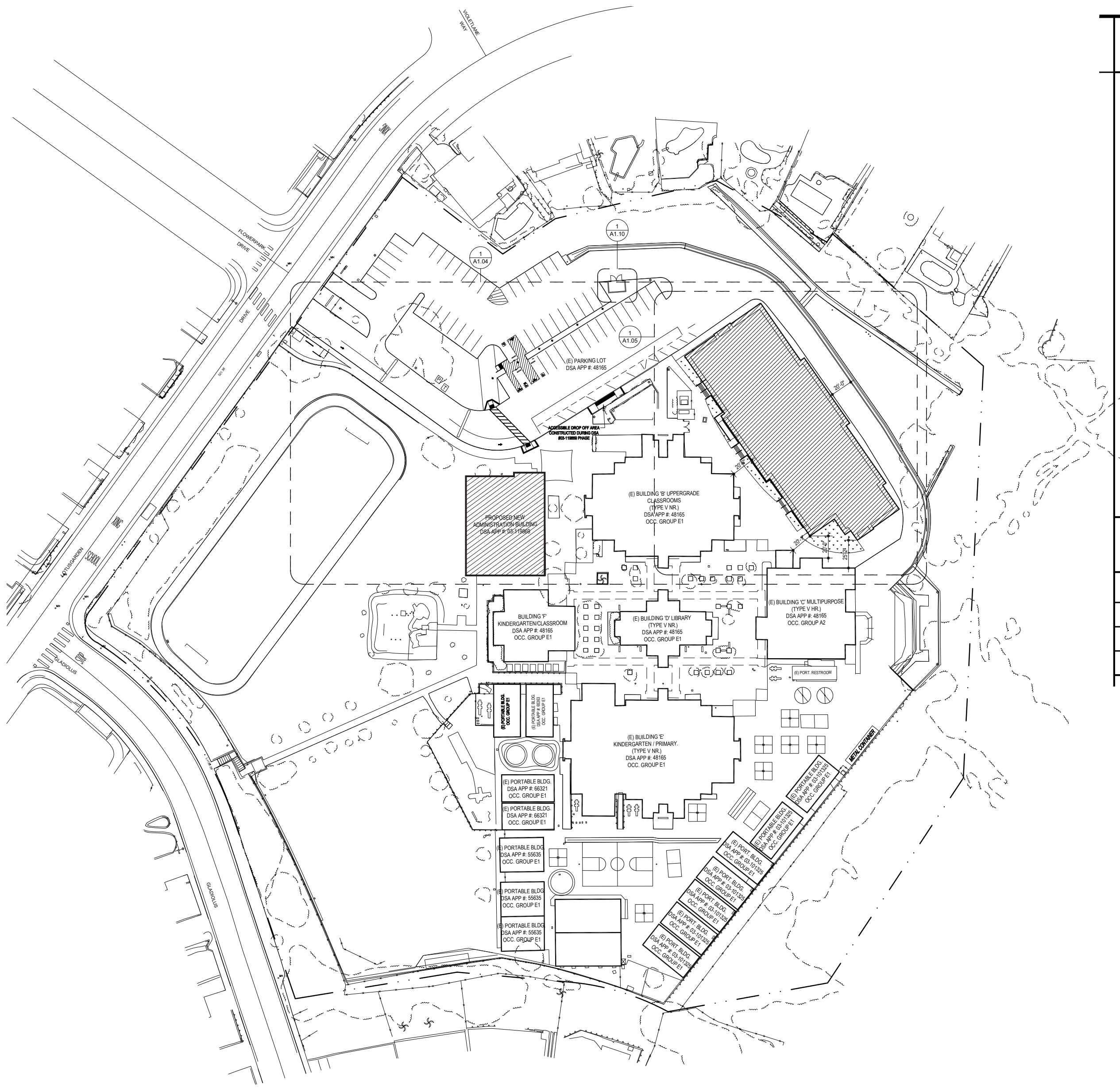
utilizing existing Division of the State Architect (DSA) approved plans. Completion of this initial work would provide the District and the Pinetree community with upgraded administrative facilities and improvement to site infrastructure for the future expansion and construction of a classroom building.

Construct a New Classroom Building and Related Improvements

Following the completion of the initial phase of work identified above, a new 12-classroom building, along with an additional two kindergarten classrooms are proposed. One relocatable classroom will be removed upon completion of this building. In addition to the new classrooms, funds have been budgeted for the reconstruction of playground space to complement the proposed new kindergarten classrooms, and to replace the existing kindergarten playground currently located in the proposed location of the new classrooms.

Mechanical Systems and Other Infrastructure Improvements

Project mechanical upgrades include long-term replacement of HVAC systems as they reach the end of their useful life, which is planned to be coordinated along with roofing replacement. Modification of the existing restrooms for ADA compliance have also been identified and budgeted, as well the restoration of ceramic tile on "mudset" walls and floors, with these items to be completed under the initial phase of improvements to the site.



LEGEND

- EXISTING BUILDING
- NEW BUILDING
- LANDSCAPE
- FIRE HYDRANT
- (E) STRIPPING

PARKING TABULATION

	STANDARD	ACCESSIBLE REQUIRED	ACCESSIBLE PROVIDED	TOTAL
LOT 1	56	1	3	59

N

1
A1.02

SOURCE: Flewelling & Moody, 2019

FIGURE **2.0-3**

Project Site Plan

IMPACT SCIENCES

1347.001•10/2020

2.5 SITE ACCESS, CIRCULATION, AND PARKING

The entrance to the school is located on Lotusgarden Drive at Flowerpark Drive. Vehicles access the school pick-up and drop-off area via a two-way driveway. Curbside pick-ups and drop-offs occur along a sidewalk that buffers the campus from the parking lot. Vehicles travel through the loop in a counterclockwise direction to exit the school. The loop has two parking lots and provides approximately 57 parking spaces for visitors and staff.

2.6 LANDSCAPING

Currently, the campus is landscaped with trees throughout the shared courtyard area and along the boundaries of the campus. A running track surrounded by a large grassy field is located along the western portion of the campus, adjacent to Lotusgarden Drive. The proposed classroom building includes revamped landscaping and hardscaping. As discussed above, the proposed classroom building would be constructed in the northeast section of the campus. A row of ornamental trees and shrubs within planters along a sidewalk would delineate the new classroom building from the rest of the campus.

2.7 CONSTRUCTION PHASING AND EQUIPMENT

As described above, construction is anticipated to occur in multiple phases, beginning with the new classroom building, remaining sitework, and modernization of existing classrooms (Phase 1). The next phase will be construction of a new 5,500-square-foot Student Support Services building (Phase 2). Phase 2 would also include improvements related to ADA accessibility issues, including paths of travel and bathroom accessibility, upgrades to utilities and site infrastructure, upgrades to the fire alarm system, and upgrades to the public address system. Construction is expected to last approximately six months for each phase.

3.0 ENVIRONMENTAL ANALYSIS

3.1 INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with each environmental issue and subject area identified in the Initial Study Checklist. The thresholds of significance are based on Appendix G of the *State CEQA Guidelines*.

3.2 IMPACT ANALYSIS

3.2.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:

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

No Impact. A significant impact would occur if the proposed Project would have a substantial adverse effect on a scenic vista. A scenic vista refers to views of focal points or panoramic views of broader geographic areas that have visual interest. A focal point view would consist of a view of a notable object, building, or setting. An impact on a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected.

The proposed Project consists of new buildings that would have a maximum height of one story. As existing views are intermittent and no expansive vistas are available, construction of the proposed Project would not have a substantial effect on a scenic vista. Although the proposed Project would change existing views by adding new structures and demolishing old ones, no existing scenic vistas would be affected, since there are none.

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

No Impact. The Project site is not adjacent to a state scenic highway and therefore would not result in any impacts on scenic resources within a state scenic highway. Furthermore, there are no unique trees, rocky outcrops or historic buildings on the campus site that could qualify as scenic resources that are within a state scenic highway. As a result, no impact on scenic resources within a state scenic highway would occur.

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 a

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. A significant impact may occur if a project would introduce incompatible visual elements on the proposed Project site or visual elements that would be incompatible with the character of the area surrounding the proposed Project site, or substantially degrade the existing visual character or quality of the Project site and its surroundings. Significant impacts to the visual character of a site and its surroundings are generally based on the removal of features with aesthetic value, the introduction of contrasting urban features into a local area, and the degree to which the elements of the proposed Project detract from the visual character of an area.

The proposed Project would not remove or degrade features with aesthetic value on or near the Project site. It would construct a new one-story, 16,175-square-foot classroom building and a 5,500-square-foot administration building. Landscaping and new trees would be provided as part of the project. Therefore, the proposed Project would not degrade the visual quality of the area and would be consistent with surrounding uses. Impacts would not 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. A significant impact would occur if light and glare substantially altered the character of off-site areas surrounding the site or interfered with the performance of an off-site activity. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The proposed Project would not result in land uses typically associated with nighttime illumination, such as residential uses. Elementary schools are not typically in use at night, so illumination from the Project site would be minimal. All lighting of outdoor areas will be directed onto driveways, walkways, and parking areas and away from adjacent properties and public rights of way to avoid any light impacts from lighting fixtures included in the project. During the nighttime, the proposed Project would only emit low-level for security purposes and wayfinding. For these reasons, the new lighting established on the site will not result

in a substantial increase in light that could adversely affect nighttime views in the area. Therefore, the project's impacts regarding light and glare would be less than significant. No further analysis is required.

3.2.2 Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Range and Assessment Project and Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. 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. A significant impact would occur if the proposed Project would convert valued farmland to non-agricultural uses. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." No impacts would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. A significant impact would occur if the proposed Project conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. The General Plan land use designation for the Project site is PI (Public Institution). The Project site is not zoned for agricultural uses nor do agricultural uses occur on the Project site. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. Accordingly, the Project site does not contain any lands covered by a Williamson Act contract. Therefore, implementation of the proposed Project would not conflict with existing agricultural zoning or a Williamson Act Contract. 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. A significant impact would occur if the proposed Project conflicted with existing zoning or caused rezoning of forest land or timberland or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The Project site and the surrounding area are not zoned for forest land or timberland. As discussed above the Project site is zoned Public Institution (PI) and is located in a developed suburban area. The surrounding area is zoned as residential. The site and the surrounding area do not contain any forest land or land zoned for timberland production. Implementation of the proposed Project would not conflict with existing zoning for, or cause rezoning of forest land or timberland. No impacts would occur, and no further analysis is required.

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

No Impact. See response to **Subsection 3.2.2(c)**, above.

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. A significant impact would occur if the proposed Project caused the conversion of farmland to non-agricultural use. See responses to **Subsections 3.2.2(a)** through **3.2.2(d)**, above. The site is located in a developed area and there are no agricultural uses or related uses on the site. The site does not result in the conversion of farmland, to other uses. No impacts would occur.

3.2.3 Air Quality

This section is based on the information provided in the California Emissions Estimator Model (CalEEMod) 2016.3.2 model using assumptions from the Project Applicant for project construction and operational emissions. The CalEEMod Output Report is incorporated herein by this reference and provided in **Appendix A** to this Draft Initial Study. Would the project:

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

Less Than Significant Impact. The South Coast Air Quality Management District (SCAQMD) is the agency primarily responsible for comprehensive air pollution control in the South Coast Air Basin and reducing emissions from area and point stationary, mobile, and indirect sources. SCAQMD prepared the 2016 Air Quality Management Plan (AQMP) to meet federal and state ambient air quality standards. A significant air quality impact may occur if a project is inconsistent with the AQMP or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The *State CEQA Guidelines* Section 15064.7 provides the significance criteria established by the applicable air quality

management district or air pollution control district, when available, may be relied upon to make determinations of significance. The potential air quality impacts of the proposed Project are, therefore, evaluated according to thresholds developed by the SCAQMD in their *CEQA Air Quality Handbook*, *Air Quality Analysis Guidance Handbook*, and subsequent guidance, which are listed below. The proposed Project is not expected to conflict with or obstruct the implementation of the AQMP and SCAQMD rules. The proposed Project is also subject to the City's Green Building Program Ordinance (Ord. No. 179,890), which was adopted to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional and global ecosystems. Therefore, impacts would be less than significant.

The 2016 AQMP provides base year emissions and future baseline emission projections for the South Coast Air Basin. In doing so, the 2016 AQMP incorporates, in part, Southern California Association of Government's (SCAG) 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) socio-economic forecast projections of regional population and employment growth. A project would not conflict with the AQMP if it is consistent with the population, housing and employment assumptions that were used in the development of the AQMP. The proposed Project is not expected to increase the population or increase student capacity at the school. Therefore, the levels of population for the project are consistent with population forecasts as adopted by SCAG. Therefore, the proposed Project would not conflict with the AQMP, and impacts 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. A significant impact may occur if a project would add a considerable cumulative contribution to federal or State non-attainment pollutant.

Construction Phase Air Quality Impacts

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to predict emissions from the construction and operation of the proposed Project. Average daily emissions from project construction and operation were calculated, including both on-site and off-site activities. On-site activities would consist of the operation of off-road construction equipment, as well as on-site truck travel (e.g., haul trucks, water trucks, dump trucks, and concrete trucks), whereas off-site sources would be emissions from construction vehicle trips.

Construction of the proposed Project is anticipated to occur over two phases of construction. The first phase of construction will include the construction of the new 16,175-square-foot classroom building as well as the removal of one portable classroom. Construction of phase one is anticipated to occur over a six-month

period. The second phase will include the construction of the new, 5,500-square-foot administrative building as well as the renovation and modernization of the 3,030-square-foot library. The second phase of construction is estimated to occur over approximately six months. As stated in **Section 2.0, Project Description**, the second phase of construction will depend on funding. In order to provide a conservative analysis, the second phase of construction was assumed to occur immediately following phase one.

Table 3.0-1, Project Construction Emissions, shows the maximum daily construction emissions of ROG, NOx, PM10, PM2.5, SOx, and CO from the construction of the proposed Project. As indicated in **Table 3.0-1,** estimated average daily project construction emissions would not exceed the thresholds for ROG, NOx, PM10, PM2.5, SOx, and CO. Construction activities associated with the proposed Project would not result in emissions that would result in a cumulatively considerable net increase of any criterial pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and thereby not result in adverse health effects. The impact associated with construction-period emissions of criteria pollutants would be less than significant.

Table 3.0-1
Project Construction Emissions

Scenario	Maximum Emissions (pounds/day)					
	ROG	NOx	CO	SOx	PM10	PM2.5
Phase One	30.21	8.29	8.00	0.01	1.27	0.83
Phase Two	16.04	8.09	7.97	0.01	1.27	0.83
Threshold (lb/day)	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	***No***	***No***	***No***	***No***	***No***	***No***

Source: Impact Sciences, 2020.
Note: Project construction will be subject to SCAQMD Rule 403, which will require certain measures be taken during construction to reduce fugitive dust emissions. In order to provide a conservative analysis, these measures were not applied to the construction emissions, implementation of these measures would reduce particulate matter emissions.

Since the proposed Project will not exceed SCAQMD mass emission thresholds, construction of the proposed Project would not contribute significantly to cumulative emissions of pollutants for any non-attainment pollutants. Specifically, for regional ozone precursors, the project would not exceed SCAQMD mass emission thresholds for ozone precursors (ROG and NOx) during construction. As such, the project's impact on cumulative ozone precursor emissions would be considered less than significant. Similarly, regional emissions of PM10 and PM2.5 would not exceed mass thresholds established by the SCAQMD; therefore, construction emissions impacts would be considered less than significant.

Operation Phase Air Quality Impacts

Operational air pollutant emissions would be generated primarily by automobiles driven to drop off and pick up students. Other sources of operational emissions include architectural coatings and maintenance products, consumer products, and energy use on the Project site, including the combustion of natural gas in heaters. CalEEMod was used to estimate emissions from operation of the proposed Project as well as to estimate emissions from the existing Pine Tree Elementary School in order to estimate the operational emissions upon full project buildout.

The CalEEMod operational emissions modeling are provided in **Appendix A.** Modeling inputs for the proposed Project are described above. For the existing land uses, the student enrollment for 2016-2017 of 607 students was used to determine the existing school size with the model.

Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher the emission rates used by CalEEMod. The earliest year the project could possibly be constructed and fully occupied would be 2021. Emissions associated with build-out later than 2021 would be lower, because newer vehicles have to meet increasingly more stringent emissions standards, while older, more polluting, vehicles are less utilized.

Table 3.0-2, Project Operational Emissions, shows the predicted daily operational emissions in pounds per day. As shown in **Table 3.0-2**, daily emissions of ROG, NOx, SOx, CO, PM10, and PM2.5 emissions association with operation of the proposed Project and the existing school would be below the SCAQMD significance thresholds.

Table 3.0-2
Project Operational Emissions

Scenario	Maximum Emissions (pounds/day)					
	ROG	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Phase One	0.82	2.21	6.21	0.02	1.85	0.51
Phase Two	0.43	1.17	3.28	0.01	0.98	0.27
Existing Emissions	2.57	6.94	19.55	0.07	5.81	1.59
Total Operational Emissions	3.82	10.32	29.04	0.10	8.64	2.37
Threshold (lbs/day)	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	***No***	***No***	***No***	***No***	***No***	***No***

Source: Impact Sciences, 2020.

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the project's air quality impacts would not exceed the SCAQMD's mass regional operational thresholds of significance as noted in **Table 3.0-2**, the project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Based on the City of Los Angeles CEQA Thresholds Guide, a significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors.

Localized Significance Thresholds

SCAQMD protocol utilizes localized CO concentrations from motor vehicles and localized concentrations of NOx, CO, PM10, and PM2.5 from construction and operation to determine localized pollutant concentration potential. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.[1] The nearest receptors to the Project site are residents located adjacent to north, south, and west of the Project site as well as on-site students. In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing Localized Significance Thresholds (LSTs).

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAMQD provided the Final Localized Significance Threshold Methodology for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific level proposed projects.

As detailed above, the SRA for the LST is the Santa Clarita Valley area (SRA 13) since this area includes the Project site. LSTs apply to CO, NO_2, PM10, and PM2.5. The SCAMQD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. The school encompasses 10-acres, however, much of the school site includes fields, parking lots, and classrooms or other buildings that will not be impacted by the proposed Project. Therefore, construction of the proposed administration and classroom building will

1 SCAQMD CEQA Air Quality Handbook, 1993, page 5-1.

only occur over a small portion of the school site. Therefore, the LST threshold for one acre was utilized for the construction LST analysis.

The SCAQMD's methodology clearly states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptors to the Project site are the residents located across the street from the school site to the south. LST screening thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. According to SCAQMD methodology, "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." In order to provide a conservative analysis, LSTs for receptors located at 25 meters were utilized in this analysis.

Table 3.0-3, Localized Significance of Construction Emissions – Maximum Pounds per Day, presents the results of the localized emissions during construction activity of the proposed Project. As shown in **Table 3.0-3**, the on-site air pollutant emissions on the peak day of construction during either phase of construction would not exceed the applicable LST. Therefore, impacts would be less than significant.

Table 3.0-3
Localized Significance of Construction Emissions – Maximum Pounds per Day

Year	NOx	CO	PM10	PM2.5
Phase One (2021)	7.99	7.57	1.16	0.80
Phase Two (2021)	7.99	7.57	1.16	0.80
Localized Significance Threshold[1]	**114**	**590**	**4**	**3**
Exceeds Thresholds?	***No***	***No***	***No***	***No***

Source: Impact Sciences, 2020.
SCAQMD. Localized Significance Thresholds. Available: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds

According to the SCAQMD LST methodology, LSTs would apply to operational phase of a proposed Project only if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The project is proposing a new administrative and classroom building for a school and, therefore, does not include such land uses. Thus, due to the lack of queuing and idling emissions, no long-term localized significance threshold analysis is needed. Operational LST impacts would be less than significant in this regard.

As evaluated above, the project's air emissions would not exceed the SCAQMD's LST thresholds. Therefore, the project would not exceed the most stringent applicable NAAQS or CAAQS for emissions of CO, NOx, PM10, or PM2.5. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons are protected. In other words, the ambient air quality standards are purposely set in a stringent manner to protect children, elderly, and those with existing and respiratory problems. Thus, air quality health impacts would be less than significant in this regard.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadways or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, and the elderly).

Long-term operations of the project would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.

Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.[2] Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. The proposed Project itself is not anticipated to increase student enrollment and, as a result, would not significantly increase the percentage of vehicles operating in cold start mode or substantially worsen traffic flow. Therefore, CO hotspot impacts would be less than significant.

Diesel Particulate Matter

Finally, the project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic

2 Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.

air contaminant by ARB based on chronic exposure to these emissions.[3] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the project would not create substantial concentrations of TACs. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[4] The project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, project impacts related to TACs would be less than significant.

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

Less than Significant Impact. Potential sources that may emit odors during the construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project site. Development of the proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Additionally, the odors would be temporary, and construction activity would be required to comply with SCAQMD Rule 402.[5] A less than significant impact relative to an odor nuisance would occur during construction associated with the proposed Project.

According to the SCAQMD CEQA Air Quality Handbook, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[6] The proposed Project would not include any of these odor-producing uses; odors associated with project operation would be limited to on-site waste generation and disposal and occasional minor odors generated during food preparation activities for the on-site residential development. Furthermore, all trash receptacles would be covered and properly

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3 California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust, website: www.http://oehha.ca.gov/public_info/facts/dieselfacts.html, accessed July 20, 2017.

4 SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

5 SCAQMD Rule 402 states the following "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.

6 South Coast Air Quality Management District. *CEQA Air Quality Handbook*. http://www.aqmd.gov/ceqa/hdbk.html, December 11, 2015.

maintained in a manner as to minimize odors, as required by City and Los Angeles County Health Department regulations and be emptied on a regular basis. Therefore, the implementations of the proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant, and no further analysis is required.

3.2.4 Biological Resources

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 regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. A significant impact would occur of a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the state or federal regulatory agencies cited above. The Project site is located in a developed area of Canyon Country surrounded by residential development. To that end, implementation of the project would not be expected to 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 regulation, or by the California Department of Fish and Wildlife (CDFW) or the USFWS as the proposed Project site supports no habitat for such species. Therefore, the proposed Project would have no impact on any sensitive species or habitat. No further analysis is required.

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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. The proposed Project would not expand the disturbance footprint of the school. The Project site does not contain any riparian habitat and does not contain any streams or water courses necessary to support riparian habitat. Additionally, the Project site is not located within any USFWS-designated critical habitat or Significant Ecological Areas as designated by Los Angeles County.[7] Accordingly, the proposed Project would not have a substantial adverse effect on any riparian

[7] Los Angeles County Department of Regional Planning. Significant Ecological Areas and Coastal Resource Areas Policy Map Figure 9.3. Available online at: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG 9-3_significant_ecological_areas.pdf, accessed August 12, 2020.

habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or the USFWS, and no further analysis is required.

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. A significant impact would occur if federally protected wetlands would be modified or removed by a project. The Project site is not located on or near any federally protected wetlands. As such, implementation of not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act as a consequence of direct removal, filling, hydrological interruption, or other means, and no further analysis is required.

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

No Impact. A significant impact would occur if a project were to interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The proposed Project site is not located within an established wildlife movement corridor. Additionally, the site is not a known wildlife nursery site. The Project site is not located within any USFWS-designated critical habitat, Significant Ecological Areas, or Coastal Resource Areas within Los Angeles County.[8] The site is surrounded by residential development. Therefore, the proposed Project would not interfere with wildlife movement or impede the use of native wildlife nursery sites, and 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. A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources. The City of Santa Clarita Ordinance 17.51.030 - Landscaping and Irrigation Standards requires that *where healthy trees exist on a site, maximum effort shall be given for their retention.* The project, as designed will not intersect with the location of any trees, and no impact would occur.

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8 Los Angeles County Department of Regional Planning. Significant Ecological Areas and Coastal Resource Areas Policy Map Figure 9.3. Available online at: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG 9-3_significant_ecological_areas.pdf, accessed August 12, 2020.

The proposed Project would be required to comply with the provisions of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC). Both the MBTA and CDFW protects migratory birds that may use trees on or adjacent to the Project site for nesting and may be disturbed during construction of the proposed Project. Therefore, the proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands), and no impacts would occur.

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 proposed Project site and the surrounding vicinity are not part of any adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, construction and operation of the proposed Project would have no impact on any such plans. No further analysis is required.

3.2.5 Cultural Resources

This section includes information provided in the Sacred Lands File (SLF) search report from the Native American Heritage Commission (NAHC) dated October 2, 2020. The record search of the NAHC SLF was completed for the information you have submitted for the above referenced project. The results were negative. This report is incorporated herein by this reference and provided in **Appendix X** to this Draft Initial Study.

Would the project:

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

No Impact. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[9] Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific,

9 California Public Resources Code Section 21084.1

economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

A review of the City of Santa Clarita's Historical Resources Map in the General Plan Conversation and Open Space Element does not identify any known historical resources or landmarks at or within the vicinity of the Project site.[10] The Project site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, and/or any local register. The proposed Project would not cause any substantial adverse change in the immediate surroundings such that the significance of the historical resource would be materially impaired and impacts would be less than significant. As such, no adverse impact to historical resources would occur, and no further analysis is required.

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

Less than Significant Impact. Section 15064.5 of the *State 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.

The Project site has been in use as a school facility since 1988 and has been subjected to past subsurface disturbance associated with excavation and grading activities associated with the construction of foundations for the existing school buildings; therefore, it is unlikely that undisturbed unique archeological resources exist on the Project site.

The Project would be subject to the provisions Section 21084.1 of the Public Resources Code to consider the effects of a proposed Project on potentially buried cultural resources if an archeological site is determined to be a historical resource. If the archaeological site is determined to be a "unique" resource the site shall be treated in accordance with the provisions of section 21083.2. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining compliance measures where potentially significant impacts may occur, such that in the event that archaeological resources are uncovered on the Project site during grading, or other construction activities, the District must be notified immediately and work must stop within a 30-foot radius until a qualified archeologist to be approved by the District, has evaluated the find. Construction activity may continue unimpeded on other portions of the Project site. If the find is

10 City of Santa Clarita. General Plan, Conservation and Open Space Element, p. CO-43.

determined by the qualified archeologist to be a unique archeological resource, as defined by Section 21083.2 of the Public Resources Code, the Project site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue.

Compliance with the federal, State, and local regulations would ensure impacts to archaeological resources would be less than significant.

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

Less Than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation of the Project site. The Project Site is located in a highly developed portion of the City. Because the project area has already been previously disturbed, it has been subject to ground-disturbing activities. However, ground-disturbing activities have the potential to disturb previously undiscovered subsurface human remains. While there are no known human remains on or near the project area and no formal cemeteries, other places of human interment, or burial grounds or sites are known to occur within the project area, there is always a possibility that human remains can be encountered during construction. In the event that human remains are unexpectedly uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and *CEQA Guidelines* Section 15064.5I. Pursuant to these codes, in the event that human remain are discovered, it requires that disturbance of the site shall remain halted until the Los Angeles County Coroner (Coroner) has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The Coroner is required to make a determination within two working days of notification of the discovery of the human remains. If human remains of Native American origin are discovered during project construction, compliance with state laws, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) (Public Resource Code Section 5097), relating to the disposition of Native American burials will be adhered to. If the Coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall consult with the Native American Heritage Commission (NAHC) by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. The Applicant shall bear the cost of implementing these measures. Compliance with these regulatory protocols would reduce impacts to a less than significant level. No further analysis of this topic is necessary.

3.2.6 Energy

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. Project construction would require demolition, grading, utility installation, foundation construction, building construction, paving, and landscaping installation. All construction would be typical for the region and building type. During construction, energy would be consumed in the form of petroleum-based fuels (i.e., gasoline and diesel) used to power off-road construction vehicles and equipment on the Project site, for construction worker travel to and from the Project site, as well as for delivery truck trips; and to operate generators to provide temporary power for lighting and electronic equipment. The manufacturing of construction materials used by the proposed Project would also involve energy use. Due to the large number of materials and manufacturers involved in the production of construction materials (including manufacturers in other states and countries), upstream energy use cannot be reasonably estimated. However, it is reasonable to assume that manufacturers of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. Furthermore, neither the City nor the District has control over or the ability to influence energy resource use by the manufacturers of construction materials. Therefore, this analysis does not evaluate upstream energy use.

The proposed Project consists of improvements to the existing school. There would be no increase in capacity with the Project and therefore no net increase in vehicular trips. The proposed Project includes infrastructure improvements but would not change existing operations at the school. The school would continue to house the existing school programs after Project completion. No changes to operations, including school-related events or community use would occur as the result of this Project. The levels of traffic that would be generated by the school and the geographical distribution of the school traffic on the public street network would remain unchanged compared to existing conditions and no Project-related impact would occur.

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

Less than Significant. The proposed Project would comply with Title 24. Title 24 represents the state policy on building energy efficiency. The goals of the Title 24 standards are to improve energy efficiency of residential and non-residential buildings, minimize impacts during peak energy-usage periods, and reduce impacts on state energy needs. The proposed Project is required to comply with Title 24, and therefore would be consistent with the state's plan for energy efficiency. Furthermore, the proposed Project would

include features to minimize energy consumption overall, many of which are mandated by the CALGreen and CHPS. These features would further reduce the amount of electricity and natural gas consumed as a result of the proposed Project. Because the proposed Project would be consistent with Title 24, this impact would be less than significant.

3.2.7 Geology and Soils

In 2015, the California Supreme Court, in California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Ca[l]4th 369 (*CBIA v. BAAQMD*), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. On the other hand, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze that impact of that exacerbated condition on future residents and users of a project (as well as other impacted individuals). Thus, the analysis associated with existing geological hazards below focuses on whether the proposed Project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts.

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. The proposed Project is the renovation of an existing school site and does not include any activities that would exacerbate any existing conditions related to faults, fault rupture, ground shaking or landslides that would directly expose people, or structures, to the risk of loss, injury, or death due to rupture of a known earthquake fault. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The closest known fault to the site is the San Andreas Fault, approximately 16 miles to the north. The Project site is not located within an Alquist-Priolo Fault-Rupture Hazard Zone. As the proposed Project would not exacerbate any of these existing conditions, no impact would occur.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

ii) Strong seismic ground shaking?

Less than Significant Impact. Southern California is a highly active seismological area and it is probable that the Project site would experience moderate to strong ground motion due to earthquakes. The San Andreas Fault, approximately 16 miles to the north, is the closest active fault. The project will be constructed in accordance with California Building Code (CBC) and Division of State Architect (DSA) standards. The planned construction of the site will also take recommendations and incorporate project design features from the Geotechnical Report upon completion. As a public school, Pinetree will have to comply with the California Code of Regulations Title 24 requirements and the California Geological Survey Checklist for Review of Geologic/Seismic Reports. As the new buildings will comply with all of the aforementioned regulations, the proposed Project will withstand strong seismic ground shaking. Therefore, the impacts of the Project related to strong seismic ground shaking significantly impacting the site is considered less than significant.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of approximately 50 feet or less.

A review of the State of California Seismic Hazard Zone Map shows that the Project Site is susceptible to liquefaction and thus may be susceptible to seismic-related ground failure.[11] Project construction will adhere to all current standard of practice, as outlined in the "Recommended Procedures for

[11] California Geological Survey, Earthquake Zones of Required Investigation Map. Available online at: https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed September 14, 2020.

Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California." Therefore, compliance with existing building codes and engineering practice would ensure impacts related to liquefaction would be less than significant.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iv) Landslides?

Less than Significant Impact. A significant impact would occur if the proposed Project would be implemented on a site that would be located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated. Landslides are movements of large masses of rock and/or soil. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. The Project site and surrounding areas are generally flat with gradual changes in elevation, and there are no major slopes or bluffs.

According to the California Geologic Survey, the Seismic Hazard Zones Map for this area shows the Project site is located within a landslide hazard zone. To address this potential hazard, the project the design includes a retaining wall will be constructed at the base of the hillside along the site perimeter northeast from the new classroom building. Therefore, impacts would be less than significant.

Further discussion of this topic may be found in Section 20, Wildfire, of this document.

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

Less than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the Project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The Project site is located in a developed, residential area of the City of Los Angeles, with the site and surrounding vicinity being generally flat. No major slopes or bluffs are on or adjacent to the Project site. The proposed Project is an educational facility that will include landscaped and hardscaped area and will not contain large amounts of exposed soil. Following the completion of construction of the proposed Project, the potential for soil erosion or the loss of topsoil is expected to be extremely low.

Construction of the proposed Project would involve soil disturbance activities including grading and demolition that will leave soil on the Project site exposed. Common means of soil erosion include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. However, the proposed Project would be subject to local and state codes and requirements for erosion control and grading during construction. Including, but not limited to, grading permits and haul routes established in a Construction Worksite Traffic Control Plan submitted to OEHS, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, the proposed Project would be required to comply with standard regulations, including South Coast Air Quality Management District Rule 402, which will reduce construction erosion impacts. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010, regulates construction activities to minimize water pollution, including sediment. The proposed Project would be subject to National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Construction contractors would be required to prepare and implement a SWPPP and associated best management practices (BMPs). Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project related grading and construction activities. In addition, the proposed Project would be subject to SC-HWQ-2 Compliance Checklist for Stormwater Requirements at a Construction Site, as detailed above.

Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the proposed Project would not occur and soil erosion impacts would be less than significant. No further analysis is required.

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. Potential impacts with regard to liquefaction and landslide potential are evaluated above. Building improvements founded on collapsible soils may be damaged by sudden and often induced settlement when these soils are saturated after construction. Collapsible soils are typified by low values of dry unit weight and natural water content. The amount of settlement depends on the applied vertical stresses and the extent of wetting and available water. The Project would be designed and constructed in accordance with current engineering practices, and the impacts would be less than significant.

d) Be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less than Significant Impact. A significant impact would occur if the proposed Project would be built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard to life and property. Expansive soils have relatively high clay mineral and expand with the addition of water and shrink when dried, which can cause damage to overlying structures. However, the proposed Project would be designed and constructed in conformance with the requirements of the CBC. As stated above in Section VI (c), all potential impact from soil quality would be reduced through compliance with proper design and construction practices. Therefore, impacts would be less than significant

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. A Project would cause a significant impact if adequate wastewater disposal is not available. The proposed Project would require connection to existing sewers mainlines and service lines, which are currently available in the surrounding roadways. The proposed Project would not require the use of septic systems. Therefore, no impact would occur and no further analysis is required.

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

Less than Significant Impact. As discussed above, the Project site has been previously disturbed and, therefore, it is unlikely that undisturbed paleontological resources exist on the Project site. Any surficial paleontological resources, which may have existed at one time, have likely been unearthed or disturbed to accommodate building foundations, and shallow excavation, or surface grading, is unlikely to uncover any paleontological resources. Earth moving and grading activities could potentially exceed the depth of prior grading activities and therefore, unanticipated discovery of unique paleontological resources is possible. Impacts from the proposed Project on paleontological resources would be less than significant. No further analysis is required.

3.2.8 Greenhouse Gas Emissions

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. Greenhouse gases (GHG) are those gaseous constituents of the atmosphere, both natural and human generated, that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth's surface, the atmosphere itself, and by clouds. Construction and operation (i.e., use of the new building by occupants and mobile emissions associated with such use) of the proposed Project would generate greenhouse gas emissions. Generally, the evaluation of an impact under CEQA requires measuring data from a project against a "threshold of significance."[12] Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."[13] For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact.

Existing Emissions

The Pine Tree Elementary School operates and will continue to operate at full project buildout. Emissions from the operation of the existing Pine Tree Elementary School were included within this analysis to determine the sites total annual GHG emissions.

Construction and Operation Impacts on Climate Change

Construction emissions were estimated using CalEEMod according to the same methodology as described above in **Subsection 3.2.3, Air Quality.** The SCAQMD recommends that construction GHG emissions be amortized over a 30-year project lifetime and included in the long-term operational GHG emissions. **Table 3.0-4, Estimated Operational Greenhouse Gas Emissions,** shows a summary of total estimated GHG emissions from construction and operation of the proposed Project.

Table 3.0-4
Estimated Annual CO_2e Greenhouse Gas Emissions

Scenario and Source	GHG Emissions (MT CO2e/year)
Phase 1	
Area Sources	0.0004
Energy Sources	40
Mobile Sources	261
Waste Sources	11
Water Sources	7

12 *CEQA Guidelines* Section 15064.7.

13 *CEQA Guidelines* Section 15064.7(c).

Construction (Amortized)	2.3
Phase 2	
Area Sources	*0.0002*
Energy Sources	*21*
Mobile Sources	*138*
Waste Sources	*5.6*
Water Sources	*3.6*
Construction (Amortized)	*2.1*
Existing School	
Area Sources	*0.02*
Energy Sources	*124*
Mobile Sources	*818*
Waste Sources	*56*
Water Sources	*22*
Total Emissions	***1,512***

Source: Impact Sciences, 2020.
Note: Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.

As shown in **Table 3.0-4**, the proposed Project's annual GHG emissions would be approximately 1,512 MT CO2e/year. As discussed above, the proposed Project will be consistent with CARB's 2017 Scoping Plan, SCAG's Connect SoCal Plan, and city policies and programs to reduce GHG emissions at the project-level. Consistency with these plans would result in a less than significant impact. Further discussion is provided below.

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

Less Than Significant Impact. The proposed Project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) of the *State CEQA Guidelines*.

Pursuant to Appendix G of the *CEQA Guidelines*, a significant GHG impact is identified if the project could conflict with applicable GHG reduction plans, policies, or regulations. Development projects would be subject to complying with SB 32, and SCAG's Connect SoCal Plan. SB 32 is a statewide reduction goal aimed at reducing emissions to 40% below 1990 levels by 2030. CARB's 2017 Scoping Plan sets a framework for the State to meet the reduction targets of SB 32.

Consistency with the Final 2017 Scoping Plan Update

CARB issued the Final 2017 Scoping Plan Update in November 2017 and establishes emissions reduction strategies necessary to meet SB 32's 2030 reduction goals.[14] **Table 3.0-5, Project Consistency with Applicable 2017 Scoping Plan Measures,** identifies the Scoping Plan policies that are applicable to the proposed Project. As shown, Hitch Ranch project would be consistent with the Scoping Plan.

Table 3.0-5
Project Consistency with CARB 2017 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Implement SB 350 by 2030:	
• Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and grid reliability	**Not Applicable.** The measure is not related to development projects but intended for energy providers.
• Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	**Not Applicable.** This measure is directed towards policymakers, not development projects. However, the proposed Project is designed to meet CALGreen building standards by including measures designed to reduce energy consumption.
• Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in the IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions planning targets through a combination of measures as described in IRPs.	**Consistent.** The proposed Project will provide a new administration building and classroom building that will be required to adhere to the latest CALGreen building Codes and Title 24, which will result in a more efficient Project site.
Implement Mobile Source Strategy (Cleaner Technology and Fuels):	**Not Applicable.** This measure is directed towards policymakers, not development projects.
• Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."	
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road use, parking pricing, transit discounts).	**Not Applicable.** This measure is directed towards policymakers, not development projects.

14 CARB. *California's 2017 Climate Change Scoping Plan.* Available online at: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed February 20, 2020.

Strategy	Project Consistency
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	**Not Applicable.** This measure is directed towards CARB, CalRecycle, CDFA, SWRCB, and local air districts. However, the statewide policy goals of 75 percent of solid waste generated be source reduce, recycled, or composted by 2020 under AB 341. Since the project will be operational after this year, the project's waste collection service will be required to be compliant with this waste reduction.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	**Consistent**. The project will construct a new administration building, modernize the library, and construct a new classroom building. New buildings will be required to adhere to the latest CALGreen Building Standards and Title 24.

Source: Impact Sciences, 2020.
CARB. California's 2017 Climate Change Scoping Plan. Available online at: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf; *accessed February 20, 2020.*

Based on this evaluation, this analysis finds the project would be consistent with all feasible and applicable strategies recommended in the 2017 Scoping Plan Update.

Consistency with SCAG's Connect SoCal Plan

At the regional level, the Connect SoCal RTP/SCS represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the project's potential to conflict with Connect SoCal, this section analyzes the project's land use profile for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. [15]

Table 3.0-6, Project Consistency with SCAG Connect SoCal, demonstrates the project's consistency with the Strategies set forth in the Connect SoCal Plan. The project would also be consistent with the applicable strategies set forth in Connect SoCal's "A Path to Greater Access, Mobility, & Sustainability" chapter. Therefore, the project would be consistent with the GHG reduction related actions and strategies contained in the Connect SoCal Plan.

15 SCAG. 2019. *Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Chapter 3: A Path to Greater Access, Mobility, & Sustainability*. Available online at: https://www.connectsocal.org/Documents/Draft/dConnectSoCal-03_Draft-Plan.pdf, accessed February 20, 2020.

Table 3.0-6
Project Consistency with SCAG Connect SoCal Plan

Actions and Strategies	Consistency Analysis
Focus Growth Near Destinations & Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Focus on job/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Plan for growth near transit investments and support implementation of first/last mile strategies	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Focus Growth Near Destinations & Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Focus on job/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Plan for growth near transit investments and support implementation of first/last mile strategies	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Promote Diverse Housing Crisis	
Preserve and rehabilitate affordable housing and prevent displacement	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Identify opportunities for new workforce and affordable housing development	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Leverage Technology Innovations	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedications lanes, charging and parking/drop-off space	**Not Applicable:** This strategy is aimed at local government to promote shared bikes and scooters, electric vehicles, ride sharing and provide safe infrastructure such dedicated lanes, charging and parking/drop-off space, the proposed Project would not interfere with such policymaking.
Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.

Actions and Strategies	Consistency Analysis
Support Implementation of Sustainability Policies	
Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions	**Not Applicable:** While this strategy calls on local governments to adopt policies for sustainable infrastructure and development projects, the proposed Project would not interfere with such policymaking.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations	**Not Applicable:** While this strategy calls on the state to adopt policies to new construction near transit corridors and stations, the proposed Project would not interfere with such policymaking.
Support cities in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects	**Not Applicable:** While this strategy calls on cities to establish tax incentive or other value capture tools to finance sustainable infrastructure, the proposed Project would not interfere with such policymaking.
Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies	**Not Applicable:** While this strategy calls on SCAG to work with local jurisdictions to identify ways to implement sustainable strategies, the proposed Project would not interfere with such policymaking.
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region	**Not Applicable:** While this strategy calls on planning organizations to promote resources and best practices in SCAG, the proposed Project would not interfere with such policymaking.
Continue to support long range planning efforts by local jurisdictions	**Not Applicable:** While this strategy calls on local jurisdictions to support long range planning, the proposed Project would not interfere with such policymaking.
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Not Applicable:** While this strategy calls on local jurisdictions to provide educational opportunities on new tools and practices to promote the Sustainable Communities Strategy, the proposed Project would not interfere with such policymaking.
Promote a Green Region	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration	**Not Applicable:** While this strategy calls on local governments to adopt policies for renewable energy production, the proposed Project would not interfere with such policymaking.
Integrate local food production into the regional landscape	**Not Applicable:** While this strategy aims to integrate local food into the regional landscape, the proposed Project would not interfere with such policymaking.
Promote more resource efficient development focused on conservation, recycling and reclamation	**Consistent.** The proposed Project will provide a new administration building and classroom building that will be required to adhere to the latest CALGreen building Codes and Title 24, which will result in a more efficient Project site.
Preserve, enhance and restore regional wildlife connectivity	**Not Applicable:** The proposed Project would provide updates to an existing school. However, the project would not interfere with this goal.
Reduce consumption of resource areas, including agricultural land	**Consistent**. The project will be developed on the existing Pine Tree Elementary School property and, as a result, will not consume any resource areas or agricultural land.

Actions and Strategies	Consistency Analysis
Identify ways to improve access to public park space	**Consistent.** The existing site includes tracks and fields. The proposed Project will not interfere with these land uses.

Source: SCAG. 2019. Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Chapter 3: A Path to Greater Access, Mobility, & Sustainability. Available online at: https://www.connectsocal.org/Documents/Draft/dConnectSoCal-03_Draft-Plan.pdf*, accessed February 20, 2020.*

Cumulative Impacts

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 40% below 1990 levels by 2030, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, ARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. At a minimum, most project-related emissions, such as energy, mobile, and construction, are source categories targeted for emission reductions by the Cap-and-Trade Program.

Currently, there are no quantitative ARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with *CEQA Guidelines* Section 15064h(3), the City as Lead Agency has determined that the project's contribution to cumulative GHG emissions and global climate change would be less than significant if the project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; the RTP/SCS and the 2017 Scoping Plan.

Implementation of the Project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from NAT and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in CARB's *2017 Scoping Plan* for the implementation of SB 32.

The Project is consistent with the approach outlined in CARB's *2017 Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as

recommended by CARB's *2017 Scoping Plan*, the project would achieve GHG reductions as new buildings would be designed to achieve the standards of CALGreen.

As part of SCAG's Connect SoCal Plan, a reduction in per capita VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by CARB. The project provides updates to an existing school and therefore would not result in a significant increase in VMT and would be consistent with the RTP/SCS.

The Project also would comply with the City of Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The project's regulatory compliance measures and project design features provided above and throughout this analysis would advance these objectives. Further, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives (e.g., City of Los Angeles Green Building Code).

Thus, given the Project's consistency with State and SCAG reduction goals and objectives, the project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the project's impacts are not cumulatively considerable.

3.2.9 Hazards and Hazardous Materials

As noted above, the California Supreme Court, in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. On the other hand, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze that impact of that exacerbated condition on future residents and users of a project (as well as other impacted individuals). Thus, the analysis associated with existing hazardous conditions below focuses on whether the proposed Project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts.

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. A significant impact would occur if the proposed Project would create a significant hazard though the routine transfer, use, or disposal of hazardous materials. Construction of the

proposed Project would involve the use of those hazardous materials that are typically necessary for construction of school buildings. Therefore, construction of the proposed Project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. For example, the proposed Project would be required to implement standard best management practices (BMPs) set forth by the Los Angeles Regional Water Quality Control Board (RWQCB) which would ensure that wastes generated during the construction process are disposed of properly. Therefore, the proposed Project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction and impacts would be less than significant.

The proposed Project consists of the development of a new one-story, 16,175-square-foot classroom building and a 5,500-square-foot administration building. Operation of the proposed Project may require a variety of products to be transported to and exist on site to be used for facility upkeep that could be considered hazardous if used inappropriately. Such materials include cleaning solvents used for janitorial purposes, materials used for landscaping, and materials used for maintenance. Examples of such materials could include but are not limited to cleaning solvents, pesticides and herbicides for landscaping, and painting supplies. No uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through transport, use, or disposal. As an education development, the proposed Project would not involve large quantities of hazardous materials that would require routine transport, use, or disposal. All potentially hazardous materials transported, stored, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Compliance with existing local, state, and federal regulations would ensure the transport, storage, and sale of these materials would not pose a significant hazard to the public or the environment. Project impacts related to this issue would be less than significant.

b) Create 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. A significant impact would occur if the proposed Project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. As noted in the preceding section, compliance with federal, state, and local laws and regulations relating to transport, storage, disposal and sale of hazardous materials would minimize any potential for accidental

release or upset of hazardous materials. The Project site is not within 300 feet of an oil or gas well or 1,000 feet of a methane producing site.[16] No existing structures on-site would require demolition.

Construction of the proposed Project would involve the use of potentially hazardous materials, including paints, cleaners, vehicle fuels, oils, and transmission fluids. But as stated prior, conformance with all applicable local, state, and federal regulations governing such activities would make foreseeable accidents highly unlikely. As the Project site is currently paved for a playground and does not have any structures, there would be very minimal demolition involved and thus no exposure to asbestos containing materials and/or lead-based paints that are usually present in existing, older buildings. Accordingly, 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 with Mitigation. Construction activities have the potential to result in the release, emission, handling, and disposal of hazardous materials within one-quarter mile of an existing school since the project would occur on school property.

As previously discussed, construction of the proposed Project would involve the use of those hazardous materials that are typically necessary for construction of residential development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the proposed Project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. For example, the proposed Project would be required to implement standard BMPs set forth by the RWQCB which would ensure that wastes generated during the construction process are disposed of properly.

The proposed Project consists of the development of a new one-story, 16,175-square-foot classroom building and a 5,500-square-foot administration building. Operation of the proposed Project may require a variety of products to be transported to and exist on site to be used for facility upkeep that could be considered hazardous if used inappropriately. Such materials include cleaning solvents used for janitorial purposes, materials used for landscaping, and materials used for maintenance. Examples of such materials could include but are not limited to cleaning solvents, pesticides and herbicides for landscaping, and

16 Los Angeles County Department of Public Works. Solid Waste Information Management System. Do I need Methane Mitigation? Available online at: https://pw.lacounty.gov/epd/swims/OnlineServices/search-methane-hazards-esri.aspx, accessed August 13, 2020.

painting supplies. All potentially hazardous materials transported, stored, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations.

As the proposed Project will comply with all federal, state, and local standards and regulations, it is not anticipated to emit any hazardous emissions during construction or operation. Therefore, the proposed Project is not expected to adversely affect school operations, including students and staff. Impacts 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?

Less than Significant Impact. California Government Code Section 65962.5 requires various State agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.[17] A significant impact may occur if a Project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The California Department of Toxic Substances Control (DTSC) maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. EnviroStor also provides information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted, or have been completed under DTSC's oversight. The proposed Project is not located on a site that is included on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List. A review of the Cortese List compiled on the DTSC, State Water Board, EnviroStor[18] and CAL EPA showed that the site is not identified on any of these database lists. Therefore, the proposed Project would not be located on a site that is included on a list of hazardous materials sites or create a significant hazard to the public or the environment, and impacts would be less than significant.

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17 These lists include, but are not limited to, the 'EnviroStor' (http://www.envirostor.dtsc.ca.gov/public/) and 'GeoTracker' (http://geotracker.waterboards.ca.gov/) lists maintained by the DTSC and the SWRCB, respectively.

18 Envirostor is the Department of Toxic Substances Control's data management system.

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 Project site is not located within an airport land use plan. The nearest airport to the Project site, Whiteman Airport, is located approximately 12 miles south. Therefore, the proposed Project would not result in a safety hazard for people residing or working in the project area, and impacts would be less than significant.

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

Less than Significant Impact. The California Education Code (sections 32280-32288) outlines the requirements of all K-12 schools to write and develop a school safety plan. Comprehensive School Safety Plans are required under SB719 and AB 115 and include procedures for safe ingress and egress and disaster procedures, and are updated and reviewed annually by March 1. Types of emergencies discussed in the Safety Plan include (but are not limited to) armed assaults, earthquakes, on- or off-site fires, and flooding. Wildfire emergency response is further evaluated in Section 20 of this Initial Study.

Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. The nearest emergency response routes to the Project site are Soledad Canyon Road and the Antelope Valley Freeway (SR-14).[19] Both roadways are approximately 0.7 mile south of the Project site.

Construction of the proposed Project could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of a Construction Management Plan and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response and access during construction of the proposed Project. The majority of construction activities for the proposed Project would be confined to the site, except for infrastructure improvements, which may require some work in adjacent street rights-of-way. However, this work would be short-term and temporary, and would occur during off-peak periods.

The proposed Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project site or surrounding area. Therefore, demolition, construction and operation of the proposed Project is not anticipated to significantly impair implementation of, or physically

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19 Los Angeles County Department of Public Works, Disaster Route Maps, Santa Clarita. Available online at: https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Santa%20Clarita.pdf. Accessed August 4, 2020.

interfere with, any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan, and the proposed Project would have a less than significant impact with respect to these issues.

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. A significant impact would occur if the proposed Project exposed people and structures to high risk of wildfire. The Project Site is surrounded by residential development, most of which is within a Very High Fire Hazard Severity Zone (VHFHSZ). Although the Project Site itself falls outside the boundary of the VHFHSZ, the surrounding area is subject to wildland fires due to the presence of urban-wildland interface areas. However, the project would not expose additional people or structures to a risk of loss, injury, or death involving wildland fires.

3.2.10 Hydrology and Water Quality

Would the project:

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

Less than Significant Impact. A significant impact would occur if the proposed Project discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems, or does not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

As part of Section 402 of the Clean Water Act, the United States Environmental Protection Agency (USEPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the SWRCB 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 SWRCB works in coordination with the RWQCB to preserve, protect, enhance, and restore water quality.

A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project would discharge water which does not meet the

quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

As required under the NPDES, the proposed Project would be responsible for the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of BMPs to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the NPDES discharge requirements would ensure that the construction of the proposed Project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality.

Thus, the proposed Project would be required to comply NPDES standards and BMPs set forth by the Upper Santa Clara River Watershed Integrated Regional Water Management Plan to ensure pollutant loads from the Project site are minimized for downstream receiving waters. The project would result in a less than significant impact to water quality and waste discharge during its construction and operation.

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

Less than Significant Impact. A significant impact would occur if the proposed Project substantially depleted groundwater or interfered with groundwater recharge. Santa Clarita Valley Water (SCV Water) is the water purveyor for Canyon Country and the Project site. About half of SCV Water is produced by the local groundwater from the Alluvium Aquifer and the Saugus Formation. The other half of SCV Water is imported primarily through the State Water Project.[20] The Project site is currently paved and thus does not afford an opportunity for groundwater recharge activities to a basin used for water supply by the SCV Water. Following site redevelopment, groundwater recharge on the Project site would continue to be negligible, similar to existing conditions.

Furthermore, groundwater levels in the City are maintained through the City and specific recharge basins. The site is not identified as an opportunity for groundwater recharge activities. Additionally, no groundwater production wells are located in the vicinity of the Project site, nor is the proposed Project growth inducing. Therefore, impacts related to groundwater recharge would be less than significant.

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20 SCV Water. Your Water. Water Sources. Available online at: https://yourscvwater.com/your-water/, accessed August 20, 2020.

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:

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

Less than Significant Impact. A significant impact would occur if the proposed Project substantially altered the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site.

The Project site is on school grounds located approximately 2,000 feet north of the Santa Clara River. Stormwater runoff sheet flows to existing channels during a storm event. Project construction would temporarily expose on-site soils to surface water runoff.

However, compliance with construction-related BMPs and/or the Storm Water Pollution Prevention Plan (SWPPP) would control and minimize erosion and siltation. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. Significant alterations to existing drainage patterns within the Project site and surrounding area would not occur. Therefore, the proposed Project would result in less-than-significant impacts related to the alteration of drainage patterns and on- or off-site erosion or siltation.

Therefore, the project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less than Significant Impact. As discussed above under **Subsection 3.2.9(c)**, implementation of the proposed Project is not anticipated to substantially change the drainage pattern on the Project site. As discussed above, the project would implement both a SWPPP and an LID Plan and would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or –off-site. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. Therefore, the proposed Project would result in less-than-significant impacts related to the alteration of drainage patterns and on- or off-site flooding. As such, impacts would 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?

Less than Significant Impact. A significant impact would occur if runoff water exceeded the capacity of existing or planned storm drain systems serving the Project site. A project-related significant impact would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

There are three general sources of potential short-term, construction-related stormwater pollution associated with the proposed Project.

1) The handling, storage, and disposal of construction materials containing pollutants. Generally, routine safety precautions for handling and storing construction materials effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or BMPs, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

2) The maintenance and operation of construction equipment. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

3) Ground-disturbing activities (e.g., grading, excavation) which when not controlled, may generate soil erosion and/or loss of topsoil via storm runoff or mechanical equipment. Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the District shall be required to implement all applicable and mandatory BMPs in accordance with the SWPPP as required by SC-HQW-2. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Activities associated with operation of the proposed Project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the surface parking lot could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system.

However, as mentioned in IX a) and b), impacts to water quality would be reduced since the proposed Project must comply with water quality standards and wastewater discharge BMPs set forth by the SWRCB Storm drain improvements onsite shall provide capacity to carry 25-year peak runoff rates in case of additional stormwater. Compliance with existing regulations would reduce the potential for the proposed Project to exceed the capacity existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts to a less than significant level. Impacts would be less than significant.

iv) impede or redirect flood flows?

Less than Significant Impact. The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk. The Project site is located in an area of minimal flood risk (Zone X) and is not located within a 100-year flood zone, as mapped by FEMA. Furthermore, the proposed Project does not include an increase in impervious surfaces or new construction that would impede or redirect flood flows more than what currently occurs at the Project site. As such, the impact would be less than significant.

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

No Impact. A significant impact would occur if the proposed Project exposed persons or structures to an area susceptible to inundation by seiche, tsunami, or mudflow. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a great sea wave produced by a significant undersea disturbance. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity. The Project site is not mapped within a tsunami hazard zone. Similarly, damage to the Project site due to a seiche is not likely at the Project site because no bodies of water are present near the site. Furthermore, the Project site is not positioned downslope from any unprotected slopes or landslide areas and is not positioned in an area of potential mudflow. Therefore, no impacts related to inundation by seiche, tsunami, or mudflow would occur.

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

Less than Significant Impact. The Enhancement and Management Plan for the Santa Clara River Basin (SCREMP) was developed by the Los Angeles County Department of Public Works and the Ventura County Watershed Protection District in May 2005 to regulate activities that may affect surface water and/or groundwater quality. The proposed Project would adhere to all applicable rules and regulations regarding water quality set by the SWRCB. The proposed Project would not increase capacity, or resulting

demand, on the Project site. As such, additional extraction or procurement would not be necessary. As such impacts related to conflict with existing water plans would be less than significant.

3.2.11 Land Use and Planning

Would the project:

a) Physically divide an established community?

No Impact. A significant impact would occur if the proposed Project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. A physical division of an established community is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures.

The Project does not propose any uses that would physically divide an established community, such as a new road or railway in a residential area. Therefore, no impacts would occur, and no further analysis is required.

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. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Project site is zoned PI for Public/Institutional uses by the Santa Clarita General Plan. The Project would further the educational mission of Pinetree Community School and would not involve a land use change. There would be no impact with regard to this criterion.

3.2.12 Mineral Resources

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?

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. No known or potential mineral resources have been identified on the Pinetree Community School campus. In addition, existing zoning and land uses preclude the use of the campus for mineral extraction (for example, sand and gravel extraction). Therefore, construction of the Project would not impede extraction or result in the loss of availability of a known mineral resource. There would be no impacts with regard to these criteria.

3.2.13 Noise

Would the project:

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?

Less than Significant Impact. A significant construction impact may occur where a project would not comply with the City of Santa Clarita Municipal Code. The City of Santa Clarita has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. The City's *Municipal Code*, Chapter 11.44, *Noise Limits*, established noise standards in various land use zones during daytime (7:00 AM – 10:00 PM) and nighttime (10:00 PM – 7:00 AM) periods. For residential zones, the base noise levels are 65 dBA during daytime period and 55 dBA during the nighttime period. The City's *Municipal Code* Section 11.44.080 limits construction work that requires a building permit from the City on sites within 300 feet of a residentially zoned property, except between the hours of 7:00 AM and 7:00 PM, Monday through Friday, and 8:00AM and 6:00 PM on Saturday.

Construction Noise Impacts

Two types of short-term noise impacts would occur during project construction, including: (1) on-site construction activity and (2) on-road activity.

Existing Noise Levels

Due to the COVID-19 pandemic, roadway traffic and ambient noise levels likely do not constitute the normal existing conditions at the time of this analysis. As a result, preparing noise monitoring at locations surrounding Pine Tree Elementary School may not capture the actual noise that may be present. In order to evaluate the ambient noise levels near the Project site, we used the ambient noise levels measured within the Sand Canyon Plaza Mixed Use Project's Draft Environmental Impact Report (DEIR), released in March 2017. The Sand Canyon Plaza Mixed Use Project is located approximately 0.68 miles from Pine Tree Elementary School. The DEIR included noise measurements conducted at five locations around the Project

site on August 5, 2015. The ambient noise levels ranged from 44.2 dBA Leq to 64.0 dBA Leq.[21] For the analysis, the average background noise level from the Sand Canyon's ambient noise level measurements was used below.

On-Site Construction Activity

During demolition, grading, construction, and other project phases, noise-generating activities could occur at the Project site between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday, in accordance with Ordinance No. 11.44.080 of the SCMC. Land uses surrounding the Project site include single-family residences.

Construction activity would result in temporary increases in ambient noise levels in the project area on an intermittent basis. Construction of the proposed Project would include the use of on-site heavy equipment such as bulldozers, as well as smaller equipment such as saws, hammers, and pneumatic tools during demolition, site preparation, grading, building construction, architectural coating, and paving on the Project site. Construction would be undertaken in discrete steps, each of which has its own mix of equipment, and consequently its own noise characteristics. These various sequential phases would change the character of the noise generated on the Project site. Therefore, the noise level would vary 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 analysis was prepared with the Federal Highway Administration's Roadway Construction Noise Model, which calculates the maximum noise levels based on the construction equipment that will be used during construction. The maximum noise level was calculated for a reference receptor at 50 feet.

Table 3.0-7, Construction Noise Levels by Phase, shows the construction phases, the equipment expected to be used during each phase, the composite noise levels of the equipment at 50 feet, the distance of the nearest residence (located on Lillyglen Drive) from the center of construction activities, and noise levels expected during each phase of construction when activities occur at the average distance of construction. These noise level projections do not take into account intervening topography or barriers. A 6 dBA attenuation was given to account for the hard ground surface at the school site. Both of phases of construction are anticipated to follow similar schedules and require the same construction equipment. Therefore, **Table 3.0-7** serves to demonstrate the construction noise levels during demolition, site

21 City of Santa Clarita. *Sand Canyon Plaza Mixed-Use Project EIR*. Available: http://filecenter.santa-clarita.com/Planning/SandCanyonPlaza/Sand%20Canyon%20DEIR%20-%20March%202017.pdf.

preparation, grading, building construction, paving, and architectural coating during either phase of construction.

Table 3.0-7
Construction Noise Levels by Phase

Construction Phase	Duration (Days)	Composite Noise Level at 50 feet (dBA Leq)	Distance to Sensitive Receptor (ft)[1]	Existing Ambient (dBA Leq)[2]	Noise Level at Receptor (dBA Leq)
Demolition	10	86.4	330	54.8	64.5
Site Preparation	1	83.6	330	54.8	62.1
Grading	2	86.4	330	54.8	64.5
Building Construction	100	84.5	330	54.8	62.8
Paving	5	84.5	330	54.8	62.8
Architectural Coating	5	82.2	330	54.8	61

Source: Impact Sciences, 2020.
[1] Distance measures from residential property line to the center of the construction site.
[2] The existing ambient dBA Leq
dBA Leq = average A-weighted hourly noise level.

It is expected that average noise levels during construction at the nearest resident, a single-family home on Lillyglen Drive, would range from 61 dBA to 64.5 dBA Leq. These noise levels would not exceed the City's daytime noise standard for residential land uses of 65 dBA Leq. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the project area under existing conditions, these noise impacts would no longer occur once project construction is completed.

Noise impacts associated with construction activities are regulated by the City's noise ordinance. The proposed Project would be required to comply with the construction hours specified in the City's Noise Ordinance, which states that construction activities on sites within 300 feet of a residentially zoned property are allowed between 7:00 a.m. and 6:00 p.m., Monday through Friday, and from 8:00 a.m. to 6:00 p.m. on Saturday. No construction shall be permitted outside of these hours or on Sundays and the following public holidays: New Year's Day, Independence Day, Thanksgiving, Christmas, Memorial Day, and Labor Day. Emergency work is excluded from these restrictions.

As noted in the analysis above, the Project would not exceed the City's noise ordinance criteria and would be in compliance with the permissible hours of operation. Therefore, the Project would not result in a substantial temporary increase in noise. Thus, impacts would be less than significant and no mitigation

measures would be required. However, the proposed Project will implement best management practices in order to reduce noise impacts.

Off-Site Construction Activity

Construction haul trucks would generate noise off-site during site preparation and construction. This would include removal of materials from the Project site, including the export of cut-and-fill materials, removal of asphalt, base materials, and demolished materials. While this vehicle activity would increase ambient noise levels along the haul route, ambient noise levels would not be expected to significantly increase ambient noise levels by 3 dB(A) or greater at any noise sensitive land use. Studies have shown that a 3 dB(A) increase in sound level pressure is barely detectable by the human ear. [22] A 3 dB(A) increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant.[23] The project is only expected to generate 4 vendor trips over both phases of construction and 5 hauling trips during Phase 1 demolition. Since it would take a doubling of roadway traffic volume to increase noise levels by 3 dB(A), the addition of haul trucks from the project is not expected to increase traffic to levels capable of producing 3 dB(A) ambient noise increases and there would be no perceptible increase in noise due to the addition of haul trucks. [24] However, trucks accessing the Project site, while not significantly increasing ambient traffic noise levels, have the potential to instantaneously increase noise levels as each truck passes nearby sensitive receptors (e.g., an empty truck hitting a pothole, or the application of air brakes near sensitive land uses, etc.). These temporary instantaneous noise level increases may reach a maximum range of approximately 76 to 88 dB(A) at 50 feet from the source.[25,26] At a reference distance of 100 feet, a noise level of 88 dB(A) at 50 feet would drop to approximately 82 dB(A). This is consistent with Santa Clarita *Municipal Code* that allows an increase of 20 dB for noises that occur less than 1 minute per hour.

Operational Noise Impacts

Potential long-term noise impacts would be associated with stationary sources proposed on the Project site. Stationary noise sources from the proposed Project would include noise generated from air conditioning (HVAC) noise. The proposed Project is not expected to increase the student population. As a result, traffic noise would not change as a result of long-term Project operation.

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22 California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, 2013.

23 California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Protocol.* September 2013.

24 California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Protocol.* September 2013.

25 Federal Highway Administration, Highway Construction Noise Handbook, 2006.

26 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual. September* 2018.

HVAC Systems

The HVAC system that would be installed for the proposed Project would typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. As discussed previously, CNELs for constant noise sources are about 6.7 dBA greater than 24-hour L_{eq} measurements. As such, the HVAC equipment associated with the proposed Project could generate noise levels that average from 47 to 57 dBA CNEL at 50 feet from the source when the equipment is operating continuously over a 24-hour period. These noise levels would not exceed the City's exterior noise level standard of 65 dBA CNEL for residences and would also comply with Section 11.44.070 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level limit of 65 dBA on residential properties as set by *Chapter 11.44*. Therefore, this impact would be less than significant. No further analysis is required.

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

Less than Significant Impact. A significant impact may occur if a project were to generate excessive vibration during construction or operation. Construction activities can generate varying degrees of vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source.

Construction Vibration Impacts

Ground-borne vibration would be generated by a number of on-site construction activities. **Table 3.0-8, Vibration Source Levels for Commonly Used Construction Equipment (PPV)**, shows vibration levels associated with various construction equipment.

Table 3.0-8
Vibration Source Levels for Commonly Used Construction Equipment (PPV)

Human Response	Approximate PPV (in/sec) at 25 Feet At 25 Feet	Approximate RMS (VdB) at 25 Feet
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Human Response	Approximate PPV (in/sec) at 25 Feet At 25 Feet	Approximate RMS (VdB) at 25 Feet

Source: California Department of Transportation, 2013.

Ground-borne vibration would be primarily generated by a number of on-site construction activities. As a result of construction activity generating up to 0.089 inches per second PPV (87 VdB), vibration velocities of up to 0.002 inches per second PPV (53 VdB) could occur at the nearest off-site residence. (**Table 3.0-9, Building Damage Vibration Levels At Off-Site Structures - Unmitigated** and **Table 3.0-10 Human Annoyance Vibration Levels At Off-Site Structures - Unmitigated,**). This vibration intensity is below the 0.2 inches per second PPV building damage threshold, the 0.04 inches per second human annoyance threshold, and below the 80 VdB land use disruption threshold (**Table 3.0-11, Land Use Interference - Unmitigated**). More distant receptors would experience even lower vibration levels.

Given that other construction equipment and activities would produce less vibration and have reduced impacts on nearby receptors, construction-related structural vibration impacts would be considered less than significant. Unless heavy construction activities are conducted extremely close (within a few feet) to neighboring structures, vibrations from construction activities rarely reach the levels that damage structures. There are no neighboring structures that would be damaged by construction vibration. No further analysis is required.

Table 3.0-9
Building Damage Vibration Levels at Off-Site Structures – Unmitigated

Off-Site Structures	Distance to Project Site (ft.)	Estimated PPV (in/sec)	FTA Structural Significance Threshold (in/sec)	Significant?
Single family residences along Lillyglen Drive	330	0.002	0.2	**No**
Single family residence at Lotusgarden Drive	374	0.002	0.2	**No**
Single family residence at Poppy Meadows Street	522	0.001	0.2	**No**

Source: Impact Sciences, 2020.

Table 3.0-10
Human Annoyance Vibration Levels At Off-Site Structures – Unmitigated

Off-Site Receptors	Distance to Project Site (ft.)	Estimated PPV (in/sec)	Caltrans Annoyance Significance Threshold (in/sec)	Significant?
Single family residences along Lillyglen Drive	330	0.002	0.04	**No**
Single family residence at Lotusgarden Drive	374	0.002	0.04	**No**
Single family residence at Poppy Meadows Street	522	0.001	0.04	**No**

Source: Impact Sciences, 2020.

Table 3.0-11
Land Use Interference – Unmitigated

Off-Site Structures	Distance to Project Site (ft.)	Estimated VdB	FTA Land-Use Interference Threshold (VdB)	Significant?
Single family residences along Lillyglen Drive	330	53	80	**No**
Single family residence at Lotusgarden Drive	374	52	80	**No**
Single family residence at Poppy Meadows Street	522	47	80	**No**

Source: Impact Sciences, 2020.

Operations Vibration Impacts

During operations of the proposed Project, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on local roadways. However, road vehicles rarely create enough ground-borne vibration to be perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. Project-related traffic would expose nearby land uses and other sensitive receptors to vibration levels far below levels associated with land use disruption and would as a result be considered less than significant. No further analysis is required.

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 from a public airport or public use airport. The nearest airport to the Project site, Whiteman Airport, is located approximately 12 miles south. Accordingly, the proposed Project would not expose people working or residing in the project area to excessive noise levels from a public airport or public use airport. Therefore, no impact would occur. No further analysis is required.

3.2.14 Population and Housing

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 would serve the existing student population of Pinetree Community School and existing residents in Canyon Country; thus, they would not induce population growth in the area. Furthermore, there are no housing units or businesses incorporated in the proposed Project. As a result, the proposed Projects would not induce substantial population growth in the area, either directly or indirectly. There would be no impact with regard to this criterion.

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

No Impact. There are no residences or people currently living on the Pinetree Community School campus. As a result, the proposed projects would not displace any housing or people. There would be no impact with regard to these criteria.

3.2.15 Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 following public services:

a) Fire protection?

Less than Significant Impact. The Project would serve the existing student population of the Pinetree Community School. Thus, it would not induce population growth in the area. Furthermore, the proposed structures would be built according to the Fire Code and National Fire Protection Agency Requirements. Therefore, construction and operation of the Project would not affect Los Angeles County Fire Department (LACoFD) services or response times. Additionally, the Project site is not located directly adjacent to wildlands so the spreading of a potential fire is unlikely. There would be no impact with regard to this criterion.

b) Police protection?

Less than Significant Impact. Pinetree Community School is under the jurisdiction of the Los Angeles County Sheriff's Department (LASD). LASD provides general law enforcement services throughout Los Angeles County. The nearest LASD station is the Santa Clarita Valley Sheriff's Station, approximately 10 miles west of the site. As the Project is not expected to increase student capacity or size of the site, current government facilities would be sufficient to properly serve the Campus. Therefore, the Project would have a less than significant impact on these public services.

c) Schools?

No Impact. The proposed Project would not include any residential component and would not directly and/or indirectly result in population growth. Development of the proposed Project would improve McKinley ES for its current and future students and not warrant additional schools in the area. No impact would occur.

d) Parks?

No Impact. The proposed Project would not include any residential uses that would result in a permanent population increase, resulting in a need for new or expanded park facilities. The school includes active and passive recreation areas, including a field and play structures. Pursuant to California Education Code Section 38131.b, also known as the Civic Center Act, school facilities would be available during off-school hours for permitted use by public organizations which would add to the available recreation space in the community. With the availability of shared-use open space for recreation onsite, the Project is not anticipated to have an effect on the community. No impact would occur.

e) Other Public Facilities?

No Impact. The proposed Project would serve the existing student population of Pinetree Community School; thus, they would not induce population growth in the area. Therefore, construction and operation of the proposed Project would not affect Los Angeles County Sheriff's Department services or response times. Furthermore, construction and operation of the proposed projects would not increase the need for school or park facilities, or other facilities such as public libraries. There would be no impact with regard to these criteria.

3.2.16 Recreation

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. See response to **Section 14(e),** above.

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

No Impact. See response to **Section 14(e)**, above.

3.2.17 Transportation and Traffic

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. The proposed Project would utilize the existing circulation systems that serve the Project area. There are no changes proposed to the design or configuration of these systems in the Project area.

During construction, construction vehicles would need to access the Project site. Therefore, there may be temporary impacts to the circulation systems in the area. However, the Contractor for the project will be required to develop a Traffic Management Plan for the construction phase and have this plan approved by the City.

The Project is the modernization of an existing school site and does not include any growth or capacity increase from either increased student population or operational uses. Therefore, there would be no

increase in vehicle trips associated with the site after the completion of the modernization and impacts would be less than significant.

b) Conflict or be inconsistent with *CEQA Guidelines* section 15064.3, subdivision (b?

Less than Significant Impact. The proposed Project would utilize the existing network of regional and local roadways that serve the Project area. There are no changes proposed to the design or configuration of roadways surrounding the Project site.

During construction, construction vehicles would need to access the Project site. The majority of construction equipment would be staged on the site, limiting the amount of equipment that would access the site on a daily basis and trips would cease once construction is complete.

Construction vehicle access to the Project site would be provided via the driveway on Lotusgarden Drive, and construction traffic routes shall avoid residential areas and other sensitive receptors to the extent feasible. This would ensure travel in the surrounding residential neighborhoods is minimized and that construction vehicles travel along arterial roadways to access the Project site rather than through the neighborhoods or along pedestrian routes. Construction trips would be temporary and would result in a less than significant impact.

The Project is the modernization of an existing school site and does not include any growth or capacity increase from either increased student population or operational uses. Therefore, there would be no increase in vehicle trips associated with the site after the completion of the modernization and impacts would be less than significant.

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 proposed Project would utilize the existing network of regional and local roadways that serve the Project area. There are no changes proposed to the design or configuration of roadways surrounding the Project site. The vacation of the future street dedication will not result in any physical changes at the site. The proposed Project would not create new hazards due to design features or incompatible uses and there would be no impact.

d) Result in inadequate emergency access?

Less than Significant Impact. The Project is not anticipated to interfere with an emergency response plan or evacuation plan. Construction activities are not anticipated to result in temporary partial obstruction of

adjacent roadways and the District would comply with applicable regulations relating to access. Therefore, the impact would be less than significant.

3.2.18 Tribal Cultural Resources

This section is based on information provided in the Sacred Lands File (SLF) search report from the Native American Heritage Commission (NAHC) dated October 2, 2020. The record search of the NAHC SLF was completed for the information you have submitted for the above referenced project. The results were negative. This report is incorporated herein by this reference and provided in **Appendix X** to this Draft Initial Study.

This section will be amended to include responses to the Tribal Consultation letters sent to jurisdictional Tribal Nations on October X, 2020.

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:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resource Code section 5020.1(k)?

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

As part of the AB 52 process, Native American tribes must submit a written request to Sulphur Springs Union School District (lead agency; SSUSD) to be notified of projects within their traditionally and culturally affiliated area. SSUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to SSUSD within 30 days of receiving this notification if they want to engage in consultation on the project, and SSUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

The school site has not been recommended for historic designation and is not identified on any of the historic resource lists/databases—the National Register of Historic Places and the California State Historical Landmarks, Points of Historical Interest, and Register of Historic Places. No Tribal cultural resources have been identified on the Project site.

b) 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant Impact. See Response to Threshold (a) above.

3.2.19 Utilities and Service Systems

Would the project:

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

Less than Significant Impact. The proposed Project is the modernization of an existing site that is served by water, wastewater, stormwater drainage, electric, natural gas, and telecommunication facilities. The proposed Project would not increase generated wastewater as staff and enrollment would not increase due to Project implementation. With regards to stormwater, a significant impact would occur if the volume of stormwater water runoff would increase to a level exceeding the capacity of the storm drain system serving a Project site, requiring the construction of new stormwater drainage facilities.

As described in the Project Description, the proposed Project does include the replacement and/or upgrade of existing utilities infrastructure on the Project site. This would be expected to include minor trenching to limited depths where existing utilities are located. However, as described in IX e), the proposed Project would not result in a significant increase in site runoff, or significant changes in the local drainage patterns. Similarly, discussion in VI a) indicates that current electrical service providers have the capacity to meet the demand of the proposed Project, which would connect to existing easements and power lines. Natural gas and telecommunication needs would mirror current demand at the school, and operation of the proposed Project would not necessitate the construction, relocation, or expansion of such facilities. Further, it is expected that the new buildings and site design would be more efficient and would slighting reduce utilities demand on site as capacity would not change.

As there would not be substantial generation of wastewater or storm water by the proposed Project, nor a need for new or expanded electricity, natural gas, or telecommunication facilities, the impact 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. Senate Bill 221 and Senate Bill 610 amended existing California law regarding land use planning and water supply availability by requiring more information and assurance of supply than is currently required in an Urban Water Management Plan (UWMP). As of January 1, 2002, California law requires water retail providers to demonstrate that sufficient and reliable supplies are available to serve large-scale developments (i.e., 500 dwelling units or 250,000 square feet of commercial space) prior to completion of the environmental review process and approval of such large-scale projects.

Under SB 610, it is the responsibility of the water service provider to prepare a Water Supply Assessment (WSA) requested by a City or County for any "project" defined by Section 10912 of the Water Code that is subject to CEQA.

Section 10912 of the Water Code defines a "project" as:

- a proposed residential development of more than 500 dwelling units;
- a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- a proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- a proposed hotel or motel, or both, having more than 500 rooms;
- a proposed industrial, manufacturing or processing plant, or industrial park, planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor space;
- a proposed mixed-use project that includes one or more of the previously listed projects; or
- a proposed Project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project.

The proposed Project is the modernization of an existing school site, and at buildout would not increase enrollment capacity or staffing, thus the proposed Project does not meet any of the criteria resulting in the need for a WSA; therefore, a WSA is not necessary.

During construction water may be used on site for dust suppression or similar activities. The small amount of water necessary during construction of the proposed Project would not result in the need for new or expanded water entitlements. Construction of the proposed Project would not result in a significant impact to the City's existing water supply.

Buildout of the proposed Project would generate a demand on the City's water supplies similar to that of the current demand. Water supply to the Project site is provided by Santa Clarita Valley Water Agency. As the proposed Project would not increase the enrollment capacity of the Campus, the proposed Project would not increase demand on the City's water supplies. Impacts would be less than significant.

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. Refer to Threshold a) above.

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. Construction of the proposed Project would generate construction debris. Waste materials generated during construction are expected to be typical construction debris, including concrete, stucco, asphalt, rocks, building materials, wood, paper, glass, plastic, metals, cardboard, and other inert wastes (i.e., wastes that are not likely to produce leachates of environmental concern), as well as green wastes. The District would be subject to the 2019 CAL Green Construction Waste Reduction Requirements that require 65 percent of the construction waste generated on the Project site be diverted from landfills.[27] Waste generated during demolition and construction that is not recycled would result in an incremental and intermittent increase in solid waste disposal at landfills; however, this increase in solid waste would be short-term and not exceed the available capacities of area landfills. In addition, the Project would comply with all waste recycling/reuse requirements in California Green Building Code Section 5.408Thus, construction impacts related to solid waste would be less than significant.

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27 CalRecyle. *CALGreen Construction Waste Management Requirements.* Available online at: https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/newstructures, accessed September 30, 2020.

Operationally, Pinetree Community School is served by Waste Management to dispose of solid waste generated on school campuses. As the Project would not increase the enrollment capacity of the school, the proposed Project would not expand total solid waste generation within the District, and sufficient capacity exists to serve existing students. The proposed Project would comply with the recycling requirements in AB 341.

As operational solid waste generated by the proposed Project would be nearly identical to current solid waste generation and adherence to all applicable laws and regulations regarding solid waste, the impact would be less than significant impact.

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

Less than Significant Impact. During construction and operation of the proposed Project, the District would comply with all applicable City, County, and state solid waste diversion, reduction, and recycling mandates. See response to Threshold 19.d.

3.2.20 Wildfire

Would the project:

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

Less than Significant Impact. The Project site is partially within a Very High Fire Hazard Severity Zone (VHFHSZ) in a Local Responsibility Area as defined by the California Department of Forestry and Fire Protection (CAL FIRE).[28,29] Although portions of the Project site do not lie within the VHFHSZ, the homes to its north and east do, so this analysis conservatively assumes a high wildfire risk. The Los Angeles County Fire Department oversees wildfire protection at the Project site. The nearest fire station is LACoFD Station 132, located between 1.7 to 2.6 miles from the Project site, depending on the route.

The community of Canyon Country has a semi-rural character that encourages the mix of population with the vegetation and open spaces associated with a rural environment. This wildland intermix is subject to wildland fires that can cause the loss of life and property. In October 2019, the Tick Fire burned over 4,500 acres and forced the evacuation of over 40,000 people from the Santa Clarita Valley, including Canyon Country. The fire started at Tick Canyon Road and Summit Knoll Road, approximately 3.4 miles northeast of the Project site. Mandatory evacuations were ordered for residents east of Sand Canyon Road, including the project area.[30] Evacuation decisions are typically handled by a collaboration across various agencies in a given jurisdiction, including cities, counties, fire departments, and law enforcement officials.

The City of Santa Clarita 2015 Local Hazard Mitigation Plan provides strategies for the City to reduce risk and prevent loss from natural hazard events, including wildfire. The plan goals are to protect life and property, increase public awareness, preserve natural systems, and maintain and improve emergency services. Key concerns noted in the Hazard Mitigation Plan include growth and development in urban/wildland interface areas, turn-around space on residential streets, and inadequate fire water supply in remote areas. In addition, the plan contains strategies and action items that pertain to new development in the urban/wildland interface to assist developers in mitigating aggravating conditions in these areas. These may include participation in the Brush Clearance Compliance Program and the Fuel Modification Program, which are focused on the clearing and maintenance of defensible space. In addition, this may also include evaluating evacuation routes and developing adequate routes for fire-fighting vehicles and

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28 Cal Fire, 2011. Very High Hazard Severity Zones in LRA As Recommended by CALFIRE. https://osfm.fire.ca.gov/media/5842/santa_clarita.pdf. Accessed September 22, 2020.

29 Local Responsibility Area are lands for which a local government (not the State) is responsible for all fire protection.

30 Los Angeles Times. *Tick Fire: Residents tally losses as firefighters battle flames and high winds.* October 25, 2019. Available online at: https://www.latimes.com/california/story/2019-10-25/tick-fire-jumps-14-freeway-friday, accessed September 22, 2020.

encouraging fire-resistant roofs. The enforcement of these strategies and action items occur during plan check and through the inspection process. The City of Santa Clarita is currently updating its Hazard Mitigation Plan, and the District is among the numerous stakeholders involved with the Steering Committee.

The Los Angeles County Office of Emergency Management prepared an All-Hazards Mitigation Plan in 2019 to assess risks posed by natural hazards and to develop a mitigation action plan for reducing those risks, including those posed by wildland fires. Some of the policies identified to reduce risks from wildfires include red flag warning alerts, vegetation management, fireproof coating critical assets, and backup power systems for critical facilities.[31]

The proposed Project would comply with all applicable building codes, hazard plans, and safety provisions, and 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 with Mitigation. Wildfire conditions are primarily influenced by weather, vegetation, topography, and human activities. The interaction of these factors produces local and regional fire regimes. The fire regime in any area is defined by several factors, including fire frequency, intensity, severity, and area burned.

In Santa Clarita, the summers are hot, arid, and clear and the winters are cold, wet, and partly cloudy. Over the course of the year, the temperature typically varies from 44°F to 95°F and is rarely below 37°F or above 103°F.[32]

The Santa Clarita valley is particularly susceptible to wildfires during summer and fall, especially during Santa Ana wind events, which deliver hot, dry winds that can blow over 50 miles per hour. In late October 2019, the Tick Fire burned over 4,600 acres, destroyed 27 structures, and prompted the evacuation of 40,000 people.[33] Many of the residential neighborhoods surrounding the Project site were under mandatory evacuation orders, and all schools in the District were closed through November 1 due to poor air quality

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31 Los Angeles County Office of Emergency Management. *2019 County of Los Angeles All-Hazards Mitigation Plan.* Available online at: http://file.lacounty.gov/SDSInter/lac/1062614_AHMPPublicDraft_Oct1.pdf, accessed September 29, 2020.

32 Weather Spark, 2020. Average Weather in Santa Clarita. https://weatherspark.com/y/1726/Average-Weather-in-Santa-Clarita-California-United-States-Year-Round. Accessed September 22, 2020.

33 CAL FIRE. *Tick Fire.* Available online at: https://fire.ca.gov/incidents/2019/10/24/tick-fire/, accessed September 25, 2020.

and fire danger.[34] The perimeter of the fire extended approximately 500 feet north of the campus.[35] The ongoing crisis of climate change has worsened wildfire conditions in the region, and dangerous fire conditions are likely to persist, particularly in areas of urban-wildland intermix.

The prevailing wind pattern in the project area is from the southwest, but during Santa Ana wind events, winds blow from the northeast through canyons and passes toward the ocean as high pressure builds in the interior regions. As these warm, dry winds get funneled through canyons and passes, they gain speed and lose moisture, posing elevated wildfire risk. The winds can blow embers for several miles, posing a risk to people and structures even when the perimeter of a fire is not in the immediate vicinity.

A major focus of LACoFD is fire prevention, which includes a brush clearance program, a fuel modification program, and a Schools and Institutions Special Unit, which conducts annual fire/life safety inspections in all public schools.[36] These inspections ensure that fire alarms and evacuation plans are in good working order.

Further, Section 118 of the Santa Clarita Building Code specifies construction requirements for any structure added or modified within a Fire Hazard Zone. Code provisions include specific requirements for roofing, wall covering, exterior windows and doors, and vents to mitigate fire risk. The proposed Project would implement defensible space standards per Public Resources Code (PRC) Section 4291, which requires 100 feet of defensible space around homes and structures.[37]

The proposed Project would also implement current California Building Code (CBC) and Santa Clarita Building Code standards with the goal of reducing the spread of fires if one were to occur on or near the Project site. Additionally, the campus would implement safety measures included in the Santa Clarita Hazard Mitigation Plan and the LA County All Hazards Mitigation Plan.

The project would not exacerbate wildfire hazards and would not create conditions that would expose project occupants to pollutant concentrations from a wildfire. Impacts would be less than significant.

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34 The Signal. *Sulphur Springs Union School District announces Tick Fire Closures.* October 27, 2019. Available online at: https://signalscv.com/2019/10/sulphur-springs-union-school-district-announces-tick-fire-closures/#:~:text=Sulphur%20Springs%20Union%20School%20District%20officials%20announced%20schools%20will%20be,stay%20closed%20for%20one%20week., accessed September 25, 2020.

35 United States Geological Survey. *Tick Fire Preliminary Hazard Assessment.* Available online at: https://cadoc.maps.arcgis.com/apps/webappviewer/index.html?id=bc48ad40e3504134a1fc8f3909659041, accessed September 27, 2020.

36 Los Angeles County Fire Department. *Fire Prevention.* Available online at: https://fire.lacounty.gov/fire-prevention/, accessed September 30, 2020.

37 Defensible space is a buffer intentionally created between a building and the grass, trees, shrubs, or other wildland that surrounds it

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 is located in a Local Responsibility Area partially on land classified as a VHFHSZ. The new buildings would require new connections to existing water, sewer, electrical, and telecommunications infrastructure. On-site electrical lines and utilities would be underground. The design and implementation of utility improvements would be interviewed and approved by the State Fire Marshal to ensure the project is compliant with all applicable design standards and regulations.

During peak wildfire season where high winds and low humidity may occur, Southern California Edison (SCE), the electrical utility that serves the project area, may preemptively shut off power to customers in wildfire-prone areas as a precautionary measure. SCE aims to notify customers up to two days in advance of implementing Public Safety Power Shutoffs (PSPS) depending on weather forecasts.[38] This measure is taken to prevent utility lines from sparking a fire in areas with dry brush. Customers in the vicinity of the project area experienced a PSPS during the Tick Fire. For some residents, the PSPS hampered evacuation efforts as emergency alerts regarding evacuation orders were not received.[39] However, in the event that a wildfire impacts the project area, the school would likely close before emergency evacuations need to occur. Additionally, school administrators would have emergency backup generators, battery-powered radios, and two-way communications devices to ensure receipt of evacuation notices.

Wildfire-prone areas such as the Project site tend to pose accessibility challenges for vehicular access points due to topography. These roads could face gridlock in the event of a sudden emergency evacuation. Additionally, emergency vehicles need roads wide enough for turn-around space. However, as noted in the Santa Clarita Hazard Mitigation Plan, obstacles associated with evacuation are addressed through collaboration with LACoFD, LASD, the City General Plan, the Unified Building Code, and environmental analysis of individual development projects.

The proposed Project would not include infrastructure that would exacerbate fire risk nor would the proposed Project exacerbate existing infrastructure that will result in impacts to the environment above

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38 Southern California Edison. *Public Safety Power Shutoffs.* Available online at: https://www.sce.com/wildfire/psps, accessed September 28, 2020.

39 Los Angeles Times. *The terrifying experience of escaping wildfire with the power shut off: 'It was pitch black.'* Available online at: https://www.latimes.com/california/story/2019-10-26/power-outages-residents-miss-fire-evacuation-alerts, accessed September 28, 2020.

and beyond what is already analyzed throughout this document. Impacts would be less than significant, and no mitigation is required.

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 with Mitigation. The Project site is relatively flat but flanked by a steep hillside on its eastern boundary. Elevation on campus is approximately 1,700 feet above sea level. There are several single-family homes on the street on the other side of the hill. Surrounding vegetation is dominated by chaparral.

As discussed above, the October 2019 Tick Fire affected the communities surrounding the Project site. Although no reported landslides were attributed to post-fire slope instability, the likelihood of landslides and debris-flow increases after wildfire erodes soil in any given area.[40] Typically, after wildfire spreads through an area and is extinguished, surveys are conducted to determine the stability of terrain surrounding developed areas to determine post-fire debris flow hazards. The United States Geological Survey (USGS) conducts these assessments for select fires in the Western United States. USGS found that the Tick Fire did not pose a likelihood of post-fire debris flow on the Project site. However, the likelihood of debris flow approximately 1,000 feet northeast of the Project site was estimated at between 0 and 20 percent during an intense rainfall event.[41]

Although the Project site is located within a landslide hazard zone, the project itself would not exacerbate existing hazards because it would not result in an increase in student population. To address this potential hazard, the project the design includes a retaining wall will be constructed at the base of the hillside along the site perimeter northeast from the new classroom building. Therefore, impacts would be less than significant. Additionally, the amount of permeable groundcover on the Project site would not substantially change due to the project. Site-specific modeling can also be conducted to determine susceptibility to debris-flow hazards during post-fire events. Examples of measures to reduce the potential for post-fire debris flow may include, but not be limited to, the following:[42]

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40 California Department of Conservation. *Reported California Landslides Map*. Available online at: https://cadoc.maps.arcgis.com/apps/webappviewer/index.html?id=bc48ad40e3504134a1fc8f3909659041, accessed September 27, 2020.

41 United States Geological Survey. *Tick Fire Preliminary Hazard Assessment*. Available online at: https://cadoc.maps.arcgis.com/apps/webappviewer/index.html?id=bc48ad40e3504134a1fc8f3909659041, accessed September 27, 2020.

42 Office of Planning and Research. *Fire Hazard Planning General Plan Technical Advice Series*. Available online at: https://opr.ca.gov/docs/Final_6.26.15.pdf, accessed September 27, 2020.

- Reduce post fire recovery time by replanting native species;
- Ensure fire protection measures enhance sustainability of restoration projects; and
- Ensure reduced future fire risk by removing sufficient dead woody vegetation while retaining reasonable wildlife habitat.

Such measures would be implemented by the agency or jurisdiction responsible for the burn area. Therefore, impacts would be reduced to less than significant with mitigation.

3.2.21 MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to 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, 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. As discussed in **Subsection 3.2.4, Biological Resources**, the proposed Project would not significantly impact any known threatened, endangered, or rare species or their habitats, locally designated species, locally designated natural communities, riparian or wetland habitats. Further, because the site and surrounding area is already developed, implementation of the Project would not impact the habitat or population of the Project site and the surrounding area, the Project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in **Subsection 3.2.5, Cultural Resources**, and **Subsection 3.2.7, Geology and Soils**, the Project would not impact historical resources and potential impacts related to archaeological and paleontological resources would be less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

No Impact. Based on the proceeding discussions, no significant impacts were identified for the environmental factors analyzed above. As the proposed Project would not result in any unmitigated significant impacts, there would be no cumulative impacts. No impact would occur and no further analysis is required.

c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact. As identified throughout the analysis, the proposed Project would not have an environmental effect that would cause substantial adverse effects on human beings directly or indirectly. Impacts would be less than significant and no further analysis is required.

4.0. LIST OF PREPARERS

Impact Sciences, Inc., has prepared this environmental document under contract to the lead agency. Persons directly involved in the review and preparation of this study include:

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