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INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

Paradise Canyon Elementary School Modernization Project

Prepared for:

La Cañada Unified School District
4490 Cornishon Avenue
La Cañada Flintridge, CA 91011

March 2023

PROJECT INFORMATION SHEET

1.	**Project Title**	Paradise Canyon Elementary School Modernization Project
2.	**CEQA Lead Agency and Address**	La Cañada Unified School District 4490 Cornishon Avenue La Cañada, CA 91011
3.	**Contact and Phone Number**	Harold J. Pierre, P.E., Program Manager (818) 952-8077
4.	**Project Applicant**	La Cañada Unified School District
5.	**Project Location**	471 Knight Way (northeast corner of Gould Avenue) La Cañada Flintridge, CA 91011
6.	**Assessor's Parcel Number**	APN 5817-007-902
7.	**Project Site General Plan Designation**	Public
8.	**Project Site Zoning Designation**	Public/Semi-public (PS)

9. Surrounding Land Uses and Setting

Low-density residential development is located to the north and east, very low-density residential development and open space (Gould Canyon Channel and trail) uses are to the west across Gould Avenue, and very low- and low-density residential uses are to the south across Knight Way.

10. Description of Project

The proposed Project involves the construction and use of an approximately 22,000-square-foot, two-story classroom building (containing 20 classrooms, restrooms, a conference room, and storage) and an additional approximately 5,600-square-foot, single-story classroom building (containing five classrooms, restrooms, and storage) to replace 15 portable classroom buildings, one modular building (four classrooms), and one site-built classroom building (two classrooms); renovation of 14 existing classrooms; minor improvements to library, cafeteria, and administration buildings; exterior painting; upgrade of communication systems and fire alarm system; removal of on-site trees and planting of new trees; repairs and improvements to site utilities, playground, landscaping, and pedestrian walkways; and minor parking lot improvements consisting of installation of signage compliant with the American with Disabilities Act (ADA) and assigning/painting spaces for electric vehicles. In addition, to accommodate school uses during construction, the Project includes installation of temporary portable classrooms on-site. The proposed

modernization activities, including the construction of the replacement classroom buildings, would not change the capacity of the school or affect the school programming.

11. Selected Agencies whose Approval is Required

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

- California Department of Education – School Facilities Planning Division
- California Department of General Services – Division of State Architect
- Los Angeles County Fire Department
- California Geological Survey
- California Regional Water Quality Control Board - Los Angeles
- South Coast Air Quality Management District
- Department of Toxic Substances Control

12. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, has consultation begun?

The La Cañada Unified School District initiated the Assembly Bill 52 consultation process, and sent letters to seven tribes on September 30, 2022, and October 3, 2022, asking if they wished to consult with the District. On October 5, 2022, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) responded to request consultation. Following additional correspondence with the District to schedule a consultation meeting, in a correspondence dated October 14, 2022, the Kizh Nation stated they will follow up with available times and dates. However, no further communications have been received as of December 7, 2022. In accordance with Public Resources Code Section 21080.3.1(b), the consultation process has been completed.

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1. INTRODUCTION

1.1 DOCUMENT OVERVIEW

Michael Baker International prepared this Initial Study (IS) for the La Cañada Unified School District (District) pursuant to the California Environmental Quality Act (CEQA) to assess whether there may be significant environmental impacts from the proposed Paradise Canyon Elementary School Modernization Project (Project). Based on the responses to the IS checklist questions, the District finds a Mitigated Negative Declaration (MND) is the appropriate level of CEQA environmental documentation. This MND concludes that there was no substantial evidence that there may be significant environmental impacts, or, if there was a potentially significant impact, feasible mitigation measure(s) have been identified that would avoid or mitigate the potential impacts to a less than significant level.

1.2 LEAD AGENCY

The District is the Lead Agency for this Project pursuant to CEQA and implementing regulations.[1] The Lead Agency has the principal responsibility for implementing and approving a project that may have a significant effect on the environment. The District, as Lead Agency, is responsible for preparing environmental documentation in accordance with CEQA to determine if approval of the Project and subsequent construction and operation would have a significant impact on the environment. As defined by Section 15063 of the CEQA Guidelines, an IS is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration (ND), or MND would be appropriate as the necessary environmental documentation and clearance for the proposed Project.

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

- Provide the Lead Agency with information necessary to decide if an EIR, ND, or MND should be prepared.
- Enable a Lead Agency to modify a project to mitigate adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a ND or MND.
- Assist in the preparation of an EIR, if required, by focusing the EIR on adverse effects determined to be significant, identifying the adverse effects determined not to be significant, explaining the reasons for determining that potentially significant adverse effects would not be significant, and identifying whether a program EIR, or other process, can be used to analyze adverse environmental effects of the project.
- Facilitate an environmental assessment early during project design.

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

- Provide documentation in the ND or MND that a project would not have a significant effect on the environment.
- Eliminate unnecessary EIRs.
- Determine if a previously prepared EIR could be used for the project.

In cases where no potentially significant impacts are identified, the Lead Agency may issue an ND and no mitigation measures would be needed. Where potentially significant impacts are identified, the Lead Agency may determine that mitigation measures would adequately reduce these impacts to less than significant levels. The Lead Agency would then prepare an MND for the proposed project. If the Lead Agency determines that individual or cumulative effects of the proposed project would cause a significant adverse environmental effect that cannot be mitigated to less than significant levels, then the Lead Agency would require an EIR to further analyze these impacts.

1.3 OTHER AGENCIES

Other public agencies are provided the opportunity to review and comment on the IS/MND. Other public agencies could include:

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

1.4 CONTENTS

CEQA Guidelines Section 15063(d) identifies the following specific contents of an IS:

- A description and the location of the project.
- An identification of the environmental setting.

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

- 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.
- A discussion of measures to mitigate significant adverse environmental effects, if any.
- An examination of existing zoning, plans, and other land use controls that apply to the project.
- The names of persons that participated in the preparation of the document.

1.5 ORGANIZATION OF INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

This IS/MND is organized to satisfy CEQA requirements. The IS/MND includes the following sections:

- Section 1, Introduction, which identifies the purpose and scope of the IS/MND.
- Section 2, Environmental Setting, which describes location, existing site conditions, land uses, zoning designations, topography, and vegetation associated with the Project site.
- Section 3, Project Description, a description of the proposed development, Project phasing during construction, and discretionary actions for the approval of the Project.
- Section 4, Environmental Checklist, which presents checklist responses for each resource topic to identify and assess impacts associated with the proposed Project, and proposes mitigation measures, where needed, to render potential environmental impacts less than significant, where feasible.
- Section 5, References, which includes a list of documents cited in the IS/MND.
- Section 6, List of Preparers, which identifies the persons who contributed to preparation of the IS/MND.

1.6 FINDINGS FROM THE INITIAL STUDY

1.6.1 No Impact or Impacts Considered Less than Significant

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

- Aesthetics
- Agricultural Resources
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning

- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

1.6.2 Impacts Considered Less than Significant with Mitigation Measures

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

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

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

- Appendix A Air Quality/GHG CalEEMod Input and Output Data
- Appendix B Arborist Tree Inventory
- Appendix C Cultural, Historic, and Paleontological Resources Assessment
- Appendix D Energy Calculations
- Appendix E Geotechnical Investigation Report
- Appendix F1 Phase I Environmental Site Assessment
- Appendix F2 Asbestos/Lead-Based Paint Inspection Report
- Appendix G Noise Technical Results

2. ENVIRONMENTAL SETTING

2.1 PROJECT SITE

The Project site is the approximately 8.85-acre Paradise Canyon Elementary School campus located at 471 Knight Way in the City of La Cañada Flintridge in central Los Angeles County (refer to **Figure 2.1-1** through **Figure 2.1-3**). The Project site is located in the Paradise Canyon residential neighborhood, approximately 0.5 miles north of Foothill Boulevard and Interstate (I)-210, and roughly 0.5 miles south and east of the Angeles Crest Highway. The Project site is bordered by Gould Avenue on the west and Knight Way on the south, and at the intersection of the two streets. Gould Canyon Channel, which is a channelized drainage developed as a below-grade culvert, is located on a separate parcel adjacent to the southwest corner of the school property.

The City's General Plan land use designations and zoning in the vicinity of the Project site are listed in **Table 2.1-1**, and shown in **Figure 2.1-4** and **Figure 2.1-5**. The Project site is zoned by the City as Public/Semi-Public (PS) and assigned a General Plan land use designation of Public. The area to the north is zoned as Mixed Use 2 and R-1-5,000; east is zoned as R-1-5,000; south is zoned as R-1-5,000, R-1-20,000, and Open Space; and west is zoned R-1-20,000 and Open Space. Photographs showing the Project area are shown in **Figure 2.1-6.**

TABLE 2.1-1 SUMMARY OF LAND USES AND ZONING

Area	Existing General Plan Land Use	Zoning	Existing Uses
Paradise Canyon Elementary School	Public	Public/Semi-Public (PS)	Educational and Athletic Facilities
North	Low Density Residential (up to 4 du/ac)	Mixed Use 2 and R-1-5,000	Residential
West	Very Low Density Residential (up to 2 du/ac) and Open Space	R-1-20,000 and OS (Open Space)	Residential and Recreation
South	Very Low Density Residential (up to 2 du/ac) and Low Density Residential (up to 4 du/ac)	R-1-5,000, R-1-20,000, and OS (Open Space)	Residential and Recreation
East	Low Density Residential (up to 4 du/ac)	R-1-5,000 and OS	Residential

2.2 CAMPUS HISTORY

Paradise Canyon Elementary School was built in 1949 and currently contains 21 buildings and 39 classrooms. The campus has previously undergone modernization, renovation, and expansion work in 1997, 2001, 2002, and 2009, as detailed below:

- 1997 modernization of classrooms, accessible paths and ramps, addition of nine portables, electrical system upgrades, septic system removal and replacement with sewer connection;
- 2001 modernization of portables, new chain-link fencing at playgrounds, and site drainage improvements;

- 2002 renovations to include kindergarten playground, drinking fountains and new fire alarm
- 2009 construction of new multipurpose room
- 2019 construction of lunch shelters and perimeter fencing
- 2020 perimeter landscaping improvements

2.3 EXISTING CONDITIONS

The Paradise Canyon Elementary School campus is currently developed with 21 permanent buildings (including 17 classroom buildings, a main administration building, library, multipurpose building, and cafeteria) and 18 relocatable (portable) buildings, two main playfields located at the northwest and southeast corners, and a tiered lunch shelter. Refer to **Figure 2.3-1** showing the existing campus. The elementary school provides education to children from pre-kindergarten through sixth grade levels, along with after-school programs run by the La Cañada-based nonprofit Child Educational Center.

The campus has a main entrance and student drop-off/pickup area located in the southern portion of the campus along Knight Way, which includes a dedicated turnout road from Knight Way, and a second drop-off/pickup location along Gould Avenue. There are two small parking lots located at the southeast and southern portions of the campus along Knight Way as shown on **Figure 2.3-1**. Classes begin from 8:10 a.m. through 11:20 a.m. depending on grade and class, and are dismissed from 11:50 a.m. to 3:00 p.m., as further detailed on Table 2.3-1. The District does not provide daycare; however, the Child Educational Center offers daycare on campus before and after school hours. (LCUSD 2019)

TABLE 2.3-1 SCHOOL HOURS

Area	Arrival Times	School Hours
Morning TK and Kindergarten	8:10 a.m.	8:10 a.m. – 11:50 a.m.
Afternoon TK and Kindergarten	11:20 a.m.	11:20 a.m. – 3:00 p.m.
Grades 1-3, Early Birds	7:55 a.m. – 8:10 a.m.	8:10 a.m. – 1:50 p.m.
Grades 1-3, Late Birds	8:55 a.m. – 9:10 a.m.	9:10 a.m. – 2:50 p.m.
Grades 4-6	7:55 a.m. – 8:10 a.m.	8:10 a.m. – 2:50 p.m.

2.4 CLIMATE AND AIR QUALITY

The climate in La Cañada Flintridge is mild and generally warm and temperate, with an annual average temperature of approximately 62.5 degrees Fahrenheit (°F), and annual average total precipitation of approximately 15.8 inches, which occurs mostly during the winter (Climate Data 2022). Winds in this region are generally light.

The Project site is located within the South Coast Air Basin (SCAB), a 6,600-square-mile area encompassing all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Based on regional monitoring data and the National Ambient Air Quality Standards, the SCAB is currently designated as an extreme nonattainment area for 8-hour ozone; attainment for nitrogen dioxide (NO_2);

attainment for carbon monoxide (CO); attainment for particulate matter (PM_{10}); nonattainment for lead; serious nonattainment for particulate matter ($PM_{2.5}$); and attainment for sulfur dioxide (SO_2) (SCAQMD 2017).

The SCAB is currently designated nonattainment for ozone and particulate matter PM_{10} and $PM_{2.5}$, and attainment for CO, NO_2, sulfates, lead, and hydrogen sulfides under the California Ambient Air Quality Standards (SCAQMD 2017).

2.5 GEOLOGIC AND SOIL SETTING

The Project site is located within the eastern Transverse Ranges geomorphic province of Southern California in the westernmost portion of the San Gabriel Valley. The Transverse Ranges are characterized by east–west trending ranges separated by alluviated, broadly synclinal valleys, narrow stream canyons, and prominent faults. The San Gabriel Valley is a sediment-filled, east-trending structural trough situated between the south flank of the San Gabriel Mountains to the north and Verdugo Hills and San Rafael Hills to the south. The Sierra Madre fault zone, which is an extension of the south branch of the San Gabriel fault, is trending northwest approximately 190 feet northeast of the school campus. The Sierra Madre fault zone at this location is not in an Alquist-Priolo Act Earthquake Fault Zone; however, the Los Angeles County General Plan Safety Element does classify it as active. The Sierra Madre fault zone consists of steep, north-dipping thrust and reverse faults along the range front of the San Gabriel Mountains.

2.6 PROJECT TOPOGRAPHY AND HYDROLOGY

The school campus is located in the foothills along the base of the Angeles National Forest, and the general topography of the site slopes downward from north to south, with a significant grade change along Gould Avenue. The existing buildings on campus sit at multiple terraced levels defined by the natural topography, from the highest point of 1,334 feet above mean sea level at the northwest corner to the lowest point of 1,290 feet at the southeast corner.

The existing slopes of the hardscape between the buildings at the asphalt play courts and within the parking lot vary from 1 percent to 10 percent. Surface water drainage of the site appears to be by sheet flow along the existing ground contours to the adjacent City streets. Existing catch basins, trench drains, and concrete gutters throughout the site capture the site drainage and discharge it out to the streets by curb drains. (GGA 2022)

2.7 BIOLOGICAL SETTING

The Project site is located in a residential setting that provides low habitat value for special-status plant and wildlife species. The literature review and reconnaissance biological survey conducted on October 19, 2022, assessed that the Project site contains structures, sidewalks, and multiple paved surface areas with impervious surfaces, and lacks suitable soils, biological resources, and physical features to support any candidate, sensitive, or special-status plant and animal species. Additionally, no special-status plants or wildlife were observed within the Project site during the field survey. Therefore, no direct or indirect impacts on special-status plant or animal species are anticipated as a result of the Project activities.

3. PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

As mentioned, the approximately 8.85-acre Paradise Canyon Elementary School was built in 1949 and has undergone several modernization, renovation, and expansions since. During the 2021-2022 school year, the school had an enrollment of approximately 680 students in grades pre-kindergarten (special day class and deaf and special education local plan areas hard of hearing programs) through sixth grade (California Department of Education 2022). The campus includes facilities that are over 50 years old as well as more recently constructed structures, including relocatable/portable classroom buildings. Refer to **Figure 2.3-1**, which shows the existing conditions at the Project site.

In September 2016, the District commenced a Facilities Needs Assessment at each school in the District to evaluate the condition of the facilities and program needs to support the educational program goals for improved student educational achievements. The results of the Facilities Needs Assessment were incorporated into the draft master plans developed for the school sites, including Paradise Canyon Elementary School, and from December 2016 through February 2017, multiple meetings were held to review the draft master plans with the school site committees and District leadership to ensure the accuracy and relevance of the plans for the school. Stakeholders were selected to serve on a School Site Committee to provide input on the proposed modifications and enhancements shown on the draft site master plans. The master plans were then revised to reflect this input, resulting in the District's Facilities Master Plan (LCUSD 2017), which identifies a vision for development for the next 10 to 15 years. The Facilities Master Plan contains site master plans for individual schools within the District. As projects move forward, design teams will plan individual aspects of the projects recommended in the plan (LPA 2017).

The proposed Project would provide new classroom buildings (one approximately 22,000-square foot, two-story classroom building containing 20 classrooms and one approximately 5,600-square-foot single-story classroom building containing 5 classrooms) to replace 15 portable classroom buildings, one modular building (four classrooms) and one site-built building (two classrooms). The Project also proposes renovation of 14 existing classrooms, minor improvements to the library, cafeteria, and administration buildings, exterior painting, upgrade of the communication and fire alarm systems, removal and replanting of on-site trees, repairs and improvements to site utilities, playground, landscaping, and pedestrian walkways, and minor parking lot improvements consisting of installation of ADA-compliant signage and assigning/painting spaces for electric vehicles. Additionally, during construction, the Project would install and use temporary portable classrooms in order to continue educational programming.

3.2 PROJECT LOCATION

The Project site is the approximately 8.85-acre Paradise Canyon Elementary school campus located at 471 Knight Way in the City of La Cañada Flintridge in central Los Angeles County (refer to **Figure 2.1-1** through **Figure 2.1-3**). The Project site is located in the Paradise Canyon residential neighborhood, approximately 0.5 miles north of Foothill Boulevard and I-210, and roughly 0.5 miles south and east of the Angeles Crest Highway. The Project site is bordered by Gould Avenue on the west and Knight Way on the south, and at the intersection of the two streets. Gould Canyon Channel, which is a channelized drainage developed as a below-grade culvert, is located on a separate parcel adjacent to the southwest corner of the school

property. Refer to Section 2.0 of this document for a detailed description of the project's existing environmental setting.

3.3 PROPOSED PROJECT

The various components of the proposed Project are described in detail below. The existing school facilities are shown on **Figure 2.3-1**, and the Project site plan showing the proposed improvements is provided on **Figure 3.3-1**. Table 3.3-1 provides details on the proposed modernization activities.

Removal of Existing On-site Portables and Building

As part of the proposed Project, 15 portable and modular classrooms would be removed or demolished, and one approximately 2,800-square-foot single-story classroom building (site-built) would be demolished. The portable and modular classrooms are located along the western portion of the campus along Gould Avenue, and along the northern boundary of the campus. The single-story classroom building was built in 1966 and is located at the center of the campus directly west of the library. Refer to **Figure 2.3-1**.

Construction of New One- and Two-Story Classroom Buildings

The Project proposes to construct one two-story building and one one-story buildings using modular techniques that have been successfully implemented in other recent District projects. The modular construction would reduce the duration of construction because the majority of the building fabrication occurs at the factory prior to transport to the site. The proposed new approximately 22,000-square-foot two-story classroom building would be located on the west end of the campus just south of the existing playground in the northwest corner of campus (**Figure 3.3-1**). The building would be a permanent building constructed of prefabricated modules with a two-story, east–west oriented wing and a one-story north–south oriented wing running along the west property line.

The approximately 5,600-square-foot single-wing, single-story building is proposed along the northern property line. Standard spread footing type foundations would be used and no pile driving is anticipated for any of the building foundations.

The on-site construction work related to the installation of the modular buildings includes demolition of paving, earthwork and grading, construction of concrete foundation, extension and connection of underground utilities such as electrical, communications systems, sewer, storm drain, fire water and new paving. On-site construction also includes exterior finishes and cladding of buildings with stucco and/or brick, and roofing system. Refer to **Figure 3.3-2** showing the architectural renderings of the Project.

Interim Housing for Students and Staff

The Project would remove 15 portable classrooms, one modular classroom building, and one fixed classroom building on the campus to construct the new classroom buildings. Students and school staff currently using the existing classrooms on-site that would be demolished or removed would be temporarily relocated to interim housing on campus such that school would continue with normal operations during Project construction. The interim housing would consist of 14 to 16 temporary portable modular classrooms at 960 square feet each (two classrooms will be 1,440 square feet each), and one

restroom building for a total building area of approximately 16,800 square feet. Refer to **Figure 3.3-4** showing the Project construction stages.

The interim housing classrooms would be located at the playfield at the southeast corner of the campus. The temporary classrooms would occupy the southern half of the playfield, which is currently a grassy field. During construction, the existing baseball diamond at the northern half of the playfield would be grown over with grass to provide more grassy areas for the children to play. Once construction of the proposed permanent classroom buildings and the renovation of the existing classroom buildings are completed and the interim housing is no longer needed, the temporary portables would be removed from the playfield. Then the playfield, including the baseball diamond, will be restored and returned to its use for physical education and recreational uses. Refer to **Figure 3.3-1** showing the location of the proposed interim housing.

Lighting

Outdoor lighting would be upgraded to dimmable, light-emitting diode (LED) to provide adequate pathway lights for pedestrians on campus. Exterior lighting illumination levels would be designed in accordance with *The Lighting Handbook*, 10th Edition (Illuminating Engineering Society of North America 2011) and the lighting power density shall comply with the California Building Energy Efficiency Standards, Title 24. Lighting would be controlled via timeclock by the campus energy management system. Pedestrian lighting poles would be 12 feet to 14 feet high.

Renovation of Existing Buildings

The existing buildings remaining in use on the campus (administration, multipurpose/cafeteria, 14 classrooms, and library) would be modernized with repairs and replacement of mechanical, plumbing, electrical, lighting, fire alarm and other communications systems, flooring, wall finishes, and casework. The mechanical, plumbing, and electrical systems were previously identified as requiring cleaning or repairs, or reaching the end of their economic life, and would be fixed or replaced with more energy-efficient and safer systems. Table 3.3-1 provides details on the proposed modernization activities.

TABLE 3.3-1 SUMMARY OF PROPOSED IMPROVEMENTS

Existing Campus Building Area (sf)	Total New Construction (sf)	Total Building Area Demolition (sf)	Renovation Area (sf)	Completed Campus Building Area (sf)
56,587	25,390	22,080	35,181	59,897

Outdoor Spaces and Walking Paths

The existing campus has topographic and elevation grade differences which require the installation of ramps to meet ADA requirements. The existing core of the campus is the lawn just north of the main entrance. This space is used to accommodate gatherings or various school events and serves as the central anchor between the classroom buildings. The proposed improvements, including the removal of the existing classroom building next to the library, would extend the central gathering area farther north to provide further use of outdoor space and increase the engagement with the school campus. Refer to

Figure 2.3-1 and **Figure 3.3-1** showing the existing and proposed site layout, and **Figure 3.3-2** showing the appearance of the Project.

The demolition of existing structures, construction of the new buildings, and other proposed site improvements such as underground utility work would provide the opportunity to renovate the pedestrian pathways throughout the campus. The new construction would consolidate classrooms and increase open space, which would facilitate pedestrian circulation and improve the campus path of travel. During the Site Assessment, a number of ADA deficiencies were identified on campus. The architect and engineer team has determined that these areas would be improved where feasible and/or required by the Division of the State Architect.

The new construction would open an area that, with planters, will create outdoor classrooms between the new two-story building and the existing pre-kindergarten classrooms. These areas would have benches, small-scale amphitheater seating, tables, planters, and landscaping, with a shaded corridor. Additional outdoor classroom areas would be created along the northern property line with use of planters. Seating options would vary, with more open areas for programs like study and group work.

Playground Improvements

To the north of the campus core, ramp stairs would connect the classroom area to the upper playground. The playground would be refinished with fresh striping and new playground equipment as required.

Landscaping

The Project proposes the addition of new planting areas that include use of planters, trees, and other landscaping features. The Project would remove approximately seven existing trees currently located along the western boundary and approximately 30 trees in the interior of the campus. Coast live oaks removed would be replaced in a suitable area on the campus.

Landscaping using planters and drought-tolerant trees and shrubs would be used to create the outdoor classroom areas. Refer to **Figure 3-4** showing the proposed outdoor amenity landscaping.

Site Utility Improvements

The school campus has been fully developed and the property has existing utility service connections for water, wastewater, and electricity. The school site is anticipated to require new utility connections to existing infrastructure adjacent to the school campus for sewer, storm drain, and electricity to support the site renovations. Additionally, the Project proposes upgrades and rerouting to the on-site utility infrastructure and connections to the new buildings and the construction interim housing. These are described in further detail in the following sections.

Sewer

The school campus currently connects into a public municipal sewer line along Knight Way. The public municipal sewer lines are maintained by the City of La Cañada Flintridge.

It is anticipated that the new buildings would connect into the existing on-site main sewer line. Additionally, depending on the extent of reconfiguration of existing buildings, upsized points of

connections may be required. In the case that the proposed construction may conflict with existing utilities, the on-site sewer lines would be rerouted outside of the building footprint.

Electricity

The campus is currently served by two existing Southern California Edison metered services. To serve the campus modernization work that includes power, technology, and HVAC system upgrades, a new electrical connection would be installed that would supply the campus. The service connection would be made from an existing pole located adjacent to the school property at the northwest corner of the property. The Project will construct a new electrical enclosure on-site. Refer to **Figure 3-2**, *Project Site Plan*. The proposed electrical distribution would consist of a combination of new and existing underground conduits, new distribution boards, and power distribution centers to provide each building with a single means of disconnect.

Water

The school campus is currently served by existing domestic water meters along the school perimeter at Gould Avenue and at Knight Way. The meter on Gould Avenue may be moved to a new location, also along Gould Avenue, to accommodate the Project.

Storm Drain

The school has a storm drain system that captures stormwater in catch basins throughout the campus and conveys stormwater flows to an asphalt swale where the stormwater then flows towards the playfield located at the southeast portion of the site, and eventually to the gutter in Knight Way. Stormwater on the western portion of the site is discharged to a swale through a culvert at the southern property boundary along Knight Way.

The Project's disturbed area is expected to exceed 1 acre; therefore, the Project is required to comply with California's Construction General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, which limits the allowable discharge into existing storm drain facilities.

The storm drain system serving the Project area would conform to the State Water Board Construction General Permit post-construction requirements by incorporating design elements with the following considerations:

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

3.4 CONSTRUCTION ACTIVITIES AND SCHEDULE

Construction activities for the proposed Project are anticipated to begin during summer 2023 and last approximately 35 months (3 years). Construction is expected to be completed in six stages, as described in Table 3.4-1 below, and presented on **Figure 3-5**, *Project Construction Stages.*

TABLE 3.4-1 CONSTRUCTION STAGE SCHEDULE

Construction Task	Description	Duration
Stage 1. Mobilization and Site Utilities and Interim Housing	Construction mobilization and extending power to the playfield to the southeast for the interim housing. Delivery and installation of 14 interim housing modules.	3 months
Stage 2. New West Building	Demolition of portable classroom buildings on the west side of campus, tree removal, and construction of new west building (2 story building) and surrounding outdoor amenity areas.	14-16 months
Stage 3. Modernization of West Buildings	Modernization of the existing buildings at the southwest portion of the campus.	6 months
Stage 4. Modernization of North Buildings	Modernization of the existing buildings located in the north-central portion of the campus.	6 months
Stage 5. New North Building	Demolition of portable classroom buildings on the north side of campus and construction of new 1-story building and surrounding outdoor amenity areas.	13 months
Stage 6. Restore Playfields	Removal of the interim housing and playground upgrades and restoration at the northwest and southeast portions of the campus.	4 months

As mentioned, the Project's proposed interim housing and permanent one- and two-story buildings would be constructed and assembled using prefabricated modular units. Delivery of both the temporary and permanent building module units would require a temporary closure of one lane on Gould Avenue. This temporary lane closure would be scheduled in coordination with the City's Public Works/Traffic Engineer.

The interim housing modules would be delivered from Perris, California, approximately 95 miles from the school via oversized haul trucks. The delivery of the 14 modules would occur outside of peak traffic hours and would follow I-215 from Perris, to I-15, to I-60, to I-71, and then I-210 into La Cañada Flintridge. Following new building construction and existing building renovations, the temporary interim housing will be removed and hauled back to Perris.

The permanent building modular units would be delivered from Manteca, California, and may travel up to 500 miles to the City. Similar to the temporary interim housing unit deliveries, the permanent building modular units are prefabricated and would be transported as an oversized truck load. The delivery of the modular units would occur outside of peak traffic hours and would generally follow I-5 from Manteca to State Route 118 to I-210 into La Cañada Flintridge. Once delivered, a 300-ton crane will be used to offload the modular units and position onto the foundations.

It is anticipated that the following pieces of construction equipment would be used on-site: two backhoes, one skip loader, one excavator, one grader, one vibrating smooth-wheeled roller, two light soil compacting pieces of equipment, one 300-ton crane (for off-loading and placement of permanent modular buildings), concrete trucks, and dump trucks.

The Project new construction would generally proceed with demolition of existing structures, earthwork, including grading and utility infrastructure removal and installation, and then construction of the new buildings and landscaping and outdoor amenity areas. The modernization work on the existing buildings would generally occur on the interior of the buildings; however, external work would be needed for grading, utility infrastructure work, pathway renovations, and exterior painting. Debris would be disposed of at an appropriate landfill or recycling facility that accepts construction and demolition waste.

Access would be provided via Gould Avenue during the construction of the new building on the west side of campus and via Knight Way during the construction of the interim housing. It is anticipated that the number of employees at peak demand during Project construction would be between 30 and 35. Between 15 and 20 construction personnel are anticipated to be on the Project site for those construction phases that do not require the peak number of employees. Construction staging would occur at the upper playground and the construction workers would park at the upper playground and along the street.

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

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

Grading

The Project would require earth disturbance/cut of approximately 4,820 cubic yards. Approximately 4,640 cubic yards of soil would be exported. In addition, approximately 2,000 cubic yards of building materials (i.e., asphalt, concrete and other debris) would be removed and disposed. Approximately 3,500 linear feet of trenches (between 3 and 6 feet deep) would be dug for the proposed Project for utility infrastructure.

Project operators would dig trenches of the following sizes per respective utility: storm and sewer lines would be 5-6 feet deep and 3 feet wide; and water and electrical trenches would be 3 feet wide and 3 feet deep. Water and electrical lines would be distributed throughout the campus so that all buildings have appropriate utility infrastructure. Heavy equipment to conduct these activities would be the same as those used for the demolition and construction operations.

3.5 PROJECT OPERATIONS

Following construction, the school campus would operate with the use of the new approximately 22,000-square-foot, two-story classroom building, the new approximately 5,600-square-foot, single-story classroom building, 14 renovated classrooms, outdoor amenity areas, and improved walkways. The modernization activities, including the replacement new buildings, would not change the capacity of the school or affect the school programming.

3.6 DISCRETIONARY ACTIONS

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

Agency	Permit or Approval
California Division of the State Architect	Approval of plans and specifications
California Geological Society	Review of geotechnical information
California Regional Water Quality Control Board – Los Angeles	Issuance of Waste Discharger Identification permit
South Coast Air Quality Management District	Rule 1403 Compliance; Procedure 5 approval
California Department of Education	Approval of plans (only if project is subject to School Facility Program regulations)

4. ENVIRONMENTAL CHECKLIST

Environmental Factors Potentially Affected

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

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agricultural Resources	☒ Hazards and Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology and Water Quality	☒ Transportation
☒ Biological Resources	☐ Land Use and Planning	☐ Tribal Cultural Resources
☒ Cultural Resources	☐ Mineral Resources	☐ Utilities and Service Systems
☐ Energy	☒ Noise	☐ Wildfire
☒ Geology and Soils	☐ Population and Housing	☒ 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.

Melissa M Greenwood — 3/22/23

Signature — Date

Melissa M. Greenwood — La Cañada Unified School District

Printed Name

Evaluation of Environmental Impacts

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

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

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

(4) "Negative Declaration: Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to less than significant level.

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

   (a) Earlier Analyses Used. Identify and state where the earlier analysis is available for review.

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

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

(6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated. A source list should be attached and other sources used or individuals contacted should be cited in the discussion.

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

(8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

(9) The explanation of each issue should identify:

(a) The significance criteria or threshold, if any, used to evaluate each question; and

(b) The mitigation measure identified, if any, to reduce the impact to less than significant.

4.1 AESTHETICS

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

Overview

A "visual environment" includes the built environment (e.g., development patterns, buildings, parking areas, and circulation elements) and natural environment features (e.g., hills, vegetation, rock outcroppings, drainage pathways, and soils). Views are characterized by visual quality, viewer groups and sensitivity, duration, and visual resources. Visual quality refers to the general aesthetic quality of a view, such as vividness, intactness, and unity. Viewer groups identify who is most likely to experience the view. Duration of a view is the amount of time that a particular view can be seen by a specific viewer group. Visual resources refer to unique views, and views identified in local plans, from scenic highways, or of specific unique structures or landscape features. While the District is not subject to the City's General Plan, this analysis incorporates the General Plan information and consideration of the General Plan goals and policies to provide a comprehensive analysis of aesthetic resources.

Discussion of Impacts

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

Less than Significant Impact. The City's General Plan Conservation Element identifies a number of scenic resources within and surrounding the City of La Canada Flintridge. However, no designated scenic vistas are identified.

Based on General Plan Conservation Element Figure CNE-3, Topographic and Visual Resources, City-designated scenic corridors in the Project vicinity include Interstate 210 (I-210),

approximately 0.4 miles south/southwest of the Project site, and Angeles Crest Highway (State Route [SR]-2), approximately 0.54 miles west/northwest of the Project site. In addition, SR-2 is an "officially designated" State Scenic Highway north of the City boundary and approximately 1.3 miles north of the Project site, and it is considered an "eligible" State Scenic Highway within the City from the I-210 freeway north to the City boundary (Caltrans n.d.), approximately 0.6 mile west of the school campus. Views from the I-210 and SR-2 corridors are characterized by prominent ridgelines situated within the northern and southwestern portions of the City, as well as lower lying knolls in the southeastern portion of the City.

Limited views to the Project vicinity from I-210 would occur at varying distances as one travels along the roadway. Views experienced (looking north to the Project area) would be of the existing urbanized development along the valley floor, with the mountains of the Angeles National Forest in the background. Given the distance from this roadway, combined with existing intervening development and mature landscaping present within the valley, it is anticipated that the proposed improvements on the Project site would not be discernable to travelers along this roadway. As such, it is not anticipated that the Project would have a substantial adverse effect or otherwise degrade any scenic vistas or views of other scenic resources from this roadway. Impacts would be less than significant.

Similarly, limited glimpses from SR-2 looking to the Project area may be experienced as one travels along the roadway. Along the valley floor, elevational similarities (level viewing plane), combined with existing development and vegetation, would obscure any views to the Project site. Passengers traveling north on SR-2 ascending the mountains of the Angeles National Forest may have brief intermittent views to the Project vicinity (e.g., looking east/southeast); however, due to viewing angle (viewers would actively need to turn their heads) and other influences such as topography, existing development, and established vegetation, such views would generally be obscured and/or greatly limited. Passengers traveling south along SR-2 may experience limited views of the valley floor from certain vantage points along the road, particularly when descending the mountains. However, it is anticipated that any views of the proposed improvements at the Project site would be indiscernible within the existing urbanized setting of the valley floor, and further influenced viewing angle, intervening development and landscaping, and travel speed. For the reasons above, it is not anticipated that the proposed on-site improvements would have a substantial adverse effect or otherwise degrade any scenic vistas or views of other scenic resources from this roadway. Impacts would be less than significant.

The Project site is located in a developed, residential area with sloping topography and mature trees and other vegetation. Public views within the Project vicinity are generally limited to the immediate area due to intervening topography, existing structures, and the canopies of mature trees, as well as elevational similarities with surrounding lands (e.g., level viewing plane).

Under existing conditions, views to the mountains of the Angeles National Forest are visible in the background, looking north and east from Knight Way in the immediate vicinity of the Project site. However, as the mountains are located at a distance, views to such resources occur across the valley floor and are highly restricted by existing development and established vegetation. Following Project implementation, such views looking north from Knight Way would remain and

would not be substantially altered or further obstructed by the proposed on-site improvements. Further, the existing drive along Knight Way would remain with the Project, thereby retaining the setback and distancing any on-site structures that may potentially interfere with existing sightlines to the mountains. No new structures are proposed that would interfere with or obstruct views from this road looking north or east to the mountains. Similarly, the proposed 2-story structure adjacent to Gould Avenue would not substantially alter or obstruct any existing sightlines to the mountains from Knight Way, due to distance from this roadway and existing intervening mature trees and vegetation. Therefore, no substantial adverse effect on a scenic vista or other scenic resources would result with Project implementation in this regard.

Intermittent views looking northward from Gould Avenue to the mountains of the Angeles National Forest are also afforded from various vantage points along this roadway, although the mountains are generally more visible from this road at vantage points distanced further to the south of the Project site. Views of these mountains within the immediate vicinity of the site are generally obscured, due to the established tree canopies of large, mature trees combined and existing residential development. Project construction would result in location of a new 2-story structure adjacent to Gould Avenue, which would represent an increase in height as compared to on-site structures currently bordering the roadway. However, due to existing viewing conditions that limit visibility of the mountains, the proposed increase in height would not substantially change or further obstruct existing views to the mountains or any other scenic features in the surrounding area from this roadway. No substantial adverse effect on a scenic vista would result with Project implementation in this regard.

In addition to the Angeles National Forest north of the site, other recreational resources in the Project vicinity include the adjacent Gould Canyon Drainage (concrete channel) and Trail adjacent to the school campus on the southeast and Cherry Canyon Park, located approximately 1.7 miles to the southwest across I-210. Further to the southwest, across I-5, lie the Verdugo Mountains Open Space Preserve and Descanso Gardens (approximately 3.8 miles) and Griffith Park (approximately 8 miles). These recreational areas offer a range of public hiking trails and opportunities that may afford views to the valley below, including the Project site, depending on the viewer's vantage point and awareness.

Numerous trails are present within the Angeles National Forest, including the Gould Mesa Trail, Cross Town Trail, Dark Canyon Trail, Gabrieleno Trail, and others. To the northeast within the forest, various other public trails including the Mt. Lowe Trail, Millard Falls Trail, Sunset Ridge Trail, and Chaney Trail, among others. As the school site lies within the foothills of the Angeles National Forest, views from trails within this recreational area would generally occur at a distance of more than one mile, and more commonly, at greater distances as the trails extend within the forest. Recreationalists using the trails may have intermittent views to the site from certain vantage points, particularly as a trail ascends/descends along the southern foothills where views across the valley may be afforded. However, due to distance, intervening topography, and established vegetation, it is not anticipated that any existing public views from these trails would be substantially altered with the proposed improvements at the elementary school site. Further, the Project site supports the existing school facilities which are currently visible to trail users. It is anticipated that as viewed from a distance, the Project would not substantially obstruct, interrupt,

or detract from views from these public trails and that the proposed improvements would visually blend with the existing development pattern along the valley floor. Further, it is anticipated that many hikers experiencing such views from the trails would not be from the local area and would therefore be less observant or susceptible to such changes in the visual landscape. Therefore, no substantial adverse effect on a scenic vista or other scenic resources would result with Project implementation in this regard.

Similarly, views of the Project site from public trails within the Cherry Canyon Park and Descanso Gardens to the southwest may also be afforded. This area includes numerous hiking trails that may provide views across the valley to the north at certain vantage points. However, similar to views from trails in the Angeles National Forest, it is anticipated that any views to the proposed improvements at the school site would be substantially diminished due to distance, intervening topography, established vegetation, and viewer orientation along the trails. It is further anticipated that the proposed on-site improvements would visually blend in with existing development along the valley floor and would not substantially alter or degrade public views to the site from trails from within this park. Therefore, no substantial adverse effect on a scenic vista or other scenic resources would result with Project implementation in this regard.

In summary, the Project as proposed would introduce new structures and other elements into the existing visual landscape. However, the Project has been designed to consider the existing visual character of the school site and surrounding neighborhood. Future improvements on the Project site, which currently supports similar school facilities, are not anticipated to result in a substantial change in or obstruction of existing public views to any scenic resources. Further, views to the site from any scenic vantage points in the surrounding area would generally occur at a distance and would be obscured or otherwise influenced by distance, intervening development and/or established landscaping, and viewer angle and location.

For the reasons above, it is not anticipated that the Project would have the potential to substantially detract from a scenic vista, including views from public trails within surrounding designated recreational areas. Impacts would be less than significant.

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

No Impact. As stated, Angeles Crest Highway (SR-2) is an "officially designated" State Scenic Highway north of the City boundary and it is considered an "eligible" route within the City from the I-210 freeway north to the City boundary (Caltrans n.d.). It is also a City-designated scenic corridor, as identified in the General Plan Conservation Element (City of La Cañada Flintridge 2013a). I-210 is not identified as a State scenic highway; however, it is a City-designated scenic corridor.

As discussed above under threshold 4.1-a, views to the Project site from SR-2 and I-210 are not readily afforded due to intervening development and established landscaping, combined with elevational differences. As such, the proposed improvements would not adversely affect views to the site from these roadways.

The subject site is currently developed with the existing Paradise Canyon Elementary School facilities; no rock outcroppings or historic buildings are present on-site. The Project proposes the addition of new planting areas that include use of planters, trees, and other landscaping features and would remove approximately seven existing trees currently located along the western boundary at Gould Avenue and approximately 30 trees from the interior of the campus. Although the trees enhance the visual appearance of the subject site under existing conditions, the trees identified for removal with the Project are not designated scenic resources and would be replaced with the proposed landscaping improvements, including replacement of coast live oaks.

As such, the Project would not damage any scenic resources within a designated or eligible state scenic highway. No impact would occur in this regard.

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

Less than Significant Impact. The Project site is located in a developed, residential portion of the City. As such, for the purpose of this analysis, the Project site is considered an urbanized area and the Project's potential to conflict with applicable zoning and other regulations governing scenic quality are considered. **Table 4.1-1**, *Consistency with Regulations, Goals, and Policies Related to Scenic Quality,* analyzes the Project's consistency with such regulations.

Operation

The proposed Project includes modernization and replacement of existing buildings and facilities on the Paradise Canyon Elementary School campus. Section 4.11, Land Use and Planning, discusses the Project's consistency with the zoning regulations for the site, and as concluded, the Project would be consistent with such regulations. Further, as discussed in **Table 4.1-1**, the Project site is not situated within views of a designated prominent ridgeline and would therefore not significantly impact identified such visual resources. Further, although tree removal is proposed, the Project would install new trees on-site. New planting areas would include use of planters, trees, and other landscaping features. Landscaping using planters and drought-tolerant trees and shrubs would be used to create the outdoor classroom areas. Refer to **Figure 3-4** showing the proposed outdoor amenity landscaping.

It is acknowledged that modernization improvements at the Paradise Canyon Elementary School campus are subject to review by the California Division of the State Architect (DSA), which issues the building/construction permits for projects on campus. The Project would be developed in compliance with DSA requirements and would not conflict with regulations governing scenic quality. Such oversight would ensure that on-site activities do not cause regulatory conflict that would affect scenic quality of the site or its surroundings.

Therefore, the proposed Project would have a less than significant impact in this regard.

TABLE 4.1-1 CONSISTENCY WITH REGULATIONS, GOALS, AND POLICIES RELATED TO SCENIC QUALITY

Relevant Goals and Policies	Consistency Analysis
General Plan Conservation Element	
CNE GOAL 2: Preserve the remaining natural ridgelines, canyons, streams, springs, urban forest, and other natural resources and attributes that contribute to the aesthetic and scenic qualities of the community.	**Consistent.** As discussed in Section 4.1-a, the public views of the Project site do not include identified prominent ridgelines nor is the Project situated within the vicinity of a prominent landform. Gould Canyon Channel flows southeast adjacent to the southwest corner of the Project site. At this location, the channel is routed underground and is channelized to the west and southeast of the Project site. Development of the proposed Project would not visually impact this channel.
CNE Objective 2.1: Require new development to be compatible with the natural and existing human-made resources that make the community special.	**Consistent.** The proposed Project consists of improvements that would modernize the existing elementary school campus. Proposed structures would be a continuation/modernization of existing facilities. The Project would also include ornamental landscaping features that would complement the existing campus.
CNE Policy 2.1.2: Maintain prominent landforms within the community in their natural state to the maximum extent feasible, including but not limited to: ridges, knolls, waterways, creeks (either dry or active), canyons, or other unique topographic features or viewscapes. The most significant landforms are identified on Figure CNE-3 in the Conservation Element.	**Consistent.** Refer to CNE Goal 2.
CNE Policy 2.1.3: Protect major hillside viewscapes visible from points within the City from detrimental alteration by the intrusion of highly visible cuts and/or fill slopes, building lines, and/or road surfaces.	**Consistent.** The Project would not result in any visible cut or fill slopes on-site as the result of required grading activities. Proposed building heights would be similar to that of existing structures on-site and in the surrounding neighborhood, and therefore, the Project would not introduce new elements of substantial height that may have the potential to interrupt or obstruct existing views. Additionally, no new roadways are proposed. Refer also to CNE Goal 2.

TABLE 4.1-1, CONTINUED

Relevant Goals and Policies	Consistency Analysis
CNE Policy 2.1.4: Minimize the visual impact of grading. Irrigate and landscape human-made slopes to prevent erosion and soften the visual appearance of the finished slope.	**Consistent.** The Project would include grading activities on-site. As discussed under "Construction" below, public views of construction activities, construction staging areas, grading, excavation, construction equipment, material storage areas, construction debris, exposed trenches, etc., would be visible. This impact would be short term and these elements would be removed following construction. No human-made slopes would be created by the Project. Impacts in this regard would be less than significant.
CNE Policy 2.1.5: Preserve and protect the City's urban forest in order to maintain the community's wooded character and protect the scenic beauty of the area, through continued implementation of the City's Preservation, Protection, and Removal of Trees Ordinance.	**Consistent.** Mature ornamental trees are present on-site and in the Project vicinity. The Project would remove 37 existing trees within the campus. However, the Project proposes the addition of new planting areas that include use of planters, trees, and other landscaping features, including replacement of coast live oak trees. Landscaping using planters and drought-tolerant trees and shrubs would be used to create the outdoor classroom areas. Refer to **Figure 3-4** showing the proposed outdoor amenity landscaping. As a result, the Project would maintain the community's character.
CNE Objective 2.2: Preserve the scenic beauty of viewscapes as seen from public vantage points and designated streets and locations.	**Consistent.** Refer to CNE Goal 2.
Zoning Ordinance, Section 11.16.040 Development Standards.	
Section 11.16.040.B, Siting Standards	**Consistent.** The proposed building setbacks from property lines would be consistent for the Public/Semi-Public Use zone.
Section 11.16.040.C, Building Height Standard	**Consistent.** Maximum building height for the Public/Semi-Public Use zone is 35 feet for principal structures and 15 feet for accessory structures, as measured from lowest finished grade adjacent to or directly below the structure or building face. Maximum building height of new on-site structures with the proposed improvements would be33 feet.

Shade and Shadow

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

Figure 4.1-1 illustrates existing shadow patterns experienced in the area. Based on these shade/shadow diagrams, existing on-site buildings currently shade the Project site, as well as nearby residential uses to the north of the Project site, in the morning, mid-day, and afternoon hours for most of the year. However, it is acknowledged that these existing residential yards also support mature trees, which further contribute to shade effects. Shade/shadow effects are also experienced on lands adjacent to the west and east under morning and afternoon conditions, respectfully; however, such shadows do not extend onto private property in areas within the lots where residential structures are present.

The Project proposes to remove 15 portable classrooms along the northern and western portions of the Project site and one single-story classroom building in the western-central portion of the campus. The Project would also construct one new two-story building and one new single-story building along the western and northern portions of the Project site.

Figure 4.1-2 illustrates the proposed shadow patterns on-site and in the vicinity. Similar to that which occurs under existing conditions, the proposed buildings would result in shadow effects on the Project site, as well as limited portions of nearby residential uses to the north in the morning, mid-day, and afternoon hours for most of the year. No substantial change in existing shadow effects would occur with implementation of the proposed improvements. Shade/shadow effects would continue to be experienced on lands adjacent to the west and east under morning and afternoon conditions. Although such shadow patterns would be somewhat altered with Project implementation (refer to **Figures 4.1-1** and **4.1-2**), such effects would not substantially increase nor would they extend further onto off-site private property where residential structures are present. Additionally, as discussed above, existing mature trees are present in these off-site areas and would continue to contribute to shading effects already experienced in the surrounding neighborhood.

Thus, as depicted in **Figures 4.1-1** and **4.1-2**, development of the proposed Project would not result in new substantial impacts related to shade/shadow in the Project area as compared to the existing condition. A less than significant impact would result in this regard.

Construction activities for the proposed Project are anticipated to begin during summer 2023 and last approximately 35 months (3 years). Public views of construction activities, construction staging areas, grading, excavation, construction equipment, material storage areas, construction debris, exposed trenches, etc., would be visible. Project construction could temporarily degrade the existing visual character of the Project area and its immediate surroundings. However, such

activities would be limited to the construction phase and all construction-related materials and vehicles would be removed from the site upon completion of construction.

The California Supreme Court held that public school districts are a matter of statewide concern and that school districts, being local agencies of the state, are not subject to municipal construction regulations when engaged in such sovereign activities as the construction of school buildings.[1] It was subsequently held that school construction is regulated and inspected at the state level through the DSA and the Field Act per the Education Code.[2] It is not anticipated that the project would conflict with local zoning or regulations governing scenic quality in this regard.

For the reasons above, the Project would not conflict with existing state, regional, county, or local laws, policies, regulations, plans, or guidelines governing scenic quality, as applicable to the subject educational use. Impacts would be less than significant.

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

Less than Significant Impact

Artificial light during evening and nighttime hours emanates from building interiors and passes through windows, from street lighting for purposes of vehicular circulation and bike and pedestrian safety, and from other exterior sources (e.g., building illumination, security lighting, parking lot lighting, landscape lighting, and signage). The degree of illumination may vary widely depending on the amount of light generated, height of the light source, shielding by barriers or obstructions, type of light source, and weather conditions. Light spillover is typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. Artificial light can be a nuisance to adjacent residential areas and diminish the view of the clear night sky. The adjacent residences are considered light sensitive, as occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources.

Glare is caused by the reflection of sunlight or artificial light on highly polished surfaces such as window glass or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare is common in urban areas and is typically associated with exterior facades largely or entirely comprising highly reflective glass. Glare can also occur during evening and nighttime hours with the reflection of artificial light sources such as automobile headlights. Glare-sensitive uses include the adjacent residential uses.

Construction

Light

Project construction activities would occur in accordance with the provisions of the City's Municipal Code Section 5.02.110, Temporary Construction Activities, which limits the hours of

[1] See Hall v. City of Taft (1956) 47 Cal.2d 177 [302 P.2d 574].
[2] See Town of Atherton v. Superior Court (1958) 159 Cal.App.2d 417 [324 P.2d 328].

construction to between 7:00 a.m. and 6:00 p.m. Monday through Friday (during Daylight Savings Time, weekday construction hours are from 7:00 a.m. to 7:00 p.m.), and between 9:00 a.m. and 5:00 p.m. on Saturday. No construction activities are permitted on Sunday or national holidays.

It is anticipated that Project construction would occur during daytime hours. Due to the nature of the improvements proposed and the anticipated construction schedule, it is not anticipated that nighttime construction would be required. Therefore, nighttime lighting sources such as spotlights, floodlights, and/or vehicle headlights would not be generated with construction, thereby avoiding potential adverse effects on adjacent sensitive receptors (e.g., residential uses). If it is determined that any nighttime lighting would be required, all such lighting would be low-level, located away from sensitive receptors, and shielded/directed downward as feasible to minimize potential effects on adjacent properties.

Glare

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible areas where the reflection of sunlight could occur. However, any glare would be short-term given the movement of construction equipment and materials within a given construction area and the temporary nature of construction activities. In addition, construction would occur during the daytime hours in accordance with the requirements of the City's Municipal Code. Accordingly, there would be a negligible potential for daytime glare to occur during construction.

Based on the analysis above, with adherence to existing regulations and standards, potential light and glare effects associated with Project construction would not adversely impact daytime or nighttime views in the area.

Operation

Light

The Project site is located in a suburban area, which is characterized by low to medium nighttime ambient light levels. Streetlights, traffic on local streets, and exterior lighting in surrounding homes are the primary sources of light contributing to the ambient light levels in the Project area. Light-sensitive uses in the Project vicinity are limited to surrounding residences.

The Project proposes to upgrade outdoor lighting with dimmable, light-emitting diode (LED) lighting to provide adequate pathway illumination for pedestrian safety on campus. Exterior lighting levels would be designed in accordance with *The Lighting Handbook*, 10th Edition (Illuminating Engineering Society of North America 2011) and the lighting power density is required to comply with the California Building Energy Efficiency Standards, Title 24 and Collaborative for High Performance Schools program requirements. Lighting would be controlled by a time clock by the campus energy management system. Pedestrian lighting poles would be 12 feet to 14 feet high.

The updated Project lighting would be visible from the surrounding area. Therefore, the Project's proposed exterior lighting is expected to contribute to ambient nighttime illumination in the

Project vicinity. However, lighting levels resulting with Project implementation would be generally consistent with existing illumination levels on the school campus and in the surrounding area.

For the reasons above, the Project would not create a new source of substantial nighttime lighting that would adversely affect day or nighttime views in the area. Impacts in this regard would be less than significant.

Glare

Glare could be produced from the reflection of sunlight off of glass windows or other reflective surfaces (e.g., metal) with construction of the proposed on-site improvements. However, the Project proposes use of building materials similar to those currently found on-site and in the general surrounding area in existing structures. The proposed Project improvements would not incorporate highly reflective or mirrored surfaces (e.g., large expanses of glass) and would have a similar potential for reflectivity as existing on-site structures. Further, building materials and colors proposed would not create significant amounts of glare on- or off-site. Therefore, impacts in this regard would be less than significant.

4.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
AGRICULTURE AND FORESTRY RESOURCES. 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 nonagricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526 and by Government Code Section 51104(f)), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

Overview

The California Department of Conservation (DOC) manages the Farmland Mapping and Monitoring Program (FMMP), which identifies and maps significant farmland in the State of California. Pursuant to Public Resources Code Section 21060.1, land is classified using a system of five categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. The classification of farmland as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance is based on the suitability of soils for agricultural production, as determined by a soil survey conducted by the Natural Resources Conservation Service.

According to the FMMP, a majority of the western portion of the Project site is identified as "Urban and Built-Up Land," which is not considered farmland, while the eastern portion of the Project site is shown to lie outside of the FMMP mapping area, as shown on **Figure 4.2-1**). However, the US Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey identifies the entire school campus property (including the eastern portion that is outside of the FMMP mapping range) as Urban Land-Soboba-Tujunga Complex, 5 to 15 percent slopes" soil type (NRCS 2019). Consistent with this identification, the Project site is fully developed with the existing school campus, and does not contain Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, or Grazing Land.

Discussion of Impacts

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

No Impact. The Project site is an existing elementary school campus located within a developed urban/suburban setting and is surrounded by residential uses on all sides. As described above, none of the Project site is classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Additionally, similar to the western portion of the Project school campus, the eastern portion has been fully developed with educational facilities. The Project site is considered *Urban* Land, and contains neither mapped nor conditions suitable to be considered Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As such, the Project would result in no impact in this regard.

4.2-b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. The proposed Project is on the Paradise Canyon Elementary School campus, which is zoned Public/Semi-public (PS) and is fully developed with existing educational uses. The Project site is surrounded by a residential neighborhood zoned Very Low Density Residential (R-1-20, 000) and Low Density Residential (R-1-10, 000 and R-1-15, 000) by the City of La Cañada Flintridge. The Project site is not located within an area zoned for agricultural uses, and the property is not contracted under the Williamson Act (DOC 2019). As such, the Project would result in no impact in this regard.

4.2-c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. The Project site is not located within forestland or timberland as defined by Public Resources Code Section 1220(g)), Public Resources Code Section 4526, or Government Code Section 51104(g). The Project site is located on an existing elementary school campus zoned Public/Semi-public (PS) and is surrounded by a residential neighborhood zoned as Very Low Density Residential (R-1-20, 000) and Low Density Residential (R-1-10, 000 and R-1-15, 000) by the City of La Cañada Flintridge. Therefore, no impacts related to the conversion of timberland or forestland would occur.

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

No Impact. As stated in Section 4.2-c. above, the Project is not located within lands designated as forestland and the Project does not propose removal or conversion of forestland. Therefore, the Project would result in no impacts in this regard.

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

No Impact. As stated in Sections 4.2-a and 4.2-c above, there are no lands identified as farmland or forestland within the Project area. The Project site is located on an existing elementary school campus within an urban/suburban setting developed with residential uses. Implementation of the Project would not result in changes to the environment which, due to their location or nature, could result in the conversion of farmland to non-agricultural use or the conversion of forestland to non-forest use. Therefore, the Project would result in no impact is this regard.

4.3 AIR QUALITY

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
AIR QUALITY. Would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Overview

Pollutants of Concern – Criteria Pollutants

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

Nitrogen oxides (NO_X): NO_X serve as integral participants in the process of photochemical smog production and are precursors[3] for certain particulate compounds that are formed in the atmosphere. The two major forms of NO_X are nitric oxide (NO) and NO_2. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO_2 is a reddish-brown pungent gas formed by the combination of NO and oxygen. NO_2 acts as an acute respiratory irritant and eye irritant, and increases susceptibility to respiratory pathogens. A third form of NO_x, nitrous oxide (N_2O), is a greenhouse gas.

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

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

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

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

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

Ozone (O_3): Ozone is a secondary pollutant produced through a series of photochemical reactions involving ROG and NO_X. Ozone creation requires ROG and NO_X to be available for approximately three hours in a stable atmosphere with strong sunlight. Because of the long reaction time, peak ozone concentrations frequently occur downwind of the sites where the precursor pollutants are emitted. Thus, ozone is considered a regional, rather than a local, pollutant. The health effects of ozone include eye and respiratory irritation, reduction of resistance to lung infection and possible aggravation of pulmonary conditions in persons with lung disease. Ozone is also damaging to vegetation and untreated rubber.

Meteorology and Climate

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

The South Coast Air Basin (SCAB) is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the southwest and high mountains around its remaining perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific resulting in a mild climate

tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds.

The vertical dispersion of air pollutants in the SCAB is hampered by the presence of persistent temperature inversions. An upper layer of dry air that warms as it descends characterizes high-pressure systems, such as the semi-permanent high-pressure zone in which the SCAB is located. This upper layer restricts the mobility of cooler marine-influenced air near the ground surface and results in the formation of subsidence inversions. Such inversions restrict the vertical dispersion of air pollutants released into the marine layer and, together with strong sunlight, can produce worst-case conditions for the formation of photochemical smog.

The atmospheric pollution potential of an area is largely dependent on winds, atmospheric stability, solar radiation, and terrain. The combination of low wind speeds and low inversions produces the greatest concentration of air pollutants. On days without inversions, or on days of winds averaging over 15 mph, smog potential is greatly reduced.

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

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

Regional Air Quality

The South Coast Air Quality Management District (SCAQMD) has jurisdiction over the SCAB, which has a history of recorded air quality violations and is an area where both State and federal ambient air quality standards are exceeded. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. **Table 4.3-1** shows the area designation status of the SCAB for each criteria pollutant for both the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS).

TABLE 4.3-1 FEDERAL AND STATE ATTAINMENT STATUS

Pollutants	Federal Classification	State Classification
Ozone (O_3)	Nonattainment (Extreme)	Nonattainment
Particulate Matter (PM_{10})	Attainment (Maintenance)	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Nonattainment (Serious)	Nonattainment
Carbon Monoxide (CO)	Attainment (Maintenance)	Attainment
Nitrogen Dioxide (NO_2)	Attainment (Maintenance)	Nonattainment[1]
Sulfur Dioxide (SO_2)	Unclassifiable/Attainment	Attainment
Sulfates	No Federal Standards	Attainment
Lead (Pb)		Attainment
Hydrogen Sulfide (H_2S)		Unclassified
Visibility Reducing Particles		Unclassified

[1] Nonattainment for (CA 60 near-road portion of San Bernardino, Riverside and Los Angeles Counties) Attainment (remainder of SCAB)
Source: SCAQMD 2022.

Local Air Quality

The South Coast Air Quality Management District (SCAQMD) has divided the SCAB into source receptor areas (SRAs), based on similar meteorological and topographical features. The Project site is in SCAQMD's West San Gabriel Valley SRA 8. However, the nearest monitoring site to the Project site is in Pasadena at 725 South Wilson Avenue, located 6.1 miles southeast of the Project site. Criteria pollutants monitored at the Pasadena Monitoring Station include ozone, $PM_{2.5}$, and NO_2. The nearest site that monitors PM_{10} is the Los Angeles station on North Main Street, approximately 10.1 miles south of the prosed project site. The ambient air quality data in the Project vicinity as recorded at the Pasadena and Los Angeles Monitoring Stations from 2019 to 2021 and the applicable federal and state standards are shown in **Table 4.3-2**.

Sensitive Receptors

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

The Project site is surrounded by existing single-family residences on all sides. Exposure to potential emissions would vary substantially from day to day depending on the amount of work being conducted, the weather conditions, the location of receptors, and the length of time that receptors would be exposed to air emissions. The construction phase emissions estimated in this analysis are based on conservative

estimates and worst-case conditions, with maximum levels of construction activity occurring simultaneously within a short period of time. The nearest sensitive receptors to the Project site, with the highest potential to be impacted by the proposed Project activities is the single-family residence at 50332 Gould Avenue that is located as near as 20 feet north of the proposed Project improvements.

TABLE 4.3-2 AMBIENT AIR QUALITY MONITORING DATA

Air Pollutant	Standard/Exceedance	2019	2020	2021
Ozone (O_3)	Max. 1-hour Concentration (ppm)	0.120	0.163	0.104
	# Days > California 1-hour Std. of 0.090 ppm	11	41	12
	Max. 8-hour Concentration (ppm)	0.098	0.115	0.087
	# Days > Federal 8-hour Std. of 0.070 ppm	24	60	25
	# Days > California 8-hour Std. of 0.070 ppm	29	61	32
Nitrogen Dioxide (NO_2)	Max. 1-hour Concentration (ppm)	59.1	61.2	77.3
	# Days > California 1-hour Std. of 0.18 ppm	0	0	0
	Annual Average (ppm)	13	13	13
Respirable Particulate Matter (PM_{10})	Max. 24-hour Concentration (µg/m^3)	62.4	83.7	64.0
	#Days > Federal 24-hour Std. of 150 µg/m^3	0	0	0
	#Days > California 24-hour Std. of 50 µg/m^3	15	34	14
	Annual Average (µg/m^3)	23.0	33.1	26.0
Fine Particulate Matter ($PM_{2.5}$)	Max. 24-hour Concentration (µg/m^3)	41.8	67.7	63.6
	#Days > Fed. 24-hour Std. of 35 µg/m^3	1	2	2
	Federal Annual Average (µg/m^3)	9.1	11.9	10.7
	California Annual Average (µg/m^3)	8.7	11.9	10.7

Source: CARB 2022.

Asbestos

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

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

Air Quality Management Plan (AQMP)

The SCAQMD is required to produce plans to show how air quality will be improved in the region. The California Clean Air Act (CCAA) requires that these plans be updated triennially to incorporate the most

recent available technical information.[4] A multi-level partnership of governmental agencies at the federal, state, regional, and local levels implements the programs contained in these plans. Agencies involved include the USEPA, ARB, local governments, Southern California Association of Governments (SCAG), and SCAQMD. The SCAQMD and the SCAG are responsible for formulating and implementing the Air Quality Management Plan (AQMP) for the SCAB. The SCAQMD updates its AQMP every three years.

The 2022 AQMP was adopted by the SCAQMD Governing Board on December 2, 2022, and has been submitted to the ARB for adoption before submittal to the U.S. EPA for final approval, which are anticipated to occur sometime this year. After the 2022 AQMP has been adopted by ARB and U.S. EPA, the 2022 AQMP will be incorporated into the State Implementation Plan (SIP). The 2022 AQMP establishes actions and strategies to reduce ozone levels to the U.S. EPA 2015 ozone standard of 70 ppb by 2037. The 2022 AQMP promotes extensive use of zero-emission technologies across all stationary and mobile sources coupled with rules and regulations, investment strategies, and incentives.[5]

Air Quality Thresholds

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

TABLE 4.3-3 SCAQMD REGIONAL THRESHOLDS OF SIGNIFICANCE

Pollutant	Mass Daily Thresholds (Pounds/Day)	
	Construction	Operation
Nitrogen Oxides (NO_x)	100	55
Volatile Organic Compounds (VOC)	75	55
Respirable Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55
Sulfur Oxides (SO_X)	150	150
Carbon Monoxide (CO)	550	550
Lead	3	3

Source: SCAQMD 2019

The SCAQMD Governing Board adopted a methodology for calculating localized air quality impacts through localized significance thresholds (LSTs), which is consistent with SCAQMD's Environmental Justice Enhancement Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable state or national ambient air quality

[4] CCAA of 1988.
[5] https://www.aqmd.gov/home/research/pubs-docs-reports/newsletters/august-september-2022/board-to-vote-on-updated-aqmp

standard (SCAQMD, 2008). The LSTs are developed based on the ambient concentrations of that pollutant for each source receptor area and are applicable to NO_2, CO, PM_{10}, and $PM_{2.5}$.

The LST Methodology provides Look-Up Tables with different thresholds based on the location and size of the project site and distance to the nearest sensitive receptors. The project site is in SRA 8 (West San Gabriel Valley). It is assumed that construction activities will disturb approximately half of the 8.85-acre Campus, or approximately 4.43 acres. Since the Look-Up Tables include project site acreage sizes of 1-acre, 2-acres and 5-acres, the 2-acre and 5-acre thresholds were interpolated in order to develop the threshold for a 4.43-acre Project site. The nearest sensitive receptor to the Project site is the single-family residence at 50332 Gould Avenue, that is located as near as 20 feet (6 meters) north of the proposed Project improvements. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. The appropriate LSTs for construction activity are as shown in **Table 4.3-4**. LSTs for operational emissions only apply to on-site sources. Since the primary source of emissions for this Project is associated with off-site vehicle trips, an LST analysis of long-term emissions is not required.

TABLE 4.3-4 SCAQMD LOCALIZED THRESHOLDS FOR CONSTRUCTION

Air Pollutant	Standard/Exceedance
Nitrogen Dioxide[1] (NO_2)	138
Carbon Monoxide (CO)	1,400
Inhalable Particulate Matter (PM_{10})	11
Fine Particulate Matter ($PM_{2.5}$)	6

Source: SCAQMD 2009.
[1]The threshold is for emissions of NOx.

Discussion of Impacts

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

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

Project's Contribution to Air Quality Violations

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

AQMP Assumptions

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

The Project concerns mainly construction activities in the replacement and/or upgrade of existing educational facilities and does not involve expansion of capacity. Increases in long-term operational emissions are not expected; therefore, the Project will be substantially equal to what was appropriately assumed for the site in any growth rate or trip generation assumptions. Therefore, the proposed Project would not conflict with AQMP and impacts would be less than significant.

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

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

TABLE 4.3-5 ESTIMATED CONSTRUCTION EMISSIONS

Phase	Maximum Daily Emissions (lbs/day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Stage 1. Mobilization and Site Utilities and Interim Housing	1.90	20.04	19.70	0.04	1.44	0.88
Stages 2 & 3. Demolition	1.02	9.05	14.15	0.02	0.79	0.48
Stages 2, 3, 4, & 5. Building Construction & Architectural Coatings	29.10	21.02	22.81	0.05	1.58	1.00
Stage 6. Removal of Interim Housing & Restore Playfields	1.66	15.68	18.72	0.04	1.10	0.67
SCAQMD Regional Thresholds	75	100	550	150	150	55
SCAQMD Local (LST) Thresholds	--	138	1,400	--	11	6
Are Threshold Exceeded?	No	No	No	No	No	No

Source: Michael Baker International, (see Appendix A for more detailed information)
Notes: ROG = reactive organic gases; NOx = nitrogen oxide; CO = carbon monoxide; PM10 = coarse particulate matter; PM2.5 = fine particulate matter; SO2 = sulfur dioxide

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

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

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

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

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

Project-Specific Thresholds

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

Air Quality Plans

The SCAB, in which the Project site is located, is in nonattainment for federal ozone and $PM_{2.5}$ standards. Therefore, the SCAQMD is required to prepare and implement an AQMP and to document the strategies and measures to be undertaken to reach attainment of ambient air quality standards.[6] While the SCAQMD does not have direct authority over land use decisions, it was recognized that changes in land use and circulation planning were necessary to maintain clean air. As discussed above in Impact 4.3 a), the proposed project is compliant with the AQMP.

Cumulative Health Impacts

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

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

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

Less than Significant Impact. During construction activities, diesel equipment would be operating. Diesel particulate matter (DPM) is known to the State of California as a toxic air contaminant (TAC). The risks associated with exposure to substances with carcinogenic effects are typically evaluated based on a lifetime of chronic exposure, which is defined in the California Air Pollution Control Officers' Association Air Toxics "Hot Spots" Program Risk Assessment Guidelines as 24 hours per day, 7 days per week, 365 days per year, for 70 years. DPM would be emitted during the short term of construction assumed for the proposed project from heavy equipment used in the construction process. Because diesel exhaust particulate matter is considered carcinogenic, long-term exposure to diesel exhaust emissions has the potential to result in adverse health impacts. California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment, provide annual reports to CARB of their fleet's usage and emissions, and provides phase out periods of equipment based on the equipment's Tier level. Due to the short-term nature of the Project construction and from statewide regulations, impacts from exposure to diesel exhaust emissions during construction would be less than significant.

Based on the timeframe for when the school's existing structures were constructed, there exists the potential for asbestos to be present; however, as provided under MM HAZ-1, the District will coordinate survey and demolition activities with the SCAQMD and will comply with SCAQMD's

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

Rule 1403. Removal activities will be subject to SCAQMD inspection. Asbestos-containing materials will be transported to a landfill that accepts hazardous waste. Compliance with asbestos management rules and regulations will reduce any potential impacts to a level of less than significant.

As discussed in Section 3.0, no changes will occur to the number of students as a result of the Project, and the Project does not involve changes from the existing educational uses that would result in other emissions such as odor. Therefore, impacts from Project operation would be less than significant.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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 regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
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?	☐	☐	☐	☒

Overview

Michael Baker conducted an analysis of the biological resources in the Project area, including a review of literature and records and a site survey. Michael Baker performed thorough literature reviews and records searches to determine which special-status biological resources have the potential to occur on or within the general vicinity of the Project site.[7] Previous special-status plant and wildlife species occurrence records within the *Pasadena*, *Burbank*, *Condor Peak*, and *Mt. Wilson*, *California* 7.5-minute topographic quadrangles were researched through a query of the California Natural Diversity Database (CNDDB)

[7] As used in this report, "special-status" refers to plant and wildlife species that are federally/state listed, proposed, or candidates; plant species that have been designated a California Rare Plant Rank species by the California Native Plant Society; wildlife species that are designated by the California Department of Fish and Wildlife as Fully Protected, Species of Special Concern, or Watch List species; state/locally rare vegetation communities; and species that warrant protection under local or regional preservation policies.

(CDFW 2022a) and California Inventory of Rare Plants (CIRP) (CNPS 2022), and for the project region through a review of the Information for Planning and Consultation (IPaC) database (USFWS 2022a).

The current regulatory/conservation status of special-status plant and wildlife species was verified through lists and resources provided by the California Department of Fish and Wildlife (CDFW), specifically the *Special Animals List* (CDFW 2022b), *Special Vascular Plants, Bryophytes, and Lichens List* (CDFW 2022c), *State and Federally Listed Endangered and Threatened Animals of California* (CDFW 2022d), and *State and Federally Listed Endangered, Threatened, and Rare Plants of California* (CDFW 2022e). USFWS-designated Critical Habitat for species listed under the federal Endangered Species Act was reviewed online via the Environmental Conservation Online System: Threatened and Endangered Species Active Critical Habitat Report (USFWS 2022b). In addition, Michael Baker reviewed previously prepared reports, survey results, and literature detailing the biological resources previously observed on or within the vicinity of the Project site to understand existing site conditions, confirm previous species observations, and note the extent of any disturbances, if present, that have occurred within the Project site that would otherwise limit the distribution of special-status biological resources. Standard field guides and texts were reviewed for specific habitat requirements of special-status species, as well as the following resources for species information, previous data, and general context:

- Custom Soil Resource Report for Angeles National Forest Area, California; and Los Angeles County, California, Southeastern Part (U.S. Department of Agriculture [USDA] 2022)
- National Wetlands Inventory (NWI) Mapper (USFWS 2022c)
- Google Earth Pro Historical Aerial Imagery from 1994 to 2022 (Google, Inc. 2022)
- Calflora Database (Calflora 2022)
- Species accounts provided by Birds of the World (Billerman et al. 2020)
- Cornell Lab of Ornithology's eBird Database (eBird 2022)

Michael Baker biologist Ryan Winkleman conducted a biological field survey/habitat assessment on October 17, 2022, to document existing conditions and assess the potential for special-status biological resources to occur. The area surveyed included the school property (Project site) and a 500-foot buffer zone around the perimeter of the Project site (refer to **Figure 4.4-1**).

Discussion of Impacts

4.4-a Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Less Than Significant Impact with Mitigation Incorporated. The Project site is located in a residential setting that provides low habitat value for special-status plant and wildlife species. Based on the literature review and reconnaissance biological survey conducted in October 2022, the Project site contains structures, sidewalks, and multiple paved areas with impervious surfaces,

and lacks suitable soils, biological resources, and physical features to support any special-status plant and animal species. Additionally, no special-status plants or wildlife were observed within the Project site during the field survey. Therefore, no direct or indirect impacts on special-status plant or animal species are anticipated as a result of the Project activities.

The Project site is an existing school campus located in a developed suburban area, and contains several school buildings including classroom structures, an administrative building, parking lots, walkways, a small playground, a large paved playground, and a large outdoor recreational area with a baseball field, bordered by basketball courts and other hardcourt game areas located west of the field. The Project site is surrounded by residential streets and homes. Vegetation on the site consists of multiple trees, the majority of which are ornamental, as well as grassy areas and some areas of landscaped hedges and plants. The Project site lies within 100 feet of a concrete channel that provides no suitable wildlife habitat.

The existing on-site vegetation consists of turf grass field and sparsely distributed native and ornamental tree and shrub species that do not support sensitive habitats and provide low habitat value for special-status species.

In summary, the Project site and near vicinity lacks suitable habitat and conditions to support special status plant and wildlife species. Therefore, impacts to sensitive habitat or to special-status plant species are not anticipated.

Habitat Assessment Survey Results (Plants and Vegetation Types)

Vegetation communities occurring within the Project site were mapped on an aerial photograph and classified in accordance with the vegetation descriptions provided in *A Manual of California Vegetation* (Sawyer, Keeler-Wolf, and Evens 2009) and cross referenced with the *California Sensitive Natural Communities List* (CDFW 2022f) and the *Preliminary Descriptions of the Terrestrial Natural Communities of California* (Holland 1986) for the purposes of evaluating the presence or absence of special-status vegetation communities identified in the CNDDB records search, which uses the Holland vegetation classification system. In addition, Project site characteristics such as soil condition, topography, hydrology, anthropogenic disturbances, indicator species, condition of on-site vegetation communities, and the presence of potentially regulated jurisdictional features (e.g., streams, flood control channels) were noted. Michael Baker used Geographic Information Systems (GIS) ArcView software to digitize the mapped vegetation communities and then transferred these data onto an aerial photograph to further document existing conditions and quantify the acreage of each vegetation community, which are presented on **Figure 4.4-2**, *Vegetation Communities and Other Land Uses*.

Environmental Setting

Based on a habitat assessment survey conducted by Michael Baker biologist Ryan Winkleman on October 17, 2022, the majority of the survey area consists of developed and landscaped areas. The Project site itself consists of an elementary school campus. Interspersed throughout the school premises are several trees and landscaped areas consisting primarily of non-native ornamental trees.

The off-site regions of the survey area consist primarily of developed and landscaped areas with private homes and a network of paved roads. Several mature trees occur along these streets and in landscaped areas between homes. A vegetated slope behind homes in the far northeastern edge of the survey area includes native shrub species; additionally, some native vegetation occurs along the concrete margins of Gould Canyon Channel, which is an intermittent feature contained in a concrete box channel in the southwest portion of the survey area.

The landscaped and developed areas throughout the survey area have a patchy distribution of trees in which some trees form contiguous stands providing nearly 100 percent canopy cover. Within these areas, tree species primarily consist of ornamental trees such as non-native pine (*Pinus* spp.), eucalyptus (*Eucalyptus* spp.), and olive (*Olea europea*) trees intermixed with some native species such as coast live oak (*Quercus agrifolia*), western sycamore (*Platanus racemosa*), and toyon (*Heteromeles arbutifolia)*.

List of Land Cover Types

There are no natural vegetation communities within the boundaries of the Project site. Instead, the Project site and survey area consist entirely of urban developed/ornamental land, except for a small patch of remanent chamise–sage chaparral in the northeastern section of the survey area that is outside of the Project site (refer to **Figure 4.4-2**).

Urban Developed/Ornamental (on-site and off-site): Urban developed/ornamental lands are generally non-vegetated features that describe areas occupied by man-made structures, paving and other impermeable surfaces that cannot support extensive vegetation. On-site developed lands cover the entirety of the Project site (8.85 acres) and consist of paved access roads, parking lots, playground surfaces, driveways, walkways, classroom facilities, offices, student activity facilities, and other permanent structures. The off-site developed areas cover 45.94 acres of the survey area. These developed areas provide virtually no habitat for wildlife species other than for nesting and foraging birds. Landscaping (ornamental trees, shrubs, turf, etc.) associated with the developed lands are also included in this category. Typical plant species observed within this community include a mixture of native plants and non-native ornamental plants such as coast live oak, western sycamore, eucalyptus, olive, London plane (*Platanus "x hispanica"*), jacaranda (*Jacaranda mimosifolia*), lantana (*Lantana* spp.), heavenly bamboo (*Nandina domestica*), fountaingrass (*Pennisetum setaceum*), and ivy (*Hedera* sp.). Urban developed/ornamental lands do not have a global or state rank and are not considered a sensitive plant community.

Chamise–Sage Chaparral (off-site): There is a small stand of chamise–sage chaparral in the far northeastern section of the survey area, behind a residential street, encompassing approximately 1.20 acres. It is associated with the southern boundary of the La Cañada Flintridge Country Club and is surrounded on all sides by urban developed/ornamental lands. The most common species present in this habitat type include chamise (*Adenostoma fasciculatum*), California sagebrush (*Artemisia californica*), laurel sumac (*Malosma laurina*), and California buckwheat (*Eriogonum fasciculatum*).

Special-Status Biological Resources

The CNDDB (CDFW 2022a), CIRP (CNPS 2022), and IPaC (USFWS 2022a) were queried for reported locations of special-status plant and wildlife species as well as special-status natural vegetation communities in the USGS *Pasadena*, *Burbank*, *Condor Peak*, and *Mt. Wilson*, *California* 7.5-minute quadrangles. The biological field survey/habitat assessment was conducted to assess and evaluate the conditions of the habitat(s) within the boundaries of the survey area to determine if the existing vegetation communities, at the time of the field survey, have the potential to provide suitable habitat(s) for special-status plant and wildlife species. Additionally, the potential for special-status species to occur within the survey area was determined based on the reported occurrence locations in the CNDDB, CIRP, and Calflora databases and the following criteria:

- Present: Species was observed or detected within the Project site during the field survey.
- High: Recent (within 20 years) occurrence records indicate that the species has been known to occur on or within 1 mile of the Project site and the site is within the normal expected range of this species. Intact, suitable habitat preferred by this species occurs within the Project site and/or there is viable connectivity to a local known extant population(s) or sighting(s).
- Moderate: Recent (within 20 years) occurrence records indicate that the species has been known to occur within 1 mile of the Project site and the Project site is within the normal expected range of this species. There is suitable habitat within the Project site, but the site is ecologically isolated from any local known extant populations or sightings.
- Low: Recent (within 20 years) occurrence records indicate that the species has been known to occur within 5 miles of the Project site, but the site is outside of the normal expected range of the species and/or contains poor quality or marginal habitat.
- Not Expected: There are no occurrence records of the species occurring within 5 miles of the Project site, there is no suitable habitat within the Project site, and/or the Project site is outside of the normal expected range for the species.

Based on the database search, a total of 55 special-status plant species and 33 special-status wildlife species were identified during the review of the CNDDB and CIRP as occurring within the USGS *Pasadena*, *Burbank*, *Condor Peak*, and *Mt. Wilson*, *California* 7.5-minute quadrangles and in the IPaC for the Project region. Eight special-status vegetation communities were identified in the CNDDB. Special-status plant and wildlife species were evaluated for their potential to occur within the survey area based on specific habitat requirements, availability/quality of suitable habitat, and known distributions of species/populations.

Special-Status Plants

As mentioned, a total of 55 special-status plant species have been recorded in the USGS *Pasadena*, *Burbank*, *Condor Peak*, and *Mt. Wilson*, *California* 7.5-minute quadrangles by the CNDDB, CIRP, and IPaC. However, there were no special-status plants identified in the survey area during the field survey. Based on the literature review, 24 special-status plant species met one or more of

the following criteria: reported as recent occurrences (last observed between 2002 and 2022), documented within 1 mile of the survey area (see **Figure 4.4-3**, *CNDDB Wildlife Species*), or recognized as occurring based on previous surveys or knowledge of the area. These species and their statuses as determined by various state, federal, regional, and local regulatory agencies and the ranking notations from the most relevant agencies are listed below in **Table 4.4-1** below.

TABLE 4.4-1 PROJECT AREA SPECIAL-STATUS PLANT SPECIES AND RANKING NOTATIONS

Scientific Name Common Name	Status*	General Description and Habitat	Potential for Occurrence
Acanthoscyphus parishii var. *parishii* Parish's oxytheca	4.2 G4?T3T4 S3S4	Annual herb. Habitats include sandy or shale chaparral. Found at elevations ranging from 3,750 to 6,748 feet amsl. Blooming period is June through August.	Not Expected
Arctostaphylos glandulosa ssp. *gabrielensis* San Gabriel manzanita	1B.2 G5T3 S3	Perennial evergreen shrub. Occurs on rocky soils within chaparral habitats. Occurs at elevations ranging from 1,952 to 4,921 feet amsl. Blooms during the month of March.	Not Expected
Astragalus brauntonii Braunton's milk-vetch	FE 1B.1 G2 S2	Perennial herb. Found in recently burned or disturbed areas, usually sandstone with carbonate layers in coastal scrub, chaparral, and valley and foothill grassland habitats. Found at elevations ranging from 13 to 2,100 feet amsl. Blooming period is from January to August.	Not Expected
Atriplex parishii Parish's brittlescale	1B.1 G1G2 S1	Annual herb. Blooms June through October. Usually found on drying alkali flats with fine soils in vernal pools, chenopod scrub, wet meadows, and playas. Known elevations range from 15 to 4,660 feet amsl.	Not Expected
Berberis nevinii Nevin's barberry	FE SE 1B.1 G1 S1	Perennial evergreen shrub. Occurs on sandy or gravelly soils in chaparral, cismontane woodland, coastal scrub, and riparian scrub. Found at elevations ranging from 899 to 2,707 feet amsl. Blooming period is (February) March through June.	Not Expected
Calochortus clavatus var. *gracilis* slender mariposa lily	1B.2 G4T2T3 S2S3	Perennial bulbiferous herb. Found in chaparral, coastal scrub, and valley and foothill grassland habitats. Found at elevations ranging from 1,050 to 3,280 feet amsl. Blooming period is March through June (November).	Not Expected

TABLE 4.4-1, CONTINUED

Scientific Name Common Name	Status*	General Description and Habitat	Potential for Occurrence
Calochortus palmeri var. *palmeri* Palmer's mariposa lily	1B.2 G3T2 S2	Perennial bulbiferous herb. Occurs in mesic soils within chaparral, lower montane coniferous forest, and meadows and seeps. Grows in elevations ranging from 2,329 to 7,841 feet amsl. Blooming period is April through July.	Not Expected
Calochortus plummerae Plummer's mariposa lily	4.2 G4 S4	Perennial bulbiferous herb. Occurs on granitic and rocky soils within chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, and valley/foothill grassland. Grows in elevations ranging from 328 to 5,577 feet amsl. Blooming period is from May to July.	Not Expected
Castilleja gleasoni Mt. Gleason paintbrush	Rare 1B.2 G2 S2	Perennial herb (hemiparasitic). Occurs in granitic soils within chaparral, lower montane coniferous forest, and pinyon and juniper woodland habitats. Found at elevations ranging from 3,806 to 7,119 feet amsl. Blooming period is from May to June.	Not Expected
Chorizanthe parryi var. *fernandina* San Fernando Valley spineflower	SE 1B.1 G2T1 S1	Annual herb. Found in sandy soils within coastal scrub habitat and valley and foothill grassland habitats. Found at elevations ranging from 492 to 4,003 feet amsl. Blooming period is from April to July.	Not Expected
Chorizanthe parryi var. *parryi* Parry's spineflower	1B.1 G3T2 S2	Annual herb. Occurs on sandy and/or rocky soils in chaparral, coastal sage scrub, and sandy openings within alluvial washes and margins. Found at elevations ranging from 951 to 3,773 feet amsl. Blooming period is April through June.	Not Expected
Cladium californicum California saw-grass	2B.2 G4 S2	Perennial rhizomatous herb. Found in meadows and seeps, marshes and swamps (alkaline or freshwater). Found at elevations ranging from 197 to 5,249 feet amsl. Blooming period is June to September.	Not Expected
Clinopodium mimuloides monkey-flower savory	4.2 G3 S3	Perennial herb. Occurs on streambanks and mesic soils in chaparral and North Coast coniferous forest. Found at elevations ranging from 1,000 to 5,906 feet amsl. Blooming period is from June to October.	Not Expected
Galium grande San Gabriel bedstraw	1B.2 G1 S1	Shrub. Occurs in broadleaf upland forest, chaparral, cismontane woodland, and lower montane coniferous forest habitats. Found at elevations ranging from 1,394 to 4,921 feet amsl. Blooming period is from January to July.	Not Expected

TABLE 4.4-1, CONTINUED

Scientific Name Common Name	Status*	General Description and Habitat	Potential for Occurrence
Horkelia cuneata ssp. *puberula* mesa horkelia	1B.1 G4T1 S1	Perennial herb. Found on sandy or gravelly soils within chaparral, cismontane woodland, and coastal scrub habitats. Found at elevations ranging from 230 to 2,657 feet amsl. Blooming period is from February to September.	Not Expected
Imperata brevifolia California satintail	2B.1 G4 S3	Perennial grass. Occurs in mesic areas, alkali seeps, and riparian habitats within coastal scrub, chaparral, riparian scrub, Mojavean scrub, and alkali meadows and seeps. Found at elevations ranging from 0 to 1,640 feet amsl. Blooming period is from September to May.	Not Expected
Linanthus concinnus San Gabriel linanthus	1B.2 G2 S2	Annual herb. Grows in rocky openings within chaparral, lower montane coniferous forest, and upper montane coniferous forest. Found at elevations ranging from 4,987 to 9,186 feet amsl. Blooming period is April through July.	Not Expected
Malacothamnus davidsonii Davidson's bush-mallow	1B.2 G2 S2	Perennial deciduous shrub. Occurs in chaparral, cismontane woodland, coastal scrub, and riparian woodland habitats. Found at elevations ranging from 607 to 3,740 feel amsl. Blooming period is from June to January.	Not Expected
Phacelia hubbyi Hubby's phacelia	4.2 G4 S4	Annual herb. Grows on gravelly, rocky, talus soils within chaparral, coastal scrub, and valley and foothill grassland habitats. Found at elevations ranging from 0 to 3,281 feet amsl. Blooming period is from April to July.	Not Expected
Pseudognaphalium leucocephalum white rabbit-tobacco	2B.2 G4 S2	Perennial herb. Found on sandy and gravelly soils within chaparral, cismontane woodland, coastal scrub, and riparian woodland habitats. Found at elevations ranging from 0 to 6,890 feet amsl. Blooming period is August (July) through November (December).	Not Expected
Senecio astephanus San Gabriel ragwort	4.3 G3 S3	Perennial herb. Occurs on rocky slopes within coastal bluff scrub and chaparral habitats. Found at elevations ranging from 1,312 to 4,921 feet amsl. Blooming period is May through July.	Not Expected
Sidalcea neomexicana salt spring checkerbloom	2B.2 G4 S2	Perennial herb. Found on alkaline and mesic soils within chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub, and playas. Found at elevations ranging from 49 to 5,020 feet amsl. Blooming period is from March to June.	Not Expected

TABLE 4.4-1, CONTINUED

Scientific Name Common Name	Status*	General Description and Habitat	Potential for Occurrence
Spermolepis lateriflora western bristly scaleseed	2A G5 SH	Annual herb. Found in Sonoran desert scrub, sometimes in rocky or sandy soils. Found at elevations ranging from 1,200 to 2,200 feet amsl. Blooming period is from March to April.	Not Expected
Symphyotrichum greatae Greata's aster	1B.3 G2 S2	Perennial rhizomatous herb. Found on mesic soils within broadleaf upland forest, chaparral, cismontane woodland, lower montane coniferous forest, and riparian woodland habitats. Found at elevations ranging from 984 to 6,594 feet amsl. Blooming period is June to October.	Not Expected

**Notes*

U.S. Fish and Wildlife Service (USFWS)

FE *Endangered – any species which is in danger of extinction throughout all or a significant portion of its range.*

California Department of Fish and Wildlife (CDFW)

SE *Endangered – any native species or subspecies of bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.*

California Native Plant Society (CNPS) California Rare Plant Rank

1B *Plants rare, threatened, or endangered in California and elsewhere.*

2B *Plants rare, threatened, or endangered in California but more common elsewhere.*

4 *Plants of limited distribution – Watch List.*

Threat Ranks

.1 *Seriously threatened in California (over 80% of occurrences threatened/high degree any immediacy of threat).*

.2 *Moderately threatened in California (20 to 80 percent of occurrences threatened/moderate degree and immediacy of threat).*

.3 *Not very threatened in California (less than 20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known).*

NatureServe Conservation Status Rank

The Global Rank (G#) reflects the overall condition and imperilment of a species throughout its global range. The Infraspecific Taxon Rank (T#) reflects the global situation of just the subspecies or variety. The State Rank (S#) reflects the condition and imperilment of an element throughout its range within California. (G#Q) reflects that the element is very rare but there are taxonomic questions associated with it; the calculated G rank is qualified by adding a Q after the G#). Adding a ? to a rank expresses uncertainty about the rank.

G1/T1 *Critically Imperiled – At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.*

G2/T2 *Imperiled— At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.*

G3/T3 *Vulnerable— At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.*

G4/T4 *Apparently Secure— Uncommon but not rare; some cause for long-term concern due to declines or other factors.*

G5/T5 *Secure – Common; widespread and abundant.*

S1 *Critically Imperiled – Critically imperiled in the state because of extreme rarity (often 5 or fewer occurrences) or because of some factor(s) such as very steep declines making it especially vulnerable to extirpation from the State.*

S2 *Imperiled – Imperiled in the State because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or State.*

TABLE 4.4-1, CONTINUED

S3 *Vulnerable – Vulnerable in the State due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation.*

S4 *Apparently Secure – Uncommon but not rare; some cause for long-term concern due to declines or other factors.*

Source: https://www.cnps.org/rare-plants/california-rare-plant-ranks

However, based on the results of the field survey and a review of specific habitat preferences, distributions, and elevation ranges, Michael Baker determined that none of the special-status plant species identified in **Table 4.4-1** are expected to occur within the Project site, due to the following site conditions, and therefore are not discussed further:

- Existing high level of soil compaction due to development and foot traffic, limiting establishment of such species;
- Existing high cover of non-native ornamental species reduces available space for native plant species, thus precluding their establishment;
- Habitat fragmentation from development has reduced native vegetation that could provide a seed source. With the exception of the off-site chamise–sage chaparral along the northeastern edge of the survey area, there are no patches of native vegetation stands, and this particular patch of vegetation has been surrounded on all sides for decades by development and ornamental landscaping;
- Native plant recruitment is inhibited by several factors such as soil compaction from various human activities, and maintenance activities like weeding, mowing, manicuring, and irrigating that occur throughout the survey area; and
- No special-status species were observed during the survey.

Tree Survey Methods and Results

A tree survey was conducted at the Project site in March 2022 by UltraSystems Environmental, Inc. (UltraSystems 2022) (Appendix B) to identify the species, location, physical characteristics, health rating, and recommended mitigation measures for trees that pose risks to public safety, for diseased trees that could spread disease to other trees, and for protected trees that may be impacted by development of the Project.

Methodology: In addition to mapping on-site trees, the tree characteristics were gathered, which included identification to species (or genus in some instances), number of trunks per tree, trunk diameter, height, canopy diameter, and general health and vigor. Trunk diameter measurements were collected at 54 inches above the ground at the base of the tree, or diameter at breast height (DBH), using a tree diameter tape. Tree height measurements were performed using a rangefinder hypsometer with clinometer feature, or by estimating the tree height based on a visual estimate. Tree canopy circumference was determined using a Trimble Geo 7x unit while walking the perimeter of the canopy. The tree canopy's area was determined during post-processing based on the area within the tree canopy's circumference measured with the GPS unit. Only living tree parts were measured. The Trimble unit was also used to collect point data of each tree's location

by placing the unit at the north side of the trunk and collecting satellite data for at least 20 seconds.

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

Assessments of aesthetic and health factors for each tree, as well as an overall aesthetic grade, were recorded. Pursuant to the International Society of Arboriculture's *Guide for Plant Appraisal* (CTLA & ISA 2000), tree health and structure were evaluated with respect to five distinct tree components: roots, trunk(s), scaffold branches, small branches, and foliage. Each component was assessed with regard to health factors such as insect, fungal, or pathogen damage; fire damage; mechanical damage; presence of decay; presence of wilted or dead leaves; and wound closure. As with overall tree health, components are graded as excellent, good, average, poor, and dead (as defined below). This method of tree condition rating is comprehensive and results in ratings that are useful for determining the status of trees based on common standards. Trees in natural settings have important habitat value, as evidenced by numerous cavity nesters and insects that thrive on and within oak trees, even when they are considered in poor structural or health condition. However, this assessment focuses on tree condition with regard to health and structure for purposes of analyzing potential Project impacts and where necessary, providing recommendations for mitigating potential tree hazards, such as trees with weak limb attachments, cavities and rot, or excessive lean.

Photographs of each individual tree were also taken to document its condition during the inventory. The following are the definitions and criteria for the health ratings:

- Excellent: A healthy and vigorous tree characteristic of its species and reasonably free of any visible signs of stress, disease, or pest infestation.
- Good: A healthy and vigorous tree with less than 25% of the tree affected by visible signs of stress, disease, and/or pest infestation.
- Average: Semi-healthy in appearance, with 25%–75% of the tree showing evidence of stress, disease, and/or pest infestation.
- Poor: Greater than 75% of this tree shows evidence of stress, disease, and/or pest infestation and appears to be in a state of rapid decline. The degree of decline may vary greatly.
- Dead: This tree is either dead or shows little sign of survival.

Results: A total of 133 trees were observed on-site, of which approximately 37 may need to be removed as part of development of the Project (refer to **Figure 4.4-4**). Of the 133 on-site trees, 128 are within the Project site and 5 are located just outside near the intersection of Knight Way and Gould Avenue, but are still maintained by the District. The five off-site trees are Tree 31, black locust (*Robinia pseudoacacia*), Tree 32, olive (*Olea europea*), Tree 33, black locust, Tree 34, western sycamore (*Platanus racemosa*), and Tree 87, olive. Tree 34 is located within the City's right-of-way (ROW) and any plans to remove this tree would need to comply with Section 4.24 of the City's Municipal Code regarding the removal of trees in the public ROW.

In total, 35 tree species were identified during the survey and 3 individual trees were unidentified, one of which (Tree T15) was dead. Four species have a limited ranking and one has a moderate ranking on the California Invasive Plant Council Inventory, an inventory of invasive plant species in California (Cal-IPC 2022). There was evidence of insect boring on the bark of nine tree species, with coast live oak having the most frequent sign of boring with 6 of 28 individuals displaying boring signs. There were no special-status tree species observed on the Project site. Therefore, no direct or indirect impacts on special-status tree species would occur as a result of the proposed Project.

Special-Status Wildlife

No special-status wildlife were observed during the field survey. However, a total of 33 special-status wildlife species have been recorded in the USGS *Pasadena*, *Burbank*, *Condor Peak*, and *Mt. Wilson*, *California* 7.5-minute quadrangles by the CNDDB and CIRP, and for the region by IPaC. Based on the literature review, 19 special-status wildlife species met one or more of the following criteria: reported as recent occurrences (last observed between 2002 and 2022), documented within 1 mile of the survey area, and/or recognized as occurring based on previous surveys or knowledge of the area. Those species that have been recorded within 1 mile of the survey area are shown in **Figure 4.4-5**, *CNDDB Wildlife Species*. Of the 19 species, one listed (coastal California gnatcatcher, FT) and four non-listed wildlife species were determined to have a potential to occur within the Project survey area. Due to several biological and physical disturbances within the survey area as well as analysis with the aforementioned criteria to evaluate potential for occurrence (present, high, moderate, low, not expected), it was determined that the remaining 14 of the 19 special-status wildlife species identified in the database query have no potential to occur in the Project site. These 19 wildlife species are represented in **Table 4.4-2**.

TABLE 4.4-2 WILDLIFE LITERATURE REVIEW RESULTS – POTENTIAL TO OCCUR

Scientific Name Common Name	Status*	General Description and Habitat	Potential for Occurrence
Anaxyrus californicus arroyo toad	FE SSC G2G3 S2S3	Occurs in semi-arid regions near washes or intermittent streams, including valley-foothill grasslands, desert riparian, desert washes, and oak woodlands. Breeding habitat consists of shallow streams with a mixture of sandy and gravelly substrate and sandy terraces. Generally, requires mulefat (*Baccharis salicifolia*) and willow (*Salix* spp.) in the streambed for vegetative canopy for breeding areas and forages for insects primarily under oak (*Quercus* spp.), Fremont cottonwood (*Populus fremontii*), and California sycamore (*Platanus racemosa*) trees. Occurs at elevations from near sea level to about 4,600 feet amsl.	Not Expected
Anniella spp. California legless lizard	SSC G3G4 S3S4	Resemble small snakes. Rarely found crawling in the open, except at night. Typically found under objects or leaves, often in gardens in Southern California. Not commonly seen.	High
Anniella stebbinsi Southern California legless lizard	SSC G3 S3	Locally abundant specimens are found in coastal sand dunes and a variety of interior habitats, including sandy washes and alluvial fans.	High
Aspidoscelis tigris stejnegeri coastal whiptail	SSC G5T5 S3	This subspecies is found in coastal southern California, mostly west of the Peninsular Ranges and south of the Transverse Ranges, and north into Ventura County. Ranges south into Baja California. Found in a variety of ecosystems, primarily hot and dry open areas with sparse vegetation in chaparral, woodland, and riparian areas. Associated with rocky areas with little vegetation or sunny microhabitats within shrub or grassland associations.	Not Expected
Bombus crotchii Crotch bumble bee	SCE G3G4 S1S2	Found from coastal California east to the Sierra-Cascade crest and south into Mexico. Primarily occurs in California, including the Mediterranean region, Pacific coast, western desert, great valley, and adjacent foothills through most of southwestern California. Has also been recorded in Baja California, Baja California Sur, and in southwest Nevada. Inhabits open grassland and scrub habitats. Primarily nests underground. Food plant genera include *Antirrhinum*, *Phacelia*, *Clarkia*, *Dendromecon*, *Eschscholzia*, and *Eriogonum*.	Not Expected
Corynorhinus townsendii Townsend's big-eared bat	SSC G4 S2	Now considered uncommon in California. Details of its distribution are not well known. This species is found in all but subalpine and alpine habitats and may be found at any season throughout its range. Most abundant in mesic habitats. Requires caves, mines, tunnels, buildings, or other human-made structures for roosting.	Not Expected

TABLE 4.4-2, CONTINUED

Scientific Name Common Name	Status*	General Description and Habitat	Potential for Occurrence
Emys marmorata western pond turtle	SSC G3G4 S3	Found in ponds, lakes, rivers, streams, creeks, marshes, and irrigation ditches, with abundant vegetation, either rocky or muddy bottoms, in woodland, forest, and grassland. In streams, prefers pools to shallower areas. Logs, rocks, cattail mats, and exposed banks are required for basking. May enter brackish water and even seawater. Found at elevations from sea level to over 5,900 feet amsl.	Not Expected
Falco peregrinus anatum American peregrine falcon	FP G4T4 S3S4	This species breeds and winters throughout California, with the exception of desert areas. Use a large variety of open habitats for foraging, including tundra, marshes, seacoasts, savannahs, grasslands, meadows, open woodlands, and agricultural areas. Sites are often located near rivers or lakes. Riparian areas, as well as coastal and inland wetlands, are also important habitats year-round. The species breeds mostly in woodland, forest, and coastal habitats. The nest is typically a scrape or depression dug in gravel on a cliff ledge or on man-made structures, including skyscraper ledges, tall towers, and bridges. In Southern California, peregrine falcons are primarily found at coastal estuaries and inland oases, wherever a food source is located.	High
Gila orcuttii arroyo chub	SSC G2 S2	Warm streams of the Los Angeles Plain, which are typically muddy torrents during the winter, and clear quiet brooks in the summer, possibly drying up in places. They are found both in slow-moving and fast-moving sections, but generally deeper than 16 inches.	Not Expected
Lasiurus frantzii western red bat	SSC G4 S3	Winter range includes western lowlands and coastal regions south of San Francisco Bay. There is migration between summer and winter ranges. Roosting habitat includes forests and woodlands from sea level up through mixed conifer forests. Roosts primarily in trees, less often in shrubs. Roost sites are often found adjacent to streams, fields, or urban areas. Forages over grasslands, shrublands, open woodlands and forests, and croplands. Not found in desert areas.	Not Expected
Neotoma lepida intermedia San Diego desert woodrat	SSC G5T3T4 S3S4	Occurs in coastal scrub communities between San Luis Obispo and San Diego Counties. Found in a variety of shrub and desert habitats, primarily associated with rock outcroppings, boulders, cacti, or areas of dense undergrowth. Woodrats often are associated with cholla cactus which they use for water and dens or boulders and boulder piles. The most common natural habitats for records are chaparral, coastal sage scrub (including Riversidean sage scrub and Diegan coastal sage scrub) and grassland.	Not Expected

TABLE 4.4-2, CONTINUED

Scientific Name Common Name	Status*	General Description and Habitat	Potential for Occurrence
Phrynosoma blainvillii coast horned lizard	SSC G3G4 S4	Occurs in a wide variety of vegetation types including coastal sage scrub, annual grassland, chaparral, oak woodland, riparian woodland and coniferous forest. Its elevational range extends up to 4,000 feet in the Sierra Nevada foothills and up to 6,000 feet in the mountains of southern California. In inland areas, this species is restricted to areas with pockets of open microhabitat, created by disturbance (e.g., fire, floods, unimproved roads, grazing lands, and fire breaks). The key elements of such habitats are loose, fine soils with a high sand fraction; an abundance of native ants or other insects; and open areas with limited overstory for basking and low, but relatively dense shrubs for refuge.	Not Expected
Polioptila californica californica Coastal California gnatcatcher	FT SSC G4G5T2Q S2	Yearlong resident of sage scrub habitats that are dominated by California sagebrush. This species generally occurs below 750 feet amsl in coastal regions and below 1,500 feet amsl inland. Ranges from Ventura County, south to San Diego County and northern Baja California. It is less common in sage scrub with a high percentage of tall shrubs. Prefers habitat with more low-growing vegetation.	Low
Rhinichthys osculus ssp. 3 Santa Ana speckled dace	SSC G5T1Q S1	Requires permanent flowing streams with summer water temperatures of 62 – 68 degrees Fahrenheit. Inhabits shallow cobble and gravel riffles and small streams that flow through steep, rocky canyons with chaparral covered walls.	Not Expected
Setophaga petechia yellow warbler	SSC G5 S3S4	Present in California from April through September. Nests in riparian areas dominated by willows, cottonwoods, California sycamores, or alders (*Alnus* spp.) or in mature chaparral. May also use oaks, conifers, and urban areas near stream courses.	Moderate
Taricha torosa Coast Range newt	SSC G4S4	Found in wet forests, oak forests, chaparral, and rolling grasslands. In southern California, it is found in drier chaparral, oak woodland, and grasslands.	Not Expected
Taxidea taxus American badger	SSC G5 S3	Occupies a wide variety of habitats including dry, open grassland, sagebrush, and woodland habitats. Require dry, friable, often sandy soil to dig burrows for cover, food storage, and giving birth. Occasionally found in riparian zones and open chaparral with less than 50% plant cover.	Not Expected

TABLE 4.4-2, CONTINUED

Scientific Name Common Name	Status*	General Description and Habitat	Potential for Occurrence
Thamnophis hammondii two-striped garter snake	SSC G4 S3S4	Occurs in or near permanent fresh water, often along streams with rocky beds and riparian growth up to 7,000 feet amsl.	Not Expected
Vireo bellii pusillus least Bell's vireo	FE SE G5T2 S2	Summer resident in southern California. Breeding habitat generally consists of dense, low, shrubby vegetation in riparian areas, and mesquite brushlands, often near water in arid regions. Early successional cottonwood-willow riparian groves are preferred for nesting. The most critical structural component of nesting habitat in California is a dense shrub layer that is 2 to 10 feet (0.6 to 3.0 meters) above ground. The presence of water, including ponded surface water or moist soil conditions, may also be a key component for nesting habitat.	Not Expected

**Notes*

U.S. Fish and Wildlife Service (USFWS)

FE *Endangered – any species which is in danger of extinction throughout all or a significant portion of its range.*

FT *Threatened – any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.*

California Department of Fish and Wildlife (CDFW)

SE *Endangered – any native species or subspecies of bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.*

SCE *State Candidate for Listing as Endangered – the classification provided to a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the Fish and Game Commission has formally noticed as being under review by the Department of Fish and Wildlife for addition to the list of endangered species, or a species for which the commission has published a notice of proposed regulation to add the species to the list of endangered species.*

FP *Fully Protected – any native species or subspecies of bird, mammal, fish, amphibian, or reptile that were determined by the State of California to be rare or face possible extinction.*

SSC *Species of Special Concern – any species, subspecies, or distinct population of fish, amphibian, reptile, bird, or mammal native to California that currently satisfies one or more of the following criteria:*

- *is extirpated from California or, in the case of birds, in its primary seasonal or breeding role;*
- *is listed as Federally-, but not State-, threatened or endangered; meets the State definition of threatened or endangered but has not formally been listed.*
- *is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; or*
- *has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for State threatened or endangered status.*

NatureServe Conservation Status Rank

The Global Rank (G#) reflects the overall condition and imperilment of a species throughout its global range. The Infraspecific Taxon Rank (T#) reflects the global situation of just the subspecies or variety. The State Rank (S#) reflects the condition and imperilment of an element throughout its range within California. (G#Q) reflects that the element is very rare but there are taxonomic questions associated with it; the calculated G rank is qualified by adding a Q after the G#). Adding a ? to a rank expresses uncertainty about the rank.

G1/T1 *Critically Imperiled – At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.*

TABLE 4.4-2, CONTINUED

G2/T2	*Imperiled— At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.*
G3/T3	*Vulnerable— At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.*
G4/T4	*Apparently Secure— Uncommon but not rare; some cause for long-term concern due to declines or other factors.*
G5/T5	*Secure – Common; widespread and abundant.*
S1	*Critically Imperiled – Critically imperiled in the state because of extreme rarity (often 5 or fewer occurrences) or because of some factor(s) such as very steep declines making it especially vulnerable to extirpation from the State.*
S2	*Imperiled – Imperiled in the State because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or State.*
S3	*Vulnerable – Vulnerable in the State due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation.*
S4	*Apparently Secure – Uncommon but not rare; some cause for long-term concern due to declines or other factors.*

For species that are not expected to occur, the survey area lacks suitable habitat for foraging, nesting, and/or breeding, there are no known records within 5 miles of the survey area, or the survey area does not lie within the species' reported distribution or elevation range, or a combination of all of those factors. Additionally, some of the species were excluded because the concentration of feral and domestic pet species is high in the Project area, where the feral species would hunt and reduce populations of small rodents, amphibians, and reptiles that lack effective defense mechanisms. Then, there is high cover of non-native ornamental plant species that outcompete and thus preclude the establishment of native plant species. Many of the wildlife species require native vegetation for their foraging and nesting requirements. Third, habitat fragmentation from development reduces the size of habitat patches containing contiguous stands of native vegetation. Thus, certain species would not have sufficient foraging habitat or cover for nesting or shelter requirements. Fourth, the survey area lacks complex vegetation communities. In general, more complex natural communities with more vegetation layers and more plant species provide higher-value wildlife habitat, contain more niches, and usually support more animal species than less complex vegetation communities.

Listed Bird Species

One listed bird species, coastal California gnatcatcher, was determined to have a low potential to occur in the survey area. This species is a permanent resident of and breeds within coastal sage scrub habitat. It also utilizes chaparral, grassland, and riparian habitats next to coastal sage scrub, particularly during juvenile dispersal (Billerman et al. 2022). Suitable nesting habitat for this species does not occur within the Project site; however, this species could occur within the small patch of sage scrub (chamise–sage chaparral) occurring on the slopes behind houses in the far northeastern side of the survey area. A single gnatcatcher was reported in 2013, approximately 1.4 miles northwest of this chamise–sage chaparral habitat patch (eBird 2022). Although this occurrence is reasonably close to the survey area, it is separated by development and this species is not known to have a very strong presence in this part of its range, being more common in coastal regions and areas farther south, particularly in Orange County and San Diego County (Cooper et al. 2017, CDFW 2022a, eBird 2022). In Los Angeles County, this species is locally common along

the coast (e.g., Rancho Palos Verdes, Ballona Wetlands Ecological Reserve) and in areas to the southeast of the survey area (e.g., Whittier Narrows, Bonnelli Regional Park) (eBird 2022) but is rare farther north, being "evidently extirpated" in the San Fernando Valley and irregular in the Santa Clarita Valley (Cooper et al. 2017). The survey area is located at the far northern end of the San Gabriel Valley, where it abuts the San Fernando Valley. With the patch of chamise–sage chaparral located nearly 500 feet from the Project site and with implementation of MM BIO-1 prior to construction, impacts from noise and dust during Project construction would be less than significant.

Non-listed Bird Species

Two non-listed bird species, American peregrine falcon and yellow warbler, were determined to have a moderate or high potential to occur in the survey area. American peregrine falcons visit many open habitats such as tundra, marshes, seacoasts, savannahs and high mountains (Billerman et al. 2022). These falcons hunt from high perches such as tall trees or buildings. Since there are tall conifers, eucalyptus, and pine trees within the survey area, as well as the Project site, there is a moderate potential for peregrines to occur in the survey area for foraging purposes. Peregrines breed in cliffs (or tall buildings) and the lack of such structures indicates that there is no potential for breeding within the survey area. Removal of some of the tall trees in the Project site could impact this bird species; however, with implementation of MM BIO-1 described below, impacts to this species would be less than significant.

Yellow warbler has been reported within 1 mile of the survey area and could occur within the eucalyptus and other large trees within the survey area. Its nesting habitat is typically characterized by wet, deciduous thickets (especially those dominated by willows), eucalyptus groves, and disturbed and early successional habitats (Lowther et al. 2020). Yellow warblers typically begin arriving in the region in mid-April, moving out of the lowlands in large numbers to breed from June to August before dispersing into lowlands again and ultimately leaving Southern California in early October (Hamilton and Willick 1996). Trees within the survey area are suitable for migrants to forage in; however, breeding is not expected within on-site trees, as a result of the close proximity to human activities. Regardless, with implementation of MM BIO-1 described below, impacts to this species would be less than significant.

In addition, the Project site contains ornamental vegetation and building structures that could potentially provide cover and nesting habitat for common bird species that have adapted to urban areas, such as house finches (*Haemorhous mexicanus*) and mourning doves (*Zenaida macroura*). Native bird species such as mourning doves are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC) (Sections 3503, 3503.5, and 3513), which render it unlawful to take native breeding birds, their nests, eggs, and young. The proposed Project plans include the removal or destruction of vegetation (including trees), which may occur during the bird nesting season (generally between February and September but occasionally as early as January, particularly for raptors), thus directly impacting nesting birds. Increased noise, vibration, and dust generated during construction during the nesting season could cause indirect impacts which could adversely affect the breeding behavior of some birds, and lead to the loss (take) of eggs and chicks, or nest abandonment. Therefore, the Project has the potential to impact

migratory non-game breeding birds, and their nests, young, and eggs. With implementation of MM BIO-1, impacts to nesting birds protected under the MBTA and CFGC during Project construction would be less than significant.

Sensitive Reptile Species

Two sensitive reptile species have a high potential to occur within the survey area, the Southern California legless lizard and the California legless lizard. The latter is considered the generic genus-level taxon of legless lizards, which recently underwent a range-wide series of taxonomic splits in California and for which the geographic ranges are not yet completely known or understood. Legless lizards are typically found in sandy washes or other soft substrates where they feed at the bases of vegetation and burrow under rocks, boards, logs, or leaf litter. As noted by the CNDDB, lizards may also be present in undeveloped areas northeast of the Project site, such as the patch of chamise–sage chaparral or other undeveloped areas associated with the La Cañada Flintridge Country Club, but these areas are outside the Project site and would not be impacted by construction. Ordinarily, legless lizards are associated with native habitats; however, there is a 2015 record of a Southern California legless lizard being unearthed in a planting bed at a local residence approximately 400 feet from the Project site (CDFW 2022a). It is possible that legless lizards may be present throughout the general vicinity, although they would not be expected to occur in any area that has been paved over and would be unlikely to occur in areas where the ground has already been compacted. If present, they would most likely occur along landscaped slopes such as those along the northern edge of the Project site where soil may be less compacted. They would otherwise not be expected to occur within the areas proposed for construction due to the paved surfaces, but may occur within existing landscaped areas. For this reason, MM BIO-2 is proposed to conduct pre-construction clearance surveys prior to the start of vegetation removal activities during construction.

Other Wildlife

Bats occur throughout most of Southern California and may use the survey area as foraging habitat, although it is heavily disturbed. Trees and structures within the Project site and surrounding residential development may provide suitable roosting habitat for individual or small groups of bats; however, the Project site is unlikely to support significant bat roosting due to active human use with regular and high levels of noise and other disturbances. Outside the Project site, suitable roosting habitat may be provided in places like the Gould Canyon Channel, which has subterranean areas, and the country club (north/northeast of the survey area), which has trees in a more natural setting. Since the channel and these trees occur outside the survey area, noise and dust produced by construction activities are not expected to impact bats. However, implementation of MM BIO-3 prior to construction, would ensure that any impacts to bats would be less than significant.

Mitigation Measures

MM BIO-1 Preconstruction Breeding Bird Survey

In the event that Project construction or activities occur during February 15 through August 31, a qualified biologist shall complete a survey for nesting bird activity within the Project site and a 500-foot buffer (as access to adjacent areas allows), including areas with increased impacts resulting from noise disturbances, human activity, dust, vegetation clearing, ground-disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment. Nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. A qualified biologist shall conduct bird surveys no more than 14 days prior to removing any trees or buildings to provide confirmation on the presence or absence of active nests in affected trees or buildings. Surveys shall be conducted should construction commence in areas not previously surveyed and in previously surveyed areas that have been undisturbed for at least 14 days prior to recommencing work for the duration during the bird nesting season.

If an active nest is found, a qualified biologist shall determine the nesting status and set up a species-appropriate no-work buffer that should be no less than 300 feet initially (500 feet for raptor nests) or as determined by a qualified biologist depending on the species and location. Buffers shall be marked around the active nest site as directed by the qualified biologist and maintained during Project construction and activities. Buffers shall be increased if needed to protect the nesting birds. Removal of the affected trees or buildings shall be deferred, no additional Project activities shall be allowed inside buffers, and construction personnel shall be restricted from the area until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. Construction personnel shall be instructed on the sensitivity of buffered areas. The buffer perimeter shall be fenced or adequately demarcated. A qualified biologist shall serve as a construction monitor during those periods when Project activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur. Buffer fencing shall be constructed with materials that are not harmful to wildlife. Prohibited materials shall include, but are not limited to, spikes, glass, razor, or barbed wire.

Vegetation clearing and grubbing activities when birds are likely to be nesting shall be monitored by a qualified biologist. Such activities shall only occur when a qualified biologist is present to ensure that these activities remain within the Project footprint (i.e., outside the demarcated buffer), that flagging/stakes/fencing are being maintained, and to minimize the likelihood that active nests are abandoned or fail due to Project activities.

MM BIO-2 Preconstruction Clearance Survey

A qualified biologist shall conduct a preconstruction clearance survey prior to vegetation removal to search for special-status wildlife resources that may be present

within the construction area. The biologist shall be thoroughly familiar with the habitat requirements and life histories of special-status species that could occur. Should the special-status species, such as the legless lizard be detected, the biological shall either recommend an avoidance area or if avoidance is not possible then the biologist shall relocate the lizard out of harm's way in accordance with CDFW recommendations. The biologist shall submit survey results, including negative results, to CDFW following the survey and prior to the start of construction.

MM BIO-3 Bat Protection

A qualified bat biologist shall conduct a bat survey within a 500-foot buffer (as access to adjacent areas allows) of the school, to identify trees and/or structures that could provide daytime and/or nighttime roost sites. Surveys shall include all areas that would experience increased impacts resulting from noise disturbances, human activity, dust, vegetation clearing, ground-disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment. If suitable roosting habitat is present, then acoustic recognition technology may be required to maximize detection of bats. Survey methodology and results, including negative findings, should be submitted to the California Department of Fish and Wildlife (CDFW) for review two weeks prior to initiation of Project activities. Should it be determined that roosting bats are present in the survey area and may be impacted during Project construction, the qualified bat biologist would coordinate with CDFW to identify avoidance and minimization measures and/or mitigation measures, such as seasonal exclusions, creation of new or replacement roofing/roosting habitat, installation of one-way doors that allow bats to exit but prevent bat reentry, to reduce impacts to bats to a level below significance.

Level of Significance After Mitigation

After the implementation of **MM BIO-1**, **MM BIO-2**, and **MM BIO-3,** potential project impacts during construction to special-status birds and native bird species protected under the MBTA and the CFGC, as well as to special status species including the legless lizard, and bats, would be reduced to a less than significant level.

Significant impacts to special-status species and sensitive natural habitats during Project operation are not anticipated as operation activities would occur within a site that has been previously developed and does not contain native habitats, would be utilized for the same purpose, and generally does not provide suitable habitat for special-status species.

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

No Impact. Eight special-status vegetation communities have been reported in the USGS *Pasadena*, *Mt. Wilson*, *Burbank*, and *Condor Peak, California* 7.5-minute quadrangles by the CNDDB: California Walnut Woodland, Open Engelmann Oak Woodland, Riversidian Alluvial Fan

Sage Scrub, Southern California Arroyo Chub/Santa Ana Sucker Stream, Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, Southern Mixed Riparian Forest, and Southern Sycamore Alert Riparian Woodland. No special-status vegetation communities were observed within the survey area during the field survey, neither was any riparian habitat. The Project site is also not located within designated Critical Habitat for any federally listed plant or wildlife species (refer to **Figure 4.4-6**). Therefore, Project construction and Project operations would have no impact on riparian habitats or other sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS.

4.4-c Would the project 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. Based on the results of the field survey and review of the NWI Mapper (USFWS 2022c), there are no state or federally protected wetlands or other waters within the Project site (refer to **Figure 4.4-7**). Although the Gould Canyon Channel runs through the survey area west and south of the Project site, it is outside of the site and on the opposite side of campus from the proposed improvements. Therefore, Project construction and operations would have no impact on state or federally protected wetlands or other waters.

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

No Impact. Based on the results of the field survey, the only potential wildlife movement corridor is within Gould Canyon Channel, which runs west and south of the Project site. The Project site is fenced around its entire perimeter and does not provide any access in or out except through locked gates or through the administration building, restricting terrestrial wildlife movement across the Project site. Furthermore, the Project site does not provide any habitat features to support any migratory movement through the site, nor does it support resident or migratory fish species or wildlife nursery sites. Therefore, Project construction and operations would have no impact on native resident or migratory fish species, native resident or migratory wildlife corridors, or the use of native wildlife nursery sites.

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

Less Than Significant Impact with Mitigation Incorporated. The school campus is located within a developed urban area and contains trees and shrubs on public/semi-public property owned by the La Cañada Unified School District. The District has not adopted a tree protection ordinance; therefore, no District tree ordinances exist to regulate the protection of tree species on the project site. Of the 133 trees that were surveyed on the Project site, only one tree, a western sycamore (Tree 34), is located within the City's ROW. Any plans to remove Tree 34 would need to comply with Municipal Code Section 4.24. All other trees in the Project site fall within the District's property and would not require any additional permitting to prune or remove. Therefore, the

Project would not conflict with any ordinances protecting biological resources, including any local policies or ordinances protecting biological resources, as they generally do not apply to District-owned lands. The Project impacts would be less than significant.

Although there are no tree ordinances that impose regulations on the impact of construction activities or operations on trees on the Project site, the District intends to make efforts to protect on-site native trees that provide valuable ecological habitat and that offer visually appealing character to the community. There are several native tree species on the Project site, including coast live oak trees. The District intends to incorporate tree protection and replacement to offset the loss of any native oak trees. While Project impacts are less than significant, the District proposes Project Design Features (PDFs) PDF-BIO-1 Coast Live Oak Tree Protection and PDF-BIO-2 Coast Live Oak Planting Measure to protect coast live oak tree protection during construction and implement new plantings of native oak trees to offset any oak tree removals.

Project Design Features

PDF-BIO-1 Coast Live Oak Tree Protection

During Project construction, the measures described below shall be taken to protect any coast live oak trees designated to be preserved and for which the root systems are located near and vulnerable to damage by construction activities. These measures shall be performed by a certified arborist or under the supervision of a certified arborist and/or qualified restoration professional. The exposed tap root, main roots, and any surface-feeding roots exceeding 1 inch in diameter shall be wrapped in protective moistened burlap during the excavation of existing pavement and buildings and during the regrading phase and installation of the new parking lot. The roots zone (under dripline) and 5 feet from the drip line shall be excavated with hand tools, using a probe (metal rod or stick) to locate and unearth roots, leaving them in their natural orientation. A mini excavator shall be used only if absolutely necessary. Work will be done as quickly as possible to expose the roots for as little time as possible and the roots will be reburied with clean fill as soon as is feasible (no longer than a day or so, if possible). The burlap will be kept moist. Efforts will be made to avoid cutting roots. If roots need to be cut, they will be cut with sharpened, clean, disinfected tools (10 percent bleach solution) with every effort to avoid tearing the root and root surface. A minimum distance of 8 feet should be maintained of the root (distance from the root crown to terminal end of root), where possible. If the current elevation of the trees' existing root collars differs by more than 1 foot from the new grade, then a 10-foot radius of soil at the root collar grade shall be placed around each tree. If a certified arborist or and/or qualified restoration professional determines work is being performed improperly, that individual(s) shall stop work and determine the best course of action to avoid any tree damage or mortality before restarting work.

These procedures have a potential to cause decreased health (greater than 25 percent signs of visible stress) or mortality of any oak trees designated to be preserved. If any root-disturbing activities are determined to have caused irreversible

impacts that may eventually lead to decreased health or mortality of any oak tree, those activities and potential impacts shall be documented immediately. All documentation shall be summarized in a report provided to the La Cañada Unified School District. Preserved oak trees that may succumb to impacts shall be replaced with oak trees that are of the same species and variety.

Placement of fill dirt, staging areas, chemicals, or debris should be away from any oak trees designated to be preserved.

PDF BIO-2 Coast Live Oak Planting Measure

If coast live oak trees are proposed to be removed during construction, to offset the loss of native trees, the District and landscape architect shall work with a certified arborist and/or qualified restoration professional to select the most appropriate location for replacement coast live oak trees. Coast live oak trees shall not be planted in any area that will be subject to future modernization projects or ground disturbance work that may impact replacement trees. Locations shall have appropriate biological or physical factors required by coast live oak trees to grow and persist where possible.

The District and landscape architect shall work with a certified arborist and/or qualified restoration professional to acquire appropriately sized, locally sourced coast live oak trees from a local native plant nursery that implements *Phytophthora*/Clean Nursery Stock protocols. This may reduce the probability of introducing coast live oak trees contaminated with pests, diseases, and pathogens that could spread and infect native oak trees or habitats. A certified arborist and/or qualified restoration professional shall inspect and potentially quarantine nursery stock before bringing them into the Project site and supervise the installation/transplanting of the coast live oak trees.

The District shall protect and monitor the survivorship of planted coast live oak trees until the trees begin to produce seeds. The District shall consult with the certified arborist and/or qualified restoration professional on a long-term maintenance plan to provide protective caging, shading, and irrigation. Oak trees shall be protected from trampling, damage, or climbing. The District shall also consult with the certified arborist and/or qualified restoration professional if coast live oak trees show symptoms of stress and determine the appropriate response to prevent mortality.

4.4-f Would the project conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project site is located within the developed City of La Cañada Flintridge, and is not located in an area covered by a habitat conservation plan, natural community conservation plan, or other approved conservation plan. Therefore, the project would not conflict with any provisions of such a plan and no impact would occur.

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
CULTURAL RESOURCES. Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Methodology

A cultural resources analysis was conducted that included a records search at the South Central Coastal Information Center (SCCIC), a literature and historical map review, historical society consultation, Native American Heritage Commission (NAHC) Sacred Lands File search, a buried archaeological site sensitivity analysis, built environment survey, and California Register of Historical Resources evaluation of the Project site. The SCCIC records search was conducted on October 6, 2022, and included the Project site and half-mile buffer. Additionally, the Lanterman House Historical Society of La Cañada was consulted regarding any information or concerns about historical resources within the Project area via email correspondence on September 28, 2022. On October 4, 2022, the Historical Society replied that they did not have any concerns about this Project. An archaeological and built environment field survey was conducted on October 17, 2022. The results of the cultural resources analysis are included in the Cultural and Paleontological Resources Identification and Evaluation Memorandum (Appendix C) and summarized below.

Discussion of Impacts

4.5-a Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No Impact. A historical resource is defined in Section 15064.5(a)(3) of the CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

Based on the cultural resources records search conducted at the SCCIC, no cultural resources were identified within the Project site, and two cultural resources were identified within the half-mile search radius. The resources include a historic tree landscaping and the Angeles National Forest Historical Landmark No. 717. The proposed Project would be located entirely within the boundaries of the existing school campus, and no impact would occur related to these two off-site cultural resources.

As discussed above, an intensive-level, built environment survey of the Project site was conducted. Paradise Canyon Elementary School was built in 1949 as the second of three elementary schools in the former La Cañada Elementary School District. The school was designed by architectural firm Flewelling and Moody, who constructed the school according to the trends at the time, finger plan design, which was ubiquitous in the 1940s as the most common school plan constructed in the United States. The school is not considered to be associated with persons who significantly contributed to local, state, or national culture and history nor does it contribute to our understanding of human history because the property is not and never was the principal source of important information pertaining to significant events, people. Additionally, an integrity analysis was considered immaterial because the evaluation found that the school lacked the necessary significance to warrant further analysis of its physical and historic integrity. Thus, based on an evaluation of Paradise Canyon Elementary School for its eligibility for listing in the California Register (OHP 2001) in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, using the criteria outlined in Section 5024.1 of the California Public Resources Code, the property is recommended not eligible for listing in the California Register as it lacks historical significance. As such, Paradise Canyon Elementary School is not a historical resource as defined under Section 15064.5(a) of the CEQA Guidelines. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a historical resource, and no impact would occur.

4.5-b Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

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

The SCCIC records search results and the field survey identified no archaeological resources within the Project site or a half-mile search area. The soils in the Project site have been heavily impacted by modern development upon the surface and in the near-surface sediments. Soils within the Project site are mapped as Urban Land of varying complexes, including the Tujunga and Soboba series. Urban Land is heavily modified through the creation of fills, soil import, and construction, and is typically of low sensitivity for significant prehistoric resources. Additionally, the soil sits upon Pleistocene-age sediment with low potential for containing archaeological materials

because it predates human activities. Lastly, the Project site has low sensitivity for significant or potentially significant historic-period archaeology sites as a result of modern development, since the Project site and the surrounding areas are completely built out.

The maximum depth of ground disturbance associated with Project construction is expected to reach 8 feet below ground surface for earthwork, foundation over-excavation, and utility work. It is not anticipated that excavation at this depth would impact any unknown buried archaeological resources, since the school property has been previously disturbed and has been backfilled with engineered fill during the school development and prior modernization efforts. Nonetheless, should any archaeological material be discovered during ground-disturbing activities, MM CUL-1 would be implemented to temporarily halt work in the vicinity of the find. MM CUL-1 would require the La Cañada Unified School District to retain a qualified professional archaeologist meeting the Secretary of the Interior's Standards for archaeology to evaluate the significance of the find and determine appropriate treatment for the resource in accordance with provisions of CEQA Guidelines Section 15064.5, the National Historic Preservation Act, 36 CFR (Code of Federal Regulations) Section 800.6 (Resolution of adverse effects), and Section 800.13 (Post-review discoveries). Construction activities may continue on other parts of the construction site while the evaluation and treatment of archaeological resources take place.

Mitigation Measures

MM CUL-1 Archaeological Resources Inadvertent Discovery

In the event that any subsurface cultural resources are encountered during earth-moving activities, all work within 50 feet shall be halted until an archaeologist can evaluate the findings and make recommendations. Prehistoric materials can include flaked-stone tools (e.g., projectile points, knives, choppers) or obsidian, chert, or quartzite toolmaking debris; culturally darkened soil (i.e., midden soil often containing heat-affected rock, ash, and charcoal, shellfish remains, and cultural materials); and stone milling equipment (e.g., mortars, pestles, handstones). Historical materials might include wood, stone, or concrete footings, walls, and other structural remains; debris-filled wells or privies; and deposits of wood, metal, glass, ceramics, and other refuse. The archaeologist may evaluate the find in accordance with federal, state, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2, to assess the significance of the find and identify avoidance or other measures as appropriate. If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within the immediate area of the discovery shall be redirected and the find must be evaluated by a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology.

Level of Significance After Mitigation

Implementation of **MM CUL-1** above would reduce potential impacts to archaeological resources to a less than significant level.

4.5-c Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact. The proposed Project would be located within the existing school campus, a site that has been in use as a school since the 1950s and is fully developed. During previous ground disturbance activities, no human remains were identified or recorded on-site. Thus, the potential to disturb any human remains is low.

In the unlikely event that human remains are discovered, the remains would be treated in accordance with all applicable regulations. In accordance with the provisions of the California Health and Safety Code Section 7050.5, in the event that human remains are discovered during Project construction, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains would occur, and the Los Angeles County coroner would be notified. The coroner would provide recommendations concerning the treatment and disposition of the human remains within two working days. If the remains and/or related resources, such as funerary objects, are determined to be of Native American origin, the coroner would contact the California NAHC within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC would immediately notify the person it believes to be most likely descended from the deceased Native American. The most likely descendent would be given access to the site where the remains were discovered and may make recommendations for the treatment and disposition of the remains and related resources, as well as providing input regarding the potential for other remains to be present. Work at the discovery site may commence only after consultation with the most likely descendent and treatment of the remains and any associated resources have been concluded. Work may continue on other parts of the Project site while consultation and treatment are conducted. With adherence to existing regulations, impacts related to human remains would be less than significant.

4.6 ENERGY

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion of Impacts

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

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

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

Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering equipment and lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of offroad construction vehicles and equipment on the project site, construction worker travel to and from the project site, and delivery and haul truck trips hauling solid waste from and delivering building materials to the project site. The off-road construction equipment and

construction-related vehicle trips fuel usage was calculated through use of the fuel use assumptions provided in Appendix D, which found that construction activities for the proposed Project would consume 15,499 gallons of gasoline and 166,802 gallons of diesel fuel. This equates to 0.0004 percent of the gasoline and 0.05 percent of the diesel consumed annually in Los Angeles County. As such, the construction-related petroleum use would be nominal, when compared to current countywide petroleum usage rates.

Construction activities associated with the Project would be required to adhere to all State and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the Proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant. Development of the Project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the Project. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete; therefore, it is reasonable to assume that the production 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.

Operation

The proposed modernization Project would consist of the removal of 15 portable classrooms and one single-story classroom building that would be replaced with two new classroom buildings as well as renovations to 14 existing classrooms, the library, cafeteria, and administration buildings. The modernization activities including the replacement new buildings would not change the capacity of the school or affect the school programming.

Since the development of the proposed Project would result in the replacement and renovation of older, less efficient structures with new and renovated structures that would be designed to comply with the most current State and City energy efficiency requirements, which includes CCR Title 24, Part 6 *Building Energy Efficiency Standards* and CCR Title 24, Part 11: *California Green Building Standards.* CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the new and renovated structures, including enhanced insulation, energy-efficient windows, use of energy efficient lighting and appliances, such as HVACs with electrical heat pumps, as well as requiring a variety of other energy-efficiency measures. Additionally, the proposed Project would comply with the 2022 California Energy Code which require the installation of solar photovoltaic (PV) panels on new buildings. Therefore, the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant.

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

Less Than Significant Impact. The proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As noted previously, the proposed Project would be designed to comply with all applicable state and local plans and codes. This would include CCR Title 24, which mandates a variety of energy conservation and efficiency standards

to be implemented through building design and construction. In addition, electricity supplied to the Project by SCE would comply with the state's Renewables Portfolio Standard, which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 60 percent of total procurement by 2030 and requires all of the state's electricity to come from carbon-free resources by 2045.

The City currently does not have a plan specifically pertaining to renewable energy or energy efficiency. However, the Project would be in compliance with Title 24 Building Energy Efficiency Standards and CALGreen building codes (as discussed in the preceding response). Compliance with these standards would ensure that the Project incorporates energy-efficient design features, such as energy-efficient windows and insulation, efficient lighting technology, energy-efficient HVAC equipment with electrical heat pumps, water-efficient fixtures, as well as use of solar PV panels on the new buildings.

The Project's energy consumption would not result in an increased energy demand beyond the capacity of SCE. Therefore, the Project would not conflict or obstruct of a state or local plan for renewable energy or energy efficiency. Impacts in this regard are less than significant.

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
GEOLOGY AND SOILS. 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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Analysis in this section is based upon the *Geotechnical Report, Review of Site Plan,* prepared for the proposed Project by Allan E. Seward Engineering Geology, Inc. (Appendix E). The purpose of the geotechnical report is to evaluate the subsurface soil conditions and provide geotechnical and design recommendations to ensure the safe construction and operation of the proposed Project.

Discussion of Impacts

4.7-a Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Less than Significant Impact. The DOC defines an active fault, for the purposes of the Alquist-Priolo Act, as one that has ruptured in the last 11,000 years. A fault is a fracture in the crust of the earth, where the rock mass on one side moves relative to the rock mass on the other side. Most faults are the result of repeated displacements over a long period of time. A fault trace is the line on the land surface defining the fault that can be delineated on a map. Surface rupture occurs when movement on a fault occurs at the surface. These faults may pose a risk of rupture to existing or future structures.

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. This law was a direct result of the 1971 San Fernando earthquake, which was associated with extensive surface fault ruptures that damaged numerous homes, commercial buildings, and other structures. Surface rupture is the most easily avoided seismic hazard. For the purposes of the Act, an active fault is one that has ruptured in the last 11,000 years (Holocene time), and a potentially active fault is one that has ruptured in the last 1.6 million years (Pleistocene time). The law requires the State Geologist to establish regulatory zones (earthquake fault zones) and prepare maps showing surface traces of active faults.

Similar to all of Southern California, the Project site is in a known seismically active region where the potential of seismic hazards exists. However, the Project site is not located within a currently designated State of California Earthquake Fault Zone for surface fault rupture (DOC 2022b). **Figure 4.7-1**, *Regionally Active Faults and Alquist-Priolo Earthquake Fault Zones,* shows the regionally active faults and Alquist-Priolo Earthquake Fault Zones within the Project vicinity. The nearest earthquake fault zone is delineated for the Sierra Madre fault zone, located approximately 4.3 miles northwest of the Project site. Based on the location of the Project site relative to the fault zone, lack of geomorphic expressions in the vicinity of the site, and absence of any apparent linear features in an aerial photo review, surface fault rupture hazard to the Project site is considered low. Therefore, impacts related to the rupture of a known earthquake fault during the life of the Project would be less than significant.

ii) Strong seismic ground shaking?

Less than Significant Impact. The site is located within the seismically active Southern California region, and ground shaking resulting from earthquakes associated with nearby and more distant faults may occur at the Project site. During the life of the Project, seismic activity associated with active faults expected has the potential to generate moderate to strong ground shaking at the Project site.

There are a number of regional fault systems which could produce ground shaking at the site during a major earthquake. **Table 4.7-1** presents the distance to nearby significant faults (closest distance to potential rupture surface) from the Project site. The nearest earthquake fault zone is delineated for the Sierra Madre fault zone, approximately 4.3 miles northwest of the Project site. A segment of the Sierra Madre fault zone is located at a closer distance, approximately 0.1 mile north of the Project site. Although the Los Angeles County General Plan classifies this segment as active, it is not located in an Alquist-Priolo Earthquake Fault Zone.

TABLE 4.7-1 SUMMARY OF REGIONAL FAULTS

Fault Name	Distance (miles)	Dip Direction	Slip Sense	Magnitude
Sierra Madre	0.10	N	Reverse	7.2
Sierra Madre Connected	0.10	--	Reverse	7.3
Verdugo	4.04	NE	Reverse	6.9
Raymond	6.10	N	Strike Slip	6.8
Hollywood	6.65	N	Strike Slip	6.7
Sierra Madre (San Fernando)	7.80	N	Thrust	6.7
Santa Monica Connected alt 2	8.83	--	Strike Slip	7.3
Elysian Park (Upper)	9.13	NE	Reverse	6.7
San Gabriel	9.19	N	Strike Slip	7.3
Clamshell-Sawpit	11.00	NW	Reverse	6.7
Northridge	12.93	S	Thrust	6.9
Puente Hills (LA)	14.81	N	Thrust	7.0

Source: Allan E. Seward Engineering Geology, Inc., 2022.

Although there are a number of regional fault systems in the area, the proposed Project would be constructed in accordance with the current building code requirements of Los Angeles County; other applicable federal, state, and local codes to minimize impacts related to fault rupture; and requirements from DSA. The California Building Code (CBC) provides minimum standards to protect property and the public welfare by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground motion with specified probability of occurring at the site.

The CBC requires the preparation of Project-specific geotechnical reports prepared by a certified engineering geologist or geotechnical engineer prior to construction of the proposed Project. The geotechnical report prepared for the proposed Project provides site-specific recommendations for construction (e.g., grading, foundations, and excavations) that would be incorporated into Project plans that are reviewed by the DSA for school construction projects prior to approval of construction plans. All construction activities would occur under the observation and testing of

the Project geotechnical engineer, engineering geologist, or their authorized representatives in accordance with the recommendations and the current Building Code requirements of Los Angeles County and other applicable federal, state, and local codes to minimize impacts related to fault rupture. Structures would also be inspected and signed off in the field by a certified DSA inspector to ensure that these requirements are implemented. For these reasons, impacts from strong seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is the sudden decrease in the strength of cohesionless soils due to dynamic or cyclic shaking. Saturated soils behave temporarily as a viscous fluid (liquefaction) and consequently lose their capacity to support the structures founded on them. The potential for liquefaction decreases with increasing clay and gravel content but increases as the ground acceleration and duration of shaking increase. Liquefaction potential has been found to be the greatest where the groundwater level and loose sands occur within 50 feet of the ground surface.

The Project site is not located within an area of required investigation for liquefaction (DOC 2022b). **Figure 4.7-2**, *Landslides and Liquefaction Zones,* shows the liquefaction and landslide zones within the Project area. Based on the dense soil conditions and depth to historic high groundwater (greater than 50 feet), the potential for liquefaction at the Project site is negligible. Therefore, the Project would be expected to result in no impact to seismic-related ground failure including liquefaction.

iv) Landslides?

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

The general topography of the Project site slopes downward from north to south, with a significant grade change along Gould Avenue. However, the Project site is not located within a landslide hazard zone (DOC 2022b). **Figure 4.7-2** shows the liquefaction and landslide zones within the Project area. In addition, with the incorporation of the geotechnical report recommendations for construction, the proposed Project would be safe against hazards from landslide, settlement, and slippage. Therefore, impacts related to landslides would be less than significant.

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

Less than Significant Impact.

Construction

Section 402 of the federal Clean Water Act (CWA), as well as the State of California Porter-Cologne Water Quality Control Act, requires construction projects that may potentially result in soil erosion to implement best management practices (BMPs) to eliminate or reduce sediment and other pollutants in stormwater runoff. If 1 or more acres of soil would be disturbed, a National Pollutant Discharge Elimination System (NPDES) permit is required. NPDES permits establish enforceable limits on discharges, require effluent monitoring, designate reporting requirements, and require construction and post-construction BMPs to eliminate or reduce point and non-point source discharges of pollutants, including soil.

The Project would be required to comply with California's General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, which limits the allowable discharge into existing storm drain facilities. As part of the General Permit, construction BMPs would be implemented as preventive measures to eliminate or reduce soil erosion and pollutants in stormwater and non-stormwater discharges (including soil erosion by wind) to stormwater sewer systems and other drainages. Therefore, construction-related impacts regarding soil erosion or the loss of topsoil would be less than significant.

Operation

Impacts from soil erosion or the loss of topsoil would be less than significant because the proposed Project must be designed to minimize, to the maximum extent practicable, the introduction of pollutants that may result in significant impacts, generated from site runoff to the stormwater conveyance system. Therefore, the potential for substantial soil erosion or the loss of topsoil would be less than significant.

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

Less than Significant Impact. The potential impacts of landslides, lateral spreading, subsidence, liquefaction, and collapse are discussed below.

Landslides

The potential for seismically induced landslides to affect the Project site is considered to be low (see Section 4.7.a)iv), above). Additionally, the Project site is not located within a landslide hazard zone (DOC 2022b). Therefore, impacts would be less than significant.

Lateral Spreading

Seismically induced lateral spreading involves primarily lateral movement of earth materials due to ground shaking. It differs from slope failure in that complete ground failure involving large movement does not occur due to the relatively smaller gradient of the initial ground surface. Lateral spreading is demonstrated by near-vertical cracks with predominantly horizontal movement of the soil mass involved. The Project site is not located in a zone of required investigation for seismic slope instability, and there are no known landslides at or in the vicinity of the Project site. Due to the generally level site conditions and distance from any significant sloping terrain, the potential for earthquake-induced slope failures including lateral spreading to adversely impact the proposed development is low (Allan E. Seward Engineering Geology, Inc., 2022). Therefore, impacts from lateral spreading would be less than significant.

Subsidence

Soil shrinkage and/or bulking as a result of remedial grading depends on several factors including the depth of over-excavation, the grading method and equipment utilized, and average relative compaction. Based on the recommendations for construction per the geotechnical report, the percentage of soil shrinkage when excavated, placed, and compacted as a controlled fill is estimated to be low. The supervising civil engineer would design pad grades with sufficient flexibility to accommodate a possible shrinkage or bulking of fill of up to 5 percent of the total grading volume. Therefore, the proposed Project would adhere to the geotechnical and design recommendations of the geotechnical report to ensure than soil conditions would not lead to significant subsidence impacts. Impacts related to subsidence would be less than significant.

Liquefaction

As discussed, the Project site is not located within an area of required investigation for liquefaction (see Section 4.7.a)iii), above). Based on the dense soil conditions and depth to historic high groundwater (greater than 50 feet), the potential for liquefaction at the Project site is negligible. Therefore, there would be no impact to seismic-related ground failure including liquefaction.

Collapse

Collapsible soils consist of loose, dry, low-density materials that collapse and compact with the addition of water or excessive loading. These soils are distributed throughout the southwestern United States, specifically in areas of young alluvial fans, debris flow sediments, and loess (wind-blown sediment) deposits. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. This saturation eliminates the clay bonds holding the soil grains together. Similar to expansive soils, collapsible soils result in structural damage such as cracking of the foundation, floors, and walls in response to settlement. These types of soils are not expected to be encountered during construction activities for the proposed Project. In addition, site-specific recommendations including remedial grading provided in the geotechnical report would be incorporated into Project plans that are reviewed by the DSA for school construction projects prior to approval of construction plans. Structures would also be

inspected and signed off in the field by a certified DSA inspector to ensure that these requirements are implemented. Therefore, impacts due to collapsible soils would be less than significant.

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

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

Based on the nature of the Project site soils, the expansion potential when removed, mixed, and replaced as compacted fill is anticipated to be very low. Site-specific recommendations provided in the geotechnical report would be incorporated into Project plans that are reviewed by the DSA for school construction projects prior to approval of construction plans. Structures would also be inspected and signed off in the field by a certified DSA inspector to ensure that these requirements are implemented. Therefore, impacts due to location on expansive soils would be less than significant.

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

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

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

Less than Significant Impact with Mitigation Incorporated. Geologic units underlying the Project site and surrounding area are mapped as alluvial fan gravel and sand. Quaternary deposits within and near the Project site were deposited during the late Pleistocene to Holocene, between 2.58 million years ago to present. Deposits from the Holocene epoch (less than 11,700 years ago) can contain remains of animals and plants; however, only those from the early to middle Holocene (older than about 5,000 radiocarbon years) are considered scientifically important or significant.

Based on the Natural History Museum of Los Angeles County paleontological records search, fossil locality searches in online databases, and literature review, no paleontological resources were identified within the Project site. The records search indicated that the geologic formations in the Project area are known to contain paleontological localities with rare, well-preserved fossil materials. The geotechnical report prepared for the proposed Project identified fill soils from 0 to 5-9 feet below ground surface and underlain by older alluvial fan deposits. This suggests low sensitivity for fill soils and high sensitivity for the older alluvial fan deposits at depths 5 feet or

greater. As the maximum depth of ground disturbance associated with project construction is expected to reach 8 feet below ground surface for utility work. Based on the Project's proposed design, the excavations are expected to be limited to areas previously disturbed and having artificial fill. To ensure that impacts to paleontological resources would be less than significant, the proposed Project would implement Mitigation Measure MM GEO-1 for inadvertent discovery of paleontological resources during construction.

Mitigation Measure

MM GEO-1 If paleontological resources are encountered during construction or the course of any ground-disturbance activities, all such activities within 50 feet of the find shall halt immediately. La Cañada Unified School District shall consult with a qualified paleontologist to determine the significance of the find. The assessment will follow SVP standards as delineated in the *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources* (2010). If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the La Cañada Unified School District must be followed unless avoidance is determined to be infeasible by the District. If avoidance is infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

If the fossils are determined to be significant, then the SVP-qualified paleontologist shall prepare and implement a data recovery plan. The plan shall include, but not be limited to, the following measures:

- The paleontologist shall ensure that all significant fossils collected are cleaned, identified, catalogued, and permanently curated with an appropriate institution with a research interest in the materials (which may include the Natural History Museum of Los Angeles County);
- The paleontologist shall ensure that specialty studies are completed, as appropriate, for any significant fossil collected; and
- The paleontologist shall ensure that curation of fossils is completed in consultation with the City. A letter of acceptance from the curation institution shall be submitted to La Cañada Unified School District.

Level of Significance After Mitigation

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

4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
GREENHOUSE GAS EMISSIONS. Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	☐	☐	☒	☐

Overview

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

The global warming potential (GWP) is the potential of a gas or aerosol to trap heat in the atmosphere. Individual GHG compounds have varying GWP and atmospheric lifetimes. The reference gas for the GWP is CO_2; CO_2 has a GWP of one. The calculation of the CO_2 equivalent (CO_2e) is a consistent methodology for comparing GHG emissions since it normalizes various GHG emissions to a consistent metric. Methane's warming potential of 25 indicates that methane has a 25-times greater warming effect than CO_2 on a molecule per molecule basis. A CO_2e is the mass emissions of an individual GHG multiplied by its GWP. GHGs are often presented in units called metric tons of CO_2e ($MTCO_2e$).

Types of Greenhouse Gases

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

Carbon Dioxide (CO_2): CO_2 is a colorless, odorless gas consisting of molecules made up of two oxygen atoms and one carbon atom. CO_2 is produced when an organic carbon compound (such as wood) or fossilized organic matter (such as coal, oil, or natural gas) is burned in the presence of oxygen. Whereas the natural production and absorption of CO2 is achieved through the terrestrial biosphere and the ocean, humankind

has altered the natural carbon cycle by burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700s, each of these activities has increased in scale and distribution.

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

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

GHG Thresholds

To provide guidance to local lead agencies on determining significance of GHG emissions in their CEQA documents, the SCAQMD Board adopted an Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans (SCAQMD, 2008). The Interim Guidance uses a tiered approach to determining significance. Although this Interim Guidance was developed primarily to apply to stationary source/industrial projects where the SCAQMD is the lead agency under CEQA, in absence of more directly applicable policy, the SCAQMD's Interim Guidance is often used as general guidance by local agencies to address the long-term adverse impacts associated with global climate change.

Although the proposed Project does not fit the typical land use project, the use of the Tier 3 quantitative thresholds for residential and commercial projects is a reasonable metric. The SCAQMD proposes that if a project generates GHG emissions below 3,000 tCO_2e annually, it could be concluded that the proposed project's GHG contribution is not cumulatively considerable and is therefore less than significant under CEQA. If the proposed Project generates GHG emissions above the threshold, the analysis must identify mitigation measures to reduce GHG emissions.

Discussion of Impacts

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

Less than Significant Impact. Construction GHG emissions were assessed using CalEEMod Version 2020.4.0. Estimated emissions were compared with SCAQMD Interim Thresholds to determine potential significance. Even though construction equipment would emit minor amounts of CH_4 and N_2O, the predominant GHG emission during construction would be CO_2 from construction equipment. **Table 4.8-1** shows the estimated GHG emissions by year during each construction.

Operational GHG emissions were not calculated since changes in long-term impacts from the proposed Project are not expected.

TABLE 4.8-1 CONSTRUCTION GHG EMISSIONS

Construction Year	Total GHG Emissions (tons per year)			
	CO_2	CH_4	N_2O	CO_2e
2023	212.20	0.05	<0.01	214.77
2024	507.56	0.13	<0.01	513.00
2025	503.71	0.13	<0.01	509.07
2026	189.79	0.05	<0.01	191.43
Total Construction GHG Emissions	1,413.27	0.38	0.02	1,428.27
Total Construction GHG Emission (amortized over 30 years)				47.61
SCAQMD GHG Emissions Threshold				3,000
Exceed Threshold?				No

Source: Appendix A, Air Quality/GHG CalEEMod Input and Output Data.

The data provided in **Table 4.8-1** shows that construction of the proposed project would create a total 1,428.27 $MTCO_2e$ or 47.61 $MTCO_2e$ per year, when amortized over a 30-year period. According to the SCAQMD threshold of significance, a cumulative global climate change impact would occur if the proposed project's GHG emissions would exceed 3,000 $MTCO_2e$ per year. Therefore, a less than significant generation of greenhouse gas emissions would occur from development of the proposed Project. Impacts would be less than significant.

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

Less than Significant Impact. The City's 2016 CAP, which was adopted by the La Cañada Flintridge City Council on June 21, 2016, developed a robust list of climate action measures organized in six focus areas: (1) energy; (2) water; (3) transportation; (4) solid waste; (5) urban greening; and (6) adaptation. **Table 4.8-2** provides a project consistency analysis with the measures provided in the CAP. **Table 4.8-2** shows that the Project would not conflict with any measures in the CAP and would promote implementation of many of the measures. The Project would not be expected to conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs. Therefore, the Project would have a less than significant impact in this regard and no mitigation measures are required.

TABLE 4.8-2 PROJECT CONSISTENCY WITH CITY CAP

CAP Measure	Measure Description	Project Consistency
E-1	Energy Action Plan Community Implementation	**Not Applicable.** This is a City Measure to implement; however, development of the Project would assist the City in achieving this Measure through replacement of older structures with new energy-efficient structures as well as renovation of existing structures with energy-efficient improvements.
E-2	Community-wide Renewable Energy	**Consistent.** All new structures will be designed to support future rooftop solar PV systems per Title 24 requirements.
E-3	Energy Action Plan Municipal Implementation	**Not Applicable.** This Measure is to be implemented by the City.
W-1	Establish a Water Conservation Plan	**Not Applicable.** This is a City Measure to implement; however, the Project would be designed to meet the Title 24, Part 11 CALGreen standards that require the installation of low flow water fixtures and toilets and the use of water efficient landscape irrigation systems.
W-2	Water Efficient Retrofits and Upgrades	**Consistent.** All renovated structures will be designed to meet the Title 24, Part 11 CALGreen standards that require the installation of low flow water fixtures and toilets.
W-3	Water Efficient New Development	**Consistent.** All new structures will be designed to meet the Title 24, Part 11 CALGreen standards that require the installation of low flow water fixtures and toilets.
W-4	Expand Recycled Water	**Not Applicable.** This Measure is to be implemented by the City.
W-5	Municipal Water Conservation	**Not Applicable.** This is a City Measure to implement; however, the Project would be designed to meet the Title 24, Part 11 CALGreen standards that require the installation of low flow water fixtures and toilets and the use of water efficient landscape irrigation systems.
T-1	Bicycle. Pedestrian and Equestrian Network	**Consistent.** The Project would not change access to the Gould Canyon channel and trail that is adjacent to the southwest corner of the Project site.
T-2	Improve Safety and Comfort for Bicyclists, Pedestrians, and Equestrians	**Consistent.** Although not directly part of the Project, LCUSD, in coordination with the City, encourages students to walk or bike to school and provides a variety of safety measures that includes provision of crossing guards and bicycle safety events.
T-3	Transit Network and Accessibility	**Not Applicable.** This is a City Measure to implement; however, LCUSD provides bus service to the School, which promotes the use of transit by getting children accustomed to using buses.

TABLE 4.8-2, CONTINUED

CAP Measure	Measure Description	Project Consistency
T-4	Commute Trip Reduction	**Consistent.** Although not directly part of the Project, LCUSD encourages employees to carpool and utilize public transit options for commuting to work.
T-5	Improve Traffic Flow and Reduce Vehicle Idling	**Consistent.** The Project would improve the on-site walkways and access points on the west side of the School that will improve the vehicular circulation around the School.
T-6	Low Carbon/Alternative Fuel Vehicles	**Not Applicable.** This Measure is to be implemented by the City.
T-7	Low Emissions City Fleet Vehicles	**Not Applicable.** This Measure is to be implemented by the City.
T-8	Transit-oriented Land Use	**Not Applicable.** The Project consists of modernization of a school and does not includes any mixed-use or high-density residential development.
T-9	Off-Road Equipment	**Consistent.** All construction activities for the Project will adhere to State regulations, including CCR Title 13, Article 4.8, Chapter 9, Section 2449 that requires contractors to progressively reduce emissions from their off-road equipment through scheduled retirement of older equipment.
T-10	Lawn and Garden Equipment	**Consistent.** The Project will be designed to meet Title 24, Part 11 (CALGreen) standards that require the installation of outside electrical receptacles to promote the use of electric-powered lawn and garden equipment.
SW-1	Reduce Community-Generated Solid Waste	**Consistent.** The Project will be designed to meet Title 24, Part 11 (CALGreen) standards that currently require that 65 percent of construction waste to be diverted from landfills and requires the installation of both trash and recycled waste bins at the School.
SW-2	Reduce Organic Materials in Landfills	**Consistent.** The LCUSD contracts with licensed landscaping companies that adhere to all regulations that includes taking all organic waste to organic waste collection centers.
SW-3	Reuse of Community Goods	**Not Applicable.** This Measure is to be implemented by the City; however, the School donates all lost and found items that are not retrieved in a timely manner.
SW-4	Remove and Reduce Single Use Items	**Consistent.** The School does not use any single-use items in its food service activities.
SW-5	Reduce Construction and Demolition Waste	**Consistent.** The Project will be designed to meet Title 24, Part 11 (CALGreen) standards that currently require that 65 percent of construction waste to be diverted from landfills.

TABLE 4.8-2, CONTINUED

CAP Measure	Measure Description	Project Consistency
SW-6	Improve Efficiency of Waste Collection	**Not Applicable.** This is a City Measure to implement; however, LCUSD only contracts with licensed waste haulers within the City, which will be required to implement this measure.
SW-7	Reduce City-Generated Solid Waste	**Not Applicable.** This Measure is to be implemented by the City.
UG-1	Urban Forest Inventory	**Not Applicable.** This Measure is to be implemented by the City; however, the Project will include planting additional trees at the School.
UG-2	Community Tree Planting	**Not Applicable.** This Measure is to be implemented by the City.
UG-3	Tree Planting on City Property	**Not Applicable.** This Measure is to be implemented by the City.
UG-4	Greenspace	**Consistent.** The Project will include landscaping improvements that will enhance the greenspace at the School.

Source: City of La Cañada Flintridge 2016.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS. Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 or a list of hazardous substance release sites identified by the state Department of Health Services pursuant to § 25356 of the Health & Safety Code and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a Project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☐	☒
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

The analysis in this section is based in part upon the Phase I Environmental Site Assessment (Phase I ESA) prepared by Leighton Consulting, Inc. dated December 1, 2022 (refer to Appendix F.1) and a Limited Asbestos and Lead Survey Report (Limited Survey Report) prepared by NV5 – Alta Environmental, dated December 21, 2022 (Appendix F.2). The Phase I ESA presents information conducted from a site reconnaissance of the Project site, records review, including historical review, previous environmental reports, and selected governmental databases, and an interview to determine if the Project site contains recognized environmental conditions (RECs).[8] The Limited Survey Report provides the findings from the

[8] The term "recognized environmental conditions" is defined according to ASTM E1527-13 as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not RECs."

on-site investigation, sampling, and assessment of suspect asbestos-containing materials and lead-based paint.

Discussion of Impacts

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

Less than Significant Impact.

Construction

Construction activities would be temporary in nature and would involve the limited transport, storage, use, and disposal of hazardous materials commonly associated with construction activities. Such hazardous materials could include solvents, paints, fuels, and lubricating fluids. Chemical transport, storage, use, and disposal would comply with Resource Conservation and Recovery Act; Comprehensive Environmental Response, Compensation, and Liability Act; California Department of Toxic Substances Control; California Hazardous Waste Control Law;[9] Occupational Safety & Health Administration (OSHA); and Los Angeles County Fire Authority requirements.

Additionally, the general contractor would be required by the La Cañada Unified School District to prepare and submit a Construction Safety Management Plan to the District, based on OSHA standards. This plan would include provisions for proper training of construction crews regarding the use, storage, and disposal of any hazardous materials or waste. In addition, the plan would include safety procedures in the unlikely event of an unauthorized release of hazardous materials. The transport, use, and disposal of construction-related hazardous materials would occur in conformance with applicable federal, State, and local regulations governing such activities. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

Operation

The Project would modernize Paradise Canyon Elementary School. Similar to existing conditions, after implementation of the Project, the School would require the transport, storage, use, and disposal of certain chemicals typically used for cleaning and landscaping, such as commercial cleansers, paints, and lubricants for maintenance and upkeep of school grounds. The use of these materials would be subject to District guidelines and would be stored, handled, and disposed of in accordance with applicable regulations. The proposed Project would not involve the routine transport, use, or disposal of quantities of hazardous materials that may create a significant hazard to the public or environment.

Additionally, the District's Maintenance and Operations Department has standards and management procedures for the handling of hazardous materials that require District employees be trained in the use, storage and disposal of hazardous materials or waste, and safety procedures

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

to be implemented in the unlikely event of a release of hazardous materials. Therefore, potential impacts from the routine transport, use, or disposal of hazardous materials to the public or the environment during the operational phase of the Project would be less than significant.

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

Less than Significant Impact with Mitigation Incorporated. The Phase I ESA (Appendix F.1) conducted for the Project site identified potential recognized environmental conditions (RECs) based on the age of the existing permanent buildings. Approximately 13 structures on the Project site were constructed prior to the ban on lead-based paint (LBP) in school construction in 1993. Additionally, the buildings constructed prior to the 1979 ban on polychlorinated biphenyls (PCBs) and may have PCB-containing caulk. Further, due to the age of the buildings, there is potential for the existing permanent buildings to have asbestos-containing materials (ACMs) and LBP. As mentioned, the District conducted additional assessment, as documented in the Limited Survey Report (Appendix F.2). The assessment consisted of on-site investigation, sampling, and quantification of ACM and LBP. the use of ACM, LBP, and window caulking materials are treated as known RECs and would be handled in accordance with federal, State, and local regulations.

Construction

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

ACMs

South Coast Air Quality Management District Rule 1403, Asbestos Emissions from Renovation/Demolition Activities, regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and cleanup procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of structures with ACMs, asbestos storage facilities, and waste disposal sites. OSHA also regulates asbestos as a potential worker safety hazard. Mandatory compliance with Rule 1403 and with OSHA regulations would reduce potential impacts related to ACMs to less than significant levels. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release friable asbestos fibers unless proper precautions are taken. ACMs identified within existing buildings would be removed prior to demolition, as

required, and in accordance with applicable laws, including OSHA guidelines. Additionally, the proposed Project would implement Mitigation Measure MM HAZ-1, which would require ACM abatement in accordance with federal and state regulations prior to demolition of existing buildings, and preparation of a Hazardous Material Abatement Plan which incorporates the test results.

Lead

Lead and lead compounds have been used in a wide variety of products found in and around homes, including paint, ceramics, pipes, and plumbing materials (USEPA 2022a). LBP is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm2 (or 5,000 µg/g or 0.5% by weight) or more of lead. Lead is a highly toxic metal that affects virtually every system of the body. As the proposed Project would demolish buildings that have the potential to have lead-based or lead-containing materials, the proposed Project would implement Mitigation Measure MM HAZ-1, which would require LBP removal in accordance with federal and state regulations prior to demolition of existing buildings, and preparation of a Hazardous Material Abatement Plan which incorporates the test results.

PCBs

PCBs are a group of man-made organic chemicals that were domestically manufactured from 1929 until their manufacturing was banned in 1979. They have a range of toxicity and have been demonstrated to cause a variety of adverse health effects. Due to their non-flammability, chemical stability, high boiling point, and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications (USEPA 2022b). As the proposed Project would demolish buildings that have the potential to have PCB-containing materials, the proposed Project would implement Mitigation Measure MM HAZ-1, which would require testing for hazardous materials to be conducted prior to demolition of existing buildings, and preparation of a Hazardous Material Abatement Plan which incorporates the test results.

Soils

The shallow soils on the Project site have the potential to be impacted with lead paint due to the age of a portion of the buildings. Therefore, the proposed Project would require implementation of Mitigation Measure MM HAZ-2 to prepare a Soil Management Plan. Excavated soil would be classified as hazardous waste if the soil contaminants exceeded criteria identified in California Code of Regulations Title 22. Such soil would require remediation (treatment), be transferred to an off-site processing facility, or be transported to a disposal facility that is permitted to accept such wastes. Excavated areas would then be backfilled by clean imported soil.

Mitigation Measures

MM HAZ-1 Due to the potential presence of polychlorinated biphenyl (PCB)-containing caulk, lead-containing paints and coatings, and asbestos-containing materials (ACMs) on the Project site, a Hazardous Material Abatement Plan shall be prepared which shall

incorporate the Limited Asbestos and Lead Survey Report (December 21, 2022) results.

Prior to the commencement of demolition, the general contractor shall prepare a detailed Hazardous Material Abatement Plan in accordance with regulatory requirements and the findings of the Limited Asbestos and Lead Survey Report (December 21, 2022). This plan shall be approved by the appropriate agencies prior to ground-disturbing activities. The Hazardous Material Abatement Plan shall be implemented prior to and during demolition activities to ensure that any hazardous materials on the Project site are properly identified, removed, and disposed of off-site at a landfill that can accept hazardous materials, and are removed from the site to prevent exposure to workers and the general public.

The Hazardous Material Abatement Plan shall include a site-specific scope of work and specifications for the proper disposal of hazardous materials. The Hazardous Material Abatement Plan shall be prepared and implemented in accordance with the Asbestos National Emission Standards for Hazardous Air Pollutants and all other federal and state standards and regulations, including those overseen by the California Department of Toxic Substances Control (DTSC), California Department of Education, and Office of Public School Construction.

MM HAZ-2 Due to the potential presence of arsenical pesticides and lead-based paint within soils at the Project site, a Soil Management Plan (SMP) shall be prepared in the event the DTSC has not provided a No Further Action letter. The SMP would be prepared that complies with all applicable regulatory requirements. The SMP shall be submitted to the La Cañada Unified School District for review and approval prior to the commencement of excavation and grading activities. The SMP shall be implemented during excavation and grading activities and require the following:

- The general contractor shall remove and properly dispose of impacted materials in accordance with applicable requirements of the Department of Toxic Substances Control, and the Los Angeles County Fire Department.
- Contaminated soils shall be transported from the Project site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment.

Level of Significance After Mitigation

With implementation of MM HAZ-1 and MM HAZ-2 above, potential impacts from PCB-containing window caulking, ACMs, and LBP, during the Project construction phase would be less than significant.

Operation

The Project would modernize Paradise Canyon Elementary School. Similar to existing conditions, the Project would use certain typical chemicals for cleaning and landscaping, such as commercial cleansers, paints, and lubricants for maintenance and upkeep of school grounds. The use of these materials would be subject to District guidelines and would be stored, handled, and used in accordance with applicable regulations.

Additionally, the District's Maintenance and Operations Department has standards and management procedures for the handling of hazardous materials that require District employees be trained in the use, storage, and disposal of hazardous materials or waste, and safety procedures to be implemented in the unlikely event of a release of hazardous materials. Therefore, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impact would occur.

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

Less than Significant Impact with Mitigation Incorporated.

Construction

There are no other schools within one-quarter of a mile of the Project site. As analyzed in Section 4.9-b, the permanent structures and soils on the Project site potentially contain hazardous materials, as identified in the Limited Asbestos and Lead Survey Report (Appendix F.2). Construction of the proposed Project would require excavation and demolition activities that may disturb and emit potential hazardous materials. Therefore, Mitigation Measures MM HAZ-1 and MM-HAZ 2 would be required during the construction phase of the Project.

Mitigation Measures

Implement MM HAZ-1 and MM HAZ-2.

Level of Significance After Mitigation

With implementation of MM HAZ-1 and MM HAZ-2 above, impacts related to emitting hazardous emissions and handling hazardous or acutely hazardous materials, substances, or waste during construction would be less than significant.

Operation

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

materials. Therefore, impacts related to emitting hazardous emissions and handling hazardous or acutely hazardous materials, substances, or waste during operation would be less than significant.

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

No Impact. Government Code Section 65962.5 requires the DTSC to compile and update, at least annually, lists of the following:

- Hazardous waste and substances sites from the DTSC EnviroStor database.
- Leaking underground storage tank (LUST) sites by county, and fiscal year from the State Water Resources Control Board (SWRCB) GeoTracker database.
- Solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit.
- SWRCB Cease and Desist Orders (CDOs) and Cleanup and Abatement Orders (CAOs).[10]
- Hazardous waste facilities subject to corrective action by the DTSC pursuant to Health and Safety Code Section 25187.5.[11]

These lists are collectively referred to as the "Cortese List." The Project site is not listed on the Cortese List and there are no Cortese-listed properties located within 0.5 miles of the Project site (USEPA 2022c). Therefore, the project would have no impact.

4.9-e For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a 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 within an airport land use plan area or within 2 miles of a public airport or public use airport. The nearest airport to the Project site is the Hollywood Burbank Airport, located approximately 9.7 miles to the west. Therefore, the proposed Project would not result in a safety hazard or excessive noise for people residing or working in the Project area, and no impact would occur.

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

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

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

No Impact. Regional emergency response plans relevant to the Project site include the City's Local Hazard Mitigation Plan, the Los Angeles County Emergency Response Plan, and the County's All-Hazard Mitigation Plan.

The County designates disaster routes that would be used in case of emergency to evacuate the area. The nearest designated emergency route to the Project site is I-210, approximately 0.4 miles to the south. No designated emergency routes are located in the immediate vicinity of the Project site. No changes to roadways are proposed, and no impacts to I-210, the designated freeway disaster route, would occur. Thus, the proposed Project would not affect the conditions of the nearest disaster routes.

The La Cañada Unified School District has a Paradise Canyon Elementary School SB 187 Comprehensive School Safety Plan that covers all aspects of campus safety (LCUSD 2022). In the event of a toxic spill, students and staff are required to stay in their classroom, or report to the nearest classroom, until notified to move. The proposed Project would necessitate an update to the school safety plan as a result of the modifications and construction on the campus, and would continue to adhere to the District's and school's emergency response plans and policies.

The City's Local Hazard Mitigation Plan designates all school sites with the District as evacuation centers during events of emergency. The proposed Project would not preclude the campus from serving as an evacuation center. Additionally, emergency access to the site and surrounding area, particularly for emergency response vehicles, would be maintained at all times. Therefore, the Proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

4.9-g Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Less than Significant Impact. As detailed in Section 4.20, Wildfire, the Project site is located within a Very High Fire Hazard Severity Zone Local Responsibility Area. However, the Project site is an existing school, and the proposed Project would modernize the school campus with new classroom buildings to replace existing portable and built buildings. The proposed Project would not include any new uses that would exacerbate wildland fires. The modernization activities would not change the capacity of the school or affect the school programming. Additionally, the proposed buildings would be designed to meet the 2019 California Fire Code and latest California State and Local Fire Marshal codes, which would improve and upgrade the existing fire alarm and communication systems. The proposed Project would be required to meet all applicable building and fire code provisions and would be designed with sprinkler and other fire-safety measures. Therefore, the proposed Project would have a less than significant impact regarding wildland fires.

4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or,	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Overview

The Project site is located in the Arroyo Seco Watershed Area within the Upper Los Angeles River Watershed (USEPA 2022d; Safe Clean Water Program 2022). Surface waters of the Arroyo Seco are contaminated by urban runoff, as are most of the lower-elevation watersheds passing through urban areas in Southern California. The Arroyo Seco is listed on the Clean Water Act (CWA) Section 303(d) list of impaired waterways for coliform bacteria and trash.

The goal of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters" (33 U.S.C §1251[a]). Under Section 303(d) of the CWA, states, territories and authorized tribes, collectively referred to in the act as "states," are required to develop lists of impaired waters. These are waters for which technology-based regulations and other required controls are not stringent enough

to meet the water quality standards set by states. The law requires that states establish priority rankings for waters on the lists and develop total maximum daily loads (TMDLs) for these waters.

Waters in which a pollutant load exceeds its assigned TMDL are considered "impaired" and placed on the Section 303(d) List. In California, the State Water Resources Control Board (SWRCB) prepares and maintains the California 303(d) List of Water Quality Limited Segments (303[d] List). According to the SWRCB's *Final California 2020 Integrated Report (303(d) List/305(b) Report)*, there is sufficient justification to place the pollutants in the Being Addressed portion of the CWA 303(d) List because a TMDL has been completed and approved by USEPA, and is expected to result in attainment of the standard (SWRCB 2022).

The Project site is the approximately 8.85-acre Paradise Canyon Elementary school campus bordered by Gould Avenue on the west and Knight Way on the south. At the intersection of the two streets, Gould Canyon Channel, which is a channelized drainage developed as a below-grade culvert, is located on a separate parcel adjacent to the southwest corner of the school property. As described in Section 3, the existing slopes of the hardscape between the on-site buildings at the asphalt play courts and within the parking lot vary from 1 percent to 10 percent. Surface water drainage of the site appears to be by sheet flow along the existing ground contours to the adjacent City streets. The school has been developed with a storm drain system that captures stormwater in catch basins throughout the campus and conveys stormwater flows to an asphalt swale where the stormwater flows towards the playfield in the southeast portion of the site, and eventually to the gutter in Knight Way. On the west portion of site stormwater is discharged to a swale through a culvert at the southern property boundary along Knight Way.

Discussion of Impacts

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

Less than Significant Impact.

Surface Water Quality

During Project construction, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, and fuel could also occur. However, in compliance with City Municipal Code Section 4.23.110, the Project would prepare a comprehensive grading plan designed to minimize soil erosion and runoff such that irrigation and normal rainfall remain within property lines and do not drain on to non-permeable hardscapes, and disruption of natural drainage patterns and undisturbed soil is avoided. Furthermore, as previously discussed in Section 4.7-b, if 1 or more acres of soil would be disturbed, a NPDES permit is required. Accordingly, the Project would be required to comply with the State Water Board Construction General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, which limits the allowable discharge into existing storm drain facilities. In accordance with the Construction General Permit, the Project would prepare a Stormwater Pollution Prevention Plan (SWPPP), and construction BMPs would be implemented as preventive measures to eliminate or

reduce soil erosion and pollutants in stormwater and non-stormwater discharges (including soil erosion by wind) to stormwater sewer systems and other drainages. With the implementation of regulatory compliance requirements, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. Therefore, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Thus, temporary, construction-related impacts on surface water quality would be less than significant.

Project operations are not anticipated to increase concentrations of the constituents of concern for the Arroyo Seco Watershed in addition to the existing sources of potential water pollution that are typical of school and maintenance uses (e.g., sediment, nutrients, pesticides from runoff from landscaping areas, trash and debris). The Project site grading and drainage would be designed such that stormwater flows would be managed as to not increase volumes or rates above existing conditions, which would reduce the potential for the Project to contribute to the degradation of downstream waters. As a result, impacts to surface water quality during operation of the Project would be less than significant.

Groundwater

There are no existing groundwater wells within the Project site or vicinity (LACDPW 2022a). In addition, as previously described, the historic high groundwater is at a depth greater than 50 feet. As Project construction activities would include minimal grading and no excavation for subterranean levels, construction activities are not expected to encounter groundwater and temporary dewatering is not anticipated.

The most prominent type of operational activities from a development project that affect groundwater quality are typically spills of hazardous materials and leaking storage facilities and tanks. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner in accordance with applicable regulatory requirements, thereby resulting in little threat to groundwater. Other types of risks, such as leaking underground storage tanks, have a greater potential to affect groundwater. As discussed above in Section 4.9-d and in the Phase I ESA, there are no underground storage tanks within the Project site. Furthermore, the Project would not involve installation or operation of water/extraction wells.

Based on the above, the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirement associated with groundwater protection. Therefore, Project impacts related to groundwater quality would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The Project is intended to modernize and upgrade the campus's educational facilities and not intended to increase student enrollment. As such, the Project is not

anticipated to increase water usage on the site. Therefore, water services from Valley Water Company, which supplies water to the school, are not anticipated to increase from current needs.

In addition, as discussed above, there are no existing groundwater wells within the Project site or vicinity, and the Project construction activities would not require dewatering or other withdrawals of groundwater. The Project's BMPs would retain or reduce the stormwater volume, as feasible. Furthermore, the Project would not involve installation or operation of water/extraction wells. Therefore, the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation measures are required.

4.10-c Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:

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

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

Less Than Significant Impact. As described in Section 3, the existing slopes of the hardscape between the on-site buildings at the asphalt play courts and within the parking lot vary from 1 percent to 10 percent. Surface water drainage of the site appears to be by sheet flow along the existing ground contours to the adjacent City streets. Existing catch basins, trench drains, and concrete gutters throughout the site capture the site drainage and discharge it out to the streets by curb drains.

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

Therefore, the Project would not substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on- or off-site or affect surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation measures are required.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or,

Less Than Significant Impact. As described in Section 4.10-a, the proposed Project would not result in substantial additional sources of polluted runoff. As detailed in Section 3, the school has been developed with a storm drain system that captures stormwater in catch basins throughout the campus and conveys stormwater flows to an asphalt swale where the stormwater flows

towards the playfield in the southeast portion of the site, and eventually to the gutter in Knight Way. A CDS unit also connects to a bubbler catch basin that discharges to Knight Way. The school would continue to maintain the storm drain system and implement upgrades, as needed, to ensure that the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts would be less than significant, and no mitigation measures are required.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The Project site is in an area that has been mapped by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) panel number 06037C1375F as Zone X and Zone D (LACDPW 2022b). See **Figure 4.10-1**. The western portion of the Project site is located within an area identified as Zone X, which are areas determined to be outside the 0.2 percent annual chance [500-year] floodplain. The eastern portion of the Project site is located within an area identified as Zone D, which are areas in which flood hazards are undetermined, but possible. The school would continue to maintain the storm drain system and implement upgrades, as needed, to ensure that the Project would not impede or redirect flood flows. Therefore, impacts would be less than significant, and no mitigation measures are required.

4.10-d In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. As discussed above, the western portion of the Project site is located within an area identified as Zone X, which are areas determined to be outside the 0.2 percent annual chance [500-year] floodplain. The eastern portion of the Project site is located within an area identified as Zone D, which are areas in which flood hazards are undetermined, but possible. As described in the City's Safety Element, the City includes areas identified as Zones X and D and is susceptible to flooding due to its proximity to the Los Angeles River and the fact that it is a hillside community (City of La Cañada Flintridge 2022). As such, the City has several flood control facilities in place, including stormwater systems, drainage channels, and debris basins, and continues to implement its Floodplain Management and Flood Control ordinances. Moreover, the City continues to work with Los Angeles County Department of Public Works to identify infrastructure needs and deficiencies, update relevant plans, and prioritize projects to maintain adequate citywide drainage and flood control. Thus, the Project would not be anticipated to risk release of pollutants due to Project inundation in flood hazard areas, and impacts would be less than significant. No mitigation measures are required.

A tsunami is a sea wave, commonly referred to as a tidal wave, generated by an underwater seismic disturbance, such as sudden faulting or landslide activity. A review of the CGS Los Angeles County Tsunami Hazard Areas mapping tool shows that the Project site is not located within a tsunami hazard area (CGS 2022). The nearest tsunami hazard area is located near Santa Monica and the Pacific Ocean, approximately 24 miles west of the Project site. Therefore, the Project would not be anticipated to risk release of pollutants due to a tsunami, and no impact would occur.

A seiche is an oscillating wave caused by wind, tidal forces, earthquakes, landslides and other phenomena in a closed or partially closed water body such as a river, lake, reservoir, pond, and other large inland water body. The Project site is located upstream of the Devil's Gate Dam/Reservoir, and no water bodies large enough to support a seiche are in close proximity to the Project site. Therefore, the Project would not be anticipated to risk release of pollutants due to a seiche, and no impact would occur.

4.10-e *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less Than Significant Impact. As discussed in Sections 4.10-a and 4.10-b, construction and grading activities would comply with the State Water Board Construction General Permit regulating discharges into and from the storm drain system. BMPs would be implemented to minimize or avoid potentially polluted stormwater runoff from leaving the Project site. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures are required.

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
LAND USE AND PLANNING. Would the Project:				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Discussion of Impacts

4.11-a Would the project physically divide an established community?

No Impact. The proposed Project would involve the construction of two classroom buildings to replace existing portable classroom buildings, renovation of existing classrooms, installation of temporary portable classrooms, and site repairs and improvements. The proposed construction activities would occur within an existing elementary school campus in a residential neighborhood, bordered by Gould Avenue to the west and Knight Way to the south. The proposed Project would be located within the campus boundaries and would not alter the streets or sidewalks of the Project vicinity. No physical separation of uses or disruption of access between adjoining land use types would occur. The Project would not change the existing use of the Project site; postconstruction, it would continue to operate as a school. As such, the proposed Project would not physically divide an established community, and there would be no impact.

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

No Impact. The Project site is zoned Public/Semi-public use (PS). The Public land use designation applies to all developed facilities intended for public use and that are subject to public oversight, such as public schools, fire stations, and libraries (City of La Cañada Flintridge 2013b). **Figures 2.1-4** and **2.1-5** show the land use designations and zoning designations for the Project vicinity based on the City's General Plan.

The Project would replace and renovate school buildings and facilities within the Paradise Canyon Elementary School campus. The Project would not change the existing use of the Project site; postconstruction, it would continue to operate as a school. Thus, the proposed Project would be consistent with existing zoning and land uses.

In addition, the California Supreme Court held that public school districts are a matter of statewide concern and that school districts, being local agencies of the state, are not subject to municipal construction regulations when engaged in sovereign activities such as the construction

of school buildings.[12] Subsequently, school construction is regulated and inspected at the state level through the DSA and the Field Act per the Education Code.[13] Therefore, the proposed Project would not conflict with an existing land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

[12] See Hall v. City of Taft (1956) 47 Cal.2d 177 [302 P.2d 574].
[13] See Town of Atherton v. Superior Court (1958) 159 Cal.App.2d 417 [324 P.2d 328].

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

Discussion of Impacts

4.12-a Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. California's Surface Mining and Reclamation Act of 1975 requires the State Geologist to classify land into Mineral Resource Zones (MRZ) based on the known or inferred mineral resource potential of that land. MRZ-1 are areas where geologic information indicates little likelihood exists for the presence of significant Portland cement concrete aggregate resources, lands classified MRZ-2 are areas where geologic information indicates the presence of significant Portland cement concrete aggregate resources, and lands classified MRZ-3 are areas containing known or inferred Portland cement concrete aggregate resource of undetermined mineral resource significance (DOC, 2000).

According to the California Geological Survey (CGS), the Project site is located in an area classified as MRZ-3 (CGS, 2021). The Project site is not being used for purpose of mineral extraction and the proposed Project would not include any mineral extraction activities. Therefore, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state, and no impact would occur.

4.12-b Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The Project site is developed with an elementary school and is not designated by the City of La Cañada Flintridge General Plan as a mineral resource recovery site (City of La Cañada Flintridge, 2013a). Additionally, there are no wells or oil/gas fields within the Project site or vicinity (DOC, 2022c). The proposed Project would not affect any existing oil, gas, or other mineral resource recovery facilities. Therefore, implementation of the proposed Project would not result in the loss of availability of a locally-important mineral resource recovery site, and no impact would occur.

4.13 NOISE

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

Overview

This section provides an analysis of noise impacts from the Project. It should be noted that while the District is not subject to the City's General Plan and Municipal Code, the following analysis incorporates the General Plan and Municipal Code noise thresholds to provide a comprehensive and conservative analysis of noise impacts. Pursuantly, the noise-related mitigation measure identified, while not required, is intended to further reduce or ameliorate the impacts of the Project.

Noise Fundamentals

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

Noise Measurement Scales

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

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

Existing Noise

The Project site is located in a suburban neighborhood and is surrounded by single-family residential land uses to the north, south, east, and west. The principal source of noise in the general area of the Project is traffic on the nearby roadways, including Gould Avenue that is adjacent to the west side of the Project site and Knight Way that is adjacent to the south side of the Project site. Playground activities at the School also contribute to the noise environment.

In order to determine the existing noise levels, noise measurements were taken using three Larson Davis Model LXT1 Type 1 sound level meters programmed in "slow" mode to record the sound pressure level at 1-second intervals for 24 hours in "A" weighted form. The three noise measurement locations are shown in **Figure 4.13-1**. **Table 4.13-1** lists the noise measurement sites and measurement results. The ambient noise measurement printouts are provided in Appendix G. The 24-hour noise measurements were taken between 11:52 a.m. on Monday, October 17, 2022 and 12:01 p.m. on Tuesday, October 18, 2022. The noise measurement printouts are provided in Appendix G.

TABLE 4.13-1 MEASURED EXISTING AMBIENT NOISE LEVELS

Site No.	Site Description	Average (dBA Leq)		1-hr Average (dBA Leq/Tine)		Average (dBA CNEL)
		Daytime[1]	Nighttime[2]	Minimum	Maximum	
1	On fence at southwest corner of Lower Playground	57.0	49.8	44.8 1:09 a.m.	62.4 1:21 p.m.	58.0
2	On fence at northwest corner of Upper Playground	60.8	49.6	44.5 2:32 a.m.	68.0 12:43 p.m.	59.6
3	On north property line fence across road from home at 5034 Gould Avenue	57.3	45.8	41.7 3:15 a.m.	64.0 3:44 p.m.	56.3

[1] *Daytime is defined as 7:00 a.m. to 7:00 p.m. (Section 5.02.100 of the Municipal Code)*

[2] *Nighttime is defined as 7:00 p.m. to 7:00 a.m. (Section 5.02.100 of the Municipal Code)*

Sensitive Land Uses

The City of La Cañada Flintridge General Plan Noise Element identifies noise-sensitive land uses as locations where the presence of noise could adversely affect the use of land. These typically include residences, schools, hospitals, libraries, golf courses, and passive recreation sites (ICF Jones & Stokes, 2013, p. 7-3). The nearest sensitive receptors to the Project site consist of a single-family home as near as 20 feet north of the proposed new single-story classroom building (Building Q) located on the northeastern portion of the Project site, there is also a single-family home as near as 110 feet west of the proposed new two-story classroom building (Building N) located on the southwestern portion of the Project site, and a single-family home as near as 125 feet south of the proposed Interim Housing located in the Lower Playground.

Regulatory Setting

City of La Cañada Flintridge General Plan

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

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

- Policy 2.2.1 Adopt and apply the Noise and Land Use Compatibility Matrix and the Interior and Exterior Noise Guidelines as guidelines to establish acceptable noise standards for various uses throughout the City, to avoid noise and land use conflicts, and to mitigate unacceptable levels of noise on new and existing development.
- Policy 2.2.2 Require new development to minimize noise impacts on adjacent uses through site and building design, setbacks, berms, landscaping, and/or other noise abatement techniques.
- Policy 2.2.3 Apply California Administrative Code Title 24 noise insulation standards to the construction of multi-family housing, residential portions of mixed-use development, new single-family developments, and conversion of existing apartments into condominiums.
- Policy 2.2.5 Require that an acoustical analysis be prepared by a qualified acoustical engineer in instances where noise-sensitive uses are proposed in noise-impacted areas. The recommendations of the acoustical analysis to mitigate noise will be considered during deliberations on the project.

Table 4.13-2, upon which Policy 2.2.1 is partially based, shows the compatibility of various land uses with outdoor noise levels. Its original purpose is to guide the siting of various land uses, to ensure that people are not exposed to excessive noise. However, this type of table is often used as well to determine whether a new noise source will adversely affect pre-existing land uses.

TABLE 4.13-2 LAND USE AND NOISE COMPATIBILITY MATRIX

Land Uses	Existing Noise Level (dBA CNEL)						
	<	55	60	65	70	75	80>
Hillside, Estate, Very Low Density, Low Density, Medium Density Residential	A	A	A	B	C	C	D
Medium-High, High Density Residential	A	A	A	B	B	C	D
Commercial/Office, Mixed Use 1 (DVSP), Mixed Use 2 (DVSP), Mixed Use (New), Mixed Use Overlay (New)	A	A	A	A	A	B	C
Commercial/Office	B	B	B	C	C	D	D
Institutional, Public	A	A	A	B	C	C	D
Parks and Recreation	A	A	A	A	B	C	D
Open Space	A	A	A	A	A	B	C

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

Notes:

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

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

Zone A. Clearly Acceptable. Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

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

Zone C. Normally Unacceptable. New construction or development should normally be discouraged. If new construction or development does proceed, a detailed analysis or noise reduction requirements must be made and needed noise insulation features must be included in the design.
Zone D. Clearly Unacceptable. New construction or development should generally not be undertaken.

City of La Cañada Flintridge Municipal Code

§ 5.02.050 Specific Prohibitions

While the District is not subject to the City's Municipal Code, this analysis incorporates the City's Noise Ordinance thresholds to provide a comprehensive analysis of noise resources. In addition to and separate from any provision of this code, the following acts, and the causing, suffering or permitting thereof, shall be considered intrusive, excessive and annoying noises creating a nuisance and disturbing the peace and shall constitute a violation of this code. The listing of the following specific prohibited acts is not intended to limit the city's authority to regulate any and all loud, unnecessary and unusual noises and even if not included herein, such noise disturbances shall be subject to regulation pursuant to Section 5.02.040:

H. Noise Sensitive Uses. Creation of any noise disturbance adjacent to or within one thousand (1,000) feet of a hospital or medical care facility, nursing home, school during school hours, day care during hours of operation, religious assembly use during hours of worship services, or similar facility, so as to interfere with the functions of such activity.

1. Where construction activities on a construction project which is adjacent to any noise sensitive use(s) are anticipated to last for a year or more, temporary noise barriers shall be constructed that break the line of sight between the noise-sensitive use(s) and the construction project, and that minimize noise impacts;

I. Noise resulting from construction and demolition activities, the operation of commercial refrigeration units, air conditioning systems, compressors, exhaust systems, ventilation units, use of any instrumentality that results in impulsive sound, and other commercial or industrial noises associated with land use activities, shall be regulated pursuant to standards contained within the noise regulations of the city's municipal code.

§ 5.02.060 Persistent noises.

Failure to comply with the following provisions shall constitute a nuisance and violation of this chapter:

A. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.

B. Unnecessary idling of internal combustion engines is prohibited.

C. All stationary noise-generating construction equipment such as tree grinders and air compressors are to be located as far as is practical from existing residences.

D. Quiet construction equipment, particularly air compressors, are to be selected whenever possible. (Ord. 450 § 2, 2016)

§ 5.02.100 Alternative use of maximum noise limits by dBA levels.

In addition to determining noise violations under the standard set forth elsewhere in this chapter, the enforcing officer may alternatively use the one-hour average decibel ("dBA") levels to determine a violation of this chapter. The one-hour average sound level is measured at the property line of the property on which the noise is produced or at any location on a property that is receiving the noise. The standard chosen by the enforcing officer for the specific incident shall be the sole means used to determine if a violation has occurred. Neither standard shall be considered superior, nor controlling, nor preempt the other. Standards are shown below in **Table 4.13-3**.

If the enforcing officer selects the alternative standard to using the dBA level standard, evidence of dBA levels within the permitted levels may be presented in defense of the charged violation only if the proffered dBA reading was taken at the exact time and location and under identical conditions, including wind, and temperature, as those encountered by the enforcing officer encountered at the time he or she charged the violation and by a decibel meter with valid current calibration records and evidence of the training or expertise of the person offering the dBA reading as evidence of compliance with this chapter.

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

TABLE 4.13-3 NOISE STANDARDS BASED ON ZONING DISTRICT

Zoning District	One Hour Average Noise Level in dBA Between 7:00 a.m. and 7:00 p.m. Measured at Property Line or District Boundary	One Hour Average Noise Level in dBA Between 7:00 p.m. and 7:00 a.m. Measured at Any Boundary of a Residential Zone
Single-Family Residential (R-1)	60	50
Multifamily Residential (R-3 & RPD)	65	55
Commercial (CPD & FCD)	70	60
Mixed Use	75	65
Public/Semi Public and Open Space	65	55

Source:

B. Restricted hours may be modified through a condition of an approved conditional use permit or temporary use permit. Sections and subsections of this chapter also provide for additional restricted hours and the most restrictive hours shall be controlling.

C. The sound level limit at a location on a boundary between two zones is the most restrictive of the respective limits for the two zones.

D. If the measured ambient noise level exceeds the applicable limit in the above, the allowable one-hour average sound level shall be the one-hour average ambient noise level, plus three decibels. The ambient noise level shall be measured when the alleged noise violation source is not operating.

E. In determining whether any noise exceeds the exterior noise limits set forth in this section, measurements shall be taken at the property line of the property from which the noise emanates.

F. No person shall operate or cause to be operated within a dwelling unit, any source of sound that causes the sound level when measured inside a neighboring receiving dwelling unit to exceed the allowable noise level, for any period of time.

G. In the event the noise, as judged by the enforcing authority, contains a steady, pure tone such as a whine, screech or hum, or is an impulsive sound such as hammering or riveting, or contains music or speech, the standard limits set forth above shall be reduced by five decibels. (Ord. 450 § 2, 2016)

§ 5.02.110 Temporary construction activities.

Where technically and economically feasible, temporary construction activity shall be conducted in such a manner that the one-hour average sound levels at affected properties shall not exceed the following dBA levels as shown in **Table 4.13-4**.

TABLE 4.13-4 NOISE RESTRICTIONS DURING CONSTRUCTION

	R-1 Zone (Single-Family Residential)	R-3, RPD, Mixed Use Zones (Multifamily Residential)	CPD, FCD, Public/Semi-Public, Open Space Zones (Commercial)
Weekdays* 7:00 a.m. to 6:00 p.m.	75 dBA	80 dBA	85 dBA
Saturdays** 9:00 a.m. to 5:00 p.m.	60 dBA	65 dBA	70 dBA

**During Daylight Savings Time, weekday hours shall be from 7:00 a.m. to 7:00 p.m.*
***Construction, except emergency work, is not permitted on Sunday or holidays. (Ord. 450 § 2, 2016)*

The La Cañada Flintridge Municipal Code, Chapter 5.02.100 also has limits on noise from stationary sources. The allowable exposures at the receiver's property line depends upon land use. Noise limits are shown in **Table 4.13-5**.

TABLE 4.13-5 MAXIMUM ALLOWED EXTERIOR NOISE LEVELS FOR VARIOUS EXPOSURE PERIODS

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

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

Discussion of Impacts

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

Less than Significant Impact. The proposed Project would not generate a substantial temporary or permanent increase in ambient noise levels in the Project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The following section calculates the potential noise emissions associated with the temporary construction activities and long-term operations of the proposed project and compares the noise levels to the City standards.

Construction-Related Noise

Noise impacts from construction activities are a function of the noise generated by the operation of construction equipment and on-road delivery and worker commuter vehicles, the location of equipment, and the timing and duration of the noise-generating activities. The on-site construction noise created from off-road equipment and the off-site construction noise created from on-road vehicles have been analyzed separately below.

On-site Construction Equipment Noise

For the purpose of this analysis, the construction phases and construction equipment assumptions utilized above in Section 4.3 Air Quality and detailed in Appendix A have been utilized to calculate the construction noise levels at the nearest homes to the north, west and south. For each phase of construction, all construction equipment was analyzed based on being placed in the middle of the Project site, which is based on the analysis methodology detailed in the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (2020) for a General Assessment. However, in order to provide a conservative analysis, all equipment was analyzed, instead of just the two nosiest pieces of equipment as detailed in the FTA Manual. The calculated construction noise levels are shown in **Table 4.13-6** and the construction noise model results are provided in Appendix G.

TABLE 4.13-6 NOISE ANALYTICAL FRAMEWORK

Construction Phase	Construction Noise Level at Nearest: (dBA Leq)		
	Home to North (20 feet from Campus)	Home to West (110 feet from Campus)	Home to South (125 feet from Campus)
Stage 1. Mobilization and Site Utilities and Interim Housing	74.1	68.5	67.5
Stages 2 & 3. Demolition	71.2	65.6	64.6
Stages 2, 3, 4, & 5. Building Construction & Architectural Coatings	74.6	69.0	68.0
Stage 6. Removal of Interim Housing & Restore Playfields	74.1	68.5	67.5
Construction Noise Threshold[1]	75	75	75
Exceed Threshold?	No	No	No

Source: RCNM Version 1.1 (see Appendix G).

Notes:

[1] Construction Noise Threshold from Section 5.02.110 of the Municipal Code for Single-Family Residential on Weekdays.

Table 4.13-6 shows that the greatest noise impact would occur during Stages 2, 3, 4, and 5 during the Demolition, Building Construction, and Architectural Coating activities with noise levels as high as 74.6 dBA Leq at the nearest home to the north, 69.0 dBA Leq at the nearest home to the west and 68.0 dBA Leq at the nearest home to the south. **Table 4.13-6** shows that construction noise impacts would be below the 75 dBA construction noise standard for single-family homes on weekdays as detailed in Section 5.02.110 of the Municipal Code. Therefore, through limitation of construction times to between 7:00 a.m. and 6:00 p.m. on weekdays when the highest construction noise levels are allowed, as detailed in Section 5.02.110 of the Municipal Code, on-site construction noise would be less than significant.

Off-site Construction Roadway Noise

Construction activities would generate delivery trucks and worker automobile trips to and from the Project site. Specifically, the modular units would be delivered to the Project site either during the daytime or at night when there is less traffic. According to the Circulation Element of the General Plan, the City does not identify any designated truck routes; however, as the legal truck route is the shortest distance to and from the Project site to the nearest freeway, the anticipated route would consist of traveling on Gould Avenue to Interstate 210 that is located 0.4 mile south of the Project site.

As stated in the Noise Element of the General Plan, people cannot generally detect a difference of 1 to 2 dBA between noise levels of a similar nature such as an increase in traffic noise, compared to existing traffic noise. However, under ideal listening conditions, some people can detect differences of 2 or 3 dBA. The Circulation Element of the General Plan shows that Gould Avenue currently has 5,926 daily trips and the CalEEMod provided in Appendix A calculated that

construction activities would generate up to 45 worker trips and 17 truck trips per day or a total of 62 daily trips generated from construction, which would represent 1.05 percent of the daily trips on Gould Avenue. In order for Project-generated vehicular traffic to increase the noise level on any of the nearby roadways by 3 dB, the roadway traffic would have to double, the roadway traffic would have to increase by 50 percent. As such, the construction-related off-site roadway noise impacts would be well below a 2 or 3 dBA noise increase, which is detailed above as the threshold of perception. This analysis is conservatively based on nighttime conditions when traffic levels are the lowest in the day, and therefore represents the worst-case scenario, as the Project-generated vehicular traffic would represent a greater percentage of the public roadway traffic. During the daytime the Project traffic would represent a smaller percentage of roadway traffic and would result in even less noise increase. Therefore construction-related roadway noise impacts would be less than significant.

Therefore, construction-related noise levels would not exceed any standards established in the General Plan or Noise Ordinance nor would construction activities create a substantial temporary increase in ambient noise levels from construction of the proposed Project. Impacts would be less than significant.

Operational-Related Noise

As detailed in Section 3, the Project would consist of the removal of portable classrooms, construction and use of two new classroom buildings, and renovations to existing classrooms, the library, cafeteria, and administration buildings. The modernization activities would not change the capacity of the school or affect the school programming. As such, there would be no increase in on-site noise-generating activities or in off-site traffic. Therefore, operational noise impacts would be less than significant.

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

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

Caltrans prepared the Transportation and Construction Vibration Guidance Manual (2020), which provides practical guidance to Caltrans engineers, planners, and consultants who must address vibration issues associated with the construction, operation, and maintenance of Caltrans projects. However, this Manual is also used as a reference point by many lead agencies and CEQA practitioners throughout California, as it provides numeric thresholds for vibration impacts. Thresholds are established for transient (single-event) sources of vibration, which found that the human response becomes distinctly perceptible at 0.25 inch per second PPV. The Manual also found that vibration may potentially damage older residential structures at 0.5 inch per second PPV.

Construction-Related Vibration

The Project would not include any blasting, drilling, or pile driving. Construction equipment such as loaded trucks, vibratory rollers, and small bulldozers may temporarily increase groundborne vibration or noise at the Project site. The nearest sensitive receptors to the Project site consist of a single-family home as near as 20 feet north of the proposed single-story building (Building Q) on the northeastern portion of the Project site. **Table 4.13-7** shows the typical PPV produced from some common construction equipment.

TABLE 4.13-7 TYPICAL CONSTRUCTION EQUIPMENT VIBRATION EMISSIONS

Equipment	Peak Particle Velocity in inches per second at 25 feet	Vibration Level (L_v) at 25 feet
Vibratory Roller	0.210	94
Large Bulldozer	0.089	87
Loaded truck (off road)	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: Federal Transit Administration, 2018.

From the list of equipment shown in **Table 4.13-7**, a vibratory roller with a vibration level of 0.21 inch-per-second PPV would be the source of the highest vibration levels of all equipment utilized during construction activities for the proposed Project. Based on typical propagation rates this would result in a vibration level of 0.27 inch-per-second PPV at the nearest home (20 feet away) to construction activities. The construction-related vibration levels would exceed the 0.25 inch-per-second PPV threshold detailed above and therefore would be considered a significant impact.

Mitigation Measure MM NOI-1 has been provided that restricts the operation of vibratory rollers within 25 feet of any residential structure.

Mitigation Measure

MM NOI-1 No vibratory roller shall be allowed to operate closer than 25 feet of any off-site residential structure. Any compaction that needs to occur within 25 feet of an off-site residential structure shall be performed with smaller equipment such as a plate compactor or by other methods such as multiple pass-bys with a skip loader.

Level of Significance After Mitigation

After implementation of Mitigation Measure **NOI-1** above, groundborne vibration and groundborne noise levels during construction would be reduced to a less than significant level.

Operation-Related Vibration

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

4.13-c *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

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

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

Less than Significant Impact. The nearest freeway, Interstate 210, is approximately 0.4 mile south of the Project site. Noise generated by freeway traffic would be attenuated so much by distance and by intervening structures that it would not adversely affect operations at the School. The largest roadway in the vicinity of the Project site is Gould Avenue, which is adjacent to the west boundary of the Project site. Gould Avenue is classified as a Major road in the General Plan and has a maximum operational daily roadway capacity of 15,600 vehicles (City of La Cañada Flintridge 2013b). Sections 50101 and 50104.7 of the California Code, Health and Safety defines a large volume roadway as roadways that have traffic in excess of 50,000 daily vehicle trips for rural areas and in excess of 100,000 daily vehicle trips in urban areas. As such, Gould Avenue would not be considered a major arterial roadway whose noise generation may adversely affect the education program. Therefore, a less than significant impact would occur.

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
POPULATION AND HOUSING. Would the Project:				
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion of Impacts

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

No Impact. Construction of the proposed Project is scheduled to begin in summer 2023 and is anticipated to last approximately three years. Given the temporary nature of construction industry jobs, the relatively large regional construction industry, and the relatively nominal total number of construction workers needed during any construction phase, the labor force from within the region would be sufficient to complete Project construction without an influx of new workers and their families. Accordingly, construction employment generated by the proposed Project would not impact population in the heavily populated Los Angeles County region. Therefore, construction of the proposed Project would not directly induce population growth, and there would be no impact.

The proposed Project does not include any residential or commercial land uses that would result in a direct population increase or public service and public utility expansions that would provide service where none previously existed, which may indirectly increase population and housing. The Project would replace and renovate school buildings and facilities within the existing Paradise Canyon Elementary School campus and does not involve expansion of facilities that would change the school's student or faculty capacities. As Paradise Canyon Elementary School serves the surrounding neighborhood, Project implementation would not cause the need to hire more staff or generate more students at the school. Therefore, no impact to population growth during project operation would occur.

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

No Impact. The Project is located within an elementary school campus that has no residential components. The proposed Project would not require the removal of existing housing. In addition, no persons would be displaced as a result of implementation of the proposed Project. Therefore,

the proposed Project would not affect the number or availability of existing housing in the area and would not necessitate the construction of replacement housing elsewhere. No impact would occur.

4.15 PUBLIC SERVICES

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

Discussion of Impacts

4.15-a Fire protection?

Less than Significant. The Los Angeles County Fire Department (LACoFD) provides fire protection and emergency medical services for the City. The LACoFD serves a population of over 4 million residents within the jurisdiction of 60 cities and all unincorporated areas of the County of Los Angeles (LACoFD 2021). In addition to fire protection and emergency medical services, the LACoFD provides fire inspection, brush clearance, and various fire safety programs in the City (City of La Cañada Flintridge 2022). The LACoFD operates two fire stations, Fire Station No. 19 and Fire Station No. 82 Battalion 4 Headquarters, in the City. The nearest fire station to the Project site is Fire Station No. 82, located at 1729 Foothill Boulevard, which is approximately 0.75 miles southeast of the Project site. Fire Station No. 19 is at 352 Foothill Boulevard, is approximately 1.5 miles northwest of the Project site (Google Earth Pro 2022).

Construction of the proposed Project would be entirely within the existing boundaries of the Paradise Canyon Elementary School campus, with the exception of construction-related activities including worker trips, haul truck trips, and materials and equipment deliveries. A temporary lane closure of one lane on Gould Avenue would be required to allow for delivery of the permanent building modules. This temporary lane closure would be scheduled outside of school hours, including pick-up/drop-off times. All construction-related activities would be temporary in nature and are a compatible use on the local road networks. The removal and delivery of heavy, oversized equipment and materials may cause a very slight increase in response times for fire services during construction. However, the construction-related activities would be temporary in nature, and is not anticipated to create an additional demand on the LACoFD such that it would result in the need for new or physically altered fire facilities.

The campus is already served by the LACoFD, and the Project would not create an additional burden on the LACoFD during operation given that the Project is intended to modernize and upgrade the campus's educational facilities and would not involve changes to increase student enrollment. As such, no new fire protection services would be required above existing conditions. Moreover, the proposed new buildings and classroom renovations would modernize fire protection systems at the campus, which would minimize fire risk and improve fire detection and safety response. The Project would comply with all building standards applicable to school facilities for fire protection set forth in Title 24 of California Building Code, which includes requirements for automatic sprinkler systems, fire alarms, and automatic smoke detection systems (Chapter 3), and provides regulations for fire and smoke protection features (Chapter 7) and fire protection and life safety systems (Chapter 9). Additionally, the Project would not increase the capacity of the school. As such, the proposed Project is not anticipated to create an additional demand on the LACoFD during operation. Therefore, impacts related to a substantial adverse physical impacts associated with the provision of new or physically altered fire facilities would be less than significant.

4.15-b *Police protection?*

Less Than Significant Impact. The Los Angeles County Sheriff's Department (LASD) provides law enforcement services to the City. The LASD employs approximately 18,000 people and serves a population of almost 10 million people. The LASD serves 42 contract cities and 141 unincorporated communities as well as facilities, hospitals, clinics, community colleges, and courts located throughout the County (LASD 2017). The nearest LASD station to the Project site is the Crescenta Valley Sheriff's Station, located at 4554 Briggs Avenue, in the City of La Crescenta, approximately 2.5 miles northwest from the Project site (Google Earth 2022). The LASD provides general law enforcement, traffic enforcement, crime investigation, and special services throughout the City of La Cañada Flintridge (City of La Cañada Flintridge 2022a).

Construction of the proposed Project would be entirely within the existing boundaries of the Paradise Canyon Elementary School campus, with the exception of construction-related activities including worker trips, haul truck trips, and materials and equipment deliveries. The Project may cause a very slight increase in demands for police services during construction from possible trespass, theft, and/or vandalism. Active construction areas would be fenced, and the entire campus is currently fenced and would remain secured during non-work hours. Any increase in police demands would be temporary in nature and is not anticipated to create an additional demand on the LASD such that it would result in the need for new or physically altered police facilities.

The campus is already served by the LASD, and the Project would not create an additional burden on the LASD during operation given that the Project is intended to modernize and upgrade the campus's educational facilities, and does not involve changes to increase student enrollment. As such, no new police protection services would be required above existing conditions. Additionally, the Project site is currently, and would continue to be, fenced around the perimeter. General campus activities are under the supervision of the school administrators and staff, similar to existing conditions. Additionally, the Project would not increase the capacity of the school. As

such, the proposed Project is not anticipated to create an additional demand on the LASD during operation.

Therefore, impacts related to a substantial adverse physical impacts associated with the provision of new or physically altered law enforcement facilities would be less than significant.

4.15-c Schools?

No Impact. The Project is intended to modernize and upgrade the campus's educational facilities, and does not involve changes to increase student enrollment or capacity of the school. The Project would help the District meet the improvement goals set forth in its Facilities Master Plan through the construction of new classrooms, adaptable learning spaces, larger multipurpose rooms, new shared spaces, and improved recreational/outdoor spaces. The modernized campus would serve the existing population and community of the school, and would not induce growth in the community or increase demand for school services. Additionally, the proposed Project would not have a substantial adverse impact on any other existing schools in LCUSD. Therefore, no impact would occur.

4.15-d Parks?

Less than Significant Impact. The City of La Cañada Flintridge operates and maintains various parks, athletic fields and courts, and facilities. In addition, the City has joint-use agreements with the LCUSD to operate and maintain ball fields and other recreational facilities for use by the public during non-school hours, including baseball, softball, and football fields; tennis and basketball courts; and a skateboard park. The joint-use agreement includes use of the Paradise Canyon playfields. During construction, the interim housing classrooms located at the playfield at the southeast corner of the campus would prevent the public from using the area. The Project may cause a very slight increase in demands for parks during construction from the temporary loss of the playfield. However, any increase in police demands would be temporary in nature and is not anticipated to create an additional demand for parks such that it would result in the need for new or physically altered parks.

Once construction is complete, the playfield, including the baseball diamond would be restored and returned to its use. The proposed Project does not involve changes to increase student enrollment or capacity of the school nor would it induce growth in the community or increase demand for parks. Therefore, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, and impacts would be less than significant.

4.15-e Other public facilities?

No Impact. The proposed Project is intended to modernize and upgrade the campus's educational facilities, and does not involve changes to increase student enrollment or capacity of the school. The demand for other public facilities, such as libraries, hospitals, childcare, teen or senior centers, are usually associated with population in-migration and growth. As the Project would not increase the capacity of the school, would not induce growth in the community or increase

demand for school services, and would not result in an increase in housing or population in the City, implementation of the proposed Project implementation would have not result in no impacts.

4.16 RECREATION

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Discussion of Impacts

4.16-a Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. The City of La Cañada Flintridge operates and maintains various parks, athletic fields and courts, and facilities. The City's six municipal parks—Glenhaven Park, Glenola Park, Mayors' Discovery Park, Memorial Park, Olberz Park, and Winery Channel Trailhead Park—offer a wide variety of recreational opportunities. In order to maximize its recreation facilities, the City has joint-use agreements with the LCUSD to operate and maintain ball fields and other recreational facilities for use by the public during non-school hours, including baseball, softball, and football fields (City of La Cañada Flintridge 2022b).

During construction, temporary classrooms will be placed on the playfield at the southeast corner of the campus such that the southern portion of the playfield would be unavailable to be used. As mentioned in Section 3, the existing baseball diamond located at the northern half of the playfield would be grown over with grass such that while the baseball diamond would not be available the hardtop basketball and other play courts would be available for both student and public use during the Project construction. These would be temporary effects, and once construction activities for the new and renovated classrooms are completed, then the playfield, including the baseball diamond will be restored and returned to its use for physical education and recreational uses to the students and the public.

In addition to the City's park facilities, additional baseball fields are approximately 1 mile from the Project site, including the baseball field at La Cañada Elementary School at 4540 Encinas Drive and the baseball field at La Cañada High School at 4463 Oak Grove, which are available to the public. In summary, use of a portion of the School's recreational facilities would be temporarily affected, thereby resulting in a slight increase of use at the City's and District's alternative recreational areas, but as these effects would be temporary and limited to the construction stages, the Project in this regard would be less than significant.

As mentioned, the Project does not involve increasing the enrollment or school capacity, and neither construction nor operation of the proposed Project would generate new permanent residents that would increase the use of existing parks and recreational facilities. Therefore, there would be a less than significant impact on existing neighborhood or regional parks and facilities.

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

Less Than Significant Impact.

As discussed above, during Project construction, the School's Upper Playground and a portion of the Lower Playground would be temporarily unavailable for use. However, as the construction activities are temporary in nature and alternative recreational facilities are available through the City and District, the Project would not result in impacts to require the construction or expansion of additional recreational facilities.

Additionally, upon completion of the Project, the upper playground would be renovated to meet District standards. The campus renovations are prompted by multiple issues, such as accessibility needs due to the campus's sloping nature and operational needs such as aging facilities. Therefore, the proposed Project would increase and improve the recreational services available for students and staff. The environmental effects associated with the proposed improvements to the School's recreational facilities are analyzed throughout this document. Impacts would be less than significant.

4.17 TRANSPORTATION

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

Discussion of Impacts

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

No Impact. The proposed Project would be entirely within the existing boundaries of the Paradise Canyon Elementary School campus, with the exception of construction-related activities including worker trips, haul truck trips, and materials and equipment deliveries. A temporary lane closure of one lane on Gould Avenue would be required to allow for delivery of the permanent building modules. This temporary lane closure would be scheduled outside of school hours, including pick-up/drop-off times. All construction-related activities would be temporary in nature and are a compatible use on the local road networks. There are no transit or designated bicycle facilities along Gould Avenue or Knight Way. Additionally, the proposed Project does not include any temporary or permanent changes to public roadways, including to transit, roadway, bicycle, or pedestrian facilities. During operations, the access to pick-up/drop-off areas would remain the same as under existing conditions. Therefore, the proposed Project would not conflict with any programs, plans, or ordinances addressing the circulation system. No impact would occur.

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

No Impact. CEQA Guidelines § 15064.3 pertains to the assessment of a project's potential transportation impacts based on the vehicle miles traveled (VMT) generated by a project (i.e., "the amount and distance of automobile travel attributable to a project," Section 15064.3[a]). The proposed Project would modernize the existing elementary school campus, but would not change the land use, capacity, or attendance boundaries of the school. Thus, the proposed Project would not result in more vehicle trips to and from the school during operation of the proposed Project when compared to existing conditions. In addition, the proposed Project would not modify primary site access locations and traffic patterns—two factors that could potentially result in an

increase in average trip lengths. Because total VMT is a function of the total number of trips multiplied by the average trip lengths, the proposed Project would not result in a VMT increase. Therefore, the proposed Project would not conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision, and no impact would occur.

Although the proposed Project would generate vehicle trips during construction, CEQA Guidelines § 15064.3 addresses the long-term permanent VMT associated with land use development projects and is not specifically concerned with vehicle trips generated during the construction of a project. Therefore, construction of the proposed Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3 (b).

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

Less than Significant Impact with Mitigation Incorporated.

Construction

The proposed Project would not modify any City roadways or intersections. During construction activities, vehicles associated with construction personnel commute trips would be a compatible use on the local road networks. Construction access would be provided via Gould Avenue during the construction of the new building on the west side of campus, and via Knight Way during the construction of the interim housing and improvements to the school fields once the interim housing structures are removed. However, as the Project site is within a residential neighborhood with narrow roadways, haul trucks and equipment deliveries to and from the site may increase hazards, which have the potential to physically interfere with traffic procedures for student pick-up/drop-off. Additionally, the Project would require the delivery of oversized interim housing units and permanent module units from Perris and Manteca. Delivery of the permanent building module units would require a temporary closure of one lane on Gould Avenue. This temporary lane closure would be scheduled outside of school hours, including pick-up/drop-off times. However, due to the lane closure and oversized deliveries required, impacts related to construction hazards could be potentially significant. The proposed Project would implement Mitigation Measure MM TRANS-1, which would require development of a Construction Traffic Management Plan in coordination with LCUSD to minimize construction traffic and equipment impacts on the surrounding neighborhood. Mitigation Measure MM TRANS-1 would identify how construction activities would be managed, including the transportation of construction equipment, hours of construction, and storage and staging areas to minimize disruptions. The implementation of Mitigation Measure MM TRANS-1 would reduce potential construction hazards through scheduling of construction activities and deliveries to avoid pick-up/drop-off times, identification of proper street segments and access roads for large materials and equipment deliveries, and use of temporary signage and flaggers/flagging to direct deliveries.

Therefore, the Project would not substantially increase hazards due to a geometric design feature. Additionally, the proposed Project would not include any incompatible uses. Therefore, impacts would be less than significant with mitigation incorporated.

Mitigation Measure

MM TRANS-1 A detailed Construction Traffic Management Plan shall be prepared in coordination with and approved by the La Cañada Unified School District. The Construction Traffic Management Plan shall require the General Contractor to schedule truck traffic and construction worker shifts to avoid creating trips during the peak traffic periods for the school, including during pick-up/drop-off time. All measures, including identified truck routes, shall be included in the Construction Management Plan. The plan shall include but is not limited to the following provisions:

- Construction truck trips, including deliveries and the removal of heavy, oversized equipment and materials should be scheduled 30 minutes before and after the school's morning start and afternoon end bells outside of the school's pick-up/drop-off times, to reduce potential vehicle and pedestrian conflicts;
- Designate construction work parking at the upper playground, and overflow parking would use available public parking locations along the street with a requirement that at no time shall construction worker vehicles block any driveways. Contractors would be encouraged to carpool and would be required to observe parking regulations. If complaints are received by the School District or by the Principal of Paradise Canyon Elementary School regarding issues with construction worker vehicle parking, the Project construction contractor shall identify alternative parking options for construction workers so as not to interfere with parking availability;
- Maintain emergency access on public roadways and within the school site during Project construction. Provide notice to and coordinate with emergency service providers, including the Los Angeles County Fire Department and Los Angeles County Sheriff's Department, regarding the construction schedule and worksite traffic control plans so as to coordinate emergency response routing and maintain emergency access;
- Identification of haul routes for delivery or removal of heavy and/or oversized equipment or material loads;
- Provide adequate signage and traffic flagger personnel, if needed, to control and direct traffic for deliveries, if they could preclude free flow of traffic in both directions or cause a temporary traffic hazard;
- Educate staff, students, and parents on pick-up/drop-off routes and procedures for each construction phase, if different from the previous. This may be achieved with a combination of information bulletins shared with students and parents.
- Maintain pedestrian connections around the Project site. Safe crossing locations shall be designated, as needed; and

- Maintain the security of the Project site by erecting temporary fencing during the construction phase of the Project. Any on-site night lighting used during the construction phase of the Project shall be in compliance with City of La Cañada Flintridge lighting requirements, directed towards construction areas, and shielded from residential uses.

Level of Significance After Mitigation

After implementation **MM TRANS-1** above, the Project would have less than significant construction-phase impacts.

Operation

Upon completion, the proposed Project would not expand the school campus outside of its existing boundaries, and the proposed improvements would not create any hazards or dangerous intersections. The use of the school would remain unchanged. Therefore, operation of the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant**.**

4.17-d Would the project result in inadequate emergency access?

Less Than Significant with Mitigation Incorporated.

Construction

Construction of the proposed Project would span multiple years and occur in phases. However, all construction activities would be confined to the Project site with the exception of haul trucks and construction worker trips. Project demolition and construction activities that require the removal and delivery of heavy, oversized equipment and materials has the potential to impact emergency access on local City routes. As such, the proposed Project would implement MM TRANS-1, as described in Section 4.17-c above, which would require a Construction Traffic Management Plan. The Construction Traffic Management Plan would require that emergency access to and around the Project site be maintained at all times on public roadways and within the school site during project construction. Notice to and coordination with emergency service providers would be required regarding the construction schedule and worksite traffic control plans. Additionally, the Construction Traffic Management Plan would require that construction-related traffic be coordinated with operations of the school, ensuring that trucks are not moving in or out during pick-up/drop-off times. This would minimize the potential for impeding emergency access. Therefore, impacts related to emergency access would be less than significant with mitigation incorporated during construction.

Operation

Operation of the proposed Project would not inhibit emergency access to the Project site or surrounding community, as the Project would not include modifications of the surrounding roadways or the school's entrance/exit points. Therefore, operation of the proposed Project would not result in inadequate emergency access, and no impact would occur.

Mitigation Measure

Implement **MM TRANS-1.**

Level of Significance After Mitigation

After implementation **MM TRANS-1** above, the Project would have less than significant construction-phase impacts.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
TRIBAL CULTURAL RESOURCES. 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 Resources Code Section 5020.1(k); or	☐	☐	☐	☒
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.	☐	☒	☐	☐

Overview

Assembly Bill 52

Assembly Bill (AB) 52 requires the lead agency (in this case, LCUSD) to begin consultation with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed Project prior to the release of a negative declaration, mitigated negative declaration, or EIR if: 1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of development projects proposed within the geographic area that is traditionally and culturally affiliated with the tribe, and 2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification and requests the consultation (Public Resources Code Section 21080.3.1[d]). Pursuant to AB 52, LCUSD has compiled a list of California Native American tribes that have requested consultation regarding development projects on lands with which such tribes were culturally and traditionally affiliated. These tribes include the Fernandeño Tataviam Band of Mission Indians, Gabrielino-Tongva Indian Tribe, Gabrielino Tongva Indians of California, Gabrielino/Tongva Nation, Gabrielino/Tongva San Gabriel Band of Mission Indians, the Gabrieleño Band of Mission Indians–Kizh Nation (Kizh Nation), and the San Fernando Band of Mission Indians. Additional discussion is provided below.

AB 52 Tribal Consultation

Pursuant to AB 52 requirements, notification letters were prepared by the District and sent on via email on September 30, 2022 and October 3, 2022 to: Mr. Jairo Abila, Tribal Historic and Cultural Preservation Officer for the Fernandeño Tataviam Band of Mission Indians; Mr. Charles Alvarez, Chairperson of the Gabrielino-Tongva Indian Tribe; Mr. Robert Dorame, Chairperson of the Gabrielino Tongva Indians of

California; Ms. Sandonne Goad, Chairperson of the Gabrielino/Tongva Nation; Mr. Anthony Morales, Chairperson of the Gabrielino/Tongva San Gabriel Band of Mission Indians; Mr. Andrew Salas, Chairperson of the Gabrieleño Band of Mission Indians–Kizh Nation (Kizh Nation), and Ms. Donna Yocum, Chairperson for the San Fernando Band of Mission Indians. The letter sent to the tribes by the District included a description of the proposed Project activities, maps of the proposed Project's site and location, and a request for information regarding the proposed Project's potential to impact tribal cultural resources.

On October 20, 2022, the LCUSD received an email from Ms. Sarah Brunzell, Manager of the Cultural Resources Management Division of the Fernandeño Tataviam Band of Mission Indians requesting additional information. The District responded on October 20, 2022 with additional information and maps showing the location of the new proposed buildings. After receipt of the information, Ms. Brunzell responded on October 20, 2022 that no consultation would be required.

On October 5, 2022, Ms. Brandy Salas, Administrative Specialist for the Kizh Nation, responded with a letter attached from Mr. Andrew Salas. The letter indicated that the proposed Project's site is located within the Ancestral Tribal Territory of the Kizh Nation, and that the tribe's Tribal Government was requesting to schedule consultation with the District to discuss the proposed Project and surrounding location in further detail. On October 5, 2022, the District responded to Ms. Salas's request and proposed a consultation meeting during the week of October 24. On October 14, 2022, Ms. Salas replied to the District's response, stating that Chairman Salas' schedule was fully booked until December and that she would get back to the District with additional times and dates.

Pursuant to AB 52 regulations, a tribe is given a period of 30 days in which to reply to a lead agency's outreach in response to tribal request for consultation; no follow-up from any member of the Kizh Nation was received subsequent to the tribe's October 14, 2022 correspondence. As such, the response period has closed and all consultation requirements under AB 52 are considered to be fulfilled.

Discussion of Impacts

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

No Impact. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. As discussed in Section 4.5, Cultural Resources, an analysis of the following sources was conducted: a records search at the SCCIC, a literature and historical map review, historical society consultation, NAHC Sacred Lands File search, a buried archaeological site sensitivity analysis, built environment survey, and California Register of Historical Resources evaluation of the Project site. Additionally, the Lanterman House Historical Society of La Cañada was consulted regarding potential historical resources within the Project area and they concluded that there were no concerns.

Based on the analysis, no cultural resources or historical were identified within the Project site. The two cultural resources identified within the half-mile search radius of the Project site, a historic tree landscaping and the Angeles National Forest Historical Landmark No. 717, would not be impacted as the proposed Project would be located entirely within the boundaries of the

existing school campus. Additionally, Paradise Canyon Elementary School is recommended not eligible for listing in the California Register as it lacks historical significance and therefore, is not a historical resource as defined under Section 15064.5(a) of the CEQA Guidelines. As indicated in Section 4.5, Cultural Resources, there would be no impacts to designated historical resources, as they do not exist within the Project site. Therefore, there are no known tribal cultural resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), that could be impacted by the proposed Project, and there would be no impact.

4.18-b Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be a significant resource to a California Native American tribe pursuant to the criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c)?

Less than Significant Impact with Mitigation Incorporated. As discussed above, pursuant to AB 52 requirements, the District initiated tribal consultation with interested California Native American tribes on September 30, 2022. The Fernandeño Tataviam Band of Mission Indians requested additional information and after receipt, stated that no further consultation would be required. The Kizh Nation requested to schedule further consultation; however, upon agreement from the District, no response from the Kizh Nation was received with the allotted 30-day period. As of October 14, 2022, the District has concluded consultation required under AB 52 with all tribes. Therefore, based on the correspondence with relevant Native American tribes, no known significant cultural or tribal cultural resources have been identified within the proposed Project's area.

For the reasons above, the proposed Project is not anticipated to result in impacts to a resource determined by the lead agency to be significant pursuant to established criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c). However, unanticipated and accidental archaeological discoveries are possible during the proposed Project's construction activities, such as grading and excavation. As construction activities for the proposed Project may impact unknown tribal cultural resources, MM CUL-1 would be implemented to reduce potential impacts to a less than significant level. Upon potential discovery of archaeological material, MM CUL-1 would require the District to retain a qualified professional archaeologist to evaluate the significance of the find and determine appropriate treatment for the resource in accordance with applicable regulations. Therefore, with implementation of MM CUL-1**,** potential impacts on tribal cultural resources would be reduced to less than significant.

Mitigation Measure

Implement **MM CUL-1**.

Level of Significance After Mitigation

Implementation of **MM CUL-1** above would reduce potential impacts to tribal cultural resources to a less than significant level.

4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider that 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Overview

The Project site is an existing developed campus located in a suburban residential neighborhood. The following overview provides the background of utility providers in the Project area.

Water Services

The Project site is located within the Valley Water Company (VWC) water service area. VWC is one of four water companies serving the City and is a member of the Foothill Municipal Water District, which is a member of the Metropolitan Water District (MWD) of Southern California. VWC manages over 3,580 service connections in the City (VWC 2023), and has pumping rights to the Raymond Groundwater Basin, which is an approximately 40-square-mile groundwater basin underlying La Cañada Flintridge and neighboring cities. In general, the City's groundwater supply requires dilution with other high-quality water supply sources to meet drinking water standards, and over 70 percent of the water distributed in the City is imported from Northern California (City of La Cañada Flintridge 2013b).

Wastewater Collection and Treatment

The wastewater treatment provider for the City is the Los Angeles County Sanitation Districts. The Los Angeles Sanitation Districts manage the Whittier Narrows Water Reclamation Plant, which serves the Project site. The Whittier Narrows Water Reclamation Plant treats approximately 15 million gallons of wastewater per day and serves a population of approximately 150,000 people (LACSD 2022).

Solid Waste

The City does not provide trash collection services and requires all generators to contract with one of the waste haulers permitted by the City. All waste haulers operating within the City must enter into a contract that requires minimum waste diversion. The City has developed a comprehensive set of programs to achieve and maintain compliance with the California Integrated Waste Management Act of 1989 (AB 939), as amended, including the 50% waste landfill diversion goal. These programs are primarily implemented by the City's authorized waste haulers and include recycling, green waste reuse and composting, mixed waste processing for material recovery, waste-to-energy, and Household Hazardous Waste collection. (City of La Cañada Flintridge n.d.)

Storm Drainage

The general topography of the site slopes downward from north to south, with a significant grade change along Gould Avenue. Surface water on the campus drains by sheet flow into existing catch basins, trench drains, and concrete gutters throughout the site, which discharge it out to the streets by curb drains (GGA 2022) maintained by the City's Public Works Department. The Gould Canyon Channel, a Los Angeles County Flood Control District Channel, runs parallel to the southwest corner cut of the property line.

Electricity

Southern California Edison (SCE) provides electrical service The campus is located in Southern California is located in a developed area, and electricity infrastructure currently exists at the Project site. SCE implements energy-efficiency programs to reduce energy usage and maintains reliable service throughout the year (SCE 2021).

Natural Gas

The Southern California Gas Company (SoCalGas) is the primary distributor of retail and wholesale natural gas across Southern California, including the City of La Cañada Flintridge (City of La Cañada Flintridge 2020b). SoCalGas contributed to the 2022 California Gas Report, which found that utility-served, statewide natural gas demand is projected to decrease at an annual average rate of 1.1 percent per year through 2035. The projected decline comes from less gas demand in the major market segment areas of residential, electric generation, commercial, and wholesale markets. (California Gas and Electric Utilities 2022).

Telecommunications

Cable services, including internet and television, are provided in the City of La Cañada Flintridge by Charter Spectrum (City of La Cañada Flintridge 2020

Discussion of Impacts

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

Less than Significant Impact. As mentioned, the school campus has been fully developed and the campus is served by existing connections from utility infrastructure located adjacent to the school. The proposed Project activities does not involve an increase in the school's capacity, which would result in higher demand in utility resources. Further, the newly constructed buildings would include water and energy conservation features that would be more efficient than existing systems, including low flow, high efficiency plumbing that would serve to reduce the amount of water entering the City's system. The proposed Project would not require the construction of new water or wastewater facilities that would result in a physical impact to the environment. Impacts would be less than significant.

The school is connected to the City of La Cañada Flintridge's storm drain system. Implementation of the proposed Project would not substantially increase impervious surfaces within the campus; refer also to discussion under Section 4.10, Hydrology and Water Quality. The drainage facilities at the campus are sufficient to accommodate this increase in stormwater runoff, prior to discharge to the City's storm drain system. The proposed Project would require the construction of new stormwater drainage facilities that would result in a physical impact to the environment. Impacts would be less than significant.

No natural gas, or telecommunications facilities would be relocated, constructed, or expanded as a result of the proposed Project. No impact would occur related to these facilities

The Project would include an upgraded electrical connection at an existing utility pole (where the school existing service connection point resides) adjacent to the northwest portion of the site at Gould Avenue. The upgraded connection would involve placement of a new electrical enclosure on-site. Additionally, the Project's proposed new and modernized facilities would be designed in accordance with energy conserving measures in the current CALGreen Building Code, including photovoltaic power generation equipment and energy building efficiencies. Therefore, the proposed Project would not necessitate the construction or relocation of off-site electric power facilities other than that already analyzed herein, and impacts would be less than significant. In summary, the Project would result in a less than significant impact in this regard.

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

Less than Significant Impact. Construction of the proposed Project would require a temporary increase in water demand for dust control, cleaning surfaces, and other construction-related activities such as mixing concrete; however, as the Project construction activities would be implemented in stages and would not involve intensive work over extensive areas, the temporary increase in water usage during construction would be relatively minor.

The Project does not involve increase of the school's capacity (staff, students, or transfer students). Outside of the normal increases and decreases due to normal grade fluctuations, the Project is not intended to increase student enrollment. Therefore, any changes in water demand would be negligible and Project impacts would be less than significant.

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

Less Than Significant Impact. As mentioned, the number of construction workers at peak demand during the Project construction would be between 30 and 35 individuals. Construction activities would result in temporary wastewater generation as a result of the construction workers; however, the increase resulting from up to 35 individuals is considered minimal, and the existing wastewater treatment provider would have adequate capacity to serve the proposed Project's demand during construction.

As described above in Section 4.19-a, the wastewater generated by the Project is not expected to change from existing conditions and would not be significant compared to the permitted capacity for the Whittier Narrows Water Reclamation Plant that provides service to the Project site and surrounding area. Therefore, the Project would be within the existing capacity of the wastewater treatment provider, and no impact to wastewater treatment services would occur.

4.19-d Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Solid waste, such as soil, building materials (i.e., asphalt, concrete and other debris), and packing/packaging materials, would be generated from construction and demolition activities. Demolition activities would occur for the portable classroom buildings on the north side of campus and the west side of campus. Grading for the Project would require earth disturbance/cut of approximately 4,820 cubic yards. Approximately 4,640 cubic yards of soil would be exported. In addition, approximately 2,000 cubic yards of building materials would be removed and disposed.

As mentioned, solid waste would be contracted with a waste hauler permitted by the City. All waste haulers operating within the City must enter into a contract that requires the waste hauler to implement the City's comprehensive set of programs to achieve and maintain compliance with the California Integrated Waste Management Act of 1989 (AB 939), as amended, including the waste landfill diversion goal.

Solid waste from the proposed Project would be deposited at the Scholl Canyon Landfill (LA County, 2019). The Scholl Canyon Landfill has a maximum permitted throughput of 3,400 tons per day, a maximum permitted capacity of 58,900,000 cubic yards, and has a cease operation date of April 1, 2030 (CalRecycle, 2019). Therefore, the landfill would have adequate landfill capacity to accommodate the Project, and impacts would be less than significant.

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

No Impact. The proposed Project would not result in a permanent increase in solid waste generation or a significant change in the characteristics of solid waste generated at the site because the Project would not increase student or faculty population. The District currently complies with or incorporates federal, state, and local statutes and regulations related to solid waste, and would continue this practice, and as mentioned, all waste haulers operating within the City are required to implement the City's comprehensive set of programs to achieve and maintain compliance with the California Integrated Waste Management Act of 1989 (AB 939), as amended.

Further, Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Building Standards Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. The Project would comply with AB 939 (Zero Waste Program) and other applicable local, state, and federal solid waste disposal standards, thereby ensuring that the solid waste stream to regional landfills is reduced in accordance with existing regulations. The proposed Project would not conflict with federal, state, and local statutes and regulations related to solid waste. Therefore, no impact would occur.

4.20 WILDFIRE

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Overview

The Project site is not located within a Fire Hazard Severity Zone State Responsibility Area (SRA); however, the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ) Local Responsibility Area (LRA) (CAL FIRE 2022). **Figure 4.20-1** shows the Fire Hazard Severity Zones within both the SRAs and the LRAs of the Project vicinity.

Discussion of Impacts

4.20-a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. Project activities would occur within the already developed school property and would not restrict evacuation route access or road access for emergency vehicles. Following construction of the Project, emergency access would remain the same as existing conditions. Furthermore, the proposed Project would incorporate site-wide upgrades to the fire alarm and communication systems. The Project would be designed to meet the current California Fire Code and California State and Local Fire Marshal code. The DSA would review Project plans to ensure compliance with fire and life safety standards. The proposed Project would be required to meet all applicable building and fire code provisions and would be designed with sprinkler and other fire-safety measures. Therefore, the Project would have a less than significant impact related to an emergency response plan or evacuation plan within a VHFHSZ.

4.20-b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less than Significant Impact. The general topography of the Project site slopes downward from north to south, with a gradual grade change along Gould Avenue. The topography of the Project area includes the foothills along the base of the Angeles National Forest, which may exacerbate wildfire risks. The proposed Project would replace and renovate school buildings and facilities within the existing Paradise Canyon Elementary School campus to meet current California Building and Fire Code standards. The school campus is well maintained and poses a low risk regarding fire hazards. Furthermore, the Project would improve and upgrade the existing fire alarm and communication systems and regrade sloping areas of the school campus to comply with ADA accessibility. The Project would comply with the current fire and building code requirements and improve existing conditions. Project implementation would not exacerbate existing wildfire risks or expose students and staff at the school and surrounding neighbors to increased wildfire risks. Therefore, the proposed Project would have a ss than significant impact in this regard.

4.20-c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less than Significant Impact. The proposed Project would involve site utility improvements for the new classroom buildings, including electrical lines, water lines, and sewer lines. The proposed improvements would replace aging infrastructure and be constructed in compliance with all applicable building, fire, and safety codes. Project implementation would not require the installation or maintenance of roads, fuel breaks, emergency water sources, powerlines or other utilities. Therefore, Project implementation would not exacerbate fire risk or result in temporary or ongoing impacts to the environment and impacts would be less than significant.

4.20-d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less than Significant Impact. The Project would modernize an aging campus. All improvements would comply with the current California Building and Fire Codes, and exposed soils from construction activities would be fully restored. The proposed Project would implement site-wide stormwater utility improvements and comply with California's General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities. Therefore, the Project would not cause runoff, slope instability, or drainage changes that could cause downslope flooding or landslides. Project impacts would be less than significant.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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?	☐	☐	☒	☐
c) Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion of Impacts

4.21-a Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact with Mitigation Incorporated. As discussed in Section 4.4, the Project has the potential to impact migratory non-game breeding birds, and their nests, young, and eggs. With implementation of a preconstruction breeding bird survey as required by MM BIO-1, impacts to nesting birds protected under the MBTA and CFGC during Project construction would be less than significant. In addition, while the Project site is unlikely to support significant bat roosting due to active human use with regular and high levels of noise and other disturbances, the Project would implement MM BIO-2 to conduct bat surveys, determine baseline conditions and identify daytime and/or nighttime roost sites, and coordinate with CDFW as needed.

As discussed in Section 4.5, the Project would not cause a substantial adverse change in the significance of a historical resource, and no related impacts would occur. With regard to archaeological resources, evaluation and treatment of any resources would comply with existing regulations, and impacts related to archaeological resources would be less than significant.

As discussed in Section 4.7-f, while not likely due to the prior ground disturbance at the Project site, earthwork associated with Project construction may impact paleontological resources. Therefore, the Project would implement Mitigation Measure MM GEO-1 to reduce impacts to paleontological resources to a less-than-significant level.

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

Less than Significant Impact. A significant cumulative impact may occur if a project, in conjunction with related projects, would result in impacts that are less than significant when viewed individually but would be cumulatively significant when viewed together. While the Project would generate new short-term construction jobs in the area, the Project would modernize the school and would not change the capacity of the school or affect the school programming. The Project also does not include residential or commercial components. As such, the Project is not expected to induce any growth in the region. In addition, as detailed in the preceding sections, the proposed Project would not result in any significant and unmitigable impacts in any environmental categories. The Project would be consistent with regional plans and programs that address environmental factors, such as air quality, energy, greenhouse gases, hydrology and water quality, transportation, utilities, and other applicable regulations that have been adopted by public agencies. Additionally, in many cases, including aesthetics, agriculture, biological resources, cultural resources, geology, hazards, land use, mineral resources, noise, public services and recreation, tribal cultural resources, and wildfire, the impacts associated with the Project are either localized to the Project site or are of such a negligible degree that they would not result in a considerable contribution to any significant cumulative impacts. Therefore, cumulative impacts would be less than significant (not cumulatively considerable) and the Project would not result in a mandatory finding of significance in this regard.

4.21-c Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact with Mitigation Incorporated. As discussed in Sections 4.1 through 4.20 of this document, the Project has been determined to have no impacts, less-than-significant impacts, and impacts that are less than significant with mitigation. Therefore, the Project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, and the impacts would be less than significant.

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Phase I Environmental Site Assessment Report

Zachary Freeman, PG

★ Project Location

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Regional Location

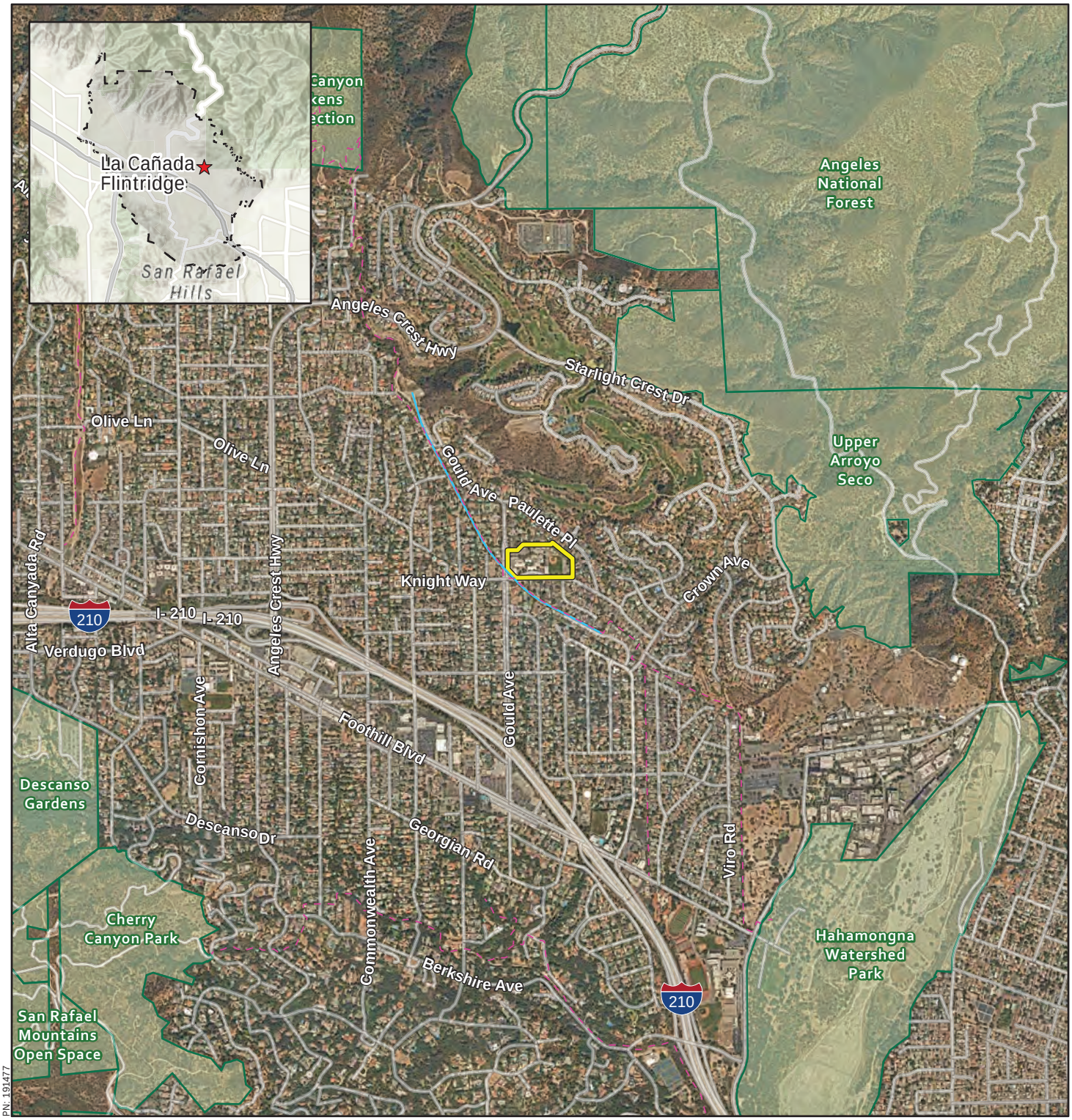
Figure 2.1-1

Michael Baker
INTERNATIONAL

N

0 2 4 8
Miles

Source: Esri, ArcGIS Online, National Geographic World Map: *La Cañada Flintridge, California*



Project Area

Trails

Gould Canyon Channel

Michael Baker INTERNATIONAL

N

0 0.13 0.25 0.5 Miles

Source: Esri, ArcGIS Online, USGS 7.5-Minute topographic quadrangle maps: *La Cañada Flintridge, California*

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Project Vicinity

Figure 2.1-2

PN: 191477

Project Area
Gould Canyon Channel
Gould Canyon Trail

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N

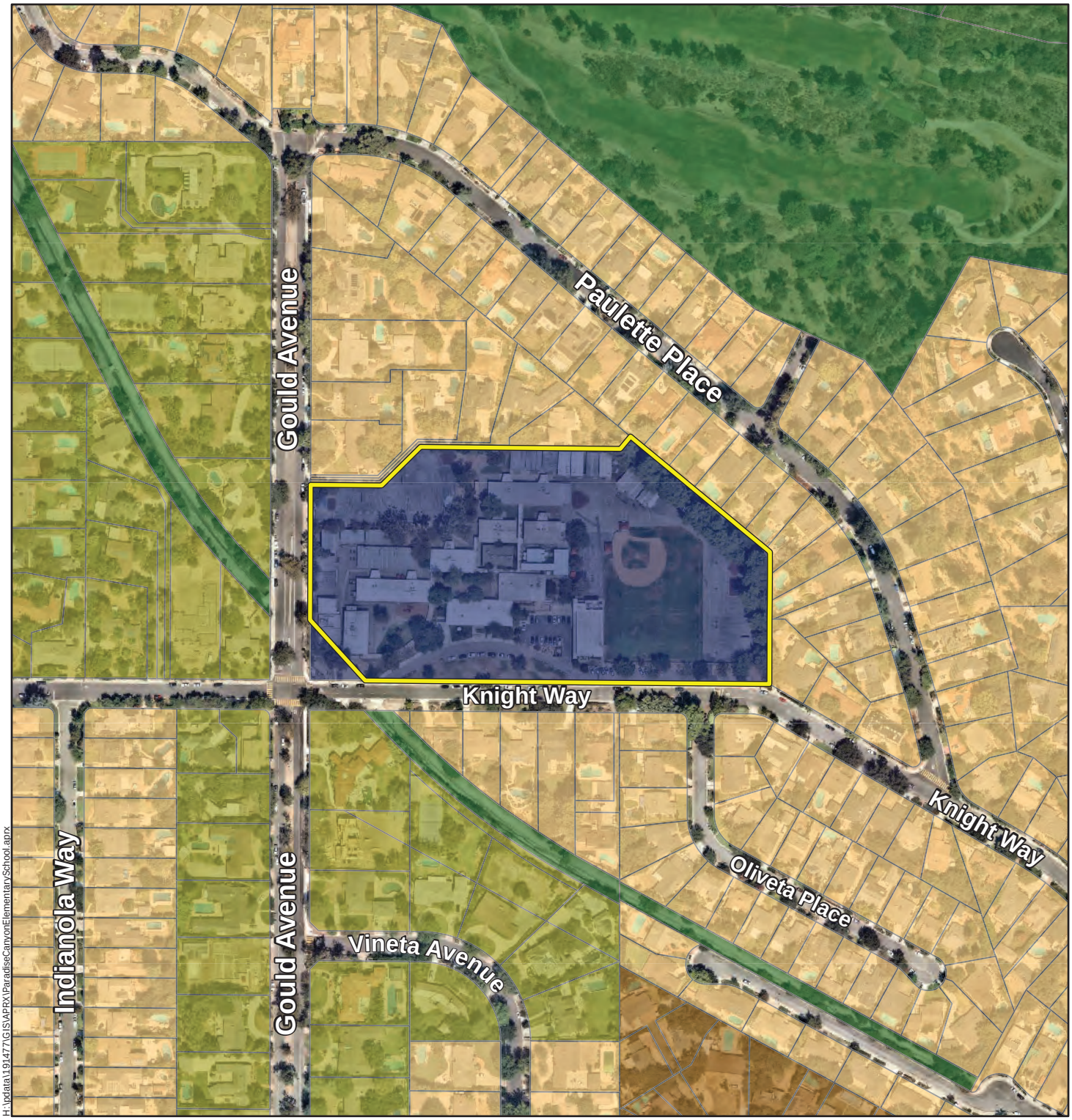
0 125 250 500 Feet

Source: Esri, ArcGIS Online, 2021 Nearmap Imagery: *La Cañada Flintridge, California*

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Project Area

Figure 2.1-3



Project Area

Land Use Type

- Very Low Density Residential
- Low Density Residential
- Medium Density Residential
- Open Space
- Public

Michael Baker INTERNATIONAL

N

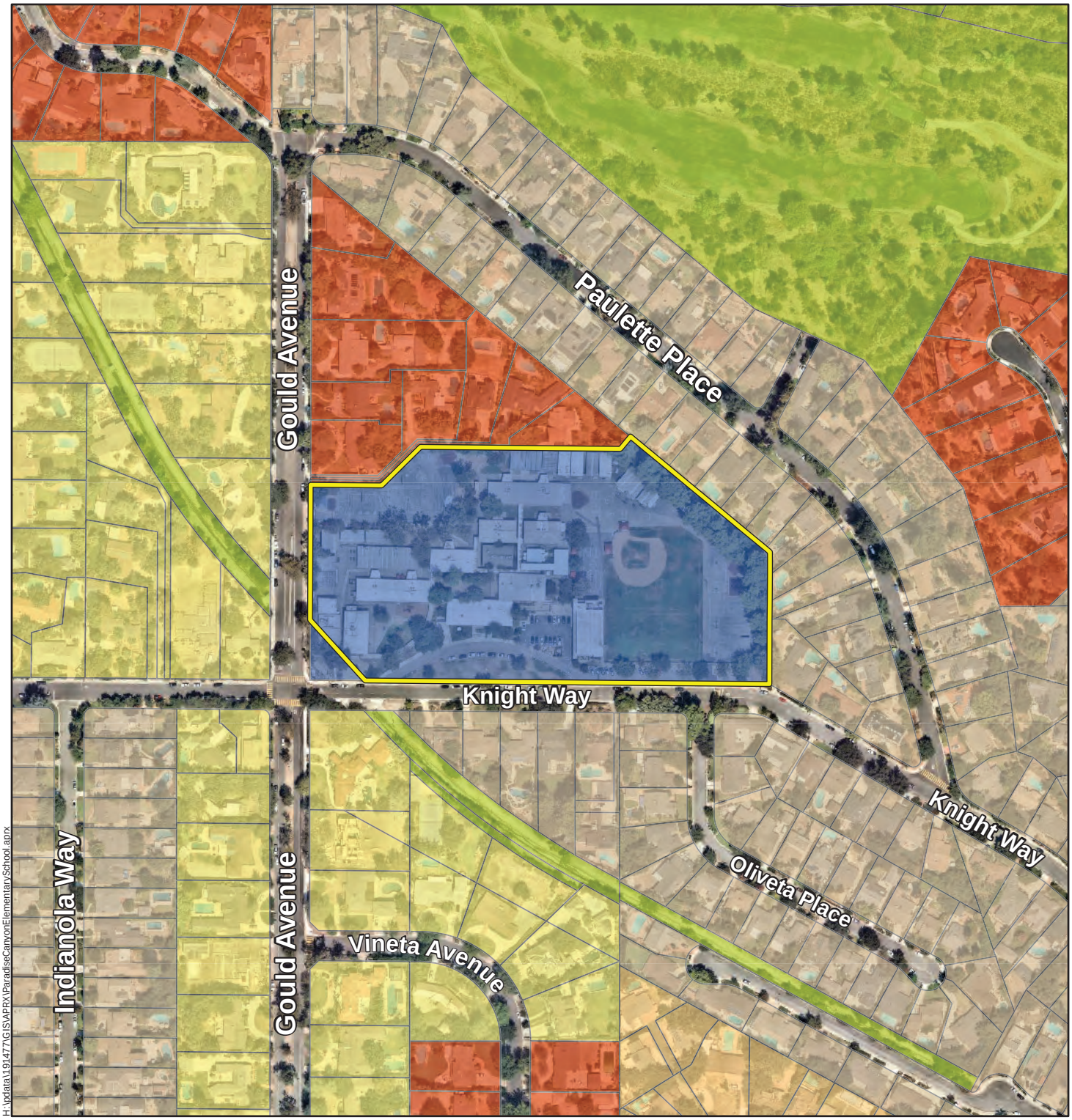
0 125 250 500 Feet

Source: Nearmap (08/2022)

PARADISE CANYON ELEMENTARY SCHOOL MODERNIZATION PROJECT

General Plan Land Use Designation

Figure 2.1-4



Project Area

Zoning Code

- Open Space
- PS (Public / Semi-public)
- R-1-7,500
- R-1-10,000
- R-1-15,000
- R-1-20,000

Michael Baker INTERNATIONAL

N

0 125 250 500 Feet

Source: Nearmap (08/2022)

PARADISE CANYON ELEMENTARY SCHOOL MODERNIZATION PROJECT

Zoning Designation

Figure 2.1-5

View from the corner of Knight Way and Gould Avenue at the southwest corner of Paradise Canyon Elementary School, facing northeast.

View from corner of Knight Way and Gould Avenue at the southwest corner of the campus, facing north along Gould Avenue and showing the western campus boundary and adjacent residential areas.

View from Gould Avenue at the western campus boundary showing the view of the existing portable structures (proposed to be removed and replaced with a building), facing east.

View at the northwest corner of the school campus (showing the upper playground area) and the adjacent access road and adjacent residences, facing east.

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PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Project Site Photographs

Figure 2.1-6A

Northern campus area showing the existing portables (proposed to be removed and replaced with a building), facing northwest.

View along Knight Way at the school entrance, facing northeast.

View at southwest corner of the campus at Knight Way and Gould Avenue showing the adjacent Gould Canyon Trail.

View from Knight Way showing the lower playground (baseball field and lawn) showing the existing multi-purpose building (to be renovated) and the existing portables (to be removed), facing north.

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Project Site Photographs

Figure 2.1-6B

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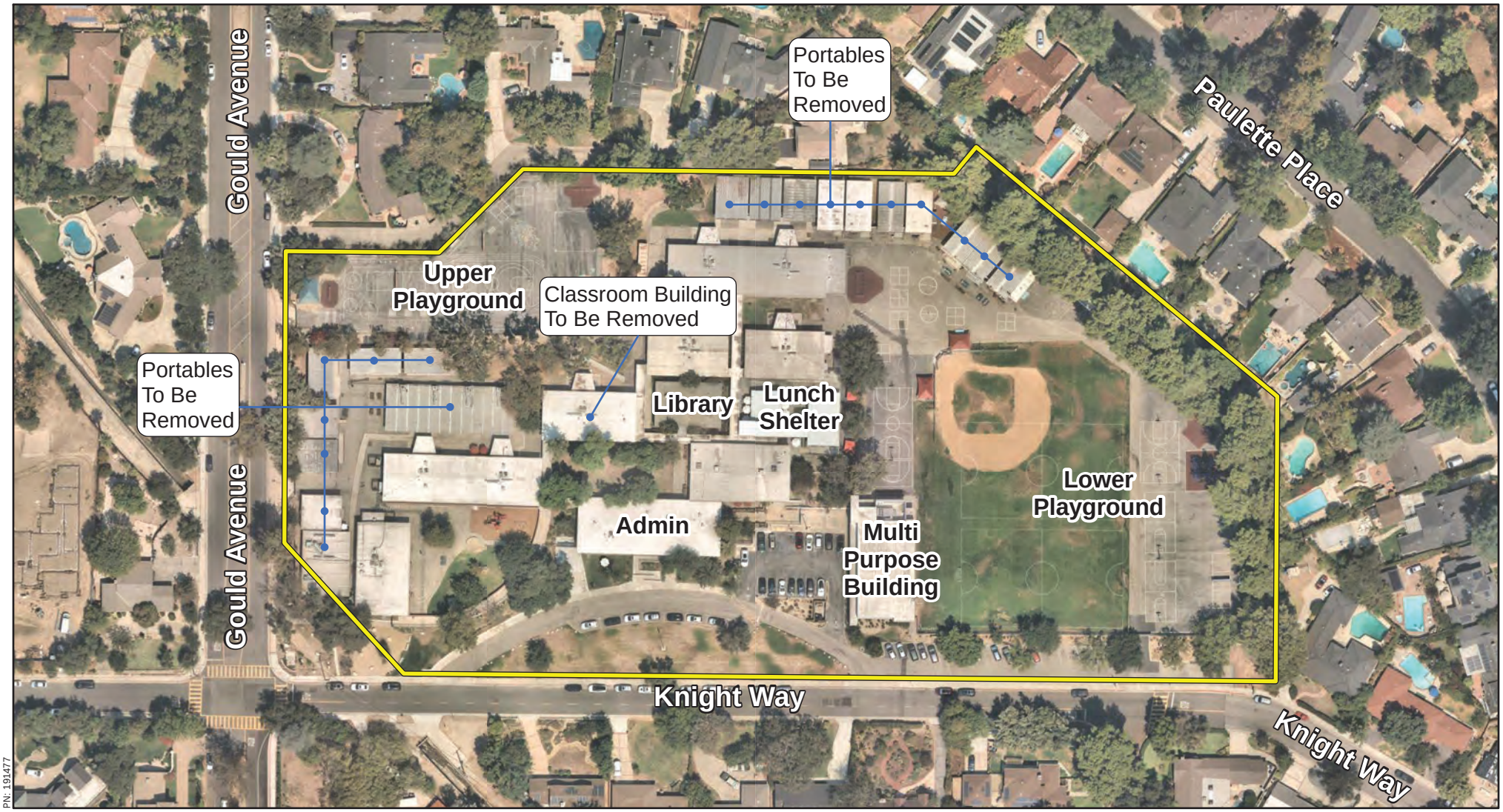

Existing School Site (Property Boundary)

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N

0 50 100 200 Feet

Source: Esri, ArcGIS Online, 2021 Nearmap Imagery: *La Cañada Flintridge, California*

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Existing Facilities

Figure 2.3-1

Source: GGA Architects

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PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Project Site Plan

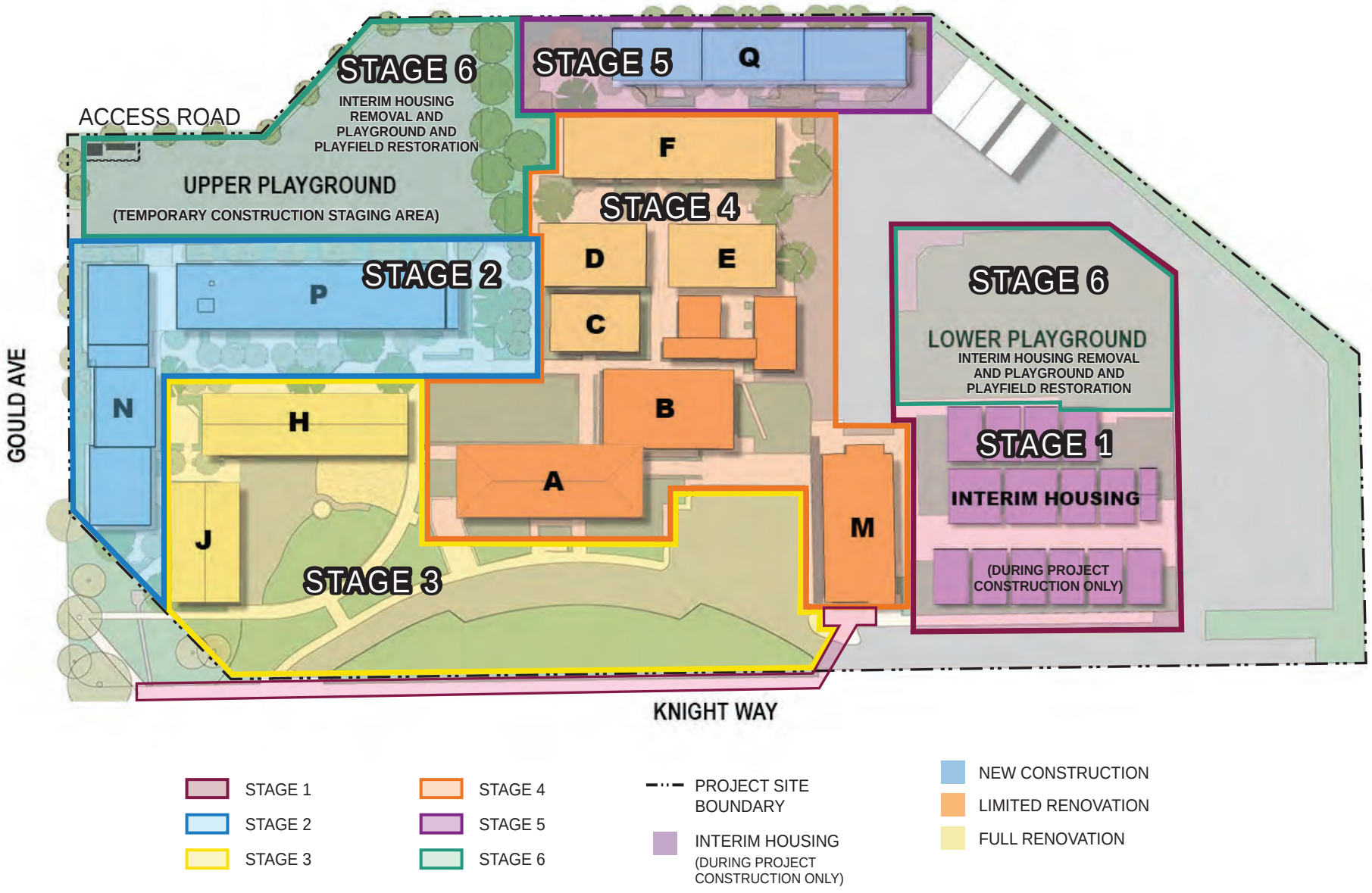
Figure 3.3-1

View of the proposed new classroom building from Gould Avenue facing east, showing the two-story and one-story portions of the new structure.

View of the proposed new classroom building from the upper playground facing south, showing the two-story portion of the new structure.

View of the interior school campus in the courtyard area between the new two-story classroom building (Building N/P) and the renovated existing building (Building H), as shown on the Project Site Plan (Figure 3-2).

View of the proposed new classroom building and design theme.



Source: GGA Architects

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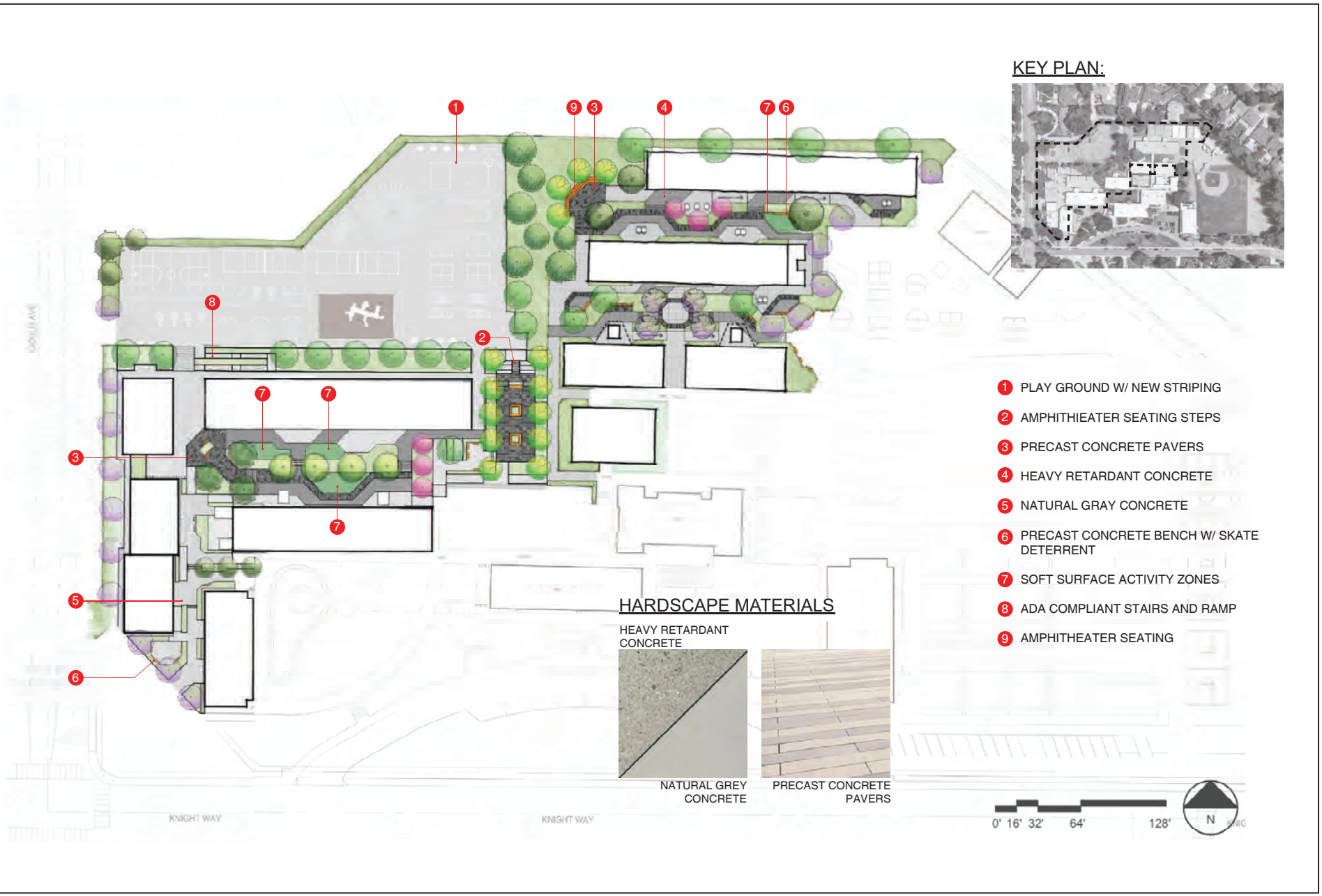
PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Project Construction Stages

Figure 3.3-4



Source: GGA Architects

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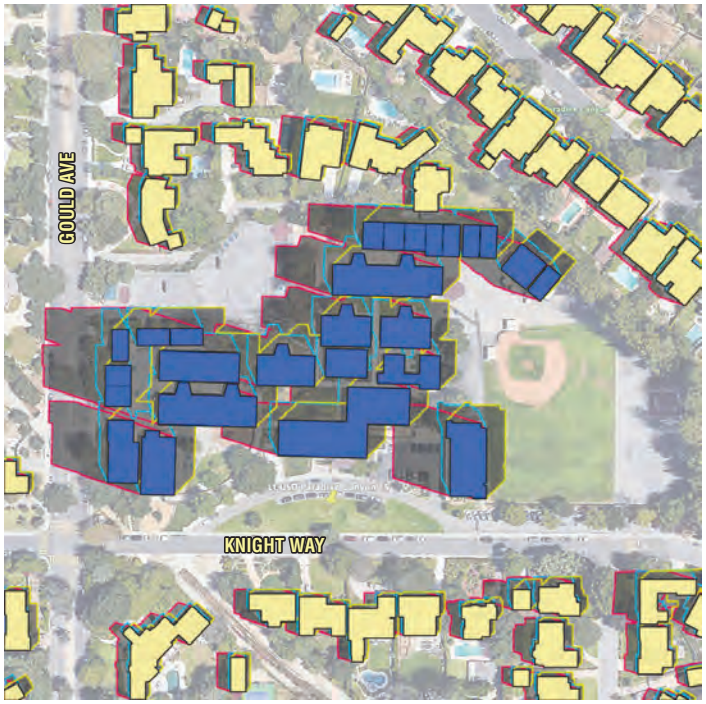
PARADISE CANYON ELEMENTARY SCHOOL MODERNIZATION PROJECT

Landscaping and Outdoor Amenities

Figure 3.3-5

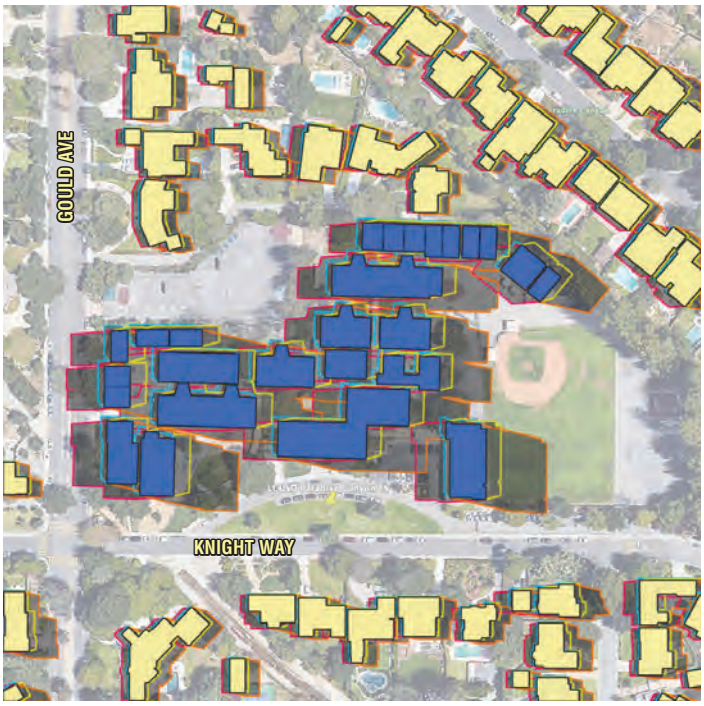
Late October to Early April

Winter Solstice



Vernal Equinox

Early April to Late October



Summer Solstice

Autumnal Equinox

LEGEND

- 9 a.m. Shadow Pattern
- 12 p.m. Shadow Pattern
- 3 p.m. Shadow Pattern
- 6 p.m. Shadow Pattern

Note: Based on the daytime lighting conditions throughout the year, the Summer Solstice and Autumnal Equinox shadow patterns are represented from 9:00 a.m. and 6:00 p.m. and the Winter Solstice and Vernal Equinox shadow patterns are represented from 9:00 a.m. to 3:00 p.m.

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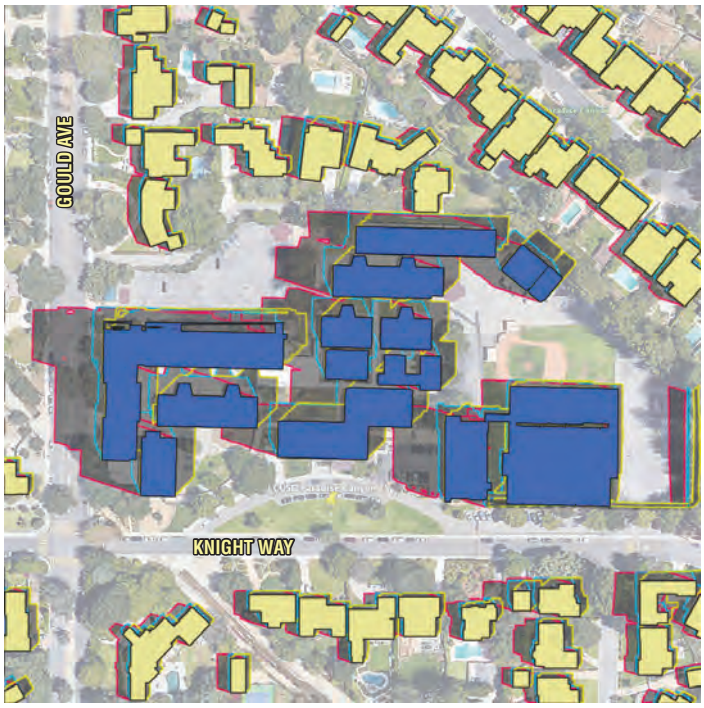
PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Existing Shade/Shadow Patterns

Figure 4.1-1

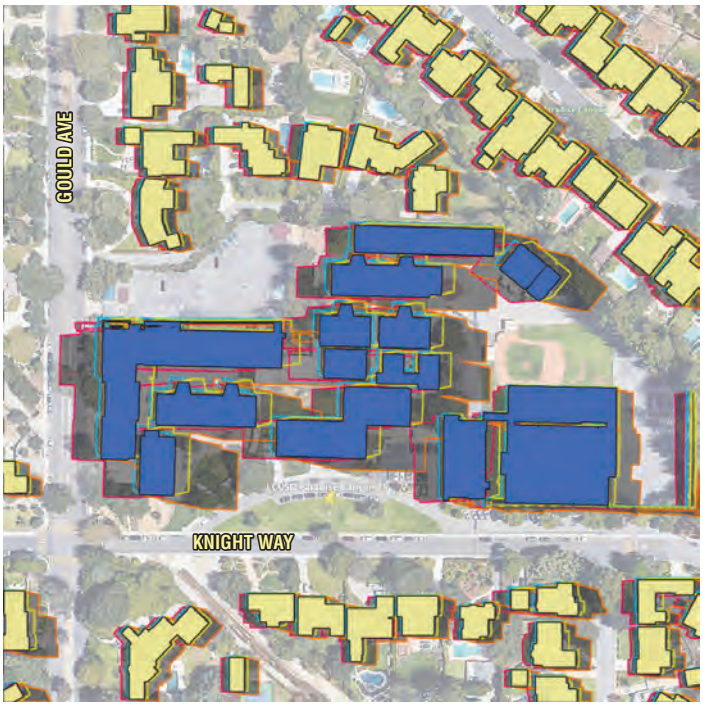
Late October to Early April

Winter Solstice

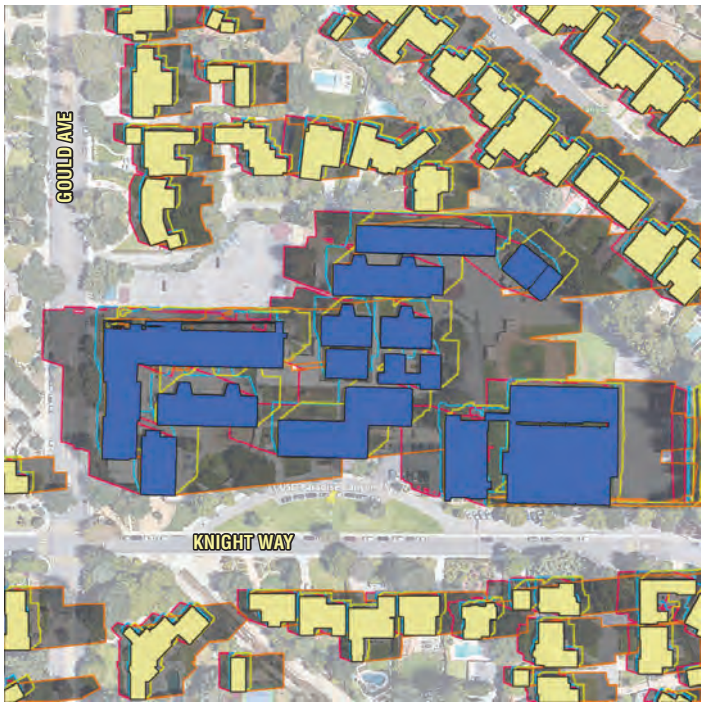


Vernal Equinox

Early April to Late October



Summer Solstice



Autumnal Equinox

LEGEND

- 9 a.m. Shadow Pattern
- 12 p.m. Shadow Pattern
- 3 p.m. Shadow Pattern
- 6 p.m. Shadow Pattern

Note: Based on the daytime lighting conditions throughout the year, the Summer Solstice and Autumnal Equinox shadow patterns are represented from 9:00 a.m. and 6:00 p.m. and the Winter Solstice and Vernal Equinox shadow patterns are represented from 9:00 a.m. to 3:00 p.m.

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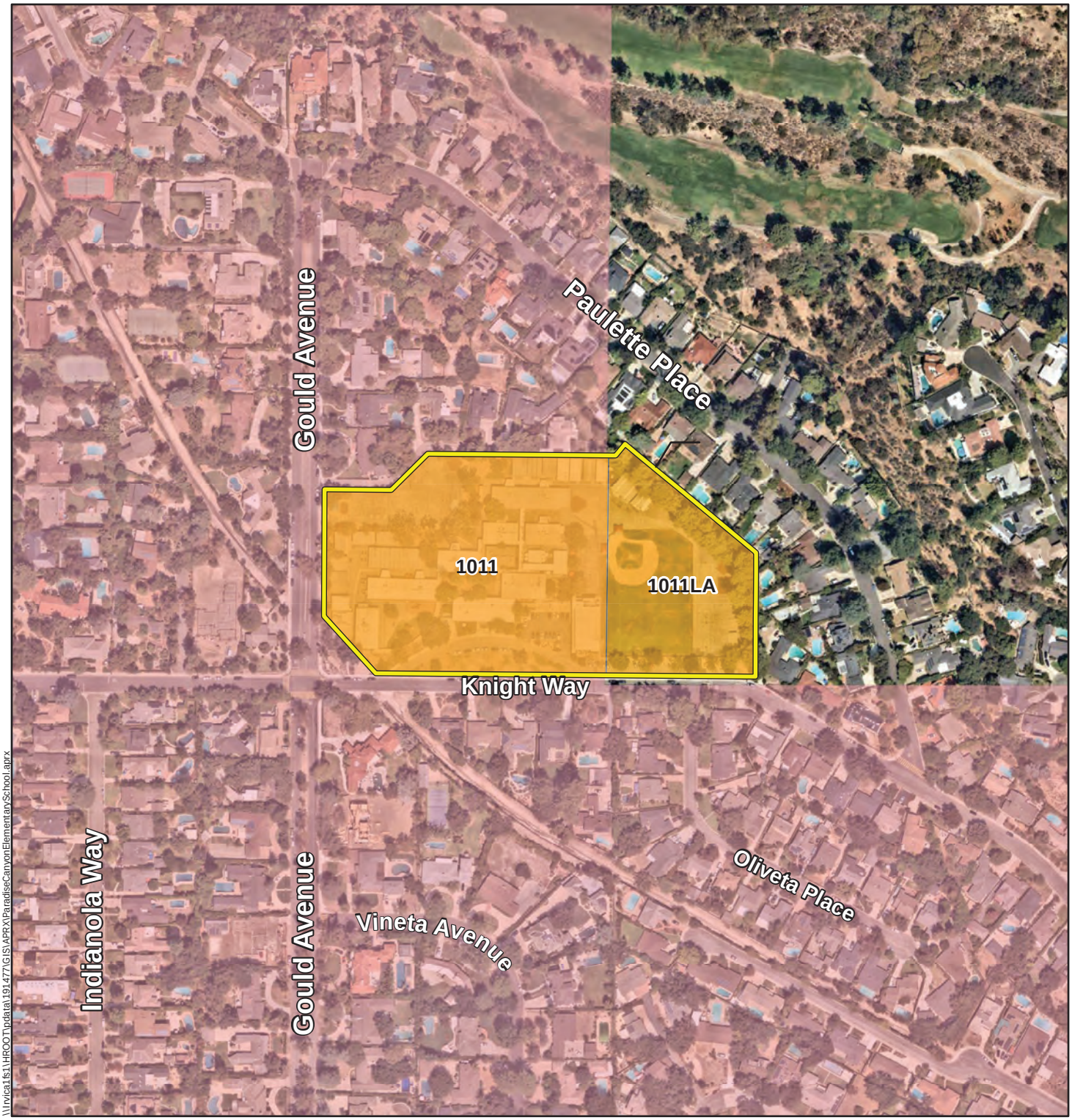
PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Proposed Shade/Shadow Patterns

Figure 4.1-2



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Legend

- Project Area
- 1011/ 1011LA — Urban land-Soboba-Tujunga complex, 5 to 15 percent slopes

Farmland Mapping and Monitoring Program

- Urban and Built-Up Land

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N

0 150 300 Feet

Source: Natural Resources Conservation Service, Nearmap (08/2022)

PARADISE CANYON ELEMENTARY SCHOOL MODERNIZATION PROJECT

FMMP and Soil Type

Figure 4.2-1

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Legend

- Project Site
- Survey Area (500-foot Buffer)

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N

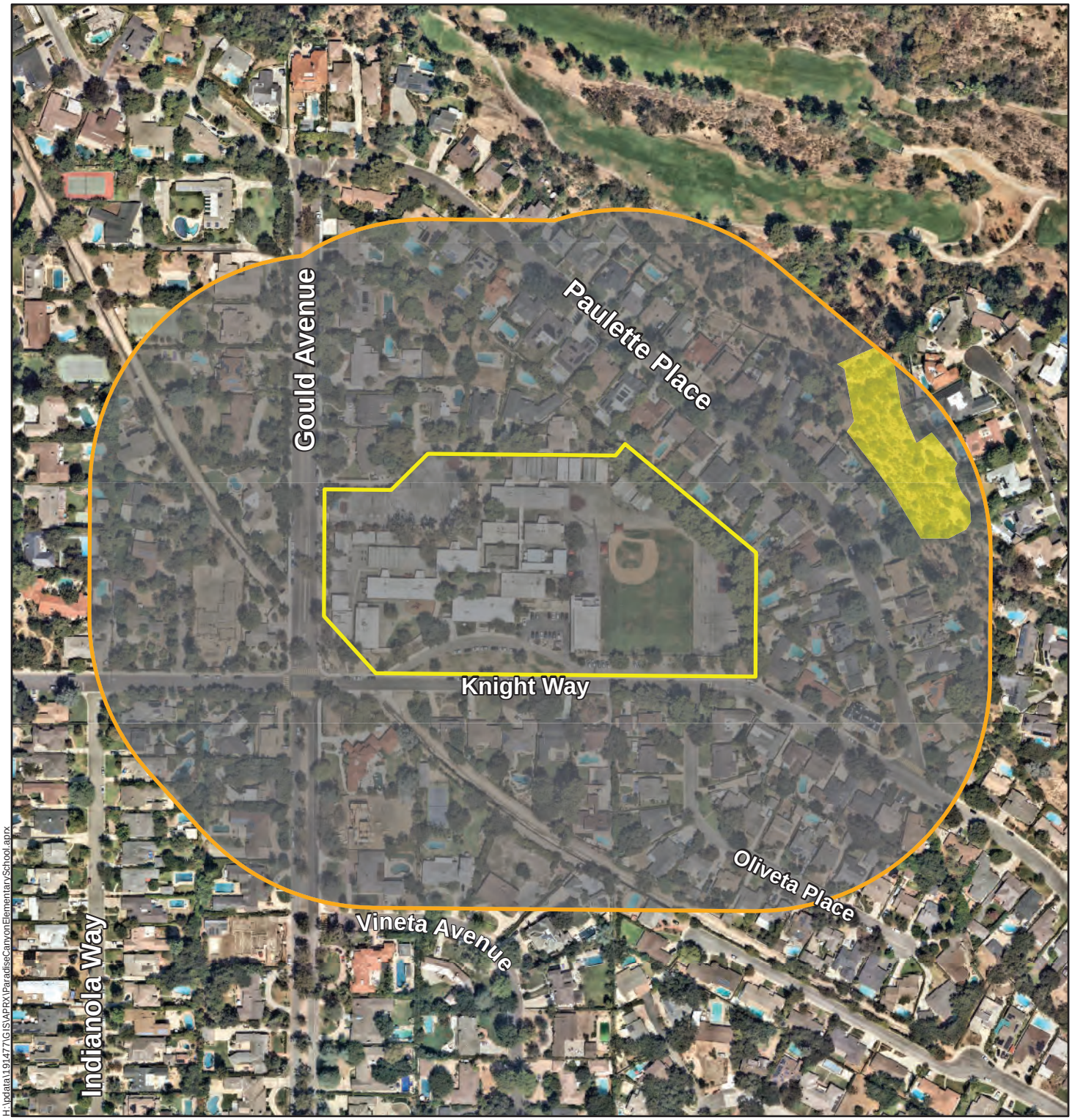
0 150 300 Feet

Source: Nearmap (08/2022)

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Survey Area

Figure 4.4-1



Legend

- Project Site
- Survey Area (500-foot Buffer)

Vegetation Communities and Other Land Uses

- Chamise - Sage Chaparral (1.20 ac)
- Developed/Landscaped (54.79 ac)

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N

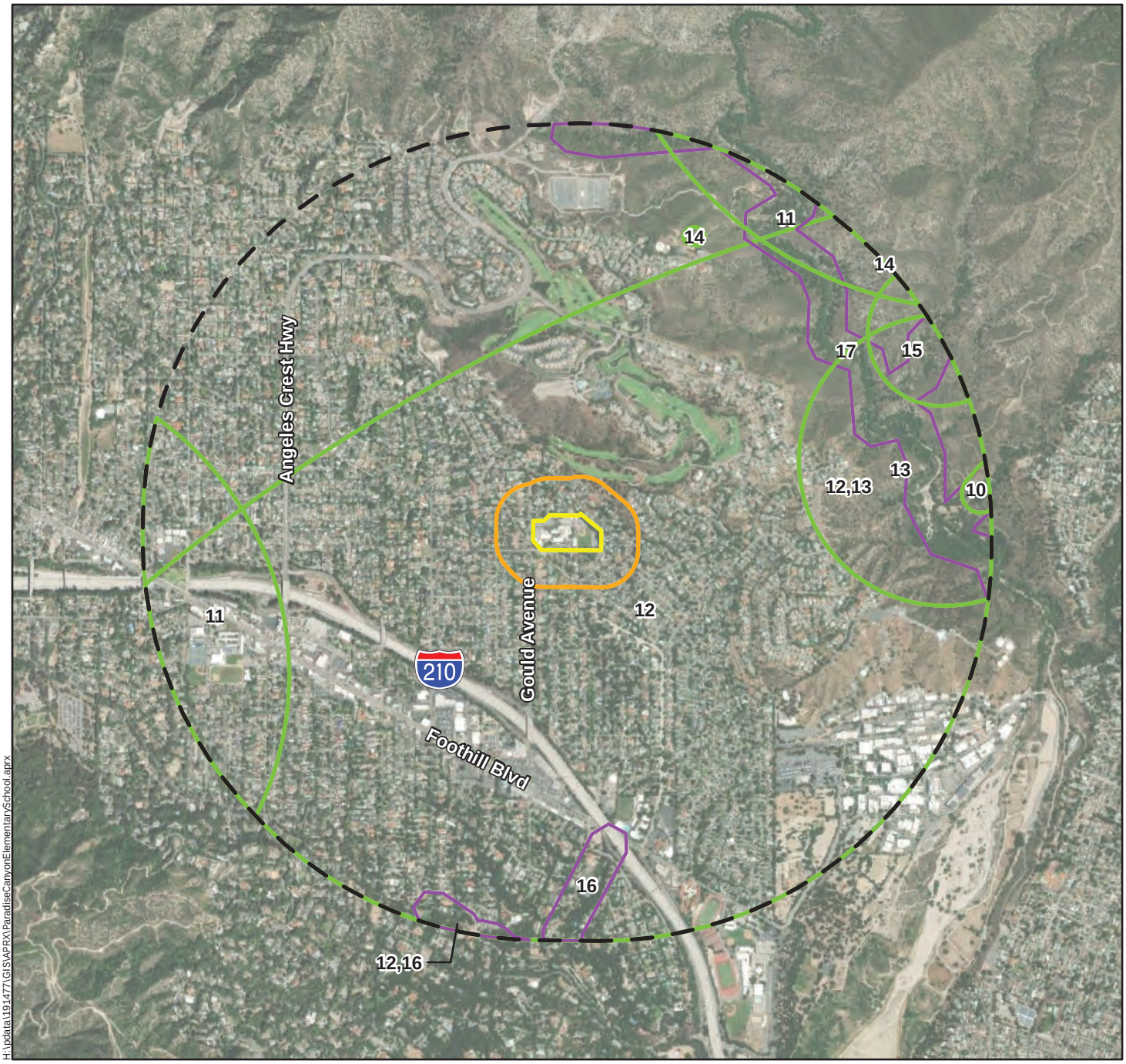
0 150 300 Feet

Source: Nearmap (08/2022)

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Vegetation Communities and Other Land Uses

Figure 4.4-2



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Legend

- Project Site
- Survey Area (500-foot Buffer)
- 1-mile Radius Buffer

CNDDB Special-Status Species Occurrences

- Plant
- Vegetation Community

ID	Plant
10	Greata's aster
11	mesa horkelia
12	Parish's gooseberry
13	Parry's spineflower
14	Plummer's mariposa-lily
15	Sonoran maiden fern
ID	**Vegetation Community**
16	Southern Coast Live Oak Riparian Forest
17	Southern Sycamore Alder Riparian Woodland

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N

0 1,000 2,000 Feet

Source: CNDDB (10/2022), ArcGIS Online (2022)

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

CNDDB Plant Species

Figure 4.4-3

Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Legend

- Project Boundary
- Tree Canopy
- Trees

* Figure originally from Arborist Report for the Paradise Canyon Elementary School Modernization Project

Source: UltraSystems 2022

11/30/2022 JN H:\pdata\191477\GIS\APRX\ParadiseCanyonElementarySchool.aprx

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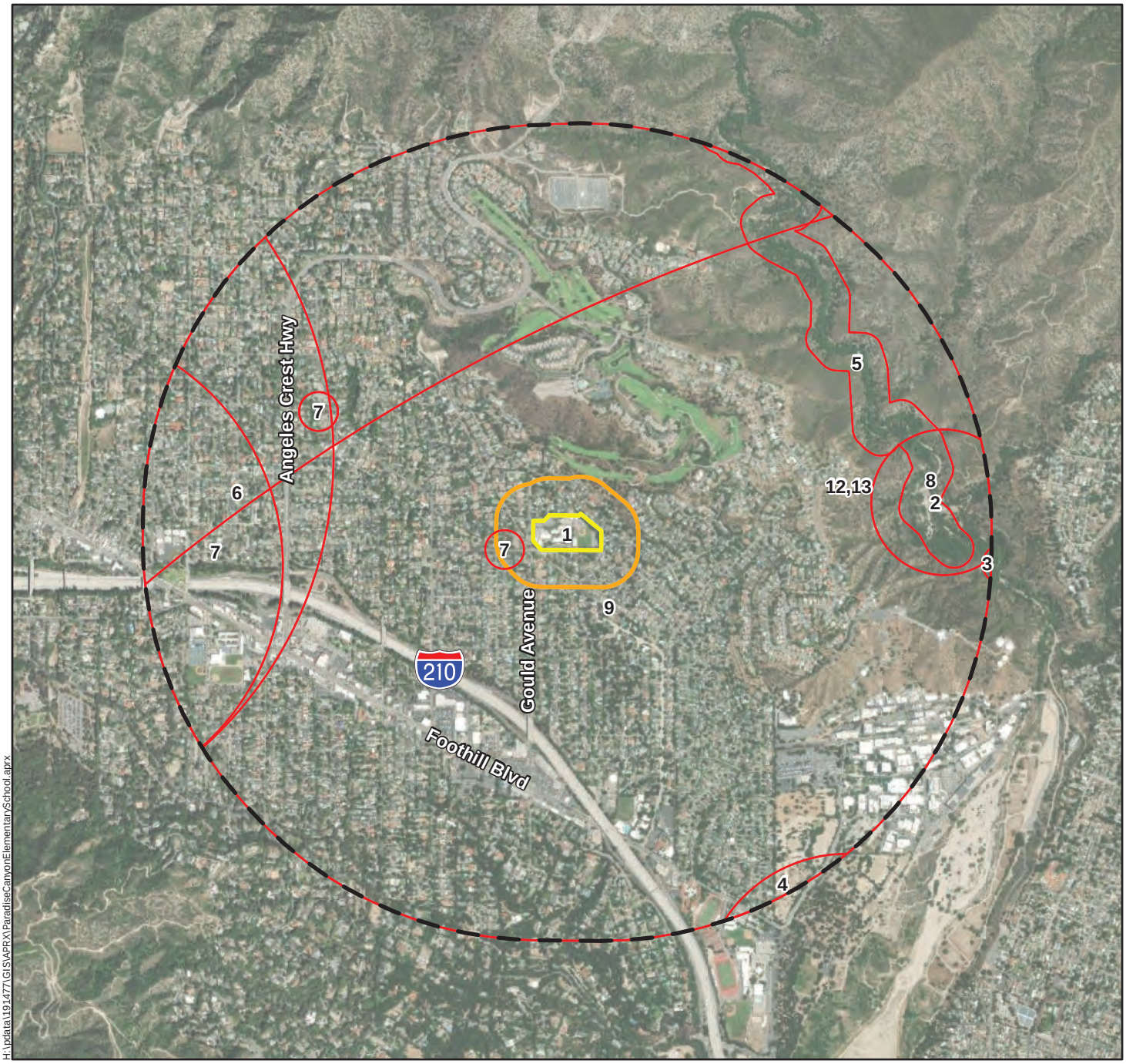
PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Tree Inventory

Figure 4:4-4



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Legend

- Project Site
- Survey Area (500-foot Buffer)
- 1-mile Radius Buffer

CNDDB Special-Status Species Occurrences

- Animal

ID	Animal
1	American peregrine falcon
2	Coast Range newt
3	Crotch bumble bee
4	least Bell's vireo
5	San Gabriel chestnut
6	silver-haired bat
7	Southern California legless lizard
8	southern mountain yellow-legged frog
9	southwestern willow flycatcher

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N

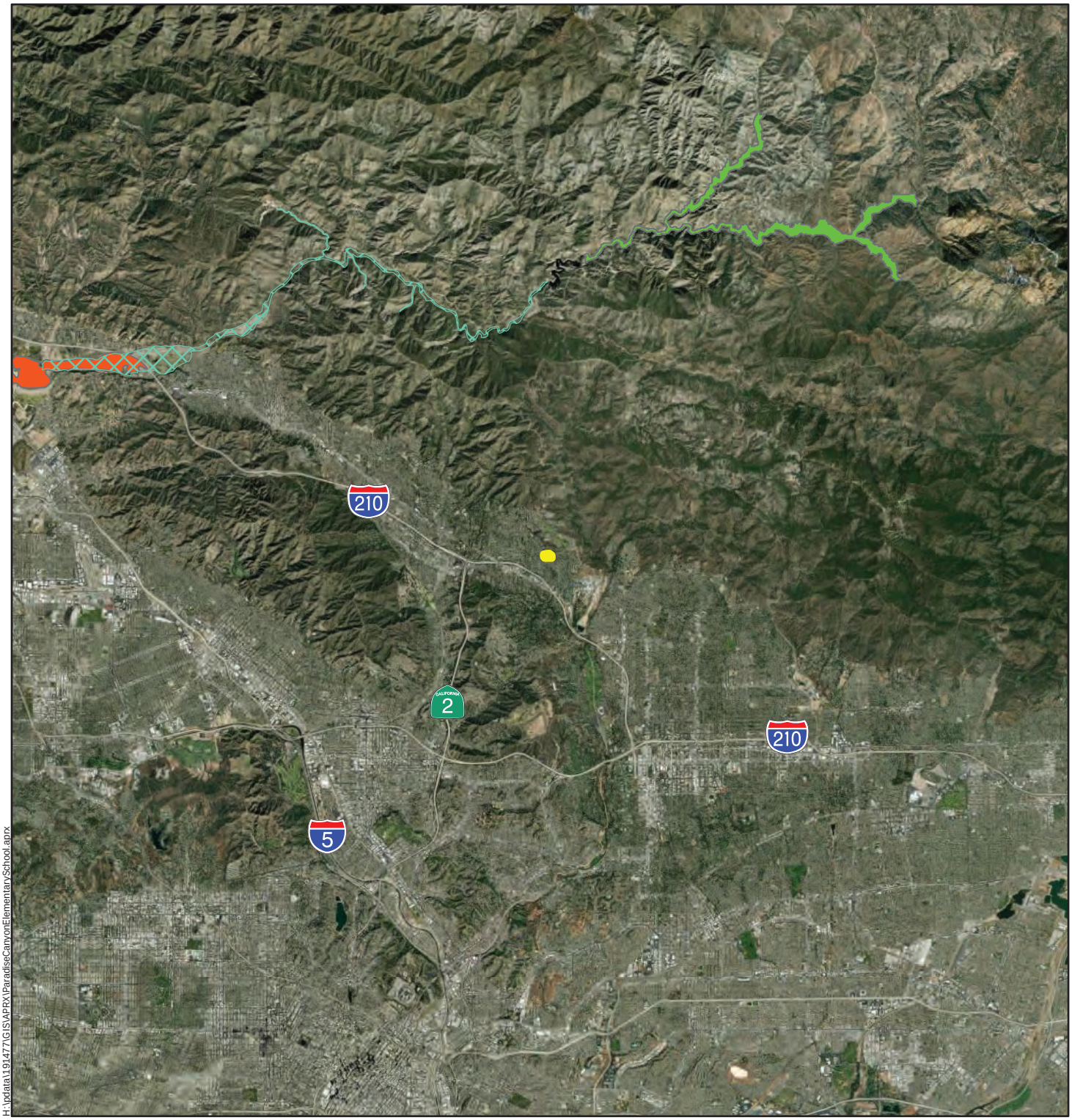
0 1,000 2,000 Feet

Source: CNDDB (10/2022), ArcGIS Online (2022)

PARADISE CANYON ELEMENTARY SCHOOL MODERNIZATION PROJECT

CNDDB Wildlife Species

Figure 4.4-5



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Legend

Project Site

Critical Habitat

- Arroyo Toad
- Southwestern Willow Flycatcher
- Santa Ana Sucker

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N

0 1.5 3 Miles

Source: US Fish and Wildlife Service (USFWS) (11/2022)

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Critical Habitat

Figure 4.4-6

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Legend

- Project Site
- Survey Area (500-foot Buffer)
- Riverine

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N

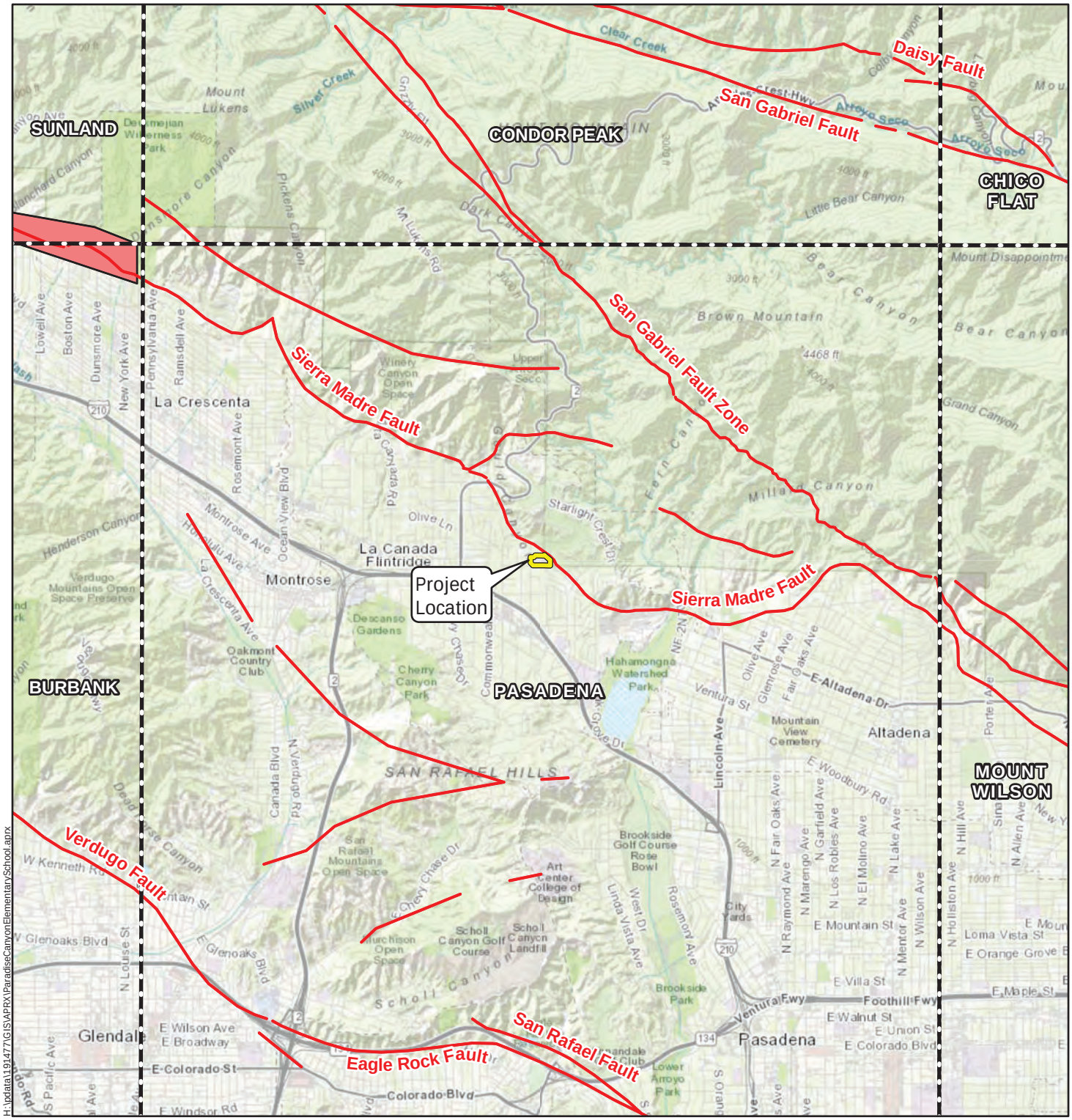
0 150 300 Feet

Source: U.S. Fish & Wildlife Service (10/2022)

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

National Wetlands Inventory Map

Figure 4.4-7



Legend

- Project Area
- Quaternary Faults
- Alquist Priolo Fault Zones
- USGS Quadrangle Boundary

Quaternary Faults
Quaternary Faults

Quaternary Faults
Quaternary Faults

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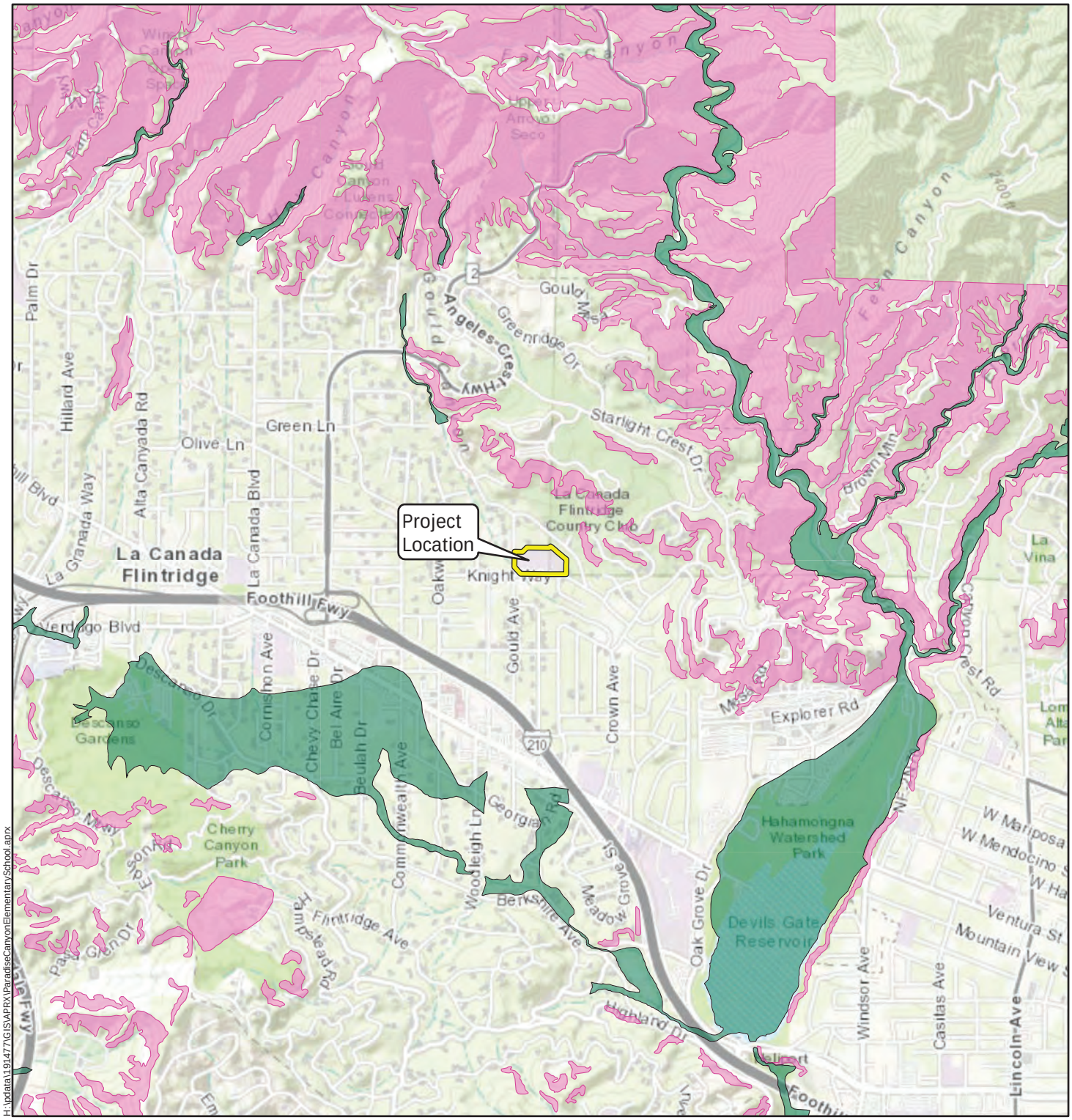
Source: Esri, ArcGIS Online, World Topographic Map, California Geological Survey

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Regionally Active Faults and Alquist-Priolo Earthquake Fault Zones

Figure 4.7-1



Legend

- Project Area
- Earthquake-induced Landslide Zones
- Liquefaction Zones

Michael Baker INTERNATIONAL

N

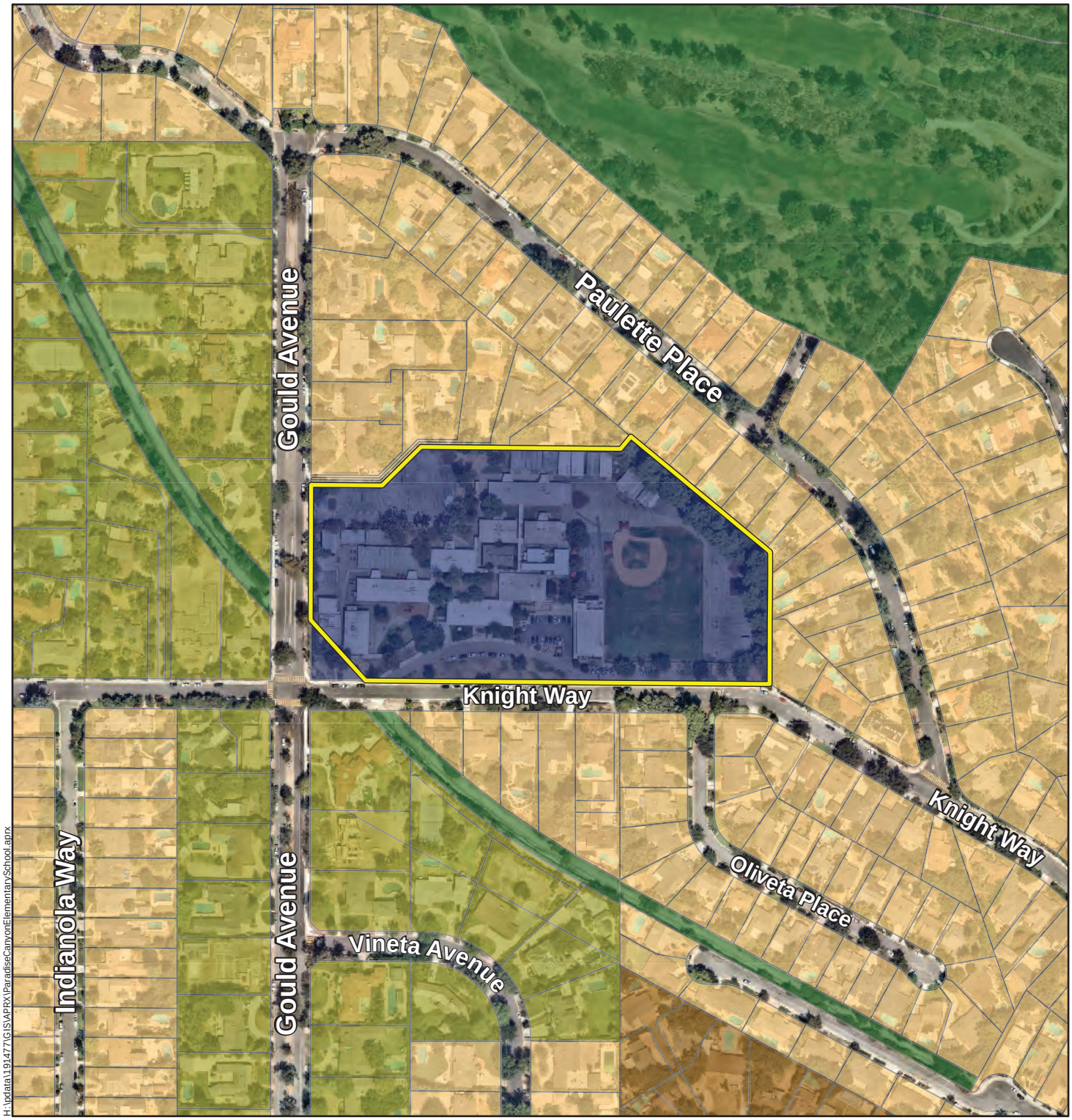
0 0.25 0.5 Miles

Source: Esri, ArcGIS Online, World Topographic Map, California Geological Survey

PARADISE CANYON ELEMENTARY SCHOOL
MODERNIZATION PROJECT

Landslides and Liquefaction Zones

Figure 4.7-2



Project Area

Land Use Type

- Very Low Density Residential
- Low Density Residential
- Medium Density Residential
- Open Space
- Public

Michael Baker INTERNATIONAL

N

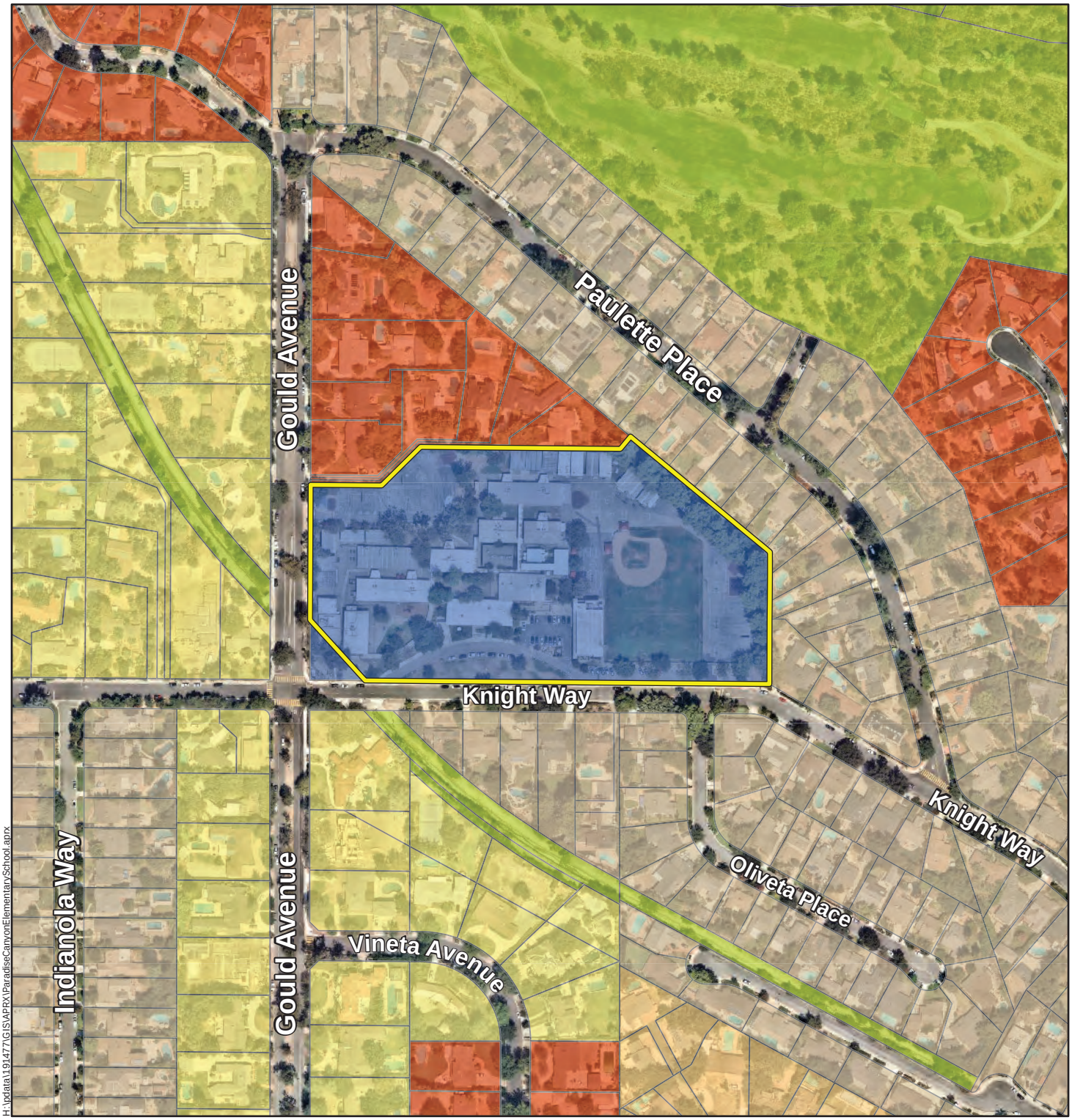
0 125 250 500 Feet

Source: Nearmap (08/2022)

PARADISE CANYON ELEMENTARY SCHOOL MODERNIZATION PROJECT

General Plan Land Use Designation

Figure 4.11-1



Project Area

Zoning Code

- Open Space
- PS (Public / Semi-public)
- R-1-7,500
- R-1-10,000
- R-1-15,000
- R-1-20,000

Michael Baker INTERNATIONAL

N

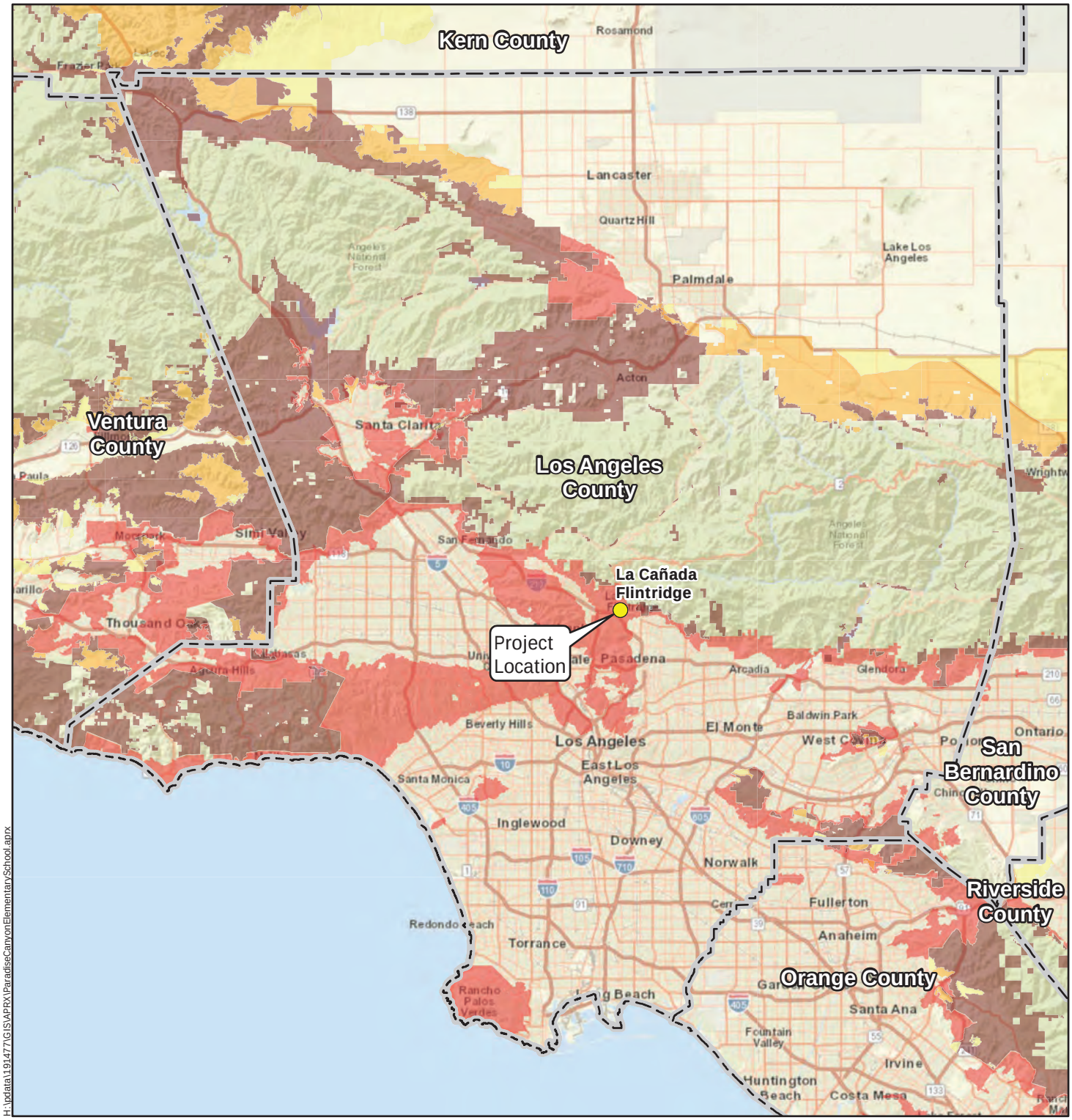
0 125 250 500 Feet

Source: Nearmap (08/2022)

PARADISE CANYON ELEMENTARY SCHOOL MODERNIZATION PROJECT

Zoning Designation

Figure 4.11-2



Legend

- Project Area
- County Boundary

Fire Hazard Severity Zones in SRA (CAL FIRE Adopted November 2007)

- Very High
- High
- Moderate

Fire Hazard Severity Zones in LRA (CAL FIRE Recommended March 2012)

- Very High

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N

0 5 10 Miles

Source: Esri, ArcGIS Online, National Geographic World Map, CAL FIRE FHSZ

PARADISE CANYON ELEMENTARY SCHOOL MODERNIZATION PROJECT

Fire Hazard Severity Zones – SRA/LRA

Figure 4.20-1