



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION

"Parks Make Life Better!"

Norma E. García-González, Director

Alina Bokde, Chief Deputy Director

**NOTICE OF PREPARATION FOR THE
DEVIL'S PUNCHBOWL NATURE CENTER
REPLACEMENT PLANNING PROJECT**

The County of Los Angeles Department of Parks and Recreation (DPR) is the lead agency for consideration of the Devil's Punchbowl Nature Center Replacement Planning Project (Proposed Project). Based on the findings of an Initial Study for the Proposed Project, DPR has determined that it will prepare a focused Environmental Impact Report (EIR). Pursuant to Section 15082 of the California Environmental Quality Act (CEQA) Guidelines, DPR is soliciting comments from all interested persons, responsible and trustee agencies and organizations concerned with the project as to the scope and content of the EIR and the environmental information to be analyzed in connection with the Proposed Project. The project description, location, environmental review requirements, and probable environmental issues to be addressed in the EIR are included in this Notice of Preparation (NOP).

PROJECT LOCATION

28000 Devil's Punchbowl Road, Pearblossom, CA 93553 (location map attached)

PROJECT DESCRIPTION

DPR is proposing to develop new park amenities at the Devil's Punchbowl Natural Area. The Proposed Project entails planning for the replacement of the Nature Center that was destroyed by the Bobcat Fire in 2020 with a new building while also making improvements to the surrounding support site elements including trail heads, Americans with Disabilities Act (ADA) access to buildings and trails, picnic areas, and shade structures. Specifically, the Proposed Project includes:

- 3,245-square-foot Nature Center, administrative offices, and gift shop
- Green roof
- Reinforced masonry structure
- Sand colored and fire rated board-form concrete panel exterior
- Protection of all remaining healthy trees onsite
- Natural ventilation
- Natural lighting and skylights
- Native landscaping and revegetation
- Storm water collection and reuse
- Solar canopy over parking lot
- Native seed collection and germination (incl. local manzanita seeds for future use)
- Shade structures

- Planting additional native trees to provide shade in the future
- Inclusion of local materials in the architectural design, such as rocks on façade
- Demolition of the existing Ranger's Residence

POTENTIAL PROJECT IMPACTS

Based on the findings of an Initial Study for the Proposed Project, DPR has determined that it will prepare a focused EIR. A preliminary assessment of potential environmental impacts that may occur as a result of the project determined that potentially significant environmental impacts related to Cultural Resources will need to be addressed as part of the EIR to assess the proposed demolition of the Ranger's Residence building. Additional resources would not be subject to potentially significant environmental effects, as described in the Initial Study.

NOTICE OF PREPARATION REVIEW AND COMMENTS

The NOP is being distributed to solicit written comments regarding the scope and content of the environmental analysis to be included in the EIR. DPR has prepared this NOP in accordance with the State CEQA Guidelines.

The review period for this NOP is from **August 16, 2023 to September 14, 2023**. Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but not later than **September 14, 2023**. Please direct all written comments to the following address:

Jui Ing Chien, Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave., Unit #40
A-9 West, 3rd Floor
Alhambra, California 91083
Telephone: (626) 588-5317
Email: jchien@parks.lacounty.gov

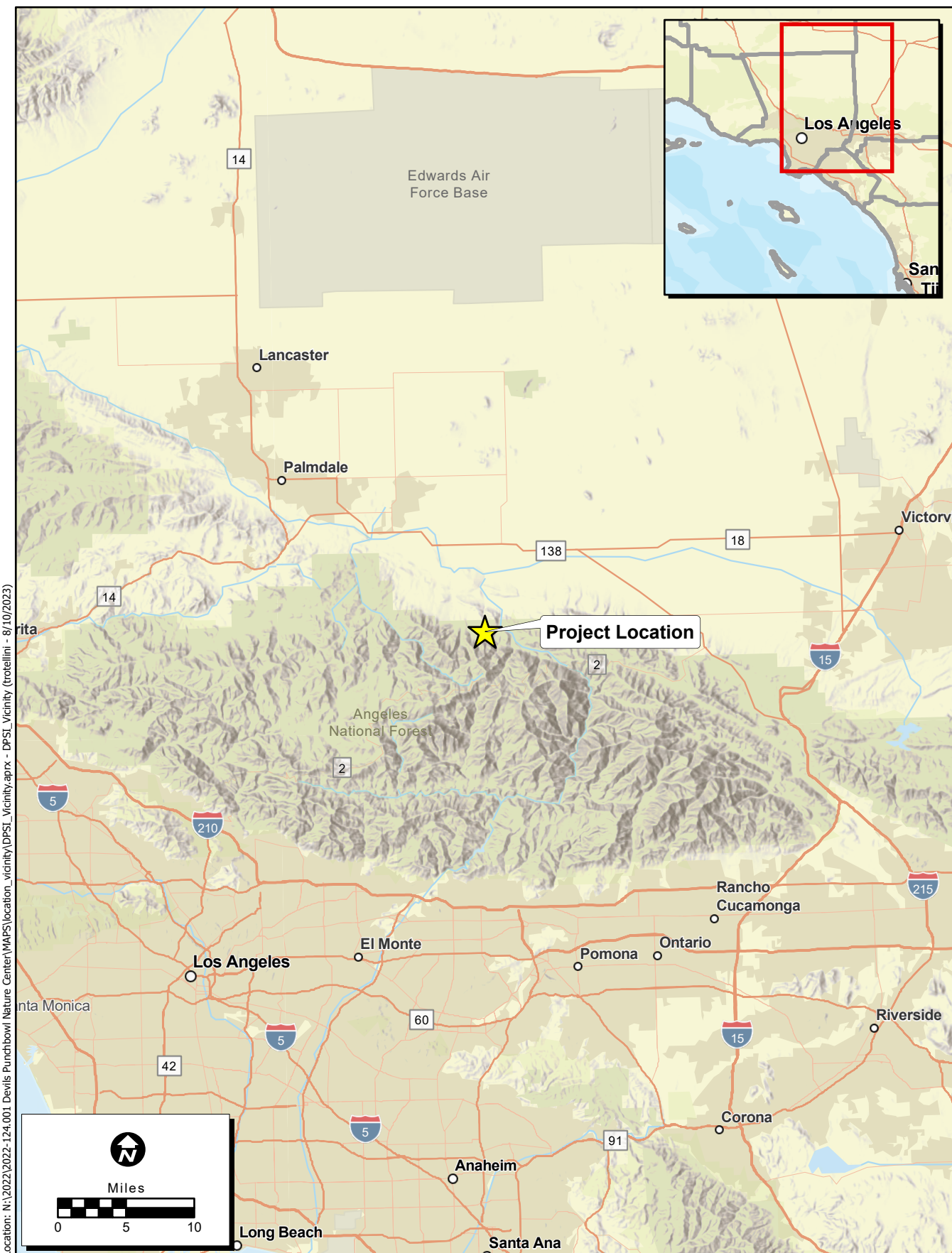
SCOPING MEETING

A Scoping Meeting will be held to present the Proposed Project and to solicit early comments from the public regarding the Proposed Project and issues to be addressed in the Draft EIR. The date, time, and location to the on-site meeting is as follows:

Saturday, September 9, 2023, 9:00 a.m. to 11:00 a.m. at the Devil's Punchbowl Natural Area and Nature Center, 28000 Devil's Punchbowl Road, Pearblossom, CA 93553.

REVIEW MATERIALS

The NOP and Initial Study are available for public review on the Department of Parks and Recreation website: <https://parks.lacounty.gov/environmental-documents/>.



Location: N:\2022\2022-124.001 Devil's Punchbowl Nature Center\MAPS\location_vicinity\DPSI_vicinity.aprx - DPSI_vicinity (trotellini - 8/10/2023)

Map Date: 8/10/2023
 Service Layer Credits: World Street Map; City of Carson, County of Los Angeles, California State Parks, Esri, HERE, Garmin, FAO, NOAA, USGS, EPA, World Street Map; County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, World Hillshade, Esri, CGIAR, USGS

Figure 1. Project Vicinity



**DEVIL'S PUNCHBOWL NATURE CENTER
REPLACEMENT PLANNING PROJECT**

INITIAL STUDY

PREPARED FOR:

COUNTY OF LOS ANGELES DEPARTMENT OF PARKS AND RECREATION

**1000 S. FREMONT AVENUE, UNIT #40
BUILDING A-9 WEST, 3RD FLOOR
ALHAMBRA, CALIFORNIA 91803**

PREPARED BY:

**ECORP CONSULTING, INC.
215 N. 5TH STREET
REDLANDS, CALIFORNIA 92374**

AUGUST 2023

Table of Contents

SECTION	PAGE
Environmental Checklist Form (Initial Study)	4
Description of Project.....	4
Reviewing Agencies.....	8
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:	13
1. AESTHETICS.....	15
2. AGRICULTURE / FOREST	17
3. AIR QUALITY.....	20
4. BIOLOGICAL RESOURCES.....	29
5. CULTURAL RESOURCES.....	34
6. ENERGY	38
7. GEOLOGY AND SOILS	43
8. GREENHOUSE GAS EMISSIONS	47
9. HAZARDS AND HAZARDOUS MATERIALS.....	51
10. HYDROLOGY AND WATER QUALITY	55
11. LAND USE AND PLANNING.....	59
12. MINERAL RESOURCES.....	61
13. NOISE	62
14. POPULATION AND HOUSING.....	70
15. PUBLIC SERVICES	71
16. RECREATION.....	73
17. TRANSPORTATION	74
18. TRIBAL CULTURAL RESOURCES	76
19. UTILITIES AND SERVICE SYSTEMS	78
20. WILDFIRE	80
21. MANDATORY FINDINGS OF SIGNIFICANCE.....	83
REFERENCES	85

APPENDICES

- Appendix A - Air Quality/Greenhouse Gas Emissions Assessment
- Appendix B - Biological Technical Report
- Appendix C - Archeological and Built Environment Resource Inventory
- Appendix D - Paleontological Assessment
- Appendix E - Energy Consumption Assessment
- Appendix F - Geotechnical Evaluation
- Appendix G - Phase I Environmental Site Assessment
- Appendix H - Noise Impact Assessment
- Appendix I - Technical Memo for the Trip Generation/VMT Screening Assessment

FIGURES	PAGE
Figure 1. Project Vicinity	9
Figure 2. Project Location	10
Figure 3. Onsite Extent of Structural Fire Damage	11
Figure 4. Site Plan	12

TABLES	PAGE
Table 3-1. Construction-Related Criteria Air Pollutant Emissions	23
Table 3-2. Operational Criteria Air Pollutant Emissions	24
Table 6-1. Nonresidential Electricity Consumption in Los Angeles County 2017-2021	39
Table 6-2. Nonresidential Natural Gas Consumption in Los Angeles County 2017-2021	39
Table 6-3. Automotive Fuel Consumption in Los Angeles County 2017-2022	39
Table 6-4. Proposed Project Energy and Fuel Consumption	40
Table 8-1. Construction Related Greenhouse Gas Emissions	48
Table 8-2. Operational-Related Greenhouse Gas Emissions	49
Table 13-1. ANSI Standard 12.9-2013/Part 3 A-weighted Sound Levels Corresponding to Land Use and Population Density	64
Table 13-2. Construction Average (dBA) Noise Levels at Nearest Receptors	66
Table 13-3. Representative Vibration Source Levels for Construction Equipment	68
Table 13-4. Construction Vibration Levels at 1,236 Feet	69

Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Parks and Recreation



Project title: Devil's Punchbowl Nature Center Replacement Planning Project

Lead agency name and address: County of Los Angeles Department of Parks and Recreation, 1000 S. Fremont Avenue, Unit 40 Building A-9 West, 3rd Floor, Alhambra, California 91803

Contact Person and phone number: Jui Ing Chien, Park Planner, (626) 588-5317, jchien@parks.lacounty.gov

Project location: 28000 Devils Punchbowl Rd., Pearblossom, CA 93553
AINs: 3061-013-903, 3061-013-300 USGS Quad: Valyermo

Gross Acreage: Approximately 13.75

General plan designation: Open Space Parks and Recreation (OS-PR)

Community/Area wide Plan designation: (OS-PR)

Zoning: Open Space (O-S)

Description of project:

The County of Los Angeles Department of Parks and Recreation (County) proposes the Devil's Punchbowl Nature Center Replacement Planning Project (Proposed Project or Project). The Project entails planning for the replacement of the Nature Center with a new building while also making improvements to the surrounding support site elements including trail heads, Americans with Disabilities Act (ADA) access to buildings and trails, picnic areas, and shade structures. The Proposed Project concept builds on the theme of site transformation, rebirth, and a new way to experience the landscape of Devils Punchbowl.

Devil's Punchbowl Natural Area is a 1,310-acre natural area that consists of rugged wilderness rock formations along the San Andreas Fault on the northern slope of the San Gabriel Mountains (Figure 1). The terrain climbs from 4,200 feet to 6,500 feet in elevation, with natural plant and animal communities ranging from desert scrub to pine forests. A seasonal stream runs through the natural area (Los Angeles County 2015). The proposed Nature Center and project improvements would be contained within Assessor's ID Number (AIN) 3061-013-903 and 3061-013-300.

The Antelope Valley Area Plan denotes the Project Site's land use as Open Space - Parks and Recreation (OS-PR). OS-PR includes open space recreational uses, such as regional and local parks, trails, athletic fields, community gardens, and golf courses (Los Angeles County 2015).

The Project Site is located near the unincorporated Juniper Hills Community and is surrounded on three sides by the Angeles National Forest (Figure 2). The Project Site's surrounding land uses include Open Space – National Forest (OS-NF) to the north, east, and south of the subject parcel. OS-NF includes areas within the National Forest managed by the National Forest Service. The area west of the subject parcel has a land use

designation of Rural Land 5 (RL5) which includes single-family residences; equestrian and limited animal uses; and limited agricultural and related activities (Los Angeles County 2015).

In 2020 heavy winds pushed the Bobcat Fire over the San Gabriel Mountains into the community of Juniper Hills. The Devil's Punchbowl Nature Center was destroyed by the fire as it descended towards the desert floor north of the National Forest. A representative figure demonstrating the extent of structural damage after the 2020 Bobcat Fire is included as Figure 3.

Nature Center: The Conceptual Site Plan includes the construction of a single story, 3,245-square-foot building that includes a Nature Center, Administrative offices, and shop (Figure 4). The architecture is inset into the landscape, within the footprint of the previously disturbed areas of the Project Site and includes a covered exterior courtyard. An accessible circular path to the south would bring visitors from the parking lot to the rim and invites visitors to explore the desert landscape restored along the edges of the path and adjacent to the new building. The inset design would allow for the roof of the Nature Center to function as a scenic overlook for the Punchbowl itself. The Nature Center would accommodate various educational, institutional, recreational, and civic-oriented activities. The Nature Center would be constructed with a reinforced masonry structure, with an exterior of sand colored fire rated board-form concrete panels. The Nature Center would be constructed in accordance with county, state, and federal building codes.

Parking Lot Solar Canopy: The Proposed Project would include the construction of a solar canopy over the existing parking lot. No additional parking would be included as part of this Project.

Landscaping: The Conceptual Site Plan specifies the use of indigenous plants to be used as landscape screening, which would require the use of potable water for landscape irrigation. The newly planted native plantings would blend into the existing surrounding landscape and over time would imbed the architecture into the Project Site. The Los Angeles County Code specifies that the director of the County of Los Angeles Department of Parks and Recreation (DPR) has the right to make determination to plant, trim, modify, and/or remove plants and trees on public lands (Los Angeles County Code 16.76.010). The Proposed Project would be subject to review and oversight by DPR to ensure consistency with the goals and policies of the County General Plan and applicable County ordinances.

Support Facilities: The Project would include the construction of new trail heads, ADA compliant site access to buildings and trails, shade structures, and picnic areas.

Demolition of Existing Structures (Ranger's Residence): The Proposed Project includes the demolition of an existing historic age structure, the Ranger's Residence, to accommodate the new Nature Center and associated improvements. The Ranger's Residence is located within the proposed Nature Center footprint and currently serves as an office for park staff and partially as storage space.

Elements of the site and building proposed include:

- 3,245-square-foot Nature Center, administrative offices, and gift shop
- Green roof
- Reinforced masonry structure
- Sand colored and fire rated board-form concrete panel exterior
- Protection of all remaining healthy trees onsite
- Natural ventilation
- Natural lighting and skylights
- Native landscaping and revegetation
- Storm water collection and reuse
- Solar canopy over parking lot

- Native seed collection and germination (including Local manzanita seeds for future use)
- Shade structures
- Planting additional native trees to provide shade in the future
- Inclusion of local materials in the architectural design, such as rocks on façade

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

The following California Native American tribes have been notified of the Project:

- Fernandeño Tataviam Band of Mission Indians
- Barbareño/Ventureño Band of Mission Indians
- Gabrieleno Band of Mission Indians – Kizh Nation
- San Manuel Band of Mission Indians
- Gabrieleno Tongva Indians of California
- San Gabriel Band of Mission Indians
- Tejon Indian Tribe

The above list of tribes was first contacted on January 5, 2023, which initiated Assembly Bill (AB) 52 Consultation. The County received an email response from the Fernandeño Tataviam Band of Mission Indians (BMI) on January 9, 2023, indicating the desire to consult regarding potential impacts to Tribal Cultural Resources pursuant to Public Resources Code section 21080.3.1. As part of the consultation process the Fernandeño Tataviam BMI affirmed the Project Site is located within their ancestral territory and made a request for additional information regarding the Proposed Project. On April 11, 2023, the Fernandeño Tataviam BMI provided comments requesting a correction of Section 3.3.3 of the Environmental Resources Inventory and Evaluation prepared for the Project in addition to the inclusion of TCR-1 and TCR-2 as Mitigation Measures or Conditions of Approval. These measures include an opportunity for tribal participation in monitoring of subsurface excavations. Consultation between the County and the Fernandeño Tataviam BMI concluded on June 23, 2023.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3I contains provisions specific to confidentiality.

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

<i>Public Agency</i>	<i>Approval Required</i>
_____	_____
_____	_____

Major projects in the area:

<i>Project/Case No.</i>	<i>Description and Status</i>
_____	_____
_____	_____
_____	_____

Reviewing Agencies:

Responsible Agencies

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

Trustee Agencies

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

Special Reviewing Agencies

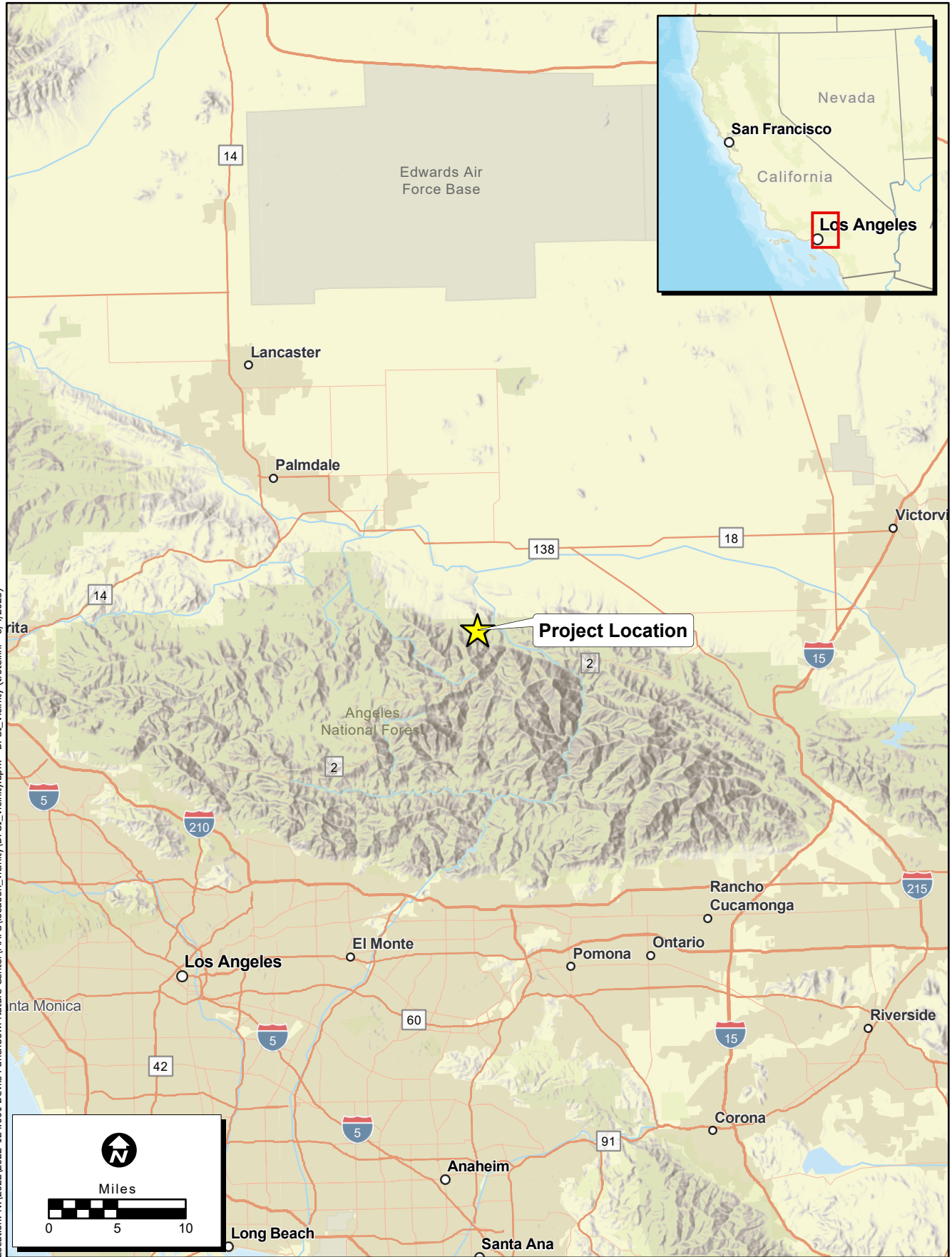
- None
- Santa Monica Mountains Conservancy
- National Parks
- National Forest
- Edwards Air Force Base
- Resource Conservation District of Santa Monica Mountains Area
-

County Reviewing Agencies

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

Regional Significance

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

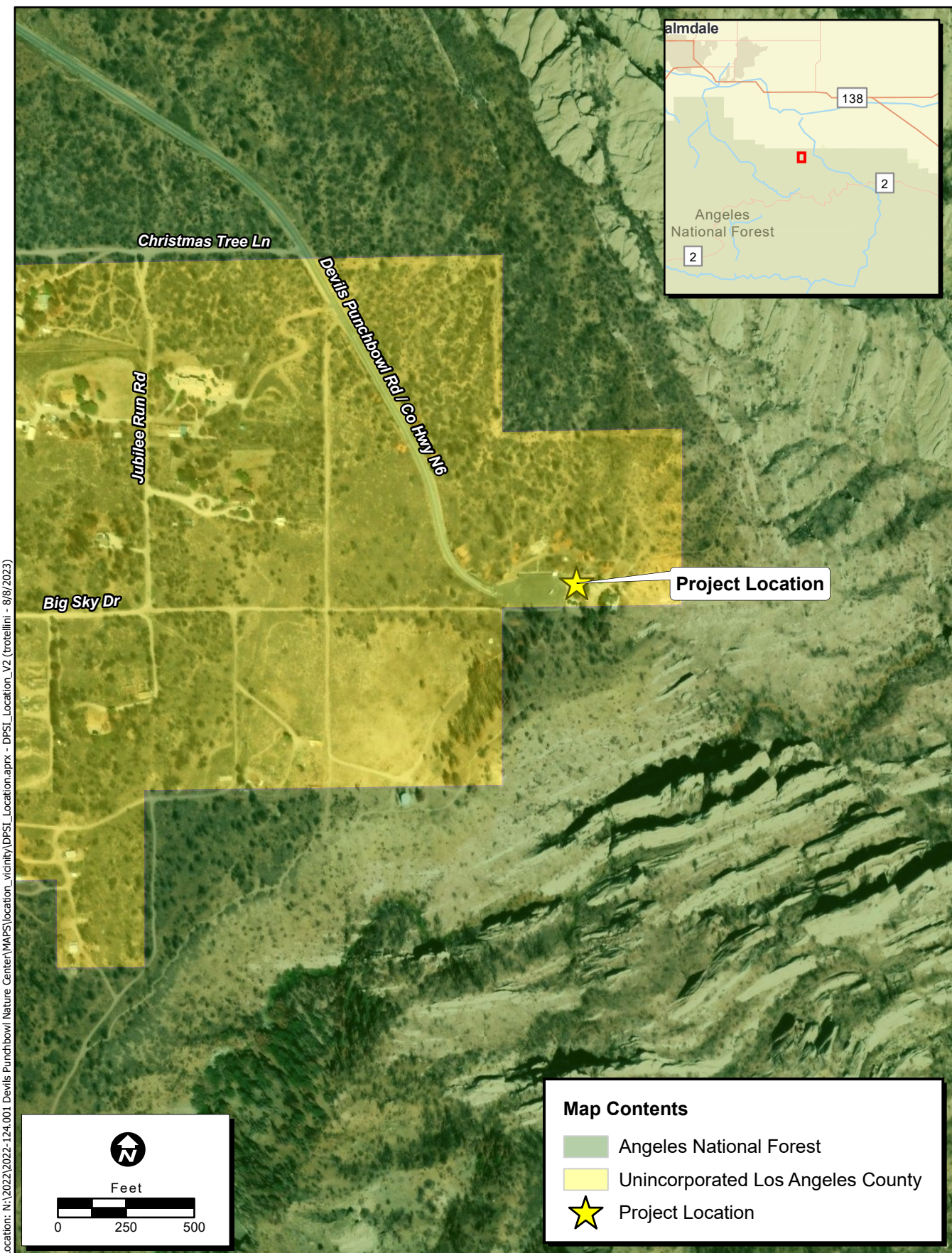


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Map Date: 7/8/2022

Service Layer Credits: World Street Map: Esri, Garmin, FAO, NOAA, USGS, EPA
 World Street Map: County of Los Angeles, California State Parks, Esri, HERE, Garmin,
 SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS
 World Hillshade: Esri, CGIAR, USGS

Figure 1. Project Vicinity



Location: N:\2022\2022-124.001 Devils Punchbowl Nature Center\MAPS\location_vicinity\DPSI_Location.aprx - DPSI_Location_V2 (trtelini) - 8/8/2023

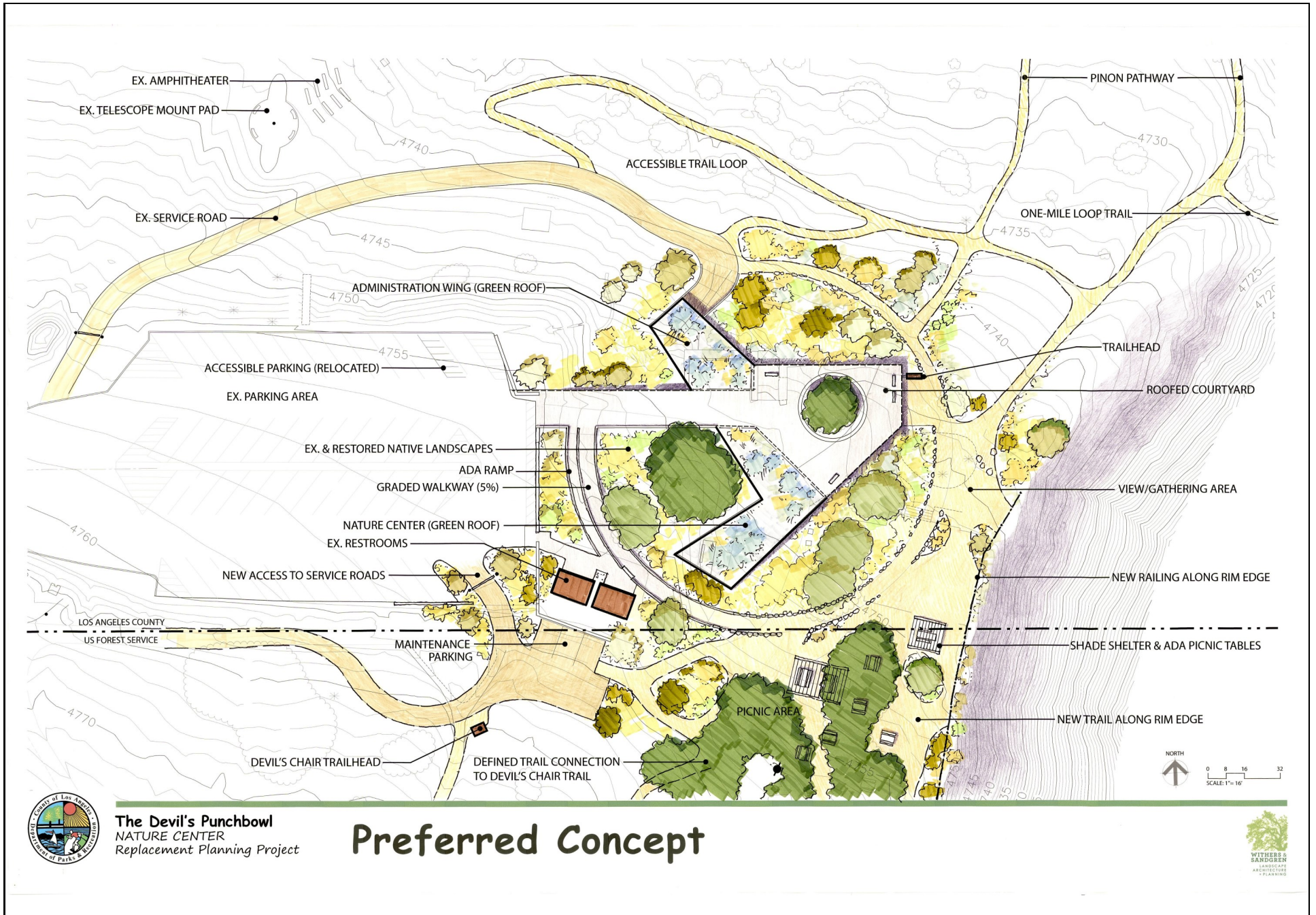
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Figure 2. Project Location



Figure 3. (Above) depicts the extent of structural damage at the Devil's Punchbowl Natural Area after the 2020 Bobcat fire. In addition to the newly installed restroom facilities, the remaining healthy trees, existing parking lot, picnic area, trailheads, telescope pad and amphitheater are to remain in place.



The Devil's Punchbowl
 NATURE CENTER
 Replacement Planning Project

Preferred Concept



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Department.)

On the basis of this initial evaluation:

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

Signature (Prepared by)

Date

Signature (Approved by)

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources the Lead Department cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the Lead Department has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significant. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

1. AESTHETICS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Except as provided in Public Resources Code Section 21099, would the project:

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

Less than Significant Impact.

Although the Nature Center’s mailing address is Pearblossom, the Proposed Project would be located near the unincorporated community of Juniper Hills in the Antelope Valley. Lands that surround Devil’s Punchbowl Natural Area are visually defined by open space associated with the recreation area. The 13.75-acre Devil’s Punchbowl Nature Center (Project Site) is contained within the 1,310-acre Natural Area. The Punchbowl itself is a unique geologic formation with up-tilted rock formations created by layers of sedimentary rocks, a network of multi-use trails that visitors use to explore the landscape of Joshua trees, California junipers, and pinyon pine woodland supporting a variety of wildlife. The replacement Nature Center would provide park visitors with an elevated view of the Punchbowl formation from a viewing platform and new railing along the rim of the Punchbowl.

The closest officially designated State Scenic Highway is Angeles Crest Highway Route-2, approximately 4.5 miles south of the Project Site (Caltrans 2022). Other scenic resources identified in Los Angeles County’s General Plan include scenic vistas, hillsides, and ridgelines. The San Gabriel Mountains play a significant role in physically defining the diverse communities in unincorporated areas (Los Angeles County 2022a). The Proposed Project would be located within the San Gabriel Mountains and would be visible to westbound traffic on Route-2. However, only brief glimpses could be visible from segments of Route-2 and would not obscure the view of the surrounding National Forest (Google Earth 2022). The new Nature Center’s inset design would allow for the roof of the Nature Center to function as a scenic overlook for the Punchbowl itself. Due to the nature of the Project and surrounding topography, impacts on scenic vistas would be less than significant. No further analysis of this subject is required.

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

Less than Significant Impact.

The nearest hiking trails to the Project Site are located within the Devil’s Punchbowl Natural Area, with multiple trailheads present on site. The Proposed Project would be visible from portions of these public trails; however, the Proposed Project would not obstruct views of nearby public trails. The proposed Nature Center and associated improvements, including new trailheads, would provide views of and access to the Devil’s Punchbowl geologic formation. Therefore, impacts to views from regional riding, hiking, or multi-use trails would be less than significant, and further analysis of this subject is not required.

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

No Impact.

The proposed Nature Center would be constructed on the same site as the previous Nature Center and would replace the approximately 1,000 square foot wooden Nature Center and related improvements that were

destroyed in the 2020 Bobcat Fire. As stated previously, brief glimpses of the Proposed Project and Devil's Punchbowl geologic formation would be visible to westbound motorists on Route-2. However, the Proposed Project is not within the vicinity of a State Scenic Highway and would not damage scenic resources adjacent to a State Scenic Highway as the Project would be located more than three-miles north of Route-2. Given the distance to the nearest State Scenic Highway, no impact would occur, and no further analysis of this subject is required.

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

Less than Significant Impact.

The construction phase of the Proposed Project would temporarily introduce equipment and personnel that would disturb the scenic quality of the Project Site. This could be perceived as an impact to the visual character or quality of the Project Site; however, these activities would be short-term and construction equipment would only be present for the duration of construction activities. As discussed in the response to question a) above, less than significant impacts would result to the Caltrans designated State Scenic Highway. The Project would be a continuation of the existing land use and would restore the previously existing park facilities. The Project would construct a Nature Center at the entrance to the Devil's Punchbowl Natural Area and would incorporate related improvements and landscaping that would be visually consistent with the existing park facilities and the surrounding landscape. Impacts to the existing visual character and visual quality of the site would be less than significant, and further analysis of this subject is not required.

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

Less than Significant Impact.

The Proposed Project would use construction materials and surface treatments with low glare characteristics for the replacement Nature Center building. Structures would be painted with earthen colors to complement surrounding natural areas and minimize glare sources. No stadium-type lighting is proposed. New lighting associated with the Proposed Project would be required to comply with existing County ordinances governing light pollution and the County of Los Angeles Park Design Guidelines and Standards, minimizing light and glare impacts. Impacts would be less than significant, and no further analysis of this subject is required.

2. AGRICULTURE / FOREST

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

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

No Impact.

Agriculture and forestry resources in the Project Area were evaluated with regard to the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) and the Los Angeles County 2035 General Plan. The State CEQA Guidelines (Section 21060.1(a), PRC 21000-21177) define agricultural land to mean “prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture (USDA) land inventory and monitoring criteria, as modified for California,” and is herein collectively referred to as “Farmland.”

The California FMMP, Important Farmland Finder Map of Los Angeles County identifies the Project Site as an area that falls outside of the U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) soil survey and is not mapped by the FMMP (DOC 2016; NRCS 2022). Therefore, the Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur, and no further analysis of this subject is required.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact.

The Project Site is zoned Open Space (O-S) according to the Antelope Valley Area Plan (Los Angeles County 2015). No portion of the Project Site is zoned for agricultural use or under a Williamson Act Contract (DOC 2017). As such, no conflict with existing zoning for agricultural use, or as a Williamson Act Contract would occur. No impact would occur, and no further analysis of this subject is required.

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

No Impact.

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

“Timberland” as defined by Public Resources Code Section 4526 means “...land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.”

“Timberland zoned Timberland Production” is defined by Public Resources Code Section 51104(g) as “...an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision h.”

The Project Site and surrounding areas are characterized by the Juniper Hills residential community, the Devil’s Punchbowl County Park, and the surrounding Angeles National Forest. All project components would be constructed within the Devil’s Punchbowl Natural Area (AIN 3061-013-903 and 3061-013-300). AIN 3061-013-903 is zoned as Open Space (O-S) and is not zoned for forest land, timberland, or timberland production (Los Angeles County 2015). AIN 3061-013-300 is Angeles National Forest land managed by the United States Forest Service (USFS). However, the proposed Nature Center and associated park improvements would not conflict with, or cause rezoning, of Forest land. The Proposed Project would be located near the parking lot and entrance to the Devil’s Punchbowl Nature Area and replace structures lost in the 2020 Bobcat Fire consistent with the pre-fire land use as a park. Therefore, no impact would occur, and further analysis of this subject is not required.

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

No Impact.

The subject parcel is zoned as Open Space (O-S) and is not zoned for forest land, timberland, or timberland production (Los Angeles County 2015). Therefore, implementation of the Proposed Project would not result in the loss or conversion of forest land. No impact would occur, and further analysis of this subject is not required.

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

No Impact.

No Farmlands are located on, or adjacent to, the Project Site. Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and Farmland of Local Importance are not mapped in the project vicinity and surrounding National Forest Land by the FMMP (DOC 2016). The Project Site is designated as Open Space (OS) and the Proposed Project would not alter the existing land use. Implementation of the Proposed Project would not result in the indirect conversion of these lands to non-agricultural use. The subject parcel is zoned as open space and is not zoned for Forest Land, Timberland, or Timberland Production (Los Angeles County 2015). Therefore, Project implementation would not result in the conversion of Farmland to non-agricultural use or forest land to non-forest use. No impact would occur, and no further analysis of this subject is required.

3. AIR QUALITY

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

Environmental Setting

An Air Quality and Greenhouse Gas Emissions Assessment was prepared for the Proposed Project (ECORP 2023a; Appendix A). The assessment is summarized in this section. Air quality in a region is determined by its topography, meteorology, and existing air pollutant sources. These factors are discussed below, along with the current regulatory structure that applies to the Mojave Desert Air Basin (MDAB), which encompasses the Project Site pursuant to the regulatory authority of the Antelope Valley Air Quality Management District (AVAQMD).

Ambient air quality is commonly characterized by climate conditions, the meteorological influences on air quality, the quantity and type of pollutants released. The following section describes the pertinent characteristics of the air basin and provides an overview of the physical conditions affecting pollutant dispersion in the Project Area.

The Proposed Project is located within unincorporated Los Angeles County. The California Air Resource Board (CARB) has divided California into regional air basins according to topographic features. The Project Site is located in the Los Angeles County portion of the MDAB. The MDAB is comprised of four air districts, the East Kern County Air Pollution Control District, the Antelope Valley Air Quality Management District (AVAQMD), the Mojave Desert Air Quality Management District, and the eastern portion of the South Coast Air Quality Management District. The AVAQMD consists of the northeastern portion of Los Angeles County, where the Project is located. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains which dot the vast terrain rise from 1,000 to 4,000 feet above the valley floor. Prevailing winds in the MDAB are out of the west and southwest. These prevailing winds are due to the proximity of the MDAB to coastal and central regions and the blocking nature of the Sierra Nevada mountains to the north; air masses pushed onshore in southern California by differential heating are channeled through the MDAB. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet), whose passes form the main channels for these air masses.

Both the U.S. Environmental Protection Agency (USEPA) and CARB have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called “criteria” pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O₃), carbon monoxide (CO), particulate matter (PM), nitrogen oxides (NO_x), sulfur dioxide (SO₂), and lead. 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. The Los Angeles County portion of the MDAB, where the Project Site is located, is designated nonattainment for the federal standards of O₃ and is nonattainment for the state standards of O₃ and coarse particulate matter (PM₁₀) (CARB 2022).

The local air quality regulating authority in Los Angeles County portion is the AVAQMD. The AVAQMD’s primary responsibility is ensuring that the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are attained and maintained in the Los Angeles County portion of the MDAB. Responsibilities of the AVAQMD include, but are not limited to, adopting, and enforcing rules and regulations concerning sources of air pollution, issuing permits for stationary sources of air pollution, monitoring ambient air quality and meteorological conditions, and implementing programs and regulations

required by the federal Clean Air Act (CAA) and CAA Amendments. Provisions applicable to the Proposed Project are summarized as follows:

Rule 201 – Permits to Construct applies to the construction of air emissions sources that are not otherwise exempt under Rule 219.

Rule 203 – Permit to Operate requires air emissions sources that are not exempted by Rule 219 to obtain an operating permit.

Rule 219 – Equipment Not Requiring a Permit describes the type of equipment that does not require a permit pursuant to District Rules 201 and 203.

Rule 401 – Visible Emissions limits visibility of fugitive dust to less than No. 1 on the Ringelmann Chart (i.e., 20 percent opacity).

Rule 402 – Nuisance applies when complaints from the public are received by the district.

Rule 403 – Fugitive Dust prohibits visible dust beyond the property line of the emission source, requires “every reasonable precaution” to minimize fugitive dust emissions and prevent trackout of materials onto public roadways, and prohibits greater than 100 µg/m³ difference between upwind and downwind particulate concentrations.

Rule 404 – Particulate Matter Concentration sets concentration limits based on the flow rate of the discharge. The concentration limits would apply to discharge from a stack (e.g., baghouse).

Rule 405 – Solid Particulate Matter Weight limits emissions based on the weight of material processed.

Rule 900 – New Source Performance Standards incorporates federal regulation (40 CFR 60) that affects the construction of emissions units. Requirements may or may not apply depending on the size, construction, and manufacture date of equipment that will be used. Specifically, NSPS OOO (40 CFR 60.670) applies to equipment in nonmetallic mineral processing plants.

Regulation XIII – New Source Review contains a number of rules that are applied to new and modified sources.

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact.

As part of its enforcement responsibilities, the United States Environmental Protection Agency (USEPA) requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the California Clean Air Act (CCAA) requires an air quality attainment plan to be prepared for areas designated as

nonattainment with regard to the federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The AVAQMD is the agency responsible for enforcing many federal and state air quality requirements and for establishing air quality rules and regulations. The AVAQMD attains and maintains air quality conditions in the Los Angeles County portion of the MDAB. They achieve this through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. As part of this effort, the AVAQMD has developed input to the SIP in the form of the air quality attainment plans and reports. These plans constitute the SIP for the portion of the MDAB encompassing the Project and include the AVAQMD's plans and control measures for attaining air quality standards. These air quality attainment plans are a compilation of new and previously submitted plans, programs (e.g., monitoring, modeling, permitting), district rules, state regulations, and federal controls describing how the state will attain ambient air quality standards. The AVAQMD has in place Reasonably Available Control Technology requirements and emission rules for the majority of emission sources; published in several different regulatory documents. The most recent Reasonably Available Control Technology requirements were adopted in 2020.

According to the AVAQMD, a project conforms with the AVAQMD Attainment Plans if it complies with all applicable district rules and regulations and is consistent with the growth forecasts in the applicable plans (or is directly included in the applicable plan). A project is nonconforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. Conformity with growth forecasts can be established by demonstrating that the Project is consistent with the land use plan that was used to generate the growth forecast.

Several AVAQMD rules that have been adopted over the years apply to the Project. Rule 403 – *Fugitive Dust*, prohibits visible dust beyond the property line of the emission source, requires “every reasonable precaution” to minimize fugitive dust emissions and prevent trackout of materials onto public roadways, and prohibits greater than 100 µg/m³ (micrograms per cubic meter) difference between upwind and downwind particulate concentrations. Rule 402 prohibits nuisance due to air quality contaminants and Rule 401 limits visibility of fugitive dust to less than No. 1 on the Ringelmann Chart (i.e., 20 percent opacity).

As identified in Table 3-1 and Table 3-2, criteria air pollutant emissions from both construction and operations of the Proposed Project would not exceed the significance thresholds set forth by the AVAQMD, and therefore the Project would not delay implementation of AVAQMD air quality planning efforts. Lastly, the Proposed Project would not result in population or job growth and therefore is consistent with the growth forecasts used to inform AVAQMD air quality planning. More specifically, the Proposed Project would replace the Devil's Punchbowl Nature Center that was burned down and would not change the type of uses that occur on the Project Site. As such, the Proposed Project would not conflict or obstruct implementation of the AVAQMD Attainment Plans and would be consistent with emission-reduction goals. As such, no impact would occur, and further analysis of this subject is not required.

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

Less than Significant Impact.

By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's individual emissions exceed its

identified significance thresholds, the project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulative considerable.

Air quality impacts were assessed in accordance with methodologies recommended by the AVAQMD. Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model (CalEEMod), version 2022.1. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Project construction-generated air pollutant emissions were calculated using CalEEMod model defaults for the Los Angeles County portion of the MDAB. Operational air pollutant emissions were calculated based on the Project Conceptual Site Plan and operational trip generation rates provided by KOA Corporation (2023).

Construction Impacts

Emissions associated with Project construction would be temporary and short-term but have the potential to represent a significant air quality impact. Three basic sources of short-term emissions will be generated through construction of the Proposed Project: operation of the construction vehicles (i.e., tractors, forklifts, pavers), the creation of fugitive dust during clearing and grading, and the use of asphalt or other oil-based substances during paving and coating activities. Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed soils would generate exhaust emissions and fugitive PM emissions that affect local air quality at various times during construction. Effects would be variable depending on the weather, soil conditions, the amount of activity taking place, and the nature of dust control efforts.

Construction-generated emissions associated with the Proposed Project were calculated using the California Air Resource Board (CARB) approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. See Appendix A for more information regarding the construction assumptions, including construction equipment and duration, used in this analysis.

Predicted maximum daily construction-generated emissions for the Proposed Project are summarized in Table 3-1. Construction-generated emissions are short-term and of temporary duration, lasting only if construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the AVAQMD’s thresholds of significance.

Table 3-1. Construction-Related Criteria Air Pollutant Emissions						
Construction Year	Pollutants					
	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
<i>Daily Emissions (maximum pounds per day)</i>						
Construction Calendar Year One	1.70	16.00	16.90	0.03	0.96	0.71
Construction Calendar Year Two	4.43	6.22	9.22	0.01	0.47	0.30
<i>AVAQMD Daily Significance Threshold</i>	<i>137 pounds/day</i>	<i>137 pounds/day</i>	<i>548 pounds/day</i>	<i>137 pounds/day</i>	<i>82 pounds/day</i>	<i>65 pounds/day</i>
Exceed AVAQMD Daily Threshold?	No	No	No	No	No	No
<i>Annual Emissions (tons per year)</i>						

Construction Calendar Year One	0.17	1.50	1.61	0.00	0.07	0.06
Construction Calendar Year Two	0.02	0.01	0.01	0.00	0.00	0.00
<i>AVAQMD Annual Significance Threshold</i>	<i>25 tons/year</i>	<i>25 tons/year</i>	<i>100 tons/year</i>	<i>25 tons/year</i>	<i>15 tons/year</i>	<i>12 tons/year</i>
Exceed AVAQMD Annual Threshold?	No	No	No	No	No	No

Source: CalEEMod version 2022.1. Refer to Appendix A for Model Data Outputs.

Notes: Construction emissions taken from the season, summer, or winter, with the highest outputs.

ROG = reactive organic gases. PM_{2.5} = fine particulate matter.

According to Table 3-1, emissions generated during Project construction would not exceed the AVAQMD's thresholds of significance. Therefore, criteria pollutant emissions generated during Project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard. Due to these reasons, this impact is less than significant.

Operational Impacts

Implementation of the Project would result in long-term operational emissions of criteria air pollutants such as PM₁₀, fine particulate matter (PM_{2.5}), CO, and SO₂ as well as O₃ precursors such as reactive organic gas (ROG) and NO_x. The emissions associated with operations for the Project are summarized in Table 3-2 and compared to the AVAQMD's significance thresholds.

Emission Source	Pollutant (Pounds per Day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
<i>Daily Emissions</i>						
Mobile	0.75	1.04	11.20	0.02	2.15	0.56
Area	0.11	0.00	0.14	0.00	0.00	0.00
Energy	0.00	0.04	0.03	0.00	0.00	0.00
Total	0.86	1.08	11.37	0.02	2.15	0.56
<i>AVAQMD Daily Significance Threshold</i>	<i>137 pounds/day</i>	<i>137 pounds/day</i>	<i>548 pounds/day</i>	<i>137 pounds/day</i>	<i>82 pounds/day</i>	<i>65 pounds/day</i>
Exceed AVAQMD Daily Threshold?	No	No	No	No	No	No
<i>Annual Emissions</i>						
Mobile	0.07	0.12	0.91	0.00	0.21	0.06
Area	0.02	0.00	0.01	0.00	0.00	0.00
Energy	0.00	0.01	0.01	0.00	0.00	0.00
Total	0.09	0.13	0.93	0.00	0.21	0.06

<i>AVAQMD Annual Significance Threshold</i>	<i>25 tons/year</i>	<i>25 tons/year</i>	<i>100 tons/year</i>	<i>25 tons/year</i>	<i>15 tons/year</i>	<i>12 tons/year</i>
Exceed AVAQMD Annual Threshold?	No	No	No	No	No	No

*Source: CalEEMod version 2022.1. Refer to Appendix A for Model Data Outputs.
Notes: Daily operational emissions taken from the season, summer, or winter, with the highest outputs.*

As shown by Table 3-2, the criteria air pollutant emissions from operations of the Proposed Project do not exceed the significance thresholds set forth by the AVAQMD. Therefore, this impact is less than significant, and no further analysis of this subject is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact.

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over age 65, children under age 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The nearest sensitive receptor to the Project Site is a residence accessed from Big Sky Drive, approximately 0.24 mile to the northwest of the Project Site.

Construction-Generated Air Contaminants

Construction of the Project would result in temporary emissions of diesel particulate matter (DPM), ROG, NO_x, CO, PM₁₀, and PM_{2.5} from the exhaust of off-road, heavy-duty diesel equipment for Project construction; site grading; trenching; and other miscellaneous activities. As previously identified, the area of the MDAB which encompasses the Project Area is designated nonattainment for the federal standards of O₃ and is nonattainment for the state standards of O₃ and PM₁₀ (CARB 2022). Thus, existing levels of these criteria pollutants in the MDAB are at unhealthy levels during certain periods. However, shown in Table 3-1 construction-related emissions would not result in an exceedance of the AVAQMD thresholds.

The health effects associated with O₃ are generally associated with reduced lung function. Because the Project would not involve construction activities that would result in O₃ precursor emissions (ROG or NO_x) in excess of the AVAQMD thresholds, the Project is not anticipated to substantially contribute to regional O₃ concentrations and the associated health impacts.

CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. The Project would not involve construction activities that would result in CO emissions in excess of AVAQMD thresholds. Thus, the Project's CO emissions would not contribute to the health effects associated with this pollutant.

Particulate matter (PM₁₀ and PM_{2.5}) contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure has been linked to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing. For construction activity, DPM is the primary toxic air contaminant (TAC) of concern. PM₁₀ exhaust is considered a surrogate for DPM as all diesel exhaust is considered to be DPM and PM₁₀ contains PM_{2.5} as a subset. As with O₃ and NO_x, the Project would not

generate emissions of PM₁₀ or PM_{2.5} that would exceed the AVAQMD's thresholds. Accordingly, the Project's PM₁₀ and PM_{2.5} emissions are not expected to cause any increase in related regional health effects for these pollutants.

In summary, Project construction would not result in a potentially significant contribution to regional concentrations of air pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants.

Operational Air Contaminants

Operation of the Proposed Project would not result in the development of any substantial sources of air toxics. There are no stationary sources associated with the operations of the Project; nor would the Project attract mobile sources that spend long periods queuing and idling at the site. The operational emissions are expected to come from Project visitors who drive to the Project Site. However, according to Table 3-2, onsite Project emissions would not result in emissions of criteria pollutants over the AVAQMD thresholds. Therefore, there would not be significant concentrations of pollutants at nearby sensitive receptors. The Project would not be a source of TACs. The Project will not result in a high carcinogenic or non-carcinogenic risk during operation.

Carbon Monoxide Hot Spots

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at intersections. Concentrations of CO are a direct function of the number of vehicles, length of delay, and traffic flow conditions. Under certain meteorological conditions, CO concentrations close to congested intersections that experience high levels of traffic and elevated background concentrations may reach unhealthy levels, affecting nearby sensitive receptors. Given the high traffic volume potential, areas of high CO concentrations, or "hot spots," are typically associated with intersections that are projected to operate at unacceptable levels of service during the peak commute hours. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. However, transport of this criteria pollutant is extremely limited, and CO disperses rapidly with distance from the source under normal meteorological conditions. Furthermore, vehicle emissions standards have become increasingly more stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the MDAB is designated as in attainment. Detailed modeling of Project-specific CO "hot spots" is not necessary and thus this potential impact is addressed qualitatively.

A CO "hot spot" would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. The analysis prepared for CO attainment in the South Coast Air Quality Management District's (SCAQMD's) 1992 Federal Attainment Plan for Carbon Monoxide in Los Angeles County and a Modeling and Attainment Demonstration prepared by the SCAQMD as part of the 2003 AQMP can be used to demonstrate the potential for CO exceedances of these standards. The SCAQMD is the air pollution control officer for much of southern California. The SCAQMD conducted a CO hot spot analysis as part of the 1992 CO Federal Attainment Plan at four busy intersections in Los Angeles County during the peak morning and afternoon time periods. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a traffic volume of approximately 100,000 vehicles per day. Despite this level of traffic, the CO analysis concluded that there was no violation of CO standards (SCAQMD 1992). In order to establish a more accurate record of baseline CO concentrations affecting Los Angeles, a CO "hot spot" analysis was conducted in 2003

at the same four busy intersections in Los Angeles at the peak morning and afternoon time periods. This “hot spot” analysis did not predict any violation of CO standards. The highest one-hour concentration was measured at 4.6 ppm at Wilshire Boulevard and Veteran Avenue and the highest eight-hour concentration was measured at 8.4 ppm at Long Beach Boulevard and Imperial Highway. Thus, there was no violation of CO standards. Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD), the air pollution control officer for the San Francisco Bay Area, concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact.

The Proposed Project is anticipated to result in 40 weekday trips, 100 Saturday trips, and 105 Sunday trips: or an average of 58 daily vehicle trips (KOA 2023). Thus, the Proposed Project would not generate traffic volumes at any intersection of more than 100,000 vehicles per day (or 44,000 vehicles per day) and there is no likelihood of the Project traffic exceeding CO values. Due to these reasons, these impacts are less than significant, and no further analysis is required.

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

Less than Significant Impact.

Typically, odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person’s reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory, and respiratory effects, nausea, vomiting, and headache).

With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals have the ability to smell minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; in fact, an odor that is offensive to one person (e.g., from a fast-food restaurant) may be perfectly acceptable to another. It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.

Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word “strong” to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human.

During construction, the Proposed Project presents the potential for generation of objectionable odors in the form of diesel exhaust in the immediate vicinity of the site. However, these emissions are short-term in nature and will rapidly dissipate and be diluted by the atmosphere downwind of the emission sources. Additionally, odors would be localized and generally confined to the construction area. Therefore, construction odors would not adversely affect a substantial number of people to odor emissions.

Land uses commonly considered to be potential sources of obnoxious odorous emissions include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project is proposing a nature center and associated features, which is not a use associated with odors. As such, long-term operation of the Proposed Project would not create objectionable odors affecting a substantial number of people and no further analysis of this subject is required.

4. BIOLOGICAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Less than Significant with Mitigation Incorporated.

The Project Site is generally classified as in a state of recovery following wildfires in the area; the recovering land cover is predominately chaparral habitat. Three special-status plant species (Joshua tree, short-joint beavertail, and southern California black walnut) were observed on or adjacent to the Project Site during the biological reconnaissance survey and previous habitat mapping efforts immediately following the Bobcat Fire. In addition, 48 special-status plant species were identified in the literature review and database searches but based on the condition of the Project Site and the available habitat, only one species (crowned muilla) was determined to have low potential to occur. No special-status plant species have a high or moderate potential to occur on the Project Site. If additional impacts are to occur outside of the footprint of the existing developed areas, then impacts to special status-plant species could occur and additional measures including rare plant surveys are warranted. If impacts are contained within the previously developed portions of the Project Site, no impacts to special-status plants would occur.

One special-status wildlife species, yellow warbler, was observed during the biological reconnaissance survey (ECORP 2022a; Appendix B). The literature review and database searches identified 27 special-status wildlife species that have previously been documented in the vicinity of the Project Site. Two species (Crotch bumblebee and California glossy snake) were determined to have moderate potential to occur on the site and six species (coast horned lizard, loggerhead shrike, pallid San Diego pocket mouse, western mastiff bat, desert bighorn sheep, and American badger) were determined to have low potential to occur on the Project Site. The remaining 19 species were presumed absent from the Project Site.

The only native vegetation communities on the Project Site are the recovering chaparral communities. The majority of the Project footprint is within existing disturbed, developed, or landscaped areas that were present on the Project Site prior to the Bobcat Fire. The lack of substantial vegetative recovery after the fire, presence of anthropogenic influences onsite, and dominant vegetation community assemblage likely preclude many of these species from occurring within the Project Site. The Project would involve the building of a new nature center and administrative offices as well as adjacent landscaping and shade structures to enhance the visitor’s center. Additionally, the Project would include activities that would involve ground disturbance within the previously disturbed Project footprint and adjacent to the recovering chaparral communities (ECORP 2022a). As such, the Project would have the potential to have a substantial adverse effect, either directly or through habitat modifications and indirectly, on special-status species identified by CDFW. Potential impacts to each special-status wildlife species identified as having a potential to occur are described below.

Yellow warbler was observed during the biological reconnaissance survey. Yellow warbler are not expected to nest within the Project Site itself due to a lack of suitable nesting habitat. However, yellow warbler could use

tree habitat adjacent to the Project Site for nesting. Indirect impacts to yellow warbler would occur from construction noise and vibrations if the species nests within 500-feet of the Project Site. Loggerhead shrike was determined to have a low potential to occur as the recovering chaparral habitat provides marginally suitable nesting habitat. As such, direct impacts to nesting loggerhead shrikes through ground disturbance and indirect impacts from construction noise and vibrations could occur (ECORP 2022a). Impacts to yellow warbler and loggerhead shrike would be less than significant with the implementation of Mitigation Measures BIO-1, BIO-3, and BIO-4.

The Project Site is located within and adjacent to suitable habitat for desert bighorn sheep, American badger, and western mastiff bat; however, habitat features within the Project Site itself are not sufficient to sustain populations of these species. As such, these species could pass through the Project Site but would not be directly affected by the Project. Indirect impacts would occur if the species are present during times of construction-related groundborne vibrations, increased human activity, and noise (ECORP 2022a). These impacts would be reduced to a less than significant level with the implementation of Mitigation Measures BIO-2, BIO-3, and BIO-4.

The approximately 0.9-acre of recovering chaparral habitat provides marginally suitable habitat for the Crotch bumble bee, California glossy snake, coast horned lizard, and pallid San Diego pocket mouse. As such, direct impacts to these species through ground disturbance and indirect impacts from habitat loss could occur. If present, direct impacts to these species would occur as a result of Project implementation in the form of mortality or injury due to ground-disturbing activities in areas adjacent to the species habitat. Indirect impacts would include loss of habitat, ground vibrations, increased human activity, and noise (ECORP 2022a). Impacts to special-status wildlife species would be reduced to a less than significant level with the implementation of Mitigation Measures BIO-2, BIO-3, and BIO-4.

The Project Site also contained suitable nesting habitat for bird species protected under the MBTA. Development of the Project Site would be required to comply with the MBTA and avoid impacts to nesting birds. If construction of the Project occurs during the nesting bird season (typically February 1 through August 31), ground-disturbing construction activities could directly affect birds protected by the MBTA and their nests through the removal of habitat and indirectly through increased noise (ECORP 2022a). Impacts to yellow warbler, loggerhead shrike, and other nesting birds would be reduced to a less than significant threshold with the implementation of Mitigation Measure BIO-1.

BIO-1: **Preconstruction Nesting Bird Survey:** If construction or other Project activities are scheduled to occur during the bird breeding season (February 1 through August 31), a preconstruction nesting bird survey shall be conducted by a qualified biologist to ensure that active bird nests, including those of the yellow warbler and loggerhead shrike, will not be disturbed or destroyed. The survey shall be completed no more than three days prior to initial ground disturbance. The nesting bird survey shall include the Project Site and adjacent areas where Project activities have the potential to affect active nests, either directly or indirectly, due to construction activity, noise, or ground disturbance. If an active nest is identified, a qualified avian biologist shall establish an appropriate disturbance-limit buffer around the nest using flagging or staking. Construction activities shall not occur within any disturbance-limit buffer zones until the nest is deemed inactive by the qualified avian biologist.

BIO-2: **Preconstruction Sensitive Wildlife Survey:** A preconstruction survey for sensitive wildlife species will be conducted within two weeks (14 days) of initial grading, demolition, and/or grubbing activities. If special-status (non-listed) wildlife species are observed within the impact area, the qualified biologist will develop and implement appropriate protection

measures for that species. These protection measures shall include, as appropriate: presence of a biological monitor during ground-disturbing activities, redirecting the species, constructing exclusionary devices, or capturing and relocating wildlife outside the work area (as Project and/or individual permits allow). The biological monitor will have the authority to temporarily halt construction activities in order to allow special-status and general wildlife to safely move out of harm's way and utilize hazing methods to direct individuals to areas outside the construction limits. If a listed wildlife species is determined to be present or to nest or den within the Project Site, the Project will be temporarily halted until agency consultation can be completed. Observations of special- status species made during the surveys shall be recorded onto a CNDDDB field data sheet and submitted to CDFW for inclusion into the CNDDDB.

BIO-3: **Worker Education:** Within 30 days prior to ground-disturbing activities, a sensitive species educational briefing shall be conducted by a qualified biologist for construction personnel. The biologist will identify all sensitive habitat and resources that may be encountered onsite, and construction personnel will be instructed to avoid Environmentally Sensitive Areas and report any sightings of sensitive species to the monitoring biologist. No night work will be allowed.

BIO-4: **Biological Monitoring:** A biologist shall be present to monitor all vegetation clearing activities both during and outside of the breeding season. A biological monitor shall perform biological clearance surveys at the start of each workday that vegetation clearing takes place to minimize impacts on sensitive wildlife and/or to avoid special-status plant species. The monitor will be responsible for ensuring that impacts to sensitive species will be avoided to the fullest extent possible. The biological monitor shall be present during the initiation of vegetation clearing activities and their presence shall continue as necessary to maintain protective measures and to monitor for species in harm's way. These protection measures include redirecting wildlife or capturing and relocating wildlife to areas outside the work area. Any captured species shall be relocated out of harm's way to adjacent appropriate habitat that is outside of Project impact areas. Biological monitoring shall take place until the Project Site has been completely cleared of any vegetation.

As Mitigation Measures BIO-1 through BIO-4 would reduce potential impacts to candidate, sensitive, or special status species to a less than significant threshold; no further analysis of this subject is required.

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

No Impact.

The Project Site consists of recovering chaparral vegetation communities with landscaped, disturbed, and developed land cover present. The Project Site does not contain any riparian habitat or sensitive natural communities that would need to be preserved and no Project-related impacts to these types of resources are anticipated with the development of the Proposed Project (ECORP 2022a). Therefore, no impact would occur, and no further analysis of this subject is required.

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

No Impact.

According to the results of the desktop review and preliminary aquatic resources delineation, no Waters of the U.S. or areas that would qualify under CDFW and SWRCB jurisdiction are present within the Project Site (ECORP 2022a). Therefore, no impacts to state or federally protected wetlands and Waters of the U.S. would occur during development of the Project Site, and no further analysis of this subject is required.

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

Less than Significant Impact.

The Project Site is located within the Devil’s Punchbowl Natural Area, a Los Angeles County Department of Parks and Recreation-managed facility that is part of the San Gabriel Mountains Wilderness area. The San Gabriel Mountains Wilderness area is connected to both the Angeles National Forest and the San Bernardino National Forest and functions as a wildlife corridor and native wildlife nursery site (ECORP 2022a). However, due to the nature of the Project no substantial impacts to wildlife corridors or nursery sites would occur during the development of the Project Site. The Project would only develop upon previously developed and disturbed areas and Project construction would occur during daytime hours. As a result, the Proposed Project would not substantially impact the site’s ability to function as a wildlife corridor. Impacts would be less than significant, and no further analysis of this subject is required.

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

No Impact.

Existing trees and vegetation deemed to be significant to the aesthetics, character, and environmental quality of the Project have been integrated into the Conceptual Site Plan. Section 22.46.2100 of the Los Angeles County Code protects all oak trees with a diameter at breast height of eight inches or greater, or 12 inches or greater for multiple trunks (combination of two largest trunks). No oak trees are present on the Project Site (ECORP 2022a). The Proposed Project would comply with local policies and ordinances protecting biological resources. The Project does not involve tree removal, onsite grading would be limited to disturbed areas, and the construction of the replacement nature center would not conflict with any existing or proposed preservation policies or ordinances. Therefore, no impact would occur, and no further analysis of this subject is required.

f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?

No Impact.

The Los Angeles County Sensitive Environmental Resource Areas (SERAs) are located within the Santa Monica Mountain region, and thus do not fall within the Project Site. According to the Los Angeles County Code of Ordinances section 12.36.020, the Project Site is not located in a designated Wildflower Reserve Area. Significant Ecological Area (SEA) is a Los Angeles County land use designation for areas that the County determines to be biologically valuable. The Project Site is located adjacent to, but not within, the Antelope Valley SEA. Furthermore, there are no oak trees located on the Project Site; the Oak Tree Ordinance would not apply (ECORP 2022a). Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. No impact would occur, and no further analysis of this subject is required.

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

No Impact.

The Project Site is not located within a Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). Therefore, development of the Project Site would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP (ECORP 2022a). No impact would occur, and no further analysis of this subject is required.

5. CULTURAL RESOURCES

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Potentially Significant Impact.

The demolition of the existing ranger station on the Project Site has the potential to result in a substantial adverse change to a historical resource pursuant to CEQA guidelines Section 15064.5, as the structure was built circa 1950 (DPB-001) (ECORP 2023c; Appendix C). The structure was built by Bill and Helen Guy as a vacation home in 1950. The County remodeled portions of the property in 1963 to convert it to a ranger’s station for the County Park; the County also oversaw the construction of the mortared boulder landscape features in 2000.

NRHP/CRHR Criterion A/1

After the Park opened to the public in 1963, there was a housing boom in the Antelope Valley area, which resulted in the Punchbowl becoming an important recreational resource for the region; and by 1990 the Devil’s Punchbowl Park hosted approximately 70,000 visitors annually (ECORP 2023c; Appendix C). DPB-001 is eligible for the National Register of Historic Places (NRHP) under Criterion A and California Register of Historical Resources (CRHR) under Criterion 1, due to its association with the Devil’s Punchbowl County Park as an administrative headquarters.

NRHP/CRHR Criterion B/2

Bill Guy (1917-1975) was an executive vice president at Rocketdyne. As the company’s longtime second-in-command, Guy is credited with supervising the company’s workforce and directing its functional operations; he briefly served as president of Rocketdyne before retiring in the 1970s. Additionally, beginning in 1963, Los Angeles County parks personnel stationed at Devil’s Punchbowl made DPB-001 their park headquarters. However, despite Guy’s influence over the corporate direction of Rocketdyne, and despite Los Angeles County parks personnel’s effective management of Devil’s Punchbowl after 1963, there is nothing in the archival record to suggest that DPB-001 is associated with the lives of persons significant in our past. Rocketdyne as a business entity possesses historical significance, but its executives and engineers, who as a team developed engines that delivered U.S. spacecraft into space, do not (ECORP 2023c; Appendix C). Therefore, DPB-001 is not eligible for the NRHP under Criterion B or CRHR under Criterion 2.

NRHP/CRHR Criterion C/3

DPB-001 embodies the distinctive characteristics of 20th-century Organic architecture in California and possesses high artistic values. Organic architecture, as defined by Alan Hess, involves “the interrelation of practical architecture, mystical nature, and progressive technology.” Rooted in the Modern movement, Organic architecture embraced new building materials, designs, and methods of construction. Crucially, its practitioners designed buildings that harmonized with natural settings, typically remote vacation destinations that possessed dramatic scenery. DPB-001, with its prominent raised poured concrete foundation and its concrete brick exterior walls set against the gray sandstone outcroppings of Devil’s Punchbowl, achieved what Hess describes as an architecture “so rooted in its landscape that it seemed to be part of the geology.” DPB-

discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for precontact and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines. Work may not resume within the no work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction.
- If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Los Angeles County Coroner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (Section 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

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

Less than Significant with Mitigation Incorporated

Although no fossils have been discovered directly from within the Project Site, terrestrial fossils have been discovered from the same sedimentary deposits as those that occur in the Project Site, either at the surface or at depth. Additionally, the 2020 Bobcat Fire may have uncovered previously unexposed fossils or soils, and any fossil specimens recovered from the Project would be scientifically significant. As there is potential for paleontological resources to exist at sub-surface levels on the Project Site that may be uncovered during Project grading and excavation activities, paleontological monitoring would be required (ECORP 2022b; Appendix D). Given geologic units of high sensitivity to produce paleontological resources exist within the Project Site and vicinity, implementation of Mitigation Measure CUL-2 would ensure that if any such

resources are found during construction of the Proposed Project, they would be handled according to the proper regulations and any potential impacts would be reduced to less than significant levels. As such, no further analysis of the subject is required.

CUL-2: Unanticipated Discovery – Paleontological Resources. The Project Applicant shall implement the Recommendations as listed in the site-specific Paleontological Assessment Memorandum (*Paleontological Assessment Memorandum for the Devil’s Punchbowl Nature Center Project, Los Angeles, California.* ECORP 2022b).

d) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant with Mitigation Incorporated.

No known human remains are present in the Project Area (ECORP 2023c). If human remains are inadvertently uncovered during Project activities, adherence to Mitigation Measure CUL-1 would reduce impacts to a less than significant level, and no further analysis of the subject is required.

6. ENERGY

This Initial Study analyzes energy consumption due to the potential direct and indirect environmental impacts associated with the Proposed Project based on the findings of the project-specific Energy Consumption Assessment prepared by ECORP Consulting, Inc. (ECORP 2023d; Appendix E). Such impacts include the depletion of nonrenewable resources (e.g., oil, natural gas, coal) and emissions of pollutants during the construction and operational phases. The impact analysis focuses on the four sources of energy that are relevant to the Proposed Project: electricity, natural gas, the equipment-fuel necessary for Project construction, and the automotive fuel necessary for Project operations.

Environmental Setting

Energy relates directly to environmental quality. Energy use can adversely affect air quality and other natural resources. The vast majority of California's air pollution is caused by burning fossil fuels. Consumption of fossil fuels is linked to changes in global climate and depletion of stratospheric ozone. Transportation energy use is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes (auto, carpool, and public transit); vehicle speeds; and miles traveled by these modes. Construction and routine operation and maintenance of transportation infrastructure also consume energy. In addition, residential, commercial, and industrial land uses consume energy, typically through the usage of natural gas and electricity (ECORP 2023d).

Energy Types and Sources

California relies on a regional power system comprised of a diverse mix of natural gas, renewable, hydroelectric, and nuclear generation resources. Natural gas provides California with a majority of its electricity, closely followed by renewables, large hydroelectric and nuclear (California Energy Commission [CEC] 2022a). Southern California Edison (SCE) provides electrical services to the Project Area through state-regulated public utility contracts. Southern California Edison, the largest subsidiary of Edison International, is the primary electricity supply company for much of Southern California. It provides 14 million people with electricity across a service territory of approximately 50,000 square miles.

The Southern California Gas Company provides natural gas services to the Project Area. Southern California Gas Company services approximately 21.6 million customers, spanning roughly 20,000 square miles of California.

The California Public Utilities Commission (CPUC) regulates SCE. The CPUC has developed energy efficiency programs such as smart meters, low-income programs, distribution generation programs, self-generation incentive programs, and a California solar initiative. Additionally, the CEC maintains a power plant database that describes all of the operating power plants in the state by county.

Energy Consumption

Electricity use is measured in kilowatt-hours (kWh), and natural gas use is measured in therms. Vehicle fuel use is typically measured in gallons (e.g., of gasoline or diesel fuel), although energy use for electric vehicles is measured in kWh.

The electricity consumption associated with all nonresidential uses in Los Angeles County from 2017 to 2021 is shown in Table 6-1. As indicated, the demand has generally decreased since 2017.

Table 6-1. Nonresidential Electricity Consumption in Los Angeles County 2017-2021	
Year	Electricity Consumption (kilowatt hours)
2021	44,437,634,389
2020	42,736,774,915
2019	46,105,550,849
2018	47,361,083,621
2017	47,960,383,020

Source: CEC 2022b

The natural gas consumption associated with all nonresidential uses in Los Angeles County from 2017 to 2021 is shown in Table 6-2. As indicated, the demand has decreased since 2017.

Table 6-2. Nonresidential Natural Gas Consumption in Los Angeles County 2017-2021	
Year	Natural Gas Consumption (therms)
2021	1,743,418,587
2020	1,698,688,767
2019	1,812,591,804
2018	1,813,722,309
2017	1,840,583,089

Source: CEC 2022b

Automotive fuel consumption in Los Angeles County from 2017 to 2022 is shown in Table 6-3. Fuel consumption demand has generally decreased since 2017.

Table 6-3. Automotive Fuel Consumption in Los Angeles County 2017-2022	
Year	Total Fuel Consumption
2022	4,695,245,754
2021	4,724,505,393
2020	4,239,755,680
2019	4,724,445,036
2018	4,797,804,755

Source: CARB 2021

Less Than Significant Impact with Mitigation Incorporated *Less Than Significant Impact* *No Impact*
Potentially Significant Impact

Would the project:

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

Less than Significant Impact.

The impact analysis focuses on the four sources of energy that are relevant to the Proposed Project: electricity, natural gas, the equipment-fuel necessary for Project construction, and the automotive fuel necessary for Project operations. Addressing energy impacts requires an agency to make a determination as to what constitutes a significant impact. There are no established thresholds of significance, statewide or locally, for what constitutes a wasteful, inefficient, and unnecessary consumption of energy for a proposed land use project. For the purpose of this analysis, the amount of electricity and natural gas estimated to be consumed by the Project is quantified and compared to that consumed by all nonresidential land uses in Los Angeles County. Similarly, the amount of fuel necessary for Project construction and the amount of fuel necessary for Project operations is calculated and compared to that consumed in Los Angeles County.

The analysis of electricity and natural gas is based on California Estimated Emissions Model (CalEEMod) modeling conducted by ECORP (ECORP 2023a; Appendix A), which quantifies energy use for Project operations. The amount of operational automotive fuel use was estimated using CARB’s Emission Factor Model (CARB 2021) computer program, which provides projections for typical daily fuel usage in Los Angeles County (ECORP 2023d; Appendix E). The amount of total construction-related fuel use was estimated using ratios provided in the Climate Registry’s General Reporting Protocol for the Voluntary Reporting Program, Version 2.1. Energy consumption associated with the Proposed Project is summarized in Table 6-4 (ECORP 2023a; Appendix A, ECORP 2023d; Appendix E).

Table 6-4. Proposed Project Energy and Fuel Consumption		
Energy Type	Annual Energy Consumption	Percentage Increase Countywide
<i>Project Energy Consumption</i>		
Electricity Consumption	31,080	0.0001
Natural Gas Consumption	2	0.0000
<i>Automotive Fuel Consumption</i>		
Project Construction Year One	26,207	0.0006
Project Construction Year Two	99	0.0000
Project Operations	25,137	0.0005

Source: Refer to Appendix A for building energy consumption calculations and Appendix E for Fuel Consumption calculations.

Notes: The Project increases in electricity and natural gas consumption are compared with all of the nonresidential usage in Los Angeles County in 2021, the latest year of data available. The Project increases in construction and operations automotive fuel consumption are compared with the countywide fuel consumption in 2022, the most recent full year of data.

As shown in Table 6-4, the annual electricity consumption due to operations would be 31,080-kilowatt-hours, resulting in a negligible increase (0.0001-percent) in the typical annual electricity consumption attributable to all non-residential uses in Los Angeles County. This is potentially a conservative estimate since in September 2018 Governor Jerry Brown Signed Executive Order (EO) B-55-18, which established a new statewide goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.” Carbon neutrality refers to achieving a net-zero carbon dioxide emissions. This can be achieved by reducing or eliminating carbon emissions, balancing carbon emissions with carbon removal, or a combination of the two. This goal is in addition to existing statewide targets for greenhouse gas (GHG) emission reduction. Governor’s Executive Order B-55-18 requires CARB to “work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.” Natural gas consumption due to operations would be two therms annually, resulting in a negligible increase (0.0000-percent) in the typical annual natural gas consumption attributable to all nonresidential uses in Los Angeles County. For these reasons, the Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.

Fuel necessary for Project construction would be required for the operation and maintenance of construction equipment and the transportation of materials to the Project Site. The fuel expenditure necessary to construct the physical building and infrastructure would be temporary, lasting only as long as Project construction. As further indicated in Table 6-4, the Project’s gasoline fuel consumption during the one-time construction period is estimated to be 26,207-gallons during the first year of construction. This would increase the annual fuel use in the county by 0.0006-percent. The Project’s gasoline fuel consumption during the second year of construction would be 99-gallons, increasing the countywide annual fuel use by 0.0000-percent. As such, Project construction would have a nominal effect on local and regional energy supplies. No unusual Project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the state. Construction contractors would purchase their own gasoline and diesel fuel from local suppliers and would judiciously use fuel supplies to minimize costs due to waste and subsequently maximize profits. Additionally, construction equipment fleet turnover and increasingly stringent state and federal regulations on engine efficiency combined with state regulations limiting engine idling times and requiring recycling of construction debris, would further reduce the amount of transportation fuel demand during Project construction. For these reasons, it is expected that construction fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

The Project is estimated to generate approximately 40 weekday trips, 100 Saturday trips, and 105 Sunday trips; or an average of 58 daily vehicle trips (KOA 2023). As indicated in Table 6-4, this would result in the consumption of approximately 25,137-gallons of automotive fuel per year, which would increase the annual countywide automotive fuel consumption by 0.0005-percent. Fuel consumption associated with the vehicle trips generated by the Project during operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Due to these reasons, these impacts are less than significant, and no further analysis of this subject is required.

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

No Impact.

The Project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. The Project would be built to the Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the CCR (Title 24). Title 24 was established in 1978 in response to a legislative mandate to reduce California’s energy consumption. Title 24 is updated approximately every three years, with the most recent update of the 2022 standards that became effective on January 1, 2023. The 2022 Energy Standards improve upon the 2019 Energy Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2022 update to the Energy Standards encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards, among other goals. The 2022 Energy Standards build and improve upon previous goals of achieving net Zero Net Energy. Buildings permitted on or after January 1, 2023, must comply with the 2022 Standards. Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments. Additionally, in January 2010, the State of California adopted the California Green Building Standards Code (CalGreen) that establishes mandatory green building standards for all buildings in California. The code was most recently updated in 2022, effective for all applicable developments starting January 1, 2023. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. With these building standards in place, the Project would not obstruct any state or local plan for renewable energy or energy efficiency. For these reasons, no impact would occur, and no further analysis of this subject is required.

7. GEOLOGY AND SOILS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known active fault trace? Refer to Division of Mines and Geology Special Publication 42.

i) **Less than Significant Impact.**

Intense ground shaking in the Project Area could occur during an earthquake event on the San Andreas Fault, Garlock Fault, San Jacinto Fault, or other nearby faults. The Project Site is not located within a State of California Earthquake Fault Zone (CGS 2016). However, like the majority of southern California, the Project Site is located within a seismically active area and the potential for strong ground motion is considered significant during the design life of the proposed improvements. The nearest known active fault is the San Andreas Fault, located approximately two miles northeast of the Project Site (Ninyo & Moore 2022b: Appendix F). Based on the review of the referenced literature and site reconnaissance conducted as part of the Project-Specific Geotechnical Report (Ninyo & Moore 2022b), no active faults are known to cross the Project Site. Therefore, the probability of damage from surface fault rupture would be low. However, lurching or cracking of the ground surface because of nearby seismic events is possible. Design of the Proposed Project would follow the recommendations of a registered civil, structural engineer, or engineering geologist and at a minimum meet current building standards and codes including those associated with protection from anticipated seismic events. The site-specific geotechnical report provides a series of recommendations related to seismic design parameters (Ninyo & Moore 2022b). With implementation of Mitigation Measure GEO-1, impacts would be less than significant, and no further analysis of this subject is required.

GEO-1: The Project Applicant shall implement the *Conclusions and Recommendations* as listed in the final site-specific Geotechnical Report (*Geotechnical Evaluation Devil's Punchbowl Nature Center Replacement Project*. Ninyo & Moore 2022b).

ii) Strong seismic ground shaking?

ii) **Less than Significant Impact.**

Considering the proximity of the Project Site to active faults capable of producing a maximum moment magnitude of 6.0 or more, the Project Site has a high potential for experiencing strong ground motion (Ninyo & Moore 2022b). It is recognized that the Project Site could experience periodical seismic ground shaking as a result of seismic events. As previously identified, future construction of the Nature Center would be required to comply with current building codes and design standards which would reduce the risk of loss, injury, or

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

Less than Significant Impact.

The Project would involve the construction of new structures including a Nature Center, solar canopy above the existing parking lot, and associated facility improvements. As stated above, a small portion of the Project Site is susceptible to landslides. However, no structures would be constructed within this portion of the Project Site. Compliance with current building codes and standards would minimize the potential for damage or collapse of new structures and would reduce the risk of loss, injury, or death resulting from landslides, lateral spreading, subsidence, liquefaction, or collapse. As such, impacts would be less than significant, and no further analysis of this subject is required.

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

Less than Significant Impact.

Expansive soils possess a shrink-swell characteristic that can result in structural damage over an extended period of time. Expansive soils are largely composed of silicate clays that expand in volume when water is absorbed and shrink when dried. Highly expansive soil can cause damage to foundations and roads. The shrink-swell potential of expansion in soils reflects the ability of some soils with high clay content to experience a significant change in volume with a change in moisture content. This characteristic poses a significant hazard to sites that undergo seasonal variation in soil moisture content, such as hillsides or flatlands with a seasonally fluctuating water table. The Proposed Project would follow all current building codes and standards that would minimize the potential for damage or collapse of new structures and would reduce the risk of loss, injury, or death resulting from subsidence and expansive soils. Standard geotechnical practices that follow building code requirements can typically minimize the potential impacts from expansive soils to a less than significant level. No further analysis of this subject is required.

e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?

No Impact.

The Project would not include the use of new septic tanks or alternative wastewater disposal systems. Under the Project's baseline condition, pit toilets are present and would remain. As the Proposed Project would not include new septic tanks or alternative wastewater disposal systems, no impact would occur, and no further analysis of this subject is required.

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?

No Impact.

The Los Angeles County Hillside Management Area Ordinance is designed to ensure, to the extent possible, that development in environmentally sensitive areas maintains and enhances the natural topography, resources, and amenities of the Hillside Management Areas, while allowing for limited controlled development. The Ordinance requires a Conditional Use Permit for any property that contains any area with a natural slope of 25-percent or more in an urban Hillside Management Area that is proposed for development, and includes residential uses at a density exceeding the midpoint of the range of densities established by an adopted areawide, community, or specific plan applicable to the area in which the proposed development is located. The Project improvements would be located at the Devil's Punchbowl Natural Area (AIN: 3061-013-903 and 3061-013-300), which is relatively flat. Elevations of the Project Site range from 4,745 to 4,760 feet above mean sea level (Ninyo & Moore 2022b). No residential development is proposed as part of the Project. As such, the Project would not conflict with the Hillside Management Area Ordinance. No impact would occur, and no further analysis of this subject is required.

8. GREENHOUSE GAS EMISSIONS

Environmental Setting

Greenhouse gas (GHG) emissions are released as byproducts of fossil fuel combustion, waste disposal, energy use, land use changes, and other human activities. This release of gases, such as carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and chlorofluorocarbons, creates a blanket around the earth that allows light to pass through but traps heat at the surface, preventing its escape into space. While this is a naturally occurring process known as the greenhouse effect, human activities have accelerated the generation of GHGs beyond natural levels. The overabundance of GHGs in the atmosphere has led to an unexpected warming of the earth and has the potential to severely impact the earth's climate system.

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. CH₄ traps over 25 times more heat per molecule than CO₂, and N₂O absorbs 298 times more heat per molecule than CO₂ (Intergovernmental Panel on Climate Change 2014). Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO₂e), which weigh each gas by its global warming potential. Expressing GHG emissions in CO₂e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted.

The local air quality agency regulating the portion of the MDAB where the Project Site is located is the AVAQMD, the regional air pollution control officer for the basin. The AVAQMD provides guidelines to assessing the significance of project specific GHG emissions and offers both daily and annual significance thresholds for GHG emissions. The AVAQMD's (2016) California Environmental Quality Act (CEQA) And Federal Conformity Guidelines identifies both annual and daily construction significance thresholds for GHG emissions. The Proposed Project is compared to the AVAQMD annual threshold of 100,000-metric-tons of CO₂e annually as well as the AVAQMD daily threshold of 548,000-pounds of CO₂e daily. The numeric thresholds described above were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provide guidance to CEQA practitioners and lead agencies with regard to determining whether GHG emissions from a proposed project are significant.

The County of Los Angeles has prepared the Los Angeles 2020 Climate Action Plan (Los Angeles County 2020a). The 2020 CAP updates the GHG inventories, future projections of emissions, outlines carbon neutrality and reduction targets for the future, and identifies municipal measures and strategies to be developed for the County to achieve the goals. The 2020 CAP is the County's adopted climate action plan, but it is currently being updated. The 2020 CAP is the most recently adopted County document addressing GHG emissions, and while the Draft 2045 CAP is still being drafted, it has not been finalized or adopted at the time of this analysis. It is noted that the document sets bold targets and contains strategies for reducing GHG emissions to the level of achieving carbon neutrality. Due to the timing of this document in correlation with the unfinalized Draft 2045 CAP, the Project is analyzed for consistency with the GHG reduction measures contained in the 2020 CAP.

In *Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal. 4th 2014, 213, 221, 227, following its review of various potential GHG thresholds proposed in an academic study [Crockett, *Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World* (July 2011), 4 Golden Gate U. Env'tl. L. J. 203], the California Supreme Court identified the use of numeric bright-line thresholds as a potential pathway for compliance with CEQA GHG requirements. The study found numeric bright line thresholds designed to determine when small projects were so small as to not cause a cumulatively considerable impact on global climate change was consistent with CEQA. Specifically, Public Resources Code section 21003(f) provides it is a policy of the State that "[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical and social resources with the

objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." The Supreme Court-reviewed study noted, "[s]ubjecting the smallest projects to the full panoply of CEQA requirements, even though the public benefit would be minimal, would not be consistent with implementing the statute in the most efficient, expeditious manner. Nor would it be consistent with applying lead agencies' scarce resources toward mitigating actual significant climate change impacts." (Crockett, *Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World* (July 2011), 4 Golden Gate U. Envtl. L. J. 203, 221, 227.)

The AVAQMD's (2016) CEQA And Federal Conformity Guidelines identifies both annual and daily construction significance thresholds for GHG emissions. The Proposed Project is compared to the AVAQMD annual threshold of 100,000 metric tons of CO₂e annually as well as the AVAQMD daily threshold of 548,000 pounds of CO₂e daily. The Project is also compared for consistency with the goals and policies in Los Angeles County's 2020 CAP.

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact.

GHG emissions were modeled using CalEEMod, version 2022.1. CalEEMod is a statewide land use emissions computer model designed to quantify potential GHG emissions associated with both construction and operations from a variety of land use projects. Project construction-generated GHG emissions were calculated using CalEEMod model defaults for the Los Angeles County portion of the MDAB. Operational GHG emissions were calculated based on the Conceptual Site Plan and operational trip generation rates provided by KOA Corporation (2023).

Construction Analysis

Construction-related activities that would generate GHG emissions include worker commute trips, haul trucks carrying supplies and materials to and from the Project Site, and off-road construction equipment (e.g., dozers, loaders, excavators). Table 8-1 illustrates the specific construction generated GHG emissions that would result from construction of the Project. Once construction is complete, the generation of these GHG emissions would cease.

Table 8-1. Construction Related Greenhouse Gas Emissions	
Description	CO ₂ e Emissions
<i>Daily Emissions (maximum pounds per day)</i>	
Construction Calendar Year One	2,825
Construction Calendar Year Two	1,444
<i>AVAQMD Daily Significance Threshold</i>	<i>548,000 pounds/day</i>
Exceed AVAQMD Daily Threshold?	No

<i>Annual Emissions (metric tons per year)</i>	
Construction Calendar Year One	266
Construction Calendar Year Two	1
<i>AVAQMD Annual Significance Threshold</i>	<i>100,000 metric tons/year</i>
Exceed AVAQMD Annual Threshold?	No

Sources: CalEEMod version 2022.1. Refer to Appendix A for Model Data Outputs

As shown in Table 8-1, construction-generated emissions would not exceed AVAQMD significance thresholds. Therefore, this impact would be less than significant, and no further analysis of this subject is required.

Operational Analysis

Long-term operational GHG emissions attributable to the Project are identified in Table 8-2.

Table 8-2. Operational-Related Greenhouse Gas Emissions	
Emission Source	CO₂e Emissions
<i>Daily Emissions (maximum pounds per day)</i>	
Mobile	2,492
Area	1
Energy	90
Water	5
Waste	6
Refrigerants	0
Total Daily Operational Emissions	2,594 pounds/day
<i>AVAQMD Daily Significance Threshold</i>	<i>548,000 pounds/day</i>
Exceed AVAQMD Daily Threshold?	No
<i>Annual Emissions (metric tons per year)</i>	
Mobile	212
Area	0
Energy	15
Water	1
Waste	1
Refrigerants	0
Total Annual Operational Emissions	229 metric tons/year
<i>AVAQMD Annual Threshold</i>	<i>100,000 metric tons/year</i>
Exceed AVAQMD Annual Threshold?	No

Sources: CalEEMod 2022.1. Refer to Appendix A for Model Data Outputs.

Notes: Emission projections are predominantly based on CalEEMod model defaults for the Los Angeles County portion of the MDAB and trip generation rates provide by KOA Corporation (2023).

As shown in Table 8-2, GHG emissions generated due to Project implementation would not exceed AVAQMD significance thresholds. As such, this impact would be less than significant, and no further analysis of this subject is required.

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

No Impact.

The Los Angeles County 2020 CAP establishes various GHG emissions reduction targets, stating that by 2025, the goal is to reduce GHG emissions by 25-percent below 2015 levels; by 2035, to reduce GHG emissions by 50 percent below 2015 levels; and by 2045, to achieve carbon neutrality in unincorporated Los Angeles County. The 2020 CAP is consistent with 2022 Scoping Plan and sets the County on a path to achieving a more substantial long-term GHG reductions consistent with statewide GHG reduction targets. The 2020 CAP addresses policies and municipal strategies to reduce GHG emissions generated in unincorporated Los Angeles County.

The Project proposes the redevelopment of the Devil’s Punchbowl Nature Center that was destroyed by the Bobcat Fire in 2020. The Proposed Project is consistent with the Los Angeles General Plan Open-Space (OS) land use designation and is thereby consistent with the GHG inventory and forecasts in the 2020 CAP since both the existing and the projected GHG inventories in the 2020 CAP were derived based on the land use designations and associated densities defined in the County’s General Plan. The Proposed Project does not include residential development or large local or regional employment centers, and thus would not result in significant population or employment growth. In addition, the Proposed Project would also be subject to all applicable regulatory requirements to reduce GHG emissions, including the applicable GHG-reducing policy provisions contained in the 2020 CAP. Additionally, the Proposed Project would not exceed AVAQMD significance thresholds, which were established with the purpose of complying with statewide GHG-reduction efforts. As such, the Project would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, no impact would occur, and no further analysis of this subject is required.

9. HAZARDS AND HAZARDOUS MATERIALS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

As the Proposed Project would construct various new park amenities, it would not involve the transport, use, or disposal of any hazardous materials beyond those used for construction and maintenance during occupancy. Construction activities may involve limited transport, storage, use or disposal of hazardous materials. Some examples of hazardous materials handled during construction include fueling and servicing construction equipment on-site and the use of paints and solvents during construction. Therefore, these activities would be short-term and one-time events and would be subject to federal, state, and local health and safety requirements. A less than significant impact related to the use or transport of hazardous materials would occur as a result of construction related activities.

Long-term operation of the Proposed Project would involve very little transport, storage, use, or disposal of hazardous material. Typical facility maintenance involves the limited use of hazardous materials through custodial, routine maintenance, and repair activities, including commercial cleansers, lubricants, paints, and pesticides/herbicides for landscaping purposes. These items would be stored in an appropriate place, such as a utility closet, with limited access only by appropriate employees of the Nature Center. Groundbreaking and construction activities on-site would not likely release any known toxins or contaminants onsite or convey hazardous materials offsite. Therefore, the Project would create a less than significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and no further analysis of this subject is required.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

As described above, construction and operation activities would require the use of small amounts of hazardous materials and would be required to comply with federal, state, and local laws and regulations regarding proper storage, application, and disposal. The proposed nature center and associated improvements would not create a significant hazard to the public or environment through reasonably foreseeable upset and accidental release of hazardous materials. Impacts would be less than significant, and further analysis of this subject is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?

No Impact.

The Proposed Project is not located within 0.25-mile of a sensitive land use. Sensitive land uses within the Project vicinity include K-12 educational facilities. Palmdale Academy Charter School is the nearest school, approximately 15.5-miles northwest of the Project Site. Additionally, these substances would be required to comply with federal, state, and local laws and regulations regarding proper storage, application, and disposal. Therefore, the Proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur, and no further analysis of this subject is required.

D) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact.

As part of the Phase I Environmental Site Assessment (ESA) prepared by Ninyo & Moore (Ninyo & Moore 2022a; Appendix G) for the Proposed Project, a review of hazards and hazardous materials was carried out in conformance with the scope and limitations of the ASTM Practice E 1527-13 to identify evidence of unauthorized release of hazardous materials to the surface, subsurface, and groundwater. This assessment did not reveal evidence of Regional Environmental Concerns (RECs), Controlled RECs, or Historic RECs in connection with the Project Site. As such, the presence or likely presence of hazardous substances or petroleum products was not encountered during the preparation of the Phase I ESA (Ninyo & Moore 2022a).

Furthermore, a review of the Department of Toxic Substances Control’s Hazardous Waste and Substances List (Cortese List) indicated that the Project Site is not located on any identified hazardous materials sites (DTSC 2022). Additionally, a review of the State Water Resources Control Board’s Leaking Underground Storage Tank (LUST) GeoTracker database and the Environmental Protection Agency’s (EPA) EnviroMapper indicated that there are no listed hazardous material sites within the Project vicinity (SWRCB 2022; EPA 2022). The Proposed Project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, it is unlikely that hazards to the public or environment are present. Groundbreaking and construction activities at the Project Site would not likely release any known toxins or contaminants onsite or convey hazardous materials offsite. No impact would occur, and no further analysis of this subject is required.

e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact.

There are no airports or airstrips in Antelope Valley. The Proposed Project is not located within an airport land use plan or within two miles of a public airport. Therefore, the Project would not result in a safety or

noise hazard for people residing or working in the Project area. No impact would occur, and no further analysis of this subject is required.

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

Less than Significant Impact.

The Project would construct new facilities and amenities including a Nature Center, and associated improvements at Devil’s Punchbowl Natural Area. The Project Site’s vehicular access would be limited to Los Angeles County Sign Route N6. Sign Route N6 terminates at the Nature Center parking lot and only provides local access. North of the Project Site is the USDA Forest Service Valyermo Fire Station, which would service the Project Site. In case of an emergency, access to the Project Site is available from Sign Route N6. Construction activity would be confined to the Project Site and not interfere with vehicle movement or emergency access along this roadway. Therefore, the Project is not anticipated to substantially impair an adopted emergency response plan or emergency evacuation plan. A less than significant impact would occur, and no further analysis of this subject is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:

i) within a high fire hazard area with inadequate access?

Less than Significant Impact.

According to CAL FIRE the Project Site is located within a High Fire Hazard Severity Zone (FHSZ) and State Responsibility Area (SRA) (CAL FIRE 2022). The Project would construct new park facilities including an interpretive Nature Center, a solar canopy above the existing parking lot, associated ADA improvements, and new trailheads. In the case of an emergency, adequate emergency access to the Project Site and its surroundings is available via LA County Sign Route N6 and multiple unnamed dirt roads. Additionally, the Los Angeles County Fire Department is one of six contract counties that has executed a contract with the State of California to provide wildland fire protection on SRA (Los Angeles County 2020b). Furthermore, The Los Angeles County Fire Department has adopted the State Fire Code standards for new development in hazardous fire areas. Fire prevention requirements include provision of access roads, adequate road width, and clearance of brush around structures located in hillside areas. In addition, proof of adequate water supply for fire flow is required within a designated distance for new construction in fire hazard areas. Therefore, impacts would be less than significant, and no further analysis of this subject is required.

ii) within an area with inadequate water and pressure to meet fire flow standards?

Less than Significant Impact.

The Proposed Project would result in less than significant impacts in regard to being located within an area with inadequate water and pressure to meet fire flow standards. The Project Site’s water supply is diverted from Devil’s Punchbowl Canyon Creek and collected in a 35,000-gallon holding tank. The License for Diversion and Use of Water from October 9, 1968, associates said right with Application No. A010092B, Permit No. 005841B, and License No. 009318. The right of diversion limits the use of water for purposes of irrigation, domestic use, and fire protection. This system has been designed to meet or exceed the total flow

requirements determined for domestic flow and fire flow for the Devil’s Punchbowl Natural Area. Impacts would be less than significant, and no further analysis of this subject is required.

iii) within proximity to land uses that have the potential for dangerous fire hazard?

Less than Significant Impact.

The Proposed Project would result in less than significant impacts in regard to exposing people or structures to a significant risk of loss, injury or death involving fires. Based on a review of fire hazard severity zones maintained by CAL FIRE, the Project Site is located within a High Fire Hazard Severity Zone (HFHSZ) (CAL FIRE 2022). The Proposed Project would construct a replacement nature center, new trailheads, and associated improvements in areas that have been designated as HFHSZ, where there is the potential to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. However, the County building permit process reduces the potential exposure of people and structures to significant loss, injury, or death involving wildland fires to below the level of significance, through the requirement to use fire-resistant construction materials for roofs and design features such as enclosing eaves, and through the requirement for submittal and approval of a fuel modification plan, prior to issuance of a Certificate of Occupancy. Therefore, impacts would be less than significant, and no further analysis of this subject is required.

h) Does the proposed use constitute a potentially dangerous fire hazard?

Less than Significant Impact.

The Project Site is located within a VHFHSZ and SRA (CALFIRE 2022). However, the Project Site has been heavily graded and contains low and sparse vegetation after the 2020 Bobcat Fire. Construction of the Proposed Project would comply with all relevant codes, as established by the County of Los Angeles Building and Safety Department. In addition, the Proposed Project would be equipped with all necessary fire protection devices in accordance with County of Los Angeles Building and Safety Department guidelines, including onsite fire alarm and fire suppression systems. Therefore, the proposed improvements do not constitute a potentially dangerous fire hazard. A less than significant impact would occur, and no further analysis of this subject is required.

10. HYDROLOGY AND WATER QUALITY

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

The quality of stormwater runoff is regulated under the National Pollution Discharge Elimination System (NPDES) permit. Construction activities of one acre or greater are subject to the statewide general construction stormwater NPDES permit. The County requires all development projects within its jurisdiction on sites of one acre or larger to comply with the NPDES requirements for construction and operations as appropriate. The NPDES stormwater permit (CAS614001, Order No. 1-182) issued to the County of Los Angeles (County) by the Los Angeles Regional Water Quality Board provides a mechanism for establishing appropriate controls and monitoring the discharge of pollutants to the stormwater runoff system. In compliance with NPDES requirements, best management practices (BMPs) would be utilized to reduce the amount of polluted runoff entering the stormwater drainage system compliance with existing County standards and regulations, including the use of BMPs, would ensure that impacts would be less than significant. Construction activities would be subject to permitting by local municipalities. Coverage under this permit requires the submission of a Notice of Intent (NOI), which serves as the application for coverage under the permit, as well as a site map and annual fee. The preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) is also required for each construction site.

Additionally, the County of Los Angeles and its municipalities (with the exception of the City of Long Beach) are required to implement a municipal stormwater program to reduce stormwater and urban runoff pollution. The Los Angeles County Municipal Storm Water Permit requires preparation of Standard Urban Storm Water Mitigation Plans (SUSMPs) that include BMPs and guidelines to reduce pollutants in storm water to the maximum extent possible. The municipal storm water permit also includes requirements for parking lots with 25 or more parking spaces (equivalent to 5,000 square foot of surface area).

As currently conceived, the Proposed Project does not include elements that would degrade surface water quality. Grading and construction activities would potentially result in short-term erosion and sedimentation impacts. Potential long-term impacts include the addition of pollutants typical of urban runoff such as pesticides, fertilizers, vehicle hydrocarbons, grease, and oil, as well as the increase of onsite activities. Implementation of the SWPPP and BMPs would ensure that construction activities would not impact runoff water quality. Therefore, the potential impacts to water quality during construction of the Proposed Project would be expected to be reduced to below the level of significance through the implementation of BMPs required pursuant to the NPDES permit. Impacts would be less than significant, and no further analysis of this subject is required.

b) 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 Proposed Project is not expected to substantially deplete any groundwater supplies or interfere with groundwater recharge. The Project as currently conceived would construct an approximately 3,245-square foot interpretive Nature Center. New wells to pump groundwater are not included in the Proposed Project elements. Water supply for the Nature Center is diverted from Punchbowl Canyon Creek and gravity feeds into a 35,000-gallon holding tank. The right of diversion limits the use of water for purposes of irrigation, domestic use, and fire protection. The right to divert water for use at Devil’s Punchbowl Canyon dates to December 20, 1940 (CIWQS 2022). Currently, the County of Los Angeles functions as the Primary Owner, and DPR as the Agent, with appropriate water rights for up to 5-acre-feet per year at a rate of 0.0125-cubic-feet per second. Historic triannual Reports of Licensee to SWRCB consistently list maximum direct diversion rate at 0.012-cubic-feet per second with Water Right Face Value at 5 acre feet (CIWQS 2022). The Proposed Project would not include any components that would divert water in excess of the County’s permitted volume. Therefore, the Proposed Project is not anticipated to substantially affect groundwater recharge. Impacts would be less than significant, and no further analysis of this subject is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:

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

Less than Significant Impact.

The Proposed Project would be expected to result in less than significant impacts to hydrology and water quality in relation to the alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on or offsite. The Proposed Project would result in the construction of a 3,245-square foot interpretive Nature Center and solar canopy over the existing parking lot. These improvements would not alter the existing drainage patterns onsite. Therefore, the Proposed Project would result in a less than significant impact to the drainage patterns onsite and would not result in substantial erosion or siltation on- or off-site. No further analysis of this subject is required.

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

Less Than Significant Impact.

As discussed above, the Proposed Project would not result in large-scale topographic changes or other changes that would affect the drainage pattern of the Project Site and surrounding area or impact water resources. The area proposed to be developed represents a relatively small area and is not located within the 100-year floodplain (FEMA 2008). Surface runoff volumes would not be substantially increased over the existing conditions. The Project Site would be designed to maintain existing runoff rates and volumes and

would not result in a significant change in flooding conditions onsite or offsite. A less than significant impact would occur, and no further analysis of this subject is 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?

Less than Significant Impact.

The Proposed Project would result in a less than significant impact to hydrology and water quality in relation to exceeding the capacity of existing or planned stormwater drainage systems providing substantial additional sources of polluted runoff. The Proposed Project would not include any unusual features that would result in substantial polluted runoff from the Project Site or other activities that would degrade water quality. The Proposed Project would not substantially increase total impervious surfaces on the Project Site. Therefore, the Proposed Project would be expected to result in a less than significant impact to the capacity of existing or planned stormwater drainage systems or providing substantial sources of polluted runoff. No further analysis of this subject is required.

(iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?

No Impact.

As stated previously, the Project Site is not located within a 100-year floodplain (FEMA 2008). Additionally, Project implementation would not impede or redirect flood flows. Therefore, no impact would occur, and no further analysis of this subject is required.

d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?

No Impact.

According to the Federal Emergency Management Agency (FEMA), the Proposed Project would not be located within a 100-year floodplain (FEMA 2008). No impact would occur, and no further analysis of this subject is required.

e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?

Less than Significant Impact.

Low Impact Development (LID) site design and treatment control BMPs would be incorporated into the Project to mimic the predeveloped hydrologic regime (patterns of water movement or flow in a given area), as feasible, and to capture and treat stormwater quality design volume. The LID treatment control BMPs would be installed in accordance with both the County MS4 Permit and County LID Ordinance and Manual. Proposed LID treatment control BMPs include, but are not limited to: hydroseeding, straw and wood mulch, sandbag, and straw waddle barriers. As these strategies and BMPs would meet LID Ordinance and MS4 requirements, impacts would be less than significant, and no further analysis of this subject is required.

f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?

No Impact.

The Project Site is located in an area without public sewer system service. Other developments within the vicinity, including the existing park facility, currently rely on septic systems to properly dispose of wastewater and sewage. Additionally, the Proposed Project would not include the use or installation of new septic tanks or alternative wastewater disposal systems. Under the Project’s baseline condition, pit toilets are present onsite and would remain. As the Proposed Project would not include new septic tanks or alternative wastewater disposal systems; no impact would occur, and no further analysis of this subject is required.

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

No Impact.

The Project Site is not located within a known flood hazard area (FEMA 2008). Additionally, the Project Site is located approximately 45-miles northeast of the Pacific Ocean and is located at an approximate elevation of 4750 feet above mean sea level (Google Earth 2022). The nearest reservoirs with dam breach inundation maps published by the Division of Safety of Dams (DSOD), Littlerock, San Gabriel No. 1, and Cogswell all depict inundation extent downslope and away from the Project Site (DSOD 2022). As such, implementation of the Proposed Project would not result in the accidental release of pollutants as a result of flood hazard, tsunami, seiche, or project inundation. No impact would occur, and no further analysis of this subject is required.

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

Less than Significant Impact.

According to the 2019 Antelope Valley Integrated Regional Water Management Plan (IRWMP), the Project Site is not within the Los Angeles County Department of Public Works (LACDPW) District (IRWM 2019; Figure 2-3). As stated previously, the Devil’s Punchbowl Natural Area’s water source is diverted from a natural spring, Punchbowl Canyon Creek, and gravity feeds into a 35,000-gallon above ground storage tank (AST). Historic triannual Reports of Licensee to SWRCB consistently list maximum direct diversion rate at 0.012 cubic-feet per second with Water Right Face Value at 5 acre-feet annually (CIWQS 2022). The Proposed Project would not result in additional demand for water supplies as the Project would not exceed its permitted water allocation of 5 acre-feet per calendar year. The Proposed Project is not located within a LACDPW District and would not result in an increase in demand for local water supplies because the Project would not exceed its permitted water allocation. Therefore, Project Impacts would not conflict with the Antelope Valley IRWMP. A less than significant impact would occur, and no further analysis of this subject is required.

11. LAND USE AND PLANNING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Physically divide an established community?

No Impact.

Lands that surround the Devil’s Punchbowl Natural Area are predominantly undeveloped Angeles National Forest land, with a community of rural single-family residences and open space to the west. The Proposed Project would develop new structures and amenities at the existing Devil’s Punchbowl Natural Area and would be consistent with the zoning and land use designations in adopted planning documents. Implementation of the Project is intended to reconstruct the Nature Center destroyed in the 2020 Bobcat Fire. The Project would serve the existing communities that frequently utilize the park for active and passive recreational activities. In addition, the proposed improvements would take place entirely within the currently established Park boundary. Therefore, land use at the Project Site would not deviate significantly from existing conditions, as no new or incompatible land uses would be introduced upon full build-out of the Project. As such, the Project would not disrupt or divide the physical arrangement of the established community. No impact would occur, and no further analysis of this subject is required.

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

No Impact.

The Project Site is located within the unincorporated area of Los Angeles County and is governed by the policies, procedures, and standards set forth in the Los Angeles County General Plan 2035 and the 2015 Antelope Valley Area Plan. The County General Plan defers to the Antelope Valley Area Plan for land use designation of the Project Site. According to the Antelope Valley Area Plan Land Use Policy map, the land use designation is Open Space (O-S) (Los Angeles County 2015). The Proposed Project would develop new structures and park amenities at the existing Devil’s Punchbowl Natural Area. All project components would be consistent with the zoning and land use designations in the 2035 Los Angeles County General Plan and 2015 Antelope Valley Area Plan. As discussed above, land use at the Project Site would not deviate significantly from existing conditions, as no new or incompatible land uses would be introduced upon full build-out of the Project. As such, the Proposed Project would not conflict with any applicable land use plans, policies, or regulations of an agency with jurisdiction (authority) over the Project. No impacts resulting from Project implementation would occur, and no further analysis of this subject is required.

c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?

Less than Significant Impact.

According to the currently adopted Los Angeles County General Plan, the Project Site lies near, but not within, the Antelope Valley Significant Ecological Area (SEA) (Los Angeles County 2022b). The Antelope Valley SEA serves as a linkage between the San Gabriel Mountains and the Mojave Desert and provides wildlife movement opportunities into open areas in Kern County and San Bernardino County. According to the Antelope Valley Area Plan, passive recreational activities would be compatible with land uses with SEAs. Therefore, the Proposed Project would not introduce an incompatible land use within or in the vicinity of the SEA.

The Los Angeles County Hillside Management Area Ordinance is designed to ensure, to the extent possible, that development in environmentally sensitive areas maintains and enhances the natural topography, resources, and amenities of the Hillside Management Areas, while allowing for limited controlled development (Los Angeles County 2022b). The Project improvements would be located within AINs 2061-013-903 and 3061-013-300. The replacement Nature Center would be constructed on the location of the former nature center. The approximately 13.75-acre Project Site is relatively flat, and would be consistent with the zoning and land use designations in adopted planning documents. As such, the Proposed Project would adhere to all regulations outlined by the Hillside Management Ordinance. A less than significant impact would occur, and further analysis of this subject is required.

12. MINERAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

No Impact.

Minerals are defined as any naturally occurring chemical element or compound, or groups of elements and compounds, formed from inorganic processes and organic substances. The California Geological Survey Mineral Resources Program provides information about California’s nonfuel mineral resources. The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources as mandated by the Surface Mining and Reclamation Act of 1975 (SMARA). Classification is the process of identifying lands containing significant mineral deposits. These areas as designated as Mineral Resource Zones (MRZs):

MRZ-1: Areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

MRZ-2: Areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present.

MRZ-3: Areas containing known or inferred mineral deposits that may qualify as mineral resources.

The Project Site is not located in an MRZ according to the County General Plan and Antelope Valley Area Plan (Los Angeles County 2015). No mining operations exist on or in the vicinity of the Project Site, and no mining operations are proposed as part of the Project. The Project would not result in the loss of any locally or regionally known mineral resources. Therefore, the Proposed Project would have no impact on known mineral resources and no further analysis of this subject is required.

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

No Impact.

The County General Plan and Antelope Valley Area Plan do not identify any locally important mineral resource recovery site at or near the Project Site. Previous documentation for the Project Site indicates that it is not located within a mineral resource zone, and no mining operations are proposed as part of the Project. Therefore, the proposed improvements would have no impact on locally important mineral resource recovery sites. No further analysis of this subject is required.

13. NOISE

This section documents the results of the Noise Impact Assessment prepared for the Proposed Project (ECORP 2023b; Appendix H). The purpose of this section is to estimate Project-generated noise levels and determine the level of impact the Proposed Project would have on the environment. This section describes the existing environmental and regulatory conditions specific to noise and addresses the potential impact posed by the Proposed Project.

Noise Fundamentals

Noise is generally defined as sound that is loud, disagreeable, or unexpected. The selection of a proper noise descriptor for a specific source is dependent on the spatial and temporal distribution, duration, and fluctuation of the noise. The noise descriptors most often encountered when dealing with traffic, community, and environmental noise include the average hourly noise level (in L_{eq}) and the average daily noise levels/community noise equivalent level (in L_{dn} /CNEL). The L_{eq} is a measure of ambient noise, while the L_{dn} and CNEL are measures of community noise. Each is applicable to this analysis and defined as follows:

- Equivalent Noise Level (L_{eq}) is the average acoustic energy content of noise for a stated period of time. 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. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- Day-Night Average (L_{dn}) is a 24-hour average L_{eq} with a 10-dBA “weighting” added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60-dBA 24-hour L_{eq} would result in a measurement of 66.4-dBA L_{dn} .
- Community Noise Equivalent Level (CNEL) is a 24-hour average L_{eq} with a 5-dBA weighting during the hours of 7:00 pm to 10:00 pm and a 10-dBA weighting added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.

Noise can be generated by a number of sources, including mobile sources, such as automobiles, trucks and airplanes, and stationary sources, such as construction sites, machinery, and industrial operations.

Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6-dB for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of approximately 3-dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics (Federal Highway Administration [FHWA] 2011). Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5-dB per doubling of distance is normally assumed (FHWA 2011).

The manner in which older structures in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20- to 25-dBA with closed windows (Caltrans 2002). The exterior-to-interior reduction of newer structures is generally 30-dBA or more (Harris Miller Miller & Hanson Inc. [HMMH] 2006).

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from

interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60-dBA, moderate in the 60- to 70-dBA range, and high, above 70-dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20-dBA and quiet, suburban, residential streets with noise levels around 40-dBA. Noise levels above 45-dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60-dBA) and commercial locations (typically 60-dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60- to 75-dBA) or dense urban or industrial areas (65- to 80-dBA). Regarding increases in dBA, the following relationships should be noted in understanding this analysis:

- Except in carefully controlled laboratory experiments, a change of 1.0-dBA cannot be perceived by humans.
- Outside of the laboratory, a 3.0-dBA change is considered a just-perceivable difference.
- A change in level of at least 5.0-dBA is required before any noticeable change in community response would be expected. An increase of 5.0-dBA is typically considered substantial.

A 10.0-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Noise Sensitive Land Uses

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as hospitals, historic sites, cemeteries, and certain recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The nearest sensitive receptor to the Project Site is a residence accessed from Big Sky Drive, approximately 1,236-feet to the northwest of the Project Site.

Existing Ambient Noise Environment

The Project Site is currently located within the Devil's Punchbowl Natural Area in the San Gabriel Mountains and is surrounded by a mix of rural residential uses. The most common noise source associated with this land use is mobile noise generated by transportation-related sources such as vehicle traffic on major roadways such as County Road N6, also known as Devil's Punchbowl Road. Other sources of noise are the residential land uses that generate stationary-source noise.

The American National Standards Institute (ANSI) Standard 12.9-2013/Part 3 "Quantities and Procedures for Description and Measurement of Environmental Sound – Part 3: Short-Term Measurements with an Observer Present" provides a table of approximate background sound levels in L_{dn} , daytime L_{eq} , and nighttime L_{eq} , based on land use and population density. The ANSI standard estimation divides land uses into six distinct categories. Descriptions of these land use categories, along with the typical daytime and nighttime levels, are provided in Table 13-1. At times, one could reasonably expect the occurrence of periods that are both louder and quieter than the levels listed in the table. ANSI notes, "95% prediction interval [confidence interval] is on the order of +/- 10 dB." The majority of the Project Area would be considered ambient noise Category 5 or 6.

Table 13-1. ANSI Standard 12.9-2013/Part 3 A-weighted Sound Levels Corresponding to Land Use and Population Density

Category	Land Use	Description	People per Square Mile	Typical L _{dn}	Daytime L _{eq}	Nighttime L _{eq}
1	Noisy Commercial & Industrial Areas and Very Noisy Residential Areas	Very heavy traffic conditions, such as in busy, downtown commercial areas; at intersections for mass transportation or other vehicles, including elevated trains, heavy motor trucks, and other heavy traffic; and at street corners where many motor buses and heavy trucks accelerate.	63,840	67 dBA	66 dBA	58 dBA
2	Moderate Commercial & Industrial Areas and Noisy Residential Areas	Heavy traffic areas with conditions similar to Category 1, but with somewhat less traffic; routes of relatively heavy or fast automobile traffic, but where heavy truck traffic is not extremely dense.	20,000	62 dBA	61 dBA	54 dBA
3	Quiet Commercial, Industrial Areas, and Normal Urban & Noisy Suburban Residential Areas	Light traffic conditions where no mass-transportation vehicles and relatively few automobiles and trucks pass, and where these vehicles generally travel at moderate speeds; residential areas and commercial streets, and intersections, with little traffic, compose this category.	6,384	57 dBA	55 dBA	49 dBA
4	Quiet Urban & Normal Suburban Residential Areas	These areas are similar to Category 3, but for this group, the background is either distant traffic or is unidentifiable; typically, the population density is one-third the density of Category 3.	2,000	52 dBA	50 dBA	44 dBA
5	Quiet Residential Areas	These areas are isolated, far from significant sources of sound, and may be situated in shielded areas, such as a small, wooded valley.	638	47 dBA	45 dBA	39 dBA
6	Very Quiet Sparse Suburban or rural Residential Areas	These areas are similar to Category 4 but are usually in sparse suburban or rural areas; and, for this group, there are few if any nearby sources of sound.	200	42 dBA	40 dBA	34 dBA

Source: The American National Standards Institute (ANSI) 2013

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project result in:

a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?**

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

Construction Noise

Onsite Construction Noise

Construction noise associated with the Proposed Project would be temporary and would vary depending on the specific nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for onsite construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., site preparation, excavation, paving). Noise generated by construction equipment, including earth movers, pile drivers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive land uses in the vicinity of the construction site.

Section 12.08.440 of the County’s Municipal Code prohibits construction noise between the hours of 8:00 p.m. and 7:00 a.m. on weekdays and Saturdays or anytime on Sundays or holidays and promulgates thresholds for construction noise. Nevertheless, construction noise is temporary, short term, intermittent in nature, and would cease on completion of the Project. Additionally, construction would occur throughout the Project Site and would not be concentrated at one point.

To estimate the worst-case onsite construction noise levels that may occur at the nearest noise-sensitive receptors and in order to evaluate the potential health-related effects (physical damage to the ear) from construction noise, the construction equipment noise levels were calculated using the FHWA’s Roadway Noise Construction Model and compared against the single-family mobile construction equipment construction-related noise level threshold established by the County’s standards.

The nearest sensitive receptor to the Project Site is a single-family residence access from Big Sky Drive, approximately 1,236 feet to the northwest of the Project Site. The anticipated short-term construction noise levels generated for the necessary equipment are presented in Table 13-2.

Table 13-2. Construction Average (dBA) Noise Levels at Nearest Receptors

Construction Phase	Estimated Exterior Construction Noise Level @ Closest Noise Sensitive Receptor (dBA L _{eq})	Construction Noise Standard (dBA L _{eq})	Exceeds Standards?
Demolition	59.5	75	No
Site Preparation	57.2	75	No
Grading	58.0	75	No
Building Construction, Paving, and Painting	61.0	75	No

Source: Construction noise levels were calculated by ECORP Consulting using the FHWA Roadway Noise Construction Model (FHWA 2006). Refer to ECORP 2023b, Appendix H for Model Data Outputs.

Notes: Construction equipment used during construction derived from the California Emissions Estimator Model v. 2022.1. The California Emissions Estimator Model is designed to calculate air pollutant emissions from construction activity and contains default construction equipment and usage parameters for typical construction projects based on several construction surveys conducted in order to identify such parameters.

L_{eq} = The equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. 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. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

As shown in Table 13-2, construction activities would not exceed the County’s single-family residential standard of 75-dBA. It is noted that construction noise was modeled on a worst-case basis and for mobile construction equipment. It is very unlikely that all pieces of construction equipment would be operating at the same time for the various phases of Project construction as well as at the point closest to the nearest noise-sensitive receptor. Therefore, this impact is less than significant.

Offsite Construction Worker Trips

Project construction would result in additional traffic on adjacent roadways over the period that construction occurs. According to the California Emissions Estimator Model (CalEEMod), which is used to predict the number of construction-related automotive trips, the maximum number of Project construction trips traveling to and from the Project Site during a single construction phase would not be expected to exceed 15 daily trips in total. According to Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol (2013), a doubling of traffic on a roadway is required to result in an increase of 3-dB (outside of the laboratory, a 3-dBA change is considered a just-perceivable difference). The Project Site is accessible from Devil’s Punchbowl Road, also known as County Road N6. The surrounding areas that are accessible from Devil’s Punchbowl Road mainly consist of the Devil’s Punchbowl Nature Center and approximately 14 single-family homes. According to the Institute of Transportation Engineer’s (ITE) 10th Edition Trip Generation Manual (2017), single family homes generate an average of 9.44 trips daily, and therefore these 14 existing residences could be expected to contribute up to 132 traffic trips daily on Devil’s Punchbowl Road (9.44 x 14 = 132). Thus, Project construction would not result in a doubling of traffic, and therefore its contribution to existing traffic noise would not be perceptible. Additionally, it is noted that construction is temporary, and these trips would cease upon completion of the Project. As such, this is a less than significant impact.

Operational Noise

Noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise-sensitive and may warrant unique measures for protection from intruding noise. The nearest sensitive receptor to the Project Site is a single-family residence accessed from Big Sky Drive, approximately 1,236-feet to the northwest of the Project Site.

Operational Traffic Noise

Future traffic noise levels within the Project vicinity for the Proposed Project were modeled based on the traffic volumes identified by KOA Corporation (2023) to determine the noise levels along Project vicinity roadways. The Project proposes to develop a Nature Center and the associated structures. The Proposed Project will result in approximately 40 weekday trips, 100 Saturday trips, and 105 Sunday trips daily (KOA 2023). The calculated noise levels as a result of Project traffic at affected sensitive land uses are compared against the County's Exterior Noise standards. The contribution of Project traffic noise, calculated using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified by KOA Corporation (2023), would equate to 43.2-dBA CNEL (ECORP 2023b; Appendix H). This noise level is below the standards established by the County for the protection of residential land uses, the predominate sensitive land use surrounding the Project Area. Thus, the Proposed Project would not result in a transportation noise exposure in excess of the County's standards.

Additionally, it is noted from the Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol (2013) that a doubling of traffic on a roadway is required to result in an increase of 3-dB (outside of the laboratory, a 3-dBA change is considered a just-perceivable difference). The Project Site is accessible from Devil's Punchbowl Road, or County Road N6. The surrounding areas that are accessible from Devil's Punchbowl Road mainly consist of the Devil's Punchbowl Nature Center and approximately 14 single-family homes. According to the ITE 10th Edition Trip Generation Manual (2017), single family homes generate an average of 9.44 trips daily, and therefore these 14 existing residences could be expected to contribute up to 132 traffic trips daily on Devil's Punchbowl Road ($9.44 \times 14 = 132$). Thus, the Project's contribution of 105 peak daily traffic trips would not result in a doubling of traffic, and therefore its contribution to existing traffic noise would not be perceptible. Due to these reasons, this impact will be less than significant.

Operational Onsite Noise

The Proposed Project would develop a Nature Center and the associated structures. Therefore, the main onsite stationary noise sources related to long-term operation on the Project Site would be from the visitors. It is noted that the Proposed Project would replace the Devil's Punchbowl Nature Center that was destroyed due to the Bobcat Fire in 2020. As such, no new land uses or activities are expected to occur on the Project Site as a result of the Project. Furthermore, uses associated with a Nature Center are not typically associated with excessive, ongoing operations-related noise that would lead to substantial permanent increases in ambient noise levels. For instance, the Proposed Project would only experience visitors during the daytime hours. Much of the operational stationary noise generated by the Project would be voices and maneuvering vehicles in and out of the parking lot. According to previous field noise measurements conducted by ECORP, a non-busy parking lot generates noise levels less than 51.0 dBA at 10 feet. These measurements were taken with a Larson Davis SoundExpert LxT precision sound level meter, which satisfies the American National Standards Institute for general environmental noise measurement instrumentation. Prior to the measurements, the SoundExpert LxT sound level meter was calibrated according to manufacturer specifications with a Larson Davis CAL200 Class I Calibrator. The closest residence is located approximately 1,236-feet to the northwest of the Project Site. Given that the noise attenuates a rate of approximately 6 dB for each doubling of distance from a stationary or point source (FHWA 2011), the residence would experience noise levels below the County's daytime exterior standard of 50-dBA.

The Project proposes to re-establish the Nature Center adjacent to existing residential uses. The most basic planning strategy to minimize adverse impacts on new land uses due to noise is to avoid designating certain land uses at locations within the community that would negatively affect noise sensitive land uses. The Project is consistent with the types, intensity, and patterns of land use envisioned for the Project Area and the Project is considered compatible with the existing noise environment. The operation of the Project would result in a less than significant noise-related impact and no further analysis of this subject is required.

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

Less than Significant Impact.

Construction Vibrations

Excessive groundborne vibration impacts result from continuously occurring vibration levels. Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Construction on the Project Site would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance.

Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. It is not anticipated that pile drivers would be necessary during Project construction. Vibration decreases rapidly with distance, and it is acknowledged that construction activities would occur throughout the Project Site and would not be concentrated at the point closest to sensitive receptors. Groundborne vibration levels associated with construction equipment are summarized in Table 13-3.

Equipment Type	Peak Particle Velocity at 25 Feet (inches per second)
Large Bulldozer	0.089
Caisson Drilling	0.170
Loaded Trucks	0.076
Rock Breaker	0.089
Jackhammer	0.035
Small Bulldozer/Tractor	0.003
Vibratory Roller	0.210

Source: FTA 2018; Caltrans 2020

The County’s regulation pertaining to vibration is included in Section 12.08.560 of the County Code and limits vibration to a perception threshold of 0.01-inches per sec.

It is acknowledged that construction activities would occur throughout the Project Site and would not be concentrated at the point closest to the nearest structure. The nearest structure of concern to the construction site, with regard to groundborne vibrations, are residences, approximately 1,236-feet northwest from the Project Site.

Based on the representative vibration levels presented for various construction equipment types in Table 13-3 and the construction vibration assessment methodology published by the FTA (2018), it is possible to estimate the potential Project construction vibration levels. The FTA provides the following equation:

$$[PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/D)^{1.5}]$$

Table 13-4 presents the expected Project related vibration levels at a distance of 1,236 feet.

Table 13-4. Construction Vibration Levels at 1,236 Feet							
Receiver PPV Levels ¹					Peak Vibration	Threshold	Exceed Threshold?
Large Bulldozer, Caisson Drilling, & Hoe Ram	Loaded Trucks	Jackhammer	Small Dozer	Vibratory Roller			
0.0003	0.0003	0.0001	0.000	0.0006	0.0006	0.01	No

Notes: ¹Based on the Vibration Source Levels of Construction Equipment included in Table 13-3 (FTA 2018). Distance to the nearest structure of concern is approximately 1,236 feet measured from Project Site.

As shown in Table 13-4, vibration as a result of onsite construction activities on the Project Site would not exceed the County’s threshold of 0.01 PPV at the nearest structure. Thus, onsite Project construction would not exceed the recommended threshold. This impact will be less than significant.

Operational Vibrations

Project operations would not include the use of any stationary equipment that would result in excessive vibration levels. The Project would not accommodate any heavy-duty trucks or equipment. Therefore, the Project would result in negligible groundborne vibration impacts during operations. This impact would be less than significant, and no further analysis of this subject is required.

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

No Impact.

The Project Site is located approximately 5.22-miles southwest of Crystal Airport in Llano. This is a private airport and mainly accommodates glider aircraft. Implementation of the Proposed Project would not affect airport operations, nor result in increased exposure of those on the Project Site to aircraft noise. Therefore, there is no impact, and no further analysis of this subject is required.

14. POPULATION AND HOUSING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact.

The Proposed Project would add new structures and amenities to the existing Devil’s Punchbowl Natural Area. The Proposed Project does not propose the construction of new housing, businesses, or extended infrastructure and therefore is not anticipated to induce population growth directly or indirectly in the area. Upon completion, existing County staff would maintain the new park amenities. As such, the Proposed Project is not expected to generate a substantial permanent increase in employment opportunities in the area capable of inducing population growth. No impact would occur, and no further analysis of this subject is required.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact.

The Project involves the proposed construction of a Nature Center and associated improvements. As described above, the Project Site does not contain any residential structures and no people live on the property under existing conditions. The Proposed Project would not remove housing; therefore, it would not displace people. Accordingly, implementation of the Proposed Project would not displace substantial numbers of people and would not necessitate the construction of housing elsewhere. No impact would occur, and no further analysis of this subject is required.

15. PUBLIC SERVICES

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<i>Potentially Significant Impact</i>			

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

Fire protection?

Less than Significant Impact.

The Project would not construct any new dwelling units or residences and therefore would not substantially increase the population in the area. The Proposed Project is the reconstruction of facilities lost in the 2020 Bobcat Fire and would not necessitate substantial additional services from the Los Angeles County Fire Department or USFS, particularly considering the code-compliant design of the new facilities. Therefore, the Proposed Project is anticipated to have a less than significant effect on fire services, and no further analysis of this subject is required.

Sheriff protection?

Less than Significant Impact.

As stated previously, the Proposed Project would not construct residences and therefore would not increase the population in the area. The Proposed Project includes the reconstruction of recreational facilities lost in the 2020 Bobcat Fire and would not result in a requirement for additional deputies, nor would it alter the local deputy to population ratio. Furthermore, no change in the Sherrif's response time is anticipated with the construction or operation of the Proposed Project. Therefore, the Proposed Project is anticipated to have a less than significant effect on Sheriff protection and no further analysis of this subject is required.

Schools?

No Impact.

The Proposed Project would include the proposed construction of a new, replacement Nature Center with associated improvements on the grounds of an existing recreational facility. The Project does not contain a residential component and would not generate any new students. Therefore, the Proposed Project would not physically impact schools by causing the need for altered or additional facilities. No impact would occur, and no further analysis of this subject is required.

Parks?

Less than Significant Impact.

The Proposed Project is a recreational facility and would not require the construction of any additional, new, or physically altered park facilities as a result of Project completion. While the Proposed Project has the potential to result in a marginally increased demand for the park, such increases would not be substantial. The Project would contribute to meeting the demand for local recreational opportunities. Please refer to the Recreation section, below, for further details. Impacts would be less than significant, and no further analysis of this subject is required.

Libraries?

No Impact.

The Proposed Project is a recreational facility with associated uses and would not necessitate alteration or expansion of library services. Therefore, the Proposed Project would not physically impact libraries by causing the need for altered or additional facilities. No impact would occur, and no further analysis of this subject is required.

Other public facilities?

No Impact.

The Proposed Project would not cause the need for any new or physically altered public facilities. It would provide improved Park facilities for public outreach and use. No impact would occur, and no further analysis of this subject is required.

16. RECREATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact.

The Proposed Project would provide additional recreational opportunities to the neighboring communities by constructing necessary facilities required to reopen the Nature Center to the public. The Project would be designed with the goal of providing children and adults with a venue for both passive and active recreation, which would be a beneficial addition to the community. The Project would construct a replacement nature center within an existing recreational facility and therefore would not result in the increased use of other neighboring recreational facilities that would accelerate the physical deterioration of neighboring recreational facilities. Therefore, the Proposed Project would have no adverse effect on surrounding recreational facilities. No impact would occur, and no further analysis of this subject is required.

b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

The Proposed Project is a recreational improvement project on an existing recreation area. The Proposed Project would incorporate amenities such as a Nature Center and other associated improvements. The environmental impacts of construction and operation of the Proposed Project, including required mitigation measures, are discussed in this Initial Study. Impacts would be less than significant, and no further analysis of this subject is required.

c) Would the project interfere with regional trail connectivity?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact.

The Devil’s Punchbowl Natural Area is designated Open Space Parks and Recreation (OS-PR) by the Antelope Valley Area Plan. The Proposed improvements would take place entirely within the existing footprint of the currently established recreational facility. Additionally, the Project would promote regional trail connectivity by constructing new trailheads and would not interfere with regional trail connectivity. No impact would occur, and no further analysis of this subject is required.

17. TRANSPORTATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

The roadway system within the Project vicinity is in place and adequate to accommodate project-generated traffic. The existing Devil’s Punchbowl Natural Area is located at the southern terminus of Sign Route N6, which serves as the only roadway with local access to the Project Site. Regional access is provided by SR-138, located approximately 8 miles north of the Project Site. SR-138 is an east-west trending highway that turns northward and merges with SR-14 (Antelope Valley Freeway) to the west and intersects with I-15 to the east at the Cajon Junction. The Project Site is not located near any existing or proposed bikeways or transit facilities. According to the Antelope Valley Area Plan Mobility Element and the LA County Online Bikeways Map the only pedestrian facilities within the Project vicinity are hiking and equestrian (multi-purpose) trails which traverse the Devil’s Punchbowl Natural Area and surrounding Angeles National Forest. These trails are accessible from trailheads present on-site (Los Angeles County 2015; 2023a). The Proposed Project would not obstruct these multi-purpose trails, as all Project components, and construction activities for the Proposed Project, would be located within the Project Site boundaries. As such, the Proposed Project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system.

The Proposed Project would not alter emergency access to the Project Site and its vicinity. Construction activities on-site would temporarily impede access to multipurpose trails in the Project Vicinity, however these impacts would be temporary in nature. Implementation of the Proposed Project would support public access to these multi-purpose trails, and a beneficial impact would occur. Therefore, a less than significant impact would occur to the circulation system within the Project vicinity and no further analysis of this subject is required.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

As of July 1, 2020, all land use projects within the State of California are required to prepare a VMT analysis. In July 2020, the County of Los Angeles developed the Transportation Impact Analysis Guidelines (County Guidelines) under which the transportation-related impacts of development projects are to be analyzed to comply with the updated CEQA Guidelines. County Guidelines provide four screening criteria to be used to determine if a VMT analysis will be required for a development project. The four screening criteria outlined in the County Guidelines include: Non-Retail Project Trip Generation Screening Criteria, Retail Project Site Plan Screening Criteria, Proximity to Transit Based Screening Criteria, and Residential Land Use Based Screening Criteria.

Additionally, the County Guidelines establish a trip threshold of 110 or more net daily vehicle trips to determine when a development project is required to prepare a Transportation Impact Analysis (TIA). KOA Corporation prepared a VMT Screening Assessment for the Proposed Project consistent with County

Guidelines. The Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021) was used to develop the traffic characteristics of the Proposed Project (KOA 2023; Appendix I). The VMT Screening Assessment found the Project would generate approximately 40 daily weekday vehicle trips. On the weekend, the Project would generate 100 trips on a typical Saturday and 105 trips on a typical Sunday. Because the Project would generate less than the County’s screening criteria of 110 daily vehicle trips, the Project does not require further VMT analysis.

Per the County’s Guidelines, additional VMT analysis is required when a project is not screened per any of the four screening criteria. Given that the Project is expected to generate fewer than 110 vehicle trips on a typical weekday and a typical weekend day, the project screens out based on the first screening criterion. As the Project will generate fewer than 110 daily vehicle trips, the Proposed Project would not conflict with CEQA Guidelines section 15064.3(b). A less than significant impact would occur, and no further analysis of this subject is required.

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

No Impact.

The Proposed Project would not alter the design of existing parking-lot facilities or vehicle circulation patterns on-site, and therefore would not increase roadway hazards due to design features or incompatible uses. The single entrance and exit on Sign Route N6 would continue to provide adequate site access as the roadway’s terminus is the entrance to the Devil’s Punchbowl Natural Area parking lot. Visitors entering the facility would keep right of the raised median at the Nature Center entrance and follow the counterclockwise loop circulation pattern through the parking lot. The existing parking lot is designed to provide convenient access from Sign Route N6. Parking lot entry provides clear visibility of the parking area as visitors are entering the Nature Center’s lot.

The Proposed Project would also include the relocation of service road access. Service road access would move from the northeast corner of the parking lot to the southeast corner, near the Devil’s Chair Trailhead and existing restroom facilities. The relocated access point would include improvements such as gated entry, and three additional parking spaces reserved for maintenance vehicles. The new access point is designed to provide safe and convenient vehicular access from the visitor’s parking lot for maintenance vehicles.

The Project does not propose any incompatible uses. The Proposed Project would replace structures lost during the 2020 Bobcat Fire and would continue a long withstanding existing use as a park facility located within a rural residential community and would not pose hazards due to design features. Furthermore, the Project does not propose any incompatible land uses. Therefore, no impact would occur, and no further analysis of this subject is required.

d) Result in inadequate emergency access?

No Impact.

The Project Site would be serviced by the Los Angeles County Fire Department, Fire Station No. 79. Fire Station No. 79 is located approximately 8-miles north of the Project Site on Sign Route N6, at 33957 Longview Road, Pearblossom, CA. The Proposed Project would not alter emergency access to the Project Site and its vicinity. The Fire Department currently has adequate access to the Project Site via Sign Route N6, and the Project Vicinity via multiple service roads. The Project would comply with all design requirements and standards of the building fire code and would not decrease emergency access to the Project Site or its vicinity. Therefore, Project implementation would not result in inadequate emergency access. No impact would occur, and no further analysis of this subject is required.

18. TRIBAL CULTURAL RESOURCES

	<i>Less Than Significant</i>			
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

No Impact.

As discussed in Section 5. Cultural Resources, the records search revealed that no previously recorded historic resources are located within the Project Site. However, as a result of the field survey, the existing ranger station, previously used by the Parks Department as storage has been identified as a potential California Historic Resource. This resource will be evaluated for CRHR eligibility as part of the EIR for the Proposed Project.

No listed or eligible historical resources were identified by the tribes that consulted with the County under AB 52. As such, the existing ranger station building has not been identified as 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 Native American tribe. No impact would occur, and further analysis is not required.

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

Less than Significant with Mitigation Incorporated.

On January 5, 2023, the County formally initiated consultation and notified all the tribes on the contact list of California Native American Tribes which have requested formal notification from the County. The County received an email response from the Fernandeño Tataviam Band of Mission Indians (BMI) on January 9, 2023, indicating the desire to consult regarding potential impacts to Tribal Cultural Resources, that the Project Site is located within their ancestral territory, and requesting additional information regarding the Proposed Project. Therefore, significant impacts may occur from the discovery of unknown Tribal Cultural Resources (TCRs) during ground disturbing activities from Project Construction. On April 11, 2023, the Fernandeño

Tataviam BMI provided comments requesting a correction of Section 3.3.3 of the Archaeological and Built Environment Resource Inventory and Evaluation Report prepared for the Proposed Project in addition to the inclusion of TCR-1 and TCR-2 as Mitigation Measures or Conditions of Approval. These measures include an opportunity for tribal participation in monitoring of subsurface excavations. Consultation between the County and the Fernandeano Tataviam BMI concluded on June 23, 2023. Impacts to unknown TCRs would be less than significant with the implementation of Mitigation Measures TCR-1 and TCR-2 and further analysis is not required.

TCR-1 If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the portions of the Projects outside of the buffered area may continue during this assessment period. The Fernandeano Tataviam Band of Mission Indians (FTBMI) shall be contacted about any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment.

Should the find be deemed significant, as defined by CEQA (as amended, 2015), the Project Applicant shall retain a professional Native American monitor procured by the FTBMI to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

TCR-2 If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code shall be enforced for the duration of the Project.

Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.

19. UTILITIES AND SERVICE SYSTEMS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact.

The Proposed Project would not result in adverse impacts to utilities and service systems related to the construction of new water or wastewater treatment facilities; nor would it be likely to produce significant environmental effects due to the expansion of facilities. Currently no sewer services are available at the Project Site; however, the Natural Area contains existing restroom facilities that are to remain. Additionally, the Project Site has utility connections for electricity, above ground propane tanks, and a water diversion system connected to storage tanks. Utility services are already present at the Project Site and implementation of the Proposed Project would not cause the construction of new utility facilities. Coordination with all potentially affected utility companies and jurisdictions prior to beginning work on the Proposed Project and protection of all existing utility lines and associated structures from damage would be implemented. Therefore, there would be no impacts to utilities and service systems relating to the construction of new water or wastewater treatment facilities or expansion of facilities, which would result in significant adverse environmental impacts. No further analysis is warranted, and no further analysis of this subject is required.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact.

The Proposed Project would not impact water supplies during normal, dry, and multiple dry years. Implementation of the Proposed Project would utilize the existing water diversion system, which is permitted to divert 5-acre-feet per year (AFY) from Punchbowl Canyon Creek. Water is diverted from the natural spring and gravity feeds into a 35,000-gallon holding tank. The Proposed Project is not anticipated to exceed the permitted volume of diverted water from Punchbowl Canyon Creek. Therefore, there would be no impacts to utilities and service systems relating to the available water supplies and the needs of the Proposed Project given the existing entitlements and resources. Thus, the expansion of new entitlements would not be expected to be necessary. Impacts would be less than significant, and no further analysis of this subject is warranted.

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

No Impact.

The Proposed Project would not impact utilities and service systems to such a degree that the wastewater treatment provider would be likely to determine itself unable to adequately meet the needs of the Proposed Project as well as its existing commitments. Currently, there are no sewer services available to the Project Site. The Proposed Project would not require the services of a wastewater treatment provider. No impact would occur, no further analysis of this subject is required.

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?

No Impact.

The Proposed Project would not result in impacts to utilities and service systems in relation to being served by a landfill with the sufficient permitted capacity to accommodate the Proposed Projects solid waste disposal needs. Both the construction and operational phases of the Proposed Project would be expected to generate waste; however, the amount of solid waste generated by the Project would be similar to the pre-fire condition of the Devil's Punchbowl Natural Area. The Proposed Project would be expected to be served by a landfill with sufficient capacity to accommodate its solid waste disposal needs. Solid waste disposal in the County of Los Angeles and unincorporated areas involves three operations: collection, hauling, and disposal. Solid waste at the Project Site would be collected under private contract by a certified waste hauler, who would transport the waste to permitted landfills in the County of Los Angeles. The Sanitation Districts of Los Angeles County establishes and oversees landfill operations. The nearest landfill to the Proposed Project is the Antelope Valley Recycling and Disposal Facility, located in the City of Palmdale. The Proposed Project would not significantly increase solid waste production and therefore would not affect regional landfill capacities. Therefore, no impacts to utilities and service systems would be expected with regards to the capacity of the landfill that would serve the Proposed Project's solid waste disposal needs and no further analysis of this subject is required.

e) 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 impacts to utilities and service systems in relation to compliance with federal, state, and local statutes and regulations pertaining to solid waste. Both the construction and operational phases of the Proposed Project would be expected to generate solid waste requiring disposal in accordance with local and state laws, including recycling requirements. The County of Los Angeles would select the best method of solids disposal and reduction of the solid waste stream. The Proposed Project would result in deposition of all solid waste at permitted facilities for solid waste (including hazardous waste). Therefore, there would be no impact to utilities and service systems in relation to compliance with federal, state, and local statutes and regulations related to solid waste and no further analysis of this subject is required.

20. WILDFIRE

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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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?

Less than Significant Impact.

Government Code 51175-89 directs the California Department of Forestry and Fire Protection (CALFIRE) to identify areas of very high fire hazard severity zones within Local Responsibility Areas (LRA). Mapping of the areas, referred to as Very High Fire Hazard Severity Zones (VHFHSZ), is based on data and models of potential fuels over a 30- to 50-year time horizon and their associated expected fire behavior, and expected burn probabilities to quantify the likelihood, and nature of vegetation fire exposure to buildings.

According to CALFIRE, the Project Site is located within a High Fire Hazard Severity Zone (FHSZ) within a State Responsibility Area (SRA) (CALFIRE 2022). The Project Site is not adjacent to a designated emergency response corridor used by emergency response vehicles. Los Angeles County Department of Public Works identifies SR-2 and SR-138 as Disaster Evacuation Routes for the Planning Area. The Project Site’s only point of egress is County Sign Route N6, a locally serving road that terminates at the Project Site’s parking lot. Sign Route N6 is not identified as an emergency response corridor within either the Los Angeles County General Plan, All-Hazards Mitigation Plan, or the Antelope Valley Area Plan (Los Angeles County 2015). No part of the Project would modify or interfere with vehicular access from Sign Route N6. In the case of an emergency, access to the Project Site would be available by Sign Route N6. Therefore, the Project is not anticipated to substantially impair an adopted emergency response plan or emergency evacuation plan. A less than significant impact would occur, and no further analysis of this subject is required.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less than Significant Impact.

The Proposed Project is located adjacent to Devil’s Punchbowl Canyon and is identified as being within a High FHSZ and SRA. The Project Site would be graded according to the approved grading plan and the new nature center would be partially subterranean, built within the footprint of the previously disturbed areas inset into the landscape. As such, the design would not introduce elements that would capture and or funnel prevailing winds in a manner that would exacerbate wildfire risks and/or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. The Nature Center would be constructed in accordance with the most recent fire codes including internal sprinkler systems and fire-resistant materials. The Project would also be subject to compliance with the Fuel Modification Requirements of the Fire Code to protect against wildland fire. By complying with all applicable regulations and guidelines, the Project is not expected to exacerbate wildfire risks due to slope, prevailing winds, and other factors, and

thereby would not expose any Project occupants to significant pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. A less than significant impact would occur, and no further analysis of this subject is required.

- c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

Less than Significant Impact.

The Proposed Project is located within a High FHSZ and would include the installation of new service roads in addition to the continuation of maintenance for associated infrastructure onsite including the existing transmission lines, and onsite water source. This maintenance would be consistent with ongoing park procedures and would not exacerbate fire risk beyond that which is present with the site's baseline condition. All project components and impacts identified have been analyzed as part of this Initial Study. Ground disturbing activities, including modifications to trailheads and service roads, would adhere to the Project's SWPPP, Grading Plan, and follow BMPs. Therefore, the Proposed Project is not anticipated to exacerbate fire risk. Impacts would be less than significant, and further analysis of this subject is not required.

- d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

Less than Significant Impact.

The Proposed Project is located on relatively flat terrain and would replace County facilities including an interpretive nature center with administrative offices and a gift shop. The Nature Center would be constructed with a reinforced masonry structure, with an exterior of sand colored fire rated board-form concrete panels. The Nature Center would be constructed in accordance with all applicable county, state, and federal building codes. The Project would not substantially change the existing runoff patterns from existing conditions or increase impervious surfaces. As such, the Proposed Project would not expose people or structures to significant risk of downslope or downstream flooding or landslides as a result of post-fire slope instability or drainage changes. Impacts would be less than significant, and further analysis of this subject is not required.

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

Less than Significant Impact.

The Project would include the construction of new facilities and amenities. And, as stated previously; the Project Site is located within a High FHSZ and SRA. These improvements would include an interpretive nature center, solar canopy, ADA access to buildings and trails, new trailheads and associated park amenities including shade structures and picnic areas. The Nature Center would be constructed with a reinforced masonry structure, with an exterior of sand colored, fire rated, board-form concrete panels and would be constructed in accordance with county, state, and federal building codes. Additionally, the County building permit process reduces the potential exposure of people and structures to significant loss, injury, or death involving wildland fires to below the level of significance, through the requirement to use fire-resistant construction materials for roofs and design features such as enclosing eaves, and through the requirement for submittal and approval of a fuel modification plan, prior to issuance of a Certificate of Occupancy.

Furthermore, the Proposed Project would be equipped with all necessary fire protection devices in accordance with County of Los Angeles Building and Safety Department guidelines, including onsite fire alarm and fire suppression systems. Therefore, the Project would not expose people or structures, either directly or indirectly, to a significant risk or loss, injury or death involving wildland fires. A less than significant impact would occur, and further analysis of this subject is not required.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Potentially Significant Impact.

Based on evaluation and discussion contained in this Initial Study, the Proposed Project would have a potentially significant impact in the following issue areas: biological resources, geologic resources, cultural resources, and tribal cultural resources. The Proposed Project's impacts would be reduced to less than significant levels with the incorporation of Mitigation Measures BIO-1 through BIO-4, CUL-1, CUL-2, GEO-1, TCR-1, and TCR-2. However, project-related impacts to cultural resources, specifically historic-age resources, would be potentially significant requiring further analysis in a focused EIR.

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

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Potentially Significant Impact.

Cumulative impacts are defined as two or more individual (and potentially less than significant) project effects that, when considered together or in concert with other projects combine to result in a significant impact within an identified geographic area. For a project to contribute to cumulative impacts, it must result in some level of impact on a project specific level.

As discussed throughout this Initial Study, potentially significant impacts were identified for biological resources, cultural resources, geologic resources (including paleontological resources), and tribal cultural resources. The Proposed Project's contribution to cumulative impacts would not be cumulatively considerable with the incorporation of Mitigation Measures BIO-1 through BIO-4, CUL-1, CUL-2, GEO-1, TCR-1, and TCR-2. Furthermore, other foreseeable projects would be subject to CEQA and would undergo the same level of review as the Proposed Project and include mitigation measures to minimize potentially significant resources. As mentioned previously, project-related impacts to cultural resources, specifically historic-age resources, would be potentially significant. This impact will be evaluated further in a focused EIR.

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

Less than Significant with Mitigation Incorporated.

The checklist categories of: Air Quality, Greenhouse Gas Emissions, Hazards, and Hazardous Materials, Cultural, Geology and Soils, Hydrology and Water Quality, Population and Housing, Tribal Cultural Resources, Noise, Transportation, and Wildfire evaluate Project impacts that could have adverse effects on human beings, either directly or indirectly. All the Project's impacts on human beings, both direct and indirect, that are attributable to the Project were identified and mitigated where necessary. Therefore, the Proposed Project would not either directly or indirectly cause substantial adverse effects on human beings because all potentially adverse direct and indirect impacts of the Proposed Project are identified as having no impact, less than significant impact, or less than significant impact with mitigation. Direct and indirect impacts to human beings would be less than significant with the implementation of mitigation measures listed in this Initial Study.

REFERENCES

[ANSI] American National Standards Institute

- 2013 ANSI/ASA Standard 12.9-2013/Part-3: Quantities and Procedures for Description and Measurement of Environmental Sound - Part 3: Short-Term Measurements with An Observer Present.

[AVAQMD] Antelope Valley Air Quality Management District

- 2016 California Environmental Quality Act (CEQA) And Federal Conformity Guidelines.
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NATIVE AMERICAN HERITAGE COMMISSION

August 16, 2023

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Re: 2023080345, Devil's Punchbowl Nature Center Replacement Planning Project, Los Angeles County

Dear Ms. Chien:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
- c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

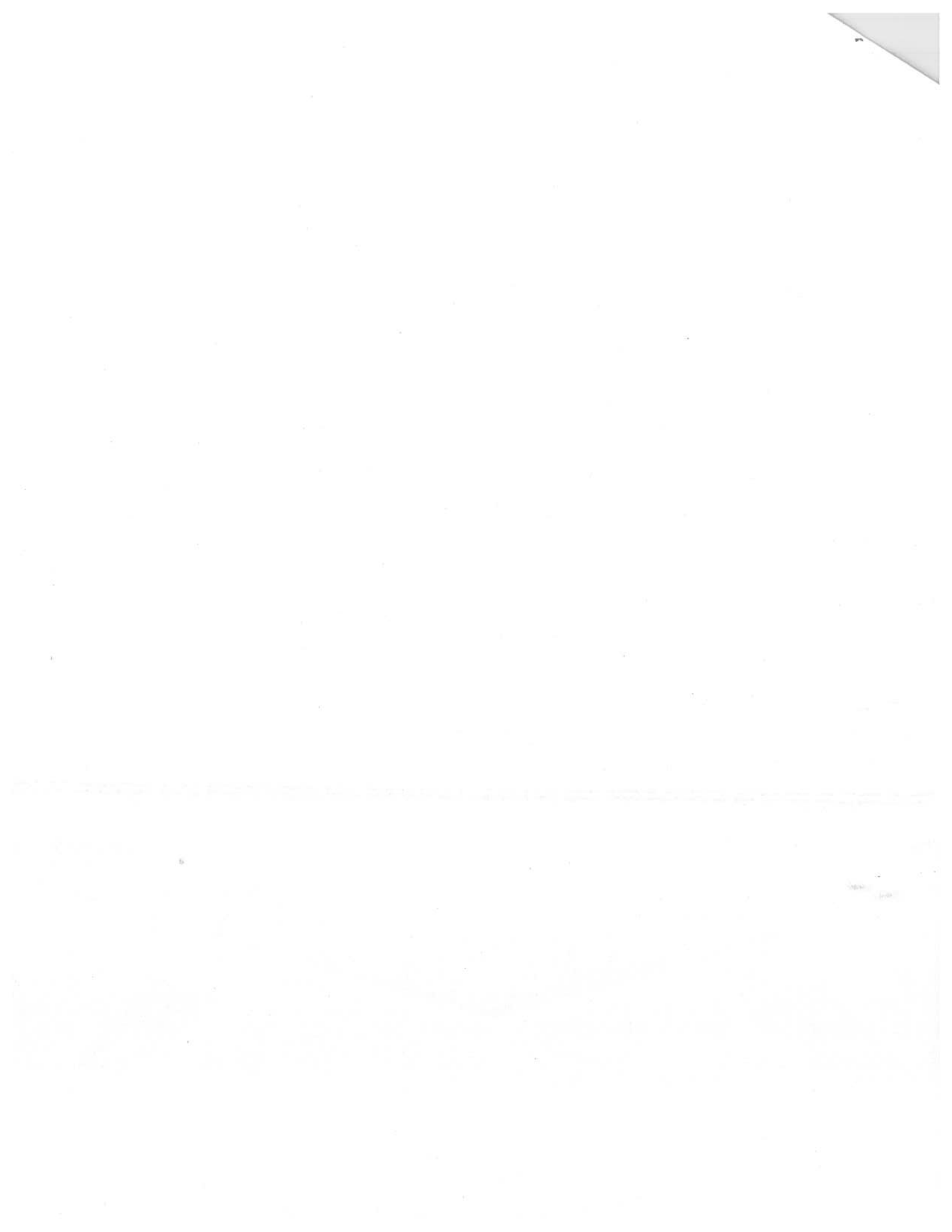
If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



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*Making Conservation
a California Way of Life*

September 7, 2023

Jui Ing Chien, Park Planner

Los Angeles County Department of Parks and Recreation

1000 S. Fremont Avenue Unit #40 A-9 West, Third Floor

Alhambra, CA 91803

RE: Devil's Punchbowl Nature Center
Replacement Planning Project

SCH #2023080345

GTS #07-LA-2023-04293

Vic. LA-138/PM 60.19

Dear Jui Ing Chien:

The County of Los Angeles is proposing the construction of a 3,245 square-foot building, which will house the nature center, administrative offices, and gift shop at the Devil's Punchbowl Natural Area. The nature center's original structure was burned down in the Bobcat Fire in September 2020, and new construction would include the nature center, a solar canopy above the existing parking lot, and associated facility improvements. The Project Site is located at the southern terminus of Sign Route N6, which serves as the only roadway with local access to the Project Site. Regional access is provided by SR-138, located approximately 8 miles north of the Project Site. The Devil's Punchbowl Natural Area is not located near any existing or proposed bikeways or transit facilities.

After reviewing the NOP, Caltrans has the following comments:

According to the Antelope Valley Area Plan Mobility Element and the LA County Online Bikeways Map, hiking and equestrian trails are the main pedestrian facilities within the Project vicinity. Recommended enhancements to pedestrian facilities include upgrading existing crosswalks to the continental crosswalk striping for higher visibility, providing robust signage and lighting along roads, and ensuring ADA access.

As stated in the Trip Generation/VMT Screening Assessment, the Project is expected to generate fewer than 110 vehicle trips on a given day. Per the County of Los Angeles' guidelines, additional Vehicle Miles Traveled (VMT) analysis is not required. As a reminder, Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using VMT as the primary metric in identifying transportation impacts for all future development projects. Caltrans' targets of tripling trips made by bicycle, doubling trips made by walking and public transit, and a 15% reduction in statewide VMT can be achieved through collaborative improvements to the state-wide transportation network.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS #07-LA-2023-04293.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse



STATE OF CALIFORNIA • NATURAL RESOURCES AGENCY Gavin Newsom, Governor
DEPARTMENT OF FISH AND WILDLIFE Charlton H. Bonham, Director

South Coast Region
3883 Ruffin Road | San Diego, CA 92123
wildlife.ca.gov

Via Electronic Mail Only

September 11, 2023

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
1000 S. Fremont Ave, Unit #40 A-9 West
Alhambra, CA 91803
JChien@parks.lacounty.gov

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Devil's Punchbowl Nature Center Replacement Planning Project, SCH #2023080345, Los Angeles County Department of Parks and Recreation, Los Angeles County

Dear Jui Ing Chien:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of a Draft Environmental Impact Report from the Los Angeles County Department of Parks and Recreation (LACDPR) for the Devil's Punchbowl Nature Center Replacement Planning Project (Project). Supporting documentation includes the *Biological Technical Report for the Devil's Punchbowl Nature Center Replacement Planning Project* (BTR), prepared August 2023. CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§711.7, subdivision (a) & 1802; Pub. Resources Code, §21070; California Environmental Quality Act (CEQA) Guidelines, §15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., §1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 2 of 15

specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, §21069; CEQA Guidelines, §15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in “take”, as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project Applicant obtain appropriate authorization under the Fish and Game Code.

Project Summary

General Site Description: The nature center was destroyed as a result of the Bobcat Fire in September/October 2020. The Project site primarily consisted of single-leaf pinyon – juniper woodland vegetation communities. During the biological reconnaissance survey conducted in May 2022, the Project site consisted of burned and resprouting vegetation, and the plant species currently dominating these areas are typical of chaparral communities. There are remnants of previously existing structures present on the Project site, including the nature center. There are also other facilities on site including a parking lot and restroom facilities.

Location: The Project site is located within the Devil’s Punchbowl Natural Area south of the Valyermo community in the County of Los Angeles, California. The site is surrounded on three sides by the Angeles National Forest. The Project site’s surrounding land uses include Open Space – National Forest to the north, east, and south of the subject parcel.

Objective: The Project entails the replacement of the Nature Center while also making improvements to trail heads, Americans with Disabilities Act (ADA) access to buildings and trails, picnic areas, and shade structures. First, an existing historic structure, the Ranger’s Residence, will be demolished to accommodate the new Nature Center and associated improvements. Then, a single-story, 3,245-square-foot building that includes a nature center, administrative offices, and shop will be constructed. The Project would also include the construction of a solar canopy over the existing parking lot. Finally, native plants will be used as

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 3 of 15

landscape screening, which would require the use of potable water for landscape irrigation.

Comments and Recommendations

CDFW offers comments and recommendations below to assist the LACFCD in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The DEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, §21061; CEQA Guidelines, §§15003(i), 15151]. CDFW looks forward to commenting on the DEIR when it is available.

Specific Comments:

- 1) Crotch's bumble bee (*Bombus crotchii*). The Project site may support habitat for Crotch's bumble bee. In addition, the Initial study identifies Crotch's bumble bee as having a moderate potential to occur on site. If Crotch's bumble bee is present in the Project site, the Project could grade and/or develop habitat supporting Crotch's bumble bee. The Project may result in temporal or permanent loss of suitable nesting and foraging habitat. In addition, Project ground-disturbing activities may cause death or injury of adults, eggs, and larva, burrow collapse, nest abandonment, and reduced nest success.
 - a) Protection Status. The California Fish and Game Commission accepted a petition to list the Crotch bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Crotch bumble bee is granted full protection of a threatened species under CESA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). In addition, Crotch bumble bee has a State ranking of S1/S2. This means that the Crotch bumble bee is considered critically imperiled or imperiled and is extremely rare (often five or fewer populations). Crotch bumble bee is also listed as an invertebrate of conservation priority under the [Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) (CDFW 2017).
 - b) Surveys and Disclosure. CDFW recommends LACFCD to retain a qualified biologist familiar with the species to survey the Project site for Crotch

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 4 of 15

bumble bee and habitat. Surveys for Crotch bumble bee should adhere to the [Survey Considerations for California Endangered Species Act \(CESA\) Candidate Bumble Bee Species](#) (CDFW 2023a). The DEIR should provide full disclosure of the presence of Crotch's bumble bee and the Project's potential impact on Crotch's bumble bee, and not deferred until a later time (i.e., preconstruction surveys).

- c) Mitigation. The DEIR should include measures to first avoid impacts on Crotch's bumble bee. If Crotch bumble bee is present, a qualified biologist should identify the location of all nests in or adjacent to the Project site. If nests are identified, 15-meter no-disturbance buffer zones should be established around nests to reduce the risk of disturbance or accidental take. If the Project cannot avoid impacts, the LACFCD should require the Project Applicant to consult CDFW to determine if a CESA Incidental Take Permit (ITP) is required. In addition, LACFCD should require compensatory mitigation for removal or damage to any floral resource associated with Crotch bumble bee. Floral resources should be replaced as close to their original location as is feasible.
- d) CESA ITP. An appropriate take authorization from CDFW under CESA may include an ITP or a Consistency Determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the project and mitigation measures may be required to obtain an ITP. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate DEIR for the issuance of an ITP for the Project unless the Project's DEIR addresses all the Project's impact on CESA endangered, threatened, and/or candidate species. The Project's DEIR should also specify a mitigation monitoring and reporting program that will meet the requirements of an ITP. It is important that the take proposed to be authorized by CDFW's ITP be described in detail in the Project's DEIR. Also, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP. However, it is worth noting that mitigation for the Project's impact on a CESA endangered, threatened, and/or candidate species proposed in the Project's DEIR may not necessarily satisfy mitigation required to obtain an ITP. Please visit CDFW's [California Endangered Species Act \(CESA\) Permits](#) webpage for more information (CDFW 2023b).

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 5 of 15

2) Special Status Plants. On page 29 of the Initial Study it states, "Three special-status plant species (Joshua tree [*Yucca brevifolia*], short-joint beavertail [*Opuntia* var. *brachyclada*], and southern California black walnut [*Juglans californica*]) were observed on or adjacent to the Project Site." It goes on to say that "only one species (crowned muilla [*Muilla coronata*]) was determined to have a low potential to occur [on site]." The BTR states on page 23, "ECORP assumes that the Project will not impact the vegetation surrounding the previously developed portions of the Project site. If additional impacts are to occur outside of the footprint of the existing developed areas, then impacts to special status-plant species may occur and additional measures including rare plant surveys are warranted. If impacts are contained within the previously developed portions of the Project site, no impacts to special-status plants would occur." However, it is unclear how impacts to special status plants, especially those in the developed areas, will be avoided. There are no avoidance, minimization, or mitigation measures for potential impacts to special status plants.

a) Western Joshua tree. Western Joshua tree is a candidate for listing under the California Endangered Species Act (CESA). As a CESA candidate species, western Joshua tree is granted full protection of a threatened species under CESA. CDFW primarily recommends the LACDPR avoid impacts to western Joshua tree to the greatest extent feasible. If "take" or adverse impacts to western Joshua trees cannot be avoided during Project activities or over the life of the Project, CDFW recommends that the Project proponent consult CDFW regarding the CESA Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2080 *et seq.* Early consultation is encouraged as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. The Project proponent should consult with CDFW to obtain additional western Joshua tree survey requirements. CDFW may require separate documentation for the issuance of an ITP unless the Project DEIR addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

b) Rare Plants. Short joint beavertail has a California Rare Plant Rank (CRPR) of 1B.2. Southern California black walnut and Crowned muilla have a CRPR of 4.2. Plants with a CRPR of 1B, 2A, and 2B are rare throughout their range, endemic to California, and are seriously or moderately threatened in California. All plants constituting CRPR 1A, 1B, 2A, and 2B should have

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 6 of 15

impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, as they meet the definition of rare or endangered (CEQA Guidelines, § 15380). California Native Plant Society's (CNPS) [Rare Plant Ranks](#) page includes additional rank definitions (CNPS 2023).

CDFW recommends conducting focused surveys for these rare plants. The survey should be conducted on site and in the surrounding 200-foot buffer. Based on the [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018), a qualified biologist should "conduct botanical surveys in the field at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting." The revised biological assessment should provide a thorough discussion on the extent of sensitive species and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts.

- c) Disclosure. The DEIR should fully disclose any impacts on rare plants, which should include at a minimum where impacts would occur; number of individual plants impacted; population size and density; and acres of habitat/plant communities impacted.
 - d) Avoidance. If the Project will impact rare plants, CDFW recommends the DEIR provide measures to fully avoid impacts on rare plants and its habitat. This may include Project alternatives that would fully avoid impacts on rare plants (see **General Comment #5**).
 - e) Mitigation. If take or adverse impacts to rare plants cannot be avoided during Project activities or over the life of the Project, the DEIR should provide measures to mitigate those impacts. Appropriate mitigation may include obtaining appropriate take authorization under CESA prior to implementing the Project (pursuant to Fish & Game Code, § 2080 *et seq.*). Appropriate authorization may include an Incidental Take Permit (ITP) or Consistency Determination, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Additionally, CDFW recommends LACDPR provide compensatory mitigation for loss of rare plants and habitat. CDFW recommends LACFCD identify an appropriate site to preserve rare plants in perpetuity (also see **General Comments #6 and #7**).
- 3) California Species of Special Concern (SSC). Page 29 of the Initial Study indicated that several SSC, including California glossy snake (*Arizona elegans*

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 7 of 15

occidentalis), coast horned lizard (*Phrynosoma blainvillii*), pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*), western mastiff bat (*Eumops perotis californicus*), and American badger (*Taxidea taxus*) may have low to moderate potential to be on the Project site. While mitigation measures BIO-2, BIO-3, and BIO-4 may provide some reduction in impacts to these species, they may be insufficient to reduce impacts to less than significant.

- a) Status. CDFW considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures [CEQA Guidelines, §§ 15064, 15065, 15125(c), and 15380].
 - b) Survey Guidelines. The DEIR should evaluate the Project's potential impacts to these and any additional special status wildlife species. Species specific, season, and time of day field surveys should be conducted in preparation of the DEIR. Survey protocols and guidelines for select special status plants and wildlife may be found on CDFW's [Survey and Monitoring Protocols and Guidelines](#) webpage (CDFW 2023c). Surveys should not deviate from established protocols and guidelines except with documented approval specific to this Project. Species-specific surveys would identify any areas where these species occur which may help inform plans to fully avoid these areas/impacts and/or appropriate mitigation measures.
 - c) Disclosure. CDFW recommends the DEIR fully disclose potential species-specific impacts and provide measures to fully avoid impacts to wildlife and habitat during and after the Project.
- 4) Preconstruction Sensitive Wildlife Survey: Measure BIO-2 on page 30 & 31 of the Initial Study may be insufficient to reduce impacts to sensitive wildlife species on site. CDFW recommends the LACDPR revise BIO-2 by incorporating the underlined language and removing the language with strikethrough:

“A preconstruction survey for sensitive wildlife species will be conducted within two weeks (14 days) of initial grading, demolition, and/or grubbing activities. If special-status (non-listed) wildlife species are observed within the impact area, the qualified biologist will develop and implement appropriate protection measures for that species. These protection measures shall include, as appropriate: presence of a biological monitor during ground-disturbing activities, redirecting the species, constructing

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 8 of 15

exclusionary devices, or capturing and relocating wildlife outside the work area (as Project and/or individual permits allow, see scientific collecting permit). In addition, prior to initial ground and habitat disturbing activities and vegetation removal, a qualified biologist will prepare a Wildlife Relocation Plan. The Wildlife Relocation Plan should describe all wildlife species that could occur within the Project site and proper handling and relocation protocols. The Wildlife Relocation Plan should include species-specific relocation areas, at least 200 feet outside of the Project site and in suitable and safe relocation areas. No wildlife nests, eggs, or nestlings may be removed or relocated at any time. The biological monitor will have the authority to temporarily halt construction activities in order to allow special-status and general wildlife to safely move out of harm's way and utilize hazing methods to direct individuals to areas outside the construction limits. If a listed wildlife species is determined to be present or to nest or den within the Project Site, the Project will be temporarily halted until agency consultation can be completed. Observations of special-status species made during the surveys shall be recorded onto a CNDDDB field data sheet and submitted to CDFW for inclusion into the CNDDDB.

- a) Scientific Collecting Permit. A scientific collecting permit will be necessary for many of the species' surveys outlined above. It will especially be necessary if there is a plan to capture and relocate wildlife. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocated wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's [Scientific Collection Permits](#) webpage for information (CDFW 2023d).
- b) Injured or Dead Wildlife. If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area should stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW within 3 calendar days of the incident or finding. The report

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 9 of 15

should include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death."

General Comments

- 1) Biological Baseline Assessment. The DEIR should provide an adequate biological resources assessment, including a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project site. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. An environmental document should include the following information:
 - a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2023e);
 - b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site;

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 10 of 15

- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a Project site and within the neighboring vicinity. The [Manual of California Vegetation Online](#) should also be used to inform this mapping and assessment (CNPS 2023). Adjoining habitat areas should be included in this assessment if the Project could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a Project. California Natural Diversity Database in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a Project site. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur on the Project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];
- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of a project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2023c). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the USFWS; and,
- f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a 1-year period, and assessments for rare plants may be considered valid for a period of up to 3 years. Some aspects of a proposed Project may warrant periodic

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 11 of 15

updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases.

- 2) Disclosure. The DEIR should provide an adequate, complete, and detailed disclosure about the effect which a proposed Project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 3) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document “shall describe feasible measures which could mitigate for impacts below a significant level under CEQA.”
 - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the Lead Agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). A public agency “shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures” (Pub. Resources Code, § 21081.6). CDFW recommends the LACDPR provide mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.
 - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the DEIR should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the DEIR should provide an adequate, complete, and detailed disclosure about the Project’s proposed mitigation measure(s). Adequate disclosure

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 12 of 15

is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

- 4) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2023f). To submit information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and Relevé Form](#) should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2023g). The LACDPR should ensure data collected for the preparation of the DEIR be properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.
- 5) Biological Direct, Indirect, and Cumulative Impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The DEIR should address the following:
 - a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
 - b) A discussion of both the short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)];
 - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 13 of 15

- d) A discussion of Project-related changes on drainage patterns; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site. The discussion should also address the potential water extraction activities and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;
 - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR; and,
 - f) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities. If the LACDPR determines that the Project would not have a cumulative impact, the DEIR should indicate why the cumulative impact is not significant. The LACDPR's conclusion should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].
- 6) Compensatory Mitigation. The DEIR should include mitigation measures for adverse Project-related direct or indirect impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 14 of 15

7) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, a DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

Conclusion

We appreciate the opportunity to comment on the NOP for the Devil's Punchbowl Nature Center Replacement Planning Project to assist the LACFCD in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at Felicia.Silva@wildlife.ca.gov or (562) 292-8105.

Sincerely,

DocuSigned by:

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Jui Ing Chien
Los Angeles County Department of Parks and Recreation
September 11, 2023
Page 15 of 15

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**Devil's Punchbowl Nature Center Replacement Planning Project
Draft Focused Environmental Impact Report**

Scoping Meeting: September 9, 2023

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**Devil's Punchbowl Nature Center Replacement Planning Project
Draft Focused Environmental Impact Report**

Scoping Meeting: September 9, 2023

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Jose A. Melgar			
Marcos Melgar	14650 big sky dr	Resident	marcosmelgar1313ad@gmail.com

**County of Los Angeles
Department of Parks and Recreation
Devil's Punchbowl Nature Center Replacement Planning Project
Draft Focused Environmental Impact Report**

COMMENTS

Please use this page to submit your input on the scope of the environmental impacts to be analyzed in the Draft focused Environmental Impact Report (EIR) being prepared for the Devil's Punchbowl Nature Center Replacement Planning Project. Your comments are an important part of creating a focused EIR. When making your comments, please be as specific as possible.

Name	<u>Jawice Wise</u>		
Address	<u>11619 Juniper Hills Rd., Juniper Hills</u>		<u>93543</u>
	Street	City	Zip Code
E-mail	<u>bobjan1977@hotmail.com</u>		

Comments can also be submitted to:

Jui Ing Chien, Park Planner
County of Los Angeles
Department of Parks and Recreation
1000 S. Fremont Ave., Unit #40
A-9 West, 3rd Floor
Alhambra, California 91083
Email: jyom@parks.lacounty.gov
Phone: (626) 588-5317

All comments must be received by September 14, 2023.

Comments

Please provide your comments below. If you need additional space, please use the reverse side of this sheet. Thank you.

To incorporate some material from the remaining building which
is to be torn down to be recycled/ incorporated into some
aspects of the new design. (stones + wood)

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Name Monique Stevens
Address 10730 Juniper Hills Rd. Little Rock 93543
Street City Zip Code
E-mail monique.stevens.av@gmail.com

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Thank you for engaging the public in the planning process. I'm looking forward to ~~the~~ seeing things move forward.
I would love to see more educational programs & public engagement projects to maintain trails etc. along w/ an increase in staff to support the new infrastructure & additional programs.
Keep up the great work!