

DRAFT

**Environmental Impact
Report for the Proposed
Devil's Punchbowl
Nature Center Replacement
Planning Project
SCH #2023080345**

Lead Agency:



**County of Los Angeles
Department of Parks and Recreation
1000 South Fremont Avenue, Unit #40
Building A-9 West, 3rd Floor
Alhambra, California 91803**

January 2024

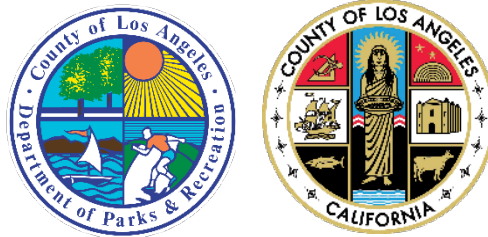


ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

Draft Environmental Impact Report for the Devil's Punchbowl Nature Center Replacement Planning Project

State Clearinghouse No. 2023080345

Prepared for:



County of Los Angeles Department of Parks and Recreation
1000 South Fremont Avenue, Unit #40
Building A-9 West, 3rd Floor
Alhambra, California 91803

Prepared by:



January 2024

TABLE OF CONTENTS

EXECUTIVE SUMMARY ES-1

 ES.1 Introduction..... ES-1

 ES.2 Project Location and Setting ES-1

 ES.3 Project Background ES-1

 ES.4 Description of Proposed Project ES-2

 ES.5 Areas of Controversy ES-3

 ES.6 Project Alternatives ES-3

 ES.6.1 No Project Alternative ES-4

 ES.6.2 Comparison of Project Alternatives ES-4

 ES.7 Issues to be Resolved by the Lead Agency..... ES-5

 ES.8 Summary of Impacts and Mitigation Measures ES-5

1.0 INTRODUCTION 1-1

 1.1 Background 1-1

 1.2 Purpose and Use of the EIR 1-1

 1.2.1 Availability of the EIR and Public Review Process 1-6

 1.3 Organization of the Draft EIR..... 1-7

 1.4 Documents Incorporated by Reference 1-8

2.0 PROJECT DESCRIPTION 2-1

 2.3 Project Description 2-11

3.0 ENVIRONMENTAL IMPACT ANALYSIS 3-1

 3.1 Biological Resources 3.1-1

 3.1.1 Introduction..... 3.1-1

 3.1.2 Environmental Setting 3.1-1

 3.1.3 Regulatory Setting 3.1-8

 3.1.4 Thresholds of Significance 3.1-14

 3.1.5 Impacts Analysis..... 3.1-15

 3.1.6 Mitigation Measures 3.1-20

 3.1.7 Level of Significance After Mitigation 3.1-24

 3.1.8 Cumulative Impacts 3.1-24

 3.2 Cultural Resources 3.2-1

 3.2.1 Introduction..... 3.2-1

 3.2.2 Environmental Setting 3.2-1

 3.2.3 Regulatory Setting 3.2-4

Devil’s Punchbowl Nature Center Replacement Planning Project
Draft Environmental Impact Report

3.2.4	Thresholds of Significance	3.2-9
3.2.5	Impact Analysis.....	3.2-10
3.2.6	Mitigation Measures	3.2-11
3.2.7	Level of Significance After Mitigation	3.2-12
3.2.8	Cumulative Impacts.....	3.2-12
4.0	ALTERNATIVES TO THE PROPOSED PROJECT	4-1
4.1	Introduction.....	4-1
4.2	Alternatives Considered but Rejected	4-1
4.2.1	Alternative Project Site Locations	4-2
4.2.2	Alternative Building Concepts.....	4-3
4.2.3	No Project Alternative	4-4
4.3	Comparison of Alternatives.....	4-4
4.4	Environmentally Superior Alternative	4-6
5.0	OTHER CEQA CONSIDERATIONS	5-1
5.1	Growth-Inducing Impacts.....	5-1
5.2	Significant Irreversible Effects	5-1
5.3	Unavoidable Significant Adverse Effects.....	5-2
6.0	LIST OF PREPARERS AND PERSONS CONSULTED.....	6-1
6.1	County of Los Angeles Department of Parks and Recreation.....	6-1
6.2	Withers & Sandgren	6-1
6.3	ECORP Consulting, Inc.	6-1
7.0	REFERENCES.....	7-1
8.0	ACRONYMS AND ABBREVIATIONS.....	8-1

LIST OF APPENDICES

Appendix A	IS/NOP and Scoping Comments
Appendix B	Biological Technical Report
Appendix C	Archeology and Built Environment Resources Inventory and Evaluation Report
Appendix D	Draft Mitigation Monitoring and Reporting Program

LIST OF FIGURES

Figure 1-1. Onsite Extent of Structural Fire Damage..... 1-3
Figure 2-1. Project Vicinity..... 2-3
Figure 2-2. Project Location 2-5
Figure 2-3. Site Plan..... 2-7
Figure 2-4. Project Components 2-9

LIST OF TABLES

Table ES.6-1. Comparison of No Project Alternative with Proposed Project..... ES-4
Table ES.8-1. Impact and Mitigation Summary Table..... ES-6
Table 1-1. Anticipated Agency Approvals and Reviews..... 1-5
Table 4-2. Comparison of No Project Alternative with Proposed Project 4-4
Table 4-3. Comparison of Project Objectives by Alternative 4-5

THIS PAGE INTENTIONALLY LEFT BLANK

EXECUTIVE SUMMARY

ES.1 Introduction

This Executive Summary has been prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15123(b), which states that an EIR should contain a brief summary of the Proposed Project and its consequences, and should identify:

1. Each significant effect with proposed mitigation measures that would reduce or avoid that effect;
2. Areas of public controversy known to the Lead Agency including issues raised by the agencies and the public; and
3. Issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.

The County of Los Angeles Department of Parks and Recreation (DPR) is proposing the Devil's Punchbowl Nature Center Replacement Planning Project (Proposed Project). The Proposed 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. DPR has prepared a Draft EIR that identifies and evaluates the potential environmental impacts associated with the implementation and operation of the Proposed Project.

CEQA requires that the Lead Agency, in this case DPR, consider the information contained in the EIR prior to taking any discretionary action. This EIR may also be used by other public agencies that must take discretionary actions related to the Proposed Project.

ES.2 Project Location and Setting

The Proposed Project is located within the boundaries of the Devil's Punchbowl Natural Area, which is managed by DPR. The Devil's Punchbowl Natural Area is approximately 1,310-acres, mostly encompassing a rugged wilderness landscape with striking rock formations along the San Andreas Fault on the northern slope of the San Gabriel Mountains. 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. The address of the Natural Area front entry is 2800 Devil's Punchbowl Road, Pearblossom, CA 93553. The proposed Nature Center and project improvements would be contained within Assessor's ID Number (AIN) 3061-013-903 and 3061-013-300. Vehicular access to the Project Site is currently available via a single entrance at the terminus of Devils Punchbowl Road / County Sign Road N6.

ES.3 Project Background

The Devil's Punchbowl Natural Area is a destination for hikers, naturalists, and schools. It is a unique geological location where visitors can walk, hike, or take a horseback ride on a 7.5-mile trail. Visitors can

see up-tilted rock formations created by layers of sedimentary rocks and explore the landscape of Joshua trees, California junipers, and pinyon pine woodland while observing the variety of wildlife.

The construction of the former Nature Center and existing Ranger's Residence date back to the 1950s. However, both structures were subsequently remodeled in the 1980s to function as park facilities to serve as critical educational resources to teach visitors about the sensitive habitat, local flora, and fauna, and how to be safe in the harsh extremes of the desert. The former Nature Center, an approximately 1,000 square foot wooden structure, originally served as a garage for the historic residence of Helen McGregor and her two sons, which now functions as the Devil's Punchbowl Ranger Station and storage. On September 6, 2020, heavy winds pushed the Bobcat Fire over the San Gabriel Mountains into the community of Juniper Hills. The Bobcat Fire destroyed over 30,000 acres of land and affected many parts of the Devil's Punchbowl Natural Area, including the loss of the former Nature Center.

On September 13, 2020, pursuant to Government Code Sections 8558(b) and 8630 and Los Angeles County Code Section 2.68.110, the Chair of the Board of Supervisors proclaimed a local emergency for the Bobcat Fire. Due to the extent of fire damage and restoration efforts, the Devil's Punchbowl Natural Area was closed until April 1, 2022. In July 2021, the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) Wildfire Prevention grant program awarded a grant in the amount of \$540,000 to the County. The grant is for the County to complete a planning package to facilitate the development of a new nature center at the Devil's Punchbowl Natural Area.

ES.4 Description of Proposed Project

DPR is proposing various improvements 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, ADA access to buildings and trails, picnic areas, and shade structures. Specifically, the Proposed Project includes:

- A new 3,245-square-foot Nature Center, including administrative offices and a gift shop, with the following features:
 - Reinforced masonry structure
 - Green roof
 - Sand colored and fire rated board-form concrete panel exterior
 - Use of local materials in the architectural design, such as rocks on façade
 - Natural ventilation
 - Natural lighting and skylights
 - Storm water collection and reuse
- Protection of all remaining healthy trees onsite

- Native landscaping and revegetation
- Solar canopy over parking lot
- Native seed collection and germination (including local manzanita seeds for future use)
- Shade structures
- Planting of additional native trees to provide shade in the future
- Demolition of the existing Ranger's Residence

ES.5 Areas of Controversy

CEQA requires the EIR to identify areas of controversy or public interest. Prior to the preparation of this EIR, an Initial Study and Notice of Preparation (NOP) were distributed for review and comment to Responsible and Trustee Agencies, the State Clearinghouse, and other interested parties for a 30-day scoping period from August 16, 2023, to September 14, 2023.

Based on information and comments received from the general public and other public agencies in response to the NOP, the following issues are considered to be either controversial or require further resolution prior to making an informed decision on the Proposed Project:

- Impacts to sensitive biological resources
- Impacts to cultural resources

ES.6 Project Alternatives

CEQA requires an evaluation of the comparative effects of a reasonable range of alternatives to the Proposed Project that would feasibly attain most of the project's basic objectives and that would avoid or substantially lessen any of the significant impacts of the Proposed Project. The Proposed Project was found to result in significant and unavoidable historic impacts and no feasible mitigation measures were identified. The impact resulted from the proposed demolition of the existing Ranger's Residence (DPB-001). The No Project Alternative is considered in this EIR to address the impact on Cultural Resources as a result of DPB-001 demolition.

Alternative plan development sought diverse opinions from three potential site locations originally presented at the first Community Workshop. The site analysis conducted for all alternative site locations concluded that the Ranger's Residence is a deterrent to the development of an environmentally sensitive, state-of-the-art facility at any of the alternative site locations.

Two Building Concept Alternatives were also considered by DPR. Devil's Punchbowl staff preferred Building Concept 2 because they felt it would suit their exhibits and needs better than Building Concept 1. Therefore, Building Concept 2 was selected to develop further (Withers & Sandgren 2022). Due to these reasons, the Building Concept 2 (Proposed Project) was selected by DPR over Building Concept 1, as Concept 1 would not meet the project goals when compared to the Proposed Project. No other alternatives, other than the No Project Alternative, were carried forward for analysis.

ES.6.1 No Project Alternative

CEQA requires that the No Project Alternative be analyzed in an EIR. In accordance with Section 15126.6(e)(3)(B), the No Project Alternative consists of an analysis of the circumstance under which the project does not proceed.

The No Project Alternative is considered in this EIR to address the impact on Cultural Resources as a result of DPB-001 demolition. With the No Project Alternative, the Devil's Punchbowl Natural Area would remain open to the public from Tuesday to Sunday during normal park hours. No trail or ADA access improvements would be constructed. Proposed landscaping improvements and park amenities would not occur. The existing Ranger's Residence building would remain, and no new structures would be built. County events and programming would remain unchanged compared to the post-fire reopening in Spring 2022. The No Project Alternative would not meet any of the Proposed Project objectives.

ES.6.2 Comparison of Project Alternatives

Table ES.6-1 provides a comparison of anticipated impacts of the No Project Alternative with the Proposed Project.

Table ES.6-1. Comparison of No Project Alternative with Proposed Project	
Category	No Project
Aesthetics	-
Agriculture and Forestry Resources	○
Air Quality	-
Biological Resources	-
Cultural Resources	-
Energy	-
Geology/Soils	-
Greenhouse Gas Emissions	-
Hazards and Hazardous Materials	-
Hydrology/Water Quality	-
Land Use/Planning	-
Mineral Resources	○
Noise	-
Population/Housing	○
Public Services	-
Recreation	○
Transportation	-
Tribal Cultural Resources	-
Utilities/Services Systems	-
Wildfire	-

Notes:

- ⊕ = Impacts would be greater than the Proposed Project
- = Impacts would be the same as the Proposed Project
- = Impact would be less than the Proposed Project

ES.7 Issues to be Resolved by the Lead Agency

The major issues to be resolved by DPR as Lead Agency include the following:

- Whether the EIR adequately describes the environmental impacts of the Proposed Project;
- Whether the recommended mitigation measures should be modified/adopted;
- Whether the benefits of the Proposed Project override the significant impacts to Cultural Resources; and
- Which among the Proposed Project and the No Project Alternative should be selected for approval.

ES.8 Summary of Impacts and Mitigation Measures

Table ES.8-1 presents a summary of environmental impacts analyzed and identified in this EIR, the mitigation measures proposed for those impacts (if required), and the level of significance after mitigation.

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
Biological Resources		
<p>Special Status Plant Species. The Project Area is generally classified as in a state of recovery; the recovering land cover is predominately chaparral habitat.</p> <p>Three special-status plant species (western Joshua tree, short-joint beavertail, and southern California black walnut) were observed on or adjacent to the Project Area during the biological reconnaissance surveys, rare plant survey, and previous habitat mapping efforts immediately following the Bobcat Fire. Although located within the Project Area, the current project design would avoid impacts to the individual short-joint beavertails, western Joshua trees, and southern California black walnuts during Project construction. However, if during final Project design, construction cannot avoid these individuals, then direct impacts in the form of ground disturbance, vegetation removal, habitat loss, and mortality and indirect impacts from dust may occur to these species. Impacts to western Joshua trees would be less than significant with the implementation of Mitigation Measure BIO-1. Impacts to short-joint beavertail would be less than significant with the implementation of Mitigation Measure BIO-2. The mitigation measures for the Proposed Project are</p>	<p>BIO-1 Western Joshua Tree Incidental Take Permit: Prior to the start of Project construction, individual western Joshua trees located within the Project Area shall be mapped using sub-meter GPS units. Impacts to individual western Joshua trees shall be avoided to the greatest extent feasible. If Project-related impacts are unavoidable to the western Joshua trees present within the Project Area, an Incidental Take Permit from CDFW under the Western Joshua Tree Conservation Act (WJTCA) will be required as long as western Joshua tree remains a candidate or listed species under the California ESA. Projects involving the take of western Joshua tree must demonstrate compliance with conditions outlined in the WJTCA. At a minimum, this includes submittal to the CDFW, for approval, a census of all western Joshua trees on a Project site and payment of fees for impacted trees as outlined in the WJTCA, according to impacted tree height.</p> <p>BIO-2 Short-Joint Beavertail Protection: Prior to the start of Project construction, individual short-joint beavertails located within the Project Area shall be mapped using sub-meter GPS units. Impacts to individual short-joint beavertails shall be avoided to the greatest extent feasible. If impacts to short-joint beavertail individuals cannot be avoided during</p>	<p>Impacts would be less than significant.</p>

Table ES.8-1. Impact and Mitigation Summary Table

Environmental Impacts	Mitigation Measures	Residual Impacts
<p>discussed in Section 3.1.6. Only three southern California black walnut tree individuals were noted straddling the western Project boundary, and not immediately adjacent to improvement or development areas. No direct impacts to California black walnut trees are likely and would be considered less than significant with implementation of Mitigation Measure BIO-3.</p> <p>Fifty (50) special-status plant species were identified in the literature review and database searches, including those described above. Based on the results of previously conducted rare plant surveys, the condition of the Project Area, and the available habitat three species (San Gabriel Mountains monardella, Mojave monardella, and crowned muilla) were determined to have a low potential to occur. No special-status plant species have a high potential to occur in the Project Area. However, as the chaparral habitat continues to recover onsite, there is the potential for additional rare plant species to be present. The project design would avoid impacts to native vegetation within the Project Area to the extent feasible. However, should these species occur within the Project Area, direct impacts in the form of ground disturbance, vegetation removal, habitat loss, and mortality and indirect impacts from dust may occur to these species. Impacts to special-</p>	<p>Project design, the following shall be implemented. To avoid impacting the seed bank, the upper 3 inches of soil for areas of soil disturbance that overlap with mapped populations of short joint beavertail shall be scraped, and the soil returned to the same location once work is complete. If direct impacts are unavoidable, transplanting or translocation of short joint beavertail specimens can be accomplished and is recommended during spring and early summer. A successful transplant will include a 6-inch buffer clod with at least a 6-inch depth around the specimen, to ensure the salvage of the main shoot, and transplanting the individual within a nearby location that contains the same soil and habitat affinities as its original location. If transplanting is deemed too difficult based on settings and/or health of the specimen, propagation through a stem/pad cutting can also be accomplished by cutting the pad as an entire segment from the plant, drying the segment, and placing it upright with the cut portion below the ground, within the first two to three inches of soil. Initial irrigation of the transplanted specimen and/or segment is not required but shall be established every other week if nighttime temperatures are above 60 degrees Fahrenheit. Monitoring of the transplant shall</p>	

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
<p>status plant species would be less than significant with the implementation of Mitigation Measure BIO-3.</p> <p>Special Status Wildlife Species. The only native vegetation communities in the Project Area are the recovering chaparral communities. The majority of the Project footprint is within existing disturbed, developed, or landscaped areas that were present in the Project Area prior to the Bobcat Fire. The slow 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 Area. The Proposed 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 – activities that would involve ground disturbance within the previously disturbed Project footprint and adjacent to the recovering chaparral communities.</p> <p>One California SSC species, Blainville's horned lizard, was observed during the September 2023 biological reconnaissance survey. Additionally, two special-status wildlife species not identified in the literature review, San Diegan tiger whiptail and yellow warbler, were observed during the May 2022 biological reconnaissance survey. The literature review and</p>	<p>be conducted for at least two years until signs of establishment (i.e., new growth) are apparent.</p> <p>BIO-3 Preconstruction Rare Plant Surveys: A preconstruction rare plant survey shall be conducted within suitable habitat in the Project Area during the year immediately prior to construction in order to ensure the protection of the root zone of walnut trees and detect any additional special-status species that may reestablish as the burn area recovers. Ideally, the surveys shall be done during the spring (late April/early May) and late summer (July/August) to capture the blooming periods of target plants with potential to occur. The survey shall be conducted by a botanist or qualified biologist in accordance with the USFWS Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants; the CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities; and the CNPS Botanical Survey Guidelines.</p> <p>If special-status (non-listed) plant species are observed during the rare plant survey, locations of individual plants or populations will be mapped using sub-meter GPS units and a no-disturbance buffer around locations of individuals or a population shall be established. A biological monitor shall be present</p>	

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
<p>database searches identified 26 special-status wildlife species that have previously been documented in the vicinity of the Project Area. One species (Crotch bumblebee) was determined to have a high potential to occur in the Project Area, one species (California glossy snake) was determined to have moderate potential to occur in the Project Area, and four species (loggerhead shrike, western mastiff bat, desert bighorn sheep, and American badger) were determined to have low potential to occur in the Project Area. The remaining 19 species were presumed absent from the Project Area.</p> <p>Crotch bumble bee is a candidate for state listing and therefore afforded all the protections as though it were listed under the California ESA. It was determined that this species has a high potential to occur in the recovering chaparral and scrub habitats surrounding the previously developed areas. As such, direct impacts to Crotch bumble bee through ground disturbance and indirect impacts from habitat loss may occur. If present, direct impacts to this species could occur as a result of the Project in the form of mortality or injury due to ground-disturbing activities in areas that serve as nesting, overwintering, and foraging habitat. Indirect impacts may include loss of habitat and ground vibrations. Because this species is a generalist forager</p>	<p>during heavy equipment operations (including but not limited to grading activities). As-needed compliance inspections shall be conducted at least monthly throughout construction to ensure no-disturbance buffers are intact and adhered to. In the unlikely event that a listed plant species is detected and cannot be avoided, then agency consultation would be required to develop a mitigation plan or additional avoidance and minimization measures.</p> <p>BIO-4 Focused Crotch Bumble Bee Surveys: If the Crotch bumble bee is no longer a candidate or listed species under the California ESA at the time ground-disturbing activities, then no additional protection measures are proposed for this species.</p> <p>If the Crotch bumble bee is legally protected under the California ESA as a candidate or listed species at the time of Project construction, focused surveys shall be conducted in accordance with CDFW's Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023d) the season immediately prior to ground disturbing activities are scheduled to occur. A minimum of three Crotch bumble bee focused surveys shall be conducted at 2 to 4 week intervals (ideally monthly) during the colony active period (April through August) when Crotch bumble bees are most likely to be detected. Non-lethal, photo voucher</p>	

Table ES.8-1. Impact and Mitigation Summary Table

Environmental Impacts	Mitigation Measures	Residual Impacts
<p>that chooses nesting and overwintering locations on an annual basis, temporary and permanent loss of habitat would not be expected to contribute substantially to the overall decline of this species in the area unless an active nest or overwintering gyne (future queen) were to be impacted. Impacts to Crotch bumble bee would be less than significant with the implementation of Mitigation Measures BIO-4, -5, -7, and -8.</p> <p>San Diegan tiger whiptail and Blainville's horned lizards were observed in the Project Area in the recovering chaparral communities surrounding the previously developed areas. As such, direct impacts to San Diegan tiger whiptail and Blainville's horned lizard through ground disturbance and indirect impacts from habitat loss may occur. The Proposed Project has the potential to impact the vegetation surrounding the previously developed portions of the Project Area during the construction of and re-construction of new and existing hiking trails, replanting of areas, and installation of signs. If present, direct impacts to these species could occur as a result of the Proposed Project in the form of mortality or injury due to ground-disturbing activities. Indirect impacts may include loss of habitat, ground vibrations, increased human activity, and noise. Impacts to San Diegan tiger whiptail and Blainville's horned lizard would be less than significant with the</p>	<p>surveys shall be completed by a biologist who holds a Memorandum of Understanding to capture and handle Crotch bumble bee (if nesting and chilling protocol is to be utilized) or by a CDFW approved biologist experienced in identifying native bumble bee species (if surveys are restricted to visual surveys that will provide high-resolution photo documentation for species verification). The surveyor shall walk through all areas of suitable habitat focusing on areas with floral resources. Surveys shall be completed at a minimum of one person-hour of searching per three acres of suitable habitat during suitable weather conditions (sustained winds less than 8 mph, mostly sunny to full sun, temperatures between 65 and 90 degrees Fahrenheit) at an appropriate time of day for detection (at least an hour after sunrise and at least two hours before sunset, though ideally between 9:00 AM and 1:00 PM).</p> <p>If Crotch bumble bees are detected, CDFW shall be notified by the designated biologist as further coordination may be required to avoid or mitigate certain impacts. At a minimum, two nesting surveys shall be conducted with focus on detecting active nesting colonies within one week and 24-hours immediately prior to ground disturbing activities that are scheduled to occur during the same flight season</p>	

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
<p>implementation of Mitigation Measures BIO-5, -7, and -8.</p> <p>Yellow warbler was observed during the biological reconnaissance survey. Yellow warbler would not be expected to nest within the Project Area itself due to lack of suitable nesting habitat but may use tree habitat adjacent to the Project Area for nesting. Indirect impacts to yellow warbler may occur from construction noise and vibrations should the species nest within 500 feet of the Project Area. 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 may occur. Impacts to yellow warbler and loggerhead shrike would be less than significant with the implementation of Mitigation Measures BIO-5, -6, -7, and -8.</p> <p>The Project Area is located within and adjacent to suitable habitat for desert bighorn sheep, American badger, and western mastiff bat, but habitat features within the Project Area itself are not sufficient to sustain populations of these species. As such, these species may be expected to pass through the Project Area but would not be expected to be directly affected</p>	<p>(February through October). If an active Crotch bumble bee nest is detected, an appropriate no disturbance buffer zone (including foraging resources and flight corridors essential for supporting the colony) shall be established around the nest to reduce the risk of disturbance or accidental take and the designated biologist shall coordinate with CDFW to determine if an Incidental Take Permit under Section 2081 of the California ESA will be required. Nest avoidance buffers may be removed at the completion of the flight season and/or once the qualified biologist deems the nesting colony is no longer active and CDFW has provided concurrence of that determination. If no nests are found but the species is present, a full-time qualified biological monitor shall be present during vegetation removal or ground disturbing activities that are scheduled to occur during the queen flight period (February through March), colony active period (March through September), and/or gyne flight period (September through October). Because bumble bees move nest sites each year, three preconstruction nesting surveys shall be required during each subsequent year of construction, regardless of the previous year's findings, whenever vegetation removal and ground disturbing activities</p>	

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
<p>by the Project. Indirect impacts may occur if the species are present through ground vibrations, increased human activity, and noise. These impacts would be less than significant with the implementation of Mitigation Measures BIO-5, -7, and -8.</p> <p>The approximately 6.6 acres of recovering chaparral habitat provides marginally suitable habitat for California glossy snake. As such, direct impacts to this species through ground disturbance and indirect impacts from habitat loss may occur. The Proposed Project has potential to impact the vegetation surrounding the previously developed portions of the Project Area during the construction and re-construction of new and existing hiking trails, replanting of areas, and installation of signs. If present, direct impacts to this species may occur as a result of the Proposed Project in the form of mortality or injury due to ground-disturbing activities. Indirect impacts may include loss of habitat, ground vibrations, increased human activity, and noise. Impacts to special-status wildlife species would be less than significant with the implementation of Mitigation Measures BIO-5, -7, and -8.</p> <p>The Project Area also contained suitable nesting habitat for bird species protected under the MBTA. Development of the Project Area will be required to</p>	<p>are scheduled to occur during the flight season (February through October).</p> <p>BIO-5 Preconstruction Sensitive Wildlife Survey: A preconstruction survey for sensitive wildlife species shall 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 Scientific Collecting Permits allow). 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 shall describe all wildlife species that could occur within the Project Area and proper handling and relocation protocols. The Wildlife Relocation Plan shall include species-specific relocation areas, at least 200 feet outside of the Project Area and in suitable and safe relocation areas. No wildlife nests, eggs, or nestlings may be removed or relocated at any time.</p>	

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
<p>comply with the MBTA and avoid impacts to nesting birds. If construction of the Proposed 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. Impacts to yellow warbler, loggerhead shrike, and other nesting birds would be less than significant with the implementation of Mitigation Measure BIO-6, -7, and -8.</p>	<p>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 may employ 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 Area, the Project will be temporarily halted until agency consultation can be completed. Observations of any 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.</p> <p>BIO-6 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 Area and adjacent areas where Project activities have the potential to affect active nests, either directly or indirectly, due to construction</p>	

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
	<p>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. As-needed nest monitoring shall be conducted at least weekly throughout construction to ensure no-disturbance buffers are intact and adhered to and to update the status of the nest. The no-disturbance buffer shall be removed and work may continue in that area once the qualified avian biologist determines the nest is no longer active and has removed the flagging or staking.</p> <p>BIO-7 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 shall 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.</p>	

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
	<p>BIO-8 Biological Monitoring: A biologist shall be present to monitor all vegetation trimming and removal 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 trimming or removal activities and their presence shall continue as necessary to maintain protective measures and to monitor for species in harm's way. If protection measures require capturing and relocating wildlife to areas outside the work area, the biological monitor shall possess the appropriate Scientific Collecting Permit to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project-related activities. Any captured species shall be relocated out of harm's way to adjacent appropriate habitat that is outside of Project impact areas. If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist shall be notified, and dead or injured wildlife documented immediately. A formal</p>	

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
	report shall be sent to CDFW within 3 calendar days of the incident or finding. The report shall 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.	
Sensitive Natural Communities. The Project Area consists of recovering chaparral vegetation communities with landscaped, disturbed, and developed land cover present. The Project Area does not contain any riparian habitat, oak woodland, 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 2023b). No impact would occur.	None required.	No impact.
Jurisdictional Resources: State or Federally Protected Wetlands. 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 Area (ECORP 2023b).	None required.	No impact.

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
Therefore, no impacts to state or federally protected wetlands and Waters of the U.S. would occur during development of the Project Area.		
Fish or Wildlife Movement Corridors and Nursery Sites. The Project Area 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 2023b). 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 Area. 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 Project Area's ability to function as a wildlife corridor. Impacts would be less than significant.	None required.	Less than significant impact.
Oak Woodlands. No oak woodlands are present in the Project Area. While individual Tucker's oaks and black oaks were documented spaced throughout the Project Area, these individuals do not constitute oak woodlands as defined by the state. Further, there are	None required.	No impact.

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
no other unique native woodlands (juniper, Joshua, southern California black walnut, etc.) present in the Project Area. As such, the Project would not convert oak woodlands or other unique native woodlands. No impact would occur.		
<p>Wildflower Reserve Areas, Los Angeles County Oak Tree Ordinance, Significant Ecological Areas (SEAs), and Sensitive Environmental Resource Areas (SERAs). 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 Area. According to the Los Angeles County Code of Ordinances section 12.36.020, the Project Area 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 Area is located adjacent to, but not within, the Antelope Valley SEA.</p> <p>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 Municipal Code protects all oak trees with a diameter at breast height of eight inches or greater, or 12 inches or greater for multiple trunks</p>	<p>BIO-9 Protection of Oak Trees: The tree protection zone (diameter of the tree canopy plus five feet) of each oak tree within the Project Area shall be avoided to the greatest extent feasible. If oak trees cannot be avoided, an oak tree survey and report shall be prepared by an International Society of Arboriculture (ISA) Certified Arborist prior to construction. An oak tree permit will be obtained prior to cutting, destroying, removing, relocating, inflicting damage, or encroaching into the protected zone of any oak trees with a diameter at breast height (dbh) of eight inches or more. All protection and replacement measures shall be consistent with the Los Angeles County Oak Tree Ordinance.</p>	Less than significant impact.

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
<p>(combination of two largest trunks). No oak woodlands are present in the Project Area. However, individual oak trees (Tucker's oak and black oak) that may be protected by the Los Angeles County Municipal Code are present along the existing trail edges and in the landscaped areas. The Proposed Project would avoid impacts to native vegetation within the Project Area to the extent feasible. The Project does not involve tree removal and onsite grading would be limited to disturbed areas. Impacts to individual oak trees would be avoided during Project construction. However, should any alterations to the final design result in the encroachment of the tree protection zone of any individual oak trees, potential direct or indirect impacts to individual trees may occur. Impacts to oak trees in the Project Area would be less than significant with the implementation of Mitigation Measure BIO-9.</p>		
<p>Habitat Conservation Plans. The Project Area is not located within a Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). Therefore, development of the Project Area would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP (ECORP 2023b). No impact would occur.</p>	<p>None required.</p>	<p>No impact.</p>

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
Cultural Resources		
<p>Historical Resources. Three distinct resources were identified within the Project Area, each subject to evaluation based on the NRHP and CRHR eligibility criteria, and Los Angeles County criteria. The three resources are discussed below.</p> <p><i>DPB-001: Existing Ranger's Station</i></p> <p>DPB-001, a 1950s single-story Ranch-style home that served as a ranger station in the Devil's Punchbowl Natural Area and is proposed for demolition as part of the Proposed Project, was found eligible for inclusion in the NRHP under Criterion A and C and CRHR under Criterion 1 and 3.</p> <p>Additionally, DPR-001 is eligible for inclusion in the County of Los Angeles Register of Landmarks and Historic Districts under Criterion 1 for its association with events that have made a significant contribution to the broad patterns of the history of the Devil's Punchbowl Natural Area; and Criterion 3 for embodying the distinctive characteristics of Organic Architecture.</p> <p>The Proposed Project would demolish DPB-001. This demolition will cause a substantial adverse change in the significance of a historical resource pursuant to</p>	<p>HIS-1 Historical Documentation: Prior to the demolition of DPB-001, provide documentation of the buildings character defining features, architectural aspects, and historical significance using detailed pictures, and a written historical narrative. The documentation shall generally follow the National Parks Service (NPS) Historic American Building Survey (HABS) short format and content style (referred to herein as "HABS like"). The photographs shall be digitally taken from a high-resolution digital camera and may be provided in print or electronic format with photograph log. The written historical narrative shall follow the HABS short format style and may be provided on archival quality paper in hard copy, or electronic copy on an archival quality DVD. The HABS like documentation shall be developed by a qualified expert that meets the Secretary of the Interior's Professional Qualification Standards in History or Architectural History. One copy shall be provided to the County and at least one additional copy provided to a local archival repository or historical society for public consumption, including the Seaver Center for Western History at the Natural History Museum.</p>	<p>Significant and unavoidable impact.</p>

Table ES.8-1. Impact and Mitigation Summary Table		
Environmental Impacts	Mitigation Measures	Residual Impacts
<p>CEQA Guidelines § 15064.5 resulting in a significant and unavoidable impact. According to CEQA Guidelines § 15126.4(b)(2), documentation in the form of photographs and historic narrative will not mitigate the effects of demolition to a point where no significant effect would occur. However, CEQA generally requires all feasible mitigation be undertaken even if it does not mitigate below a level of significance. As such, Mitigation Measures HIS-1 and HIS-2 will be implemented to be proportionate with the level of significance of the resource prior to its demolition.</p> <p><i>DPB-002: Foundation of Old Devil's Punchbowl Nature Center</i></p> <p>DPB-002 consists of the foundation of former Devil's Punchbowl Nature Center, which was destroyed in the 2020 Bobcat Fire. This resource was reviewed and found ineligible for inclusion in the NRHP, CRHR, or LA County Chapter 22.124 Historic Preservation criteria. Impacts would be less than significant.</p> <p><i>DPB-003: Large Water Tank</i></p> <p>DPB-003, a large water tank in the survey area's southwestern corner, was also reviewed and found ineligible for inclusion in the NRHP, CRHR, or under LA County Chapter 22.124 Historic Preservation criteria. No impact would occur.</p>	<p>HIS-2 Interpretive Panels: Prior to the demolition of DPB-001, develop interpretive panels that document and narrate key historical aspects of DPB-001. The interpretive panels shall include aerial imagery showing the spatial arrangement of DPB-001 at the park, as well as relevant historical and modern images and historical narrative. The placement locations of the interpretive panels shall be determined by the County, but it is recommended that they be placed near the new Nature Center for public education.</p>	

THIS PAGE INTENTIONALLY LEFT BLANK

1.0 INTRODUCTION

1.1 Background

The County of Los Angeles Department of Parks and Recreation (DPR; County) proposes the Devil's Punchbowl Nature Center Replacement Planning Project (Proposed Project or Project). The Project entails planning for the replacement of the former Nature Center with a new building while also making improvements to the surrounding support site elements including trailheads, 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 Devil's Punchbowl.

The 1,310-acre Devil's Punchbowl Natural Area, located at 28000 Devil's Punchbowl Road, Pearblossom, California 90553, is a destination for hikers, naturalists, and schools. It is a unique geological location where visitors can walk, hike, or take a horseback ride on a 7.5-mile trail. Visitors can see up-tilted rock formations created by layers of sedimentary rocks and explore the landscape of Joshua trees, California junipers, and pinyon pine woodland while observing the variety of wildlife.

The construction of the former Nature Center and existing Ranger's Residence date back to the 1950s. However, both structures were subsequently remodeled in the 1980s to function as park facilities to serve as critical educational resources to teach visitors about the sensitive habitat, local flora and fauna, and how to be safe in the harsh extremes of the desert. The former Nature Center, an approximately 1,000-square-foot wooden structure, originally served as a garage for the historic residence of Helen McGregor and her two sons, which now functions as the Devil's Punchbowl Ranger Station and storage. On September 6, 2020 heavy winds pushed the Bobcat Fire over the San Gabriel Mountains into the community of Juniper Hills. The Bobcat Fire destroyed over 30,000 acres of land and affected many parts of the Devil's Punchbowl Natural Area, including the loss of the former Nature Center.

On September 13, 2020 pursuant to Government Code Sections 8558(b) and 8630 and Los Angeles County Code Section 2.68.110, the Chair of the Board of Supervisors proclaimed a local emergency due to the Bobcat Fire. Due to the extent of fire damage and restoration efforts, the Devil's Punchbowl Natural Area was closed until April 1, 2022. A representative figure demonstrating the extent of structural damage after the 2020 Bobcat Fire is included on Figure 1-1. In July 2021, the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) Wildfire Prevention grant program awarded a grant in the amount of \$540,000 to the County. The grant is for the County to complete a planning package to facilitate the development of a new nature center at the Devil's Punchbowl Natural Area.

1.2 Purpose and Use of the EIR

This Environmental Impact Report (EIR) was prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resource Code §§ 21000-21177) and the Guidelines for the Implementation of CEQA (California Administrative Code §§ 15000 et seq.).

THIS PAGE INTENTIONALLY LEFT BLANK



Figure 1-1 (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.

THIS PAGE INTENTIONALLY LEFT BLANK

CEQA requires that the potential environmental impacts of a project be identified and that mitigation measures be recommended that may reduce significant impacts. CEQA requires the Lead Agency, in this case the County DPR, to consider the information contained in the EIR prior to taking any discretionary action. This EIR may also be used by public agencies that must take discretionary actions related to the Proposed Project.

This EIR is intended to provide information to the County, other public agencies, and the general public regarding the potential significant direct, indirect, and cumulative environmental impacts associated with the Proposed Project. The EIR process also requires investigation and development of feasible mitigation measures to reduce significant environmental effects of the Proposed Project to levels below significance. CEQA requires a Lead Agency neither approve nor implement a project unless significant environmental impacts have been reduced (CEQA Guidelines §15091), or if a Lead Agency approves the project even though significant environmental impacts identified in the EIR cannot be fully mitigated, the Lead Agency must state in writing the reasons for its action by adopting Findings and a Statement of Overriding Considerations.

This EIR may also be used by other public agencies to issue approvals and permits related to the Proposed Project. A list of the anticipated agency approvals required to implement the Proposed Project is provided in Table 1-1. The types of actions that these agencies, as well as other agencies not included on this list, may take in connection with this EIR include, but may not be limited to the following:

- Approve, adopt, or amend applicable plans, policies, or programs
- Make findings of consistency
- Approve and issue permits
- Approve agreements
- Provide authorization and approval of funding
- Provide service

Table 1-1. Anticipated Agency Approvals and Reviews	
Agency	Permit or Approval
County of Los Angeles Board of Supervisors	Certification of the EIR
United States Forest Service	Special Use Permit
Los Angeles County Department of Public Works	Plan review approval for utilities
Los Angeles County Fire Department	EIR Review
Los Angeles County Sheriff's Department	EIR Review

Table 1-1. Anticipated Agency Approvals and Reviews

Agency	Permit or Approval
California Department of Fish and Wildlife (CDFW)	<ul style="list-style-type: none"> ■ EIR Review ■ Migratory Bird Treaty Act compliance ■ California Endangered Species Act compliance
Regional Water Quality Control Board (RWQCB), Los Angeles Region	Stormwater Construction General Permit (including the development and implementation of a Stormwater Pollution Prevention Plan)
South Coast Air Quality Management District (SCAQMD)	Permit to Construct and Operate

1.2.1 Availability of the EIR and Public Review Process

In accordance with the CEQA Guidelines (Section 15082), the County, as Lead Agency, prepared an Initial Study and Notice of Preparation (NOP) for an EIR on the Proposed Project. A copy of the Initial Study and NOP are provided in Appendix A. The Initial Study and NOP were distributed for review and comment to the State Clearinghouse and interested parties for a 30-day comment period (August 16, 2023 to September 14, 2023). A public notice was also published in the Antelope Valley Press newspaper on August 16, 2023. Letters received from agencies and the general public during the scoping period are provided in Appendix A. During the scoping period, a scoping meeting was held on September 9, 2023 at the Devil's Punchbowl Natural Area in Pearblossom, CA. Comments received at that meeting are also provided in Appendix A.

Under CEQA, the analysis of an EIR may be focused on issues determined in the Initial Study to be potentially significant, whereas issues found to have no impact or a less than significant impact do not require further evaluation (CEQA Guidelines Section 15063(c)(3)). The Initial Study and the comments received during the scoping period determined that the Proposed Project could have significant effects to biological resources and cultural resources (Appendix A). The Initial Study concluded that the proposed 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. In addition, the California Department of Fish and Wildlife (CDFW) provided a comment letter asking that biological resources be further evaluated. Effects to these environmental resources have been evaluated in this EIR.

The Initial Study and comments received during the scoping period determined that the effects on other resources from the Proposed Project including aesthetics, agriculture/forest resources, air quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services,

recreation, transportation, tribal cultural resources, and wildfire would not be potentially significant and did not warrant further review in this EIR.

This Draft EIR is being distributed for comment to the same public agencies and interested groups and individuals as the Initial Study and NOP, in addition to any others that have requested to be on the project mailing list. The Draft EIR is also available for public review electronically on DPR's website: <https://parks.lacounty.gov/environmental-documents/> and available for review at the following physical locations:

Littlerock Library
35119 80th Street E
Littlerock, California 93543

Devil's Punchbowl Natural Area
28000 Devil's Punchbowl Road
Pearblossom, California 93553

**County of Los Angeles
Department of Parks and Recreation**

1000 South Fremont Avenue
Unit #40 A-9 West, 3rd Floor
Alhambra, California 91083

(Please call (626) 588-5317 to make an appointment)

A period of 45 days has been established for public review of the Draft EIR for the Proposed Project, starting January 22, 2024 through March 6, 2024. Agencies, organizations, and individuals are invited to comment on the information presented in the Draft EIR during this period. Specifically, comments are requested on the scope and adequacy of the environmental analysis presented in this Draft EIR and not on the prior Initial Study. All comments on the Draft EIR should be sent to the following contact:

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

Following the 45-day public review period, DPR will prepare responses to all comments and will compile these comments and responses in to the Final EIR. The County of Los Angeles Board of Supervisors will consider the information in the Draft and Final EIR during project review and when deciding on the Proposed Project. The Final EIR will need to be certified as complete by the Board of Supervisors prior to making a decision on the Proposed Project.

1.3 Organization of the Draft EIR

The Draft EIR is organized as follows:

Section 1.0 of the EIR provides an introduction to the Proposed Project, the purpose of the EIR, a description of the organization of the EIR, the intended uses of the EIR, and a description of the public review process.

Section 2.0 provides a description of the Proposed Project.

Section 3.0 provides the environmental analysis of the Proposed Project. This includes the description of the regulatory and environmental setting, the analysis of environmental impacts, and a discussion of mitigation measures to reduce or eliminate any significant environmental impacts.

Section 4.0 discusses the alternatives and potential environmental impacts of implementing alternatives to the Proposed Project.

Section 5.0 addresses long-term effects of the Proposed Project, including growth-inducing impacts and significant irreversible and/or unavoidable impacts.

Section 6.0 provides a list of EIR preparers and persons consulted.

Section 7.0 includes the references used to prepare the EIR.

Section 8.0 includes a list of acronyms and abbreviations.

The Notice of Preparation (NOP), Initial Study, and responses received during the scoping period are presented in Appendix A. Technical reports for biological and cultural resources are also provided in the appendices (Appendices B and C, respectively). Appendix D includes the draft Mitigation Monitoring and Reporting Program (MMRP) which includes mitigation measures from this EIR and the IS/NOP.

1.4 Documents Incorporated by Reference

An EIR may incorporate portions or all of any publicly available document by reference (CEQA Guidelines Section 15150). This Draft EIR, where applicable, incorporates by reference the Devil's Punchbowl Nature Center Replacement Planning Project Initial Study (County of Los Angeles 2023; Appendix A). The existing conditions and impact analysis that apply to this EIR are therefore referenced rather than repeated. In addition, this Draft EIR includes new analysis from two new technical reports:

- *Biological Technical Report for the Devil's Punchbowl Nature Center Replacement Planning Project* (November 2023) (Appendix B)
- *Archeology and Built Environment Resources Inventory and Evaluation Report Devil's Punchbowl Nature Center Replacement Project* (December 2023) (Appendix C)

The following documents are available at the website link below and at the Los Angeles County Department of Parks and Recreation, 1000 S. Fremont Avenue, Unit #40 A-9 West, 3rd Floor, Alhambra, California 91083, and are hereby incorporated by reference into this EIR:

- *Devil's Punchbowl Nature Center Replacement Planning Project Initial Study (August 2023)*
- *Devil's Punchbowl Nature Center Replacement Planning Project Notice of Preparation (August 2023)*

Documents are available at: <https://parks.lacounty.gov/environmental-documents/>.

2.0 PROJECT DESCRIPTION

2.1 Project Location and Setting

The Proposed Project is located within the boundaries of the Devil's Punchbowl Natural Area, which is managed by the County DPR. The Devil's Punchbowl 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 2-1, Project Vicinity). 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, and a seasonal stream flowing through the natural area's Punchbowl feature (Los Angeles County 2015a). The proposed Nature Center and project improvements would be contained within AIN 3061-013-903 and -300.

The Project Site is located adjacent to the unincorporated Juniper Hills Community and is surrounded on three sides by the Angeles National Forest (Figure 2-2, Project Location). The Project Site's surrounding land uses include Open Space – National Forest (OS-NF) to the north, east, and south of the subject parcel. The area west of the subject parcels 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 2015a).

The Antelope Valley Area Plan denotes the Project Site's land use as Open Space – Parks and Recreation (OS-PR; AIN 3061-013-903) and OS-NF (AIN 3061-013-300). OS-PR includes open space recreational uses, such as regional and local parks, trails, athletic fields, community gardens, and golf courses (Los Angeles County 2015a). OS-NF also provides for recreational land uses; however, this area is managed by the U.S. Forest Service.

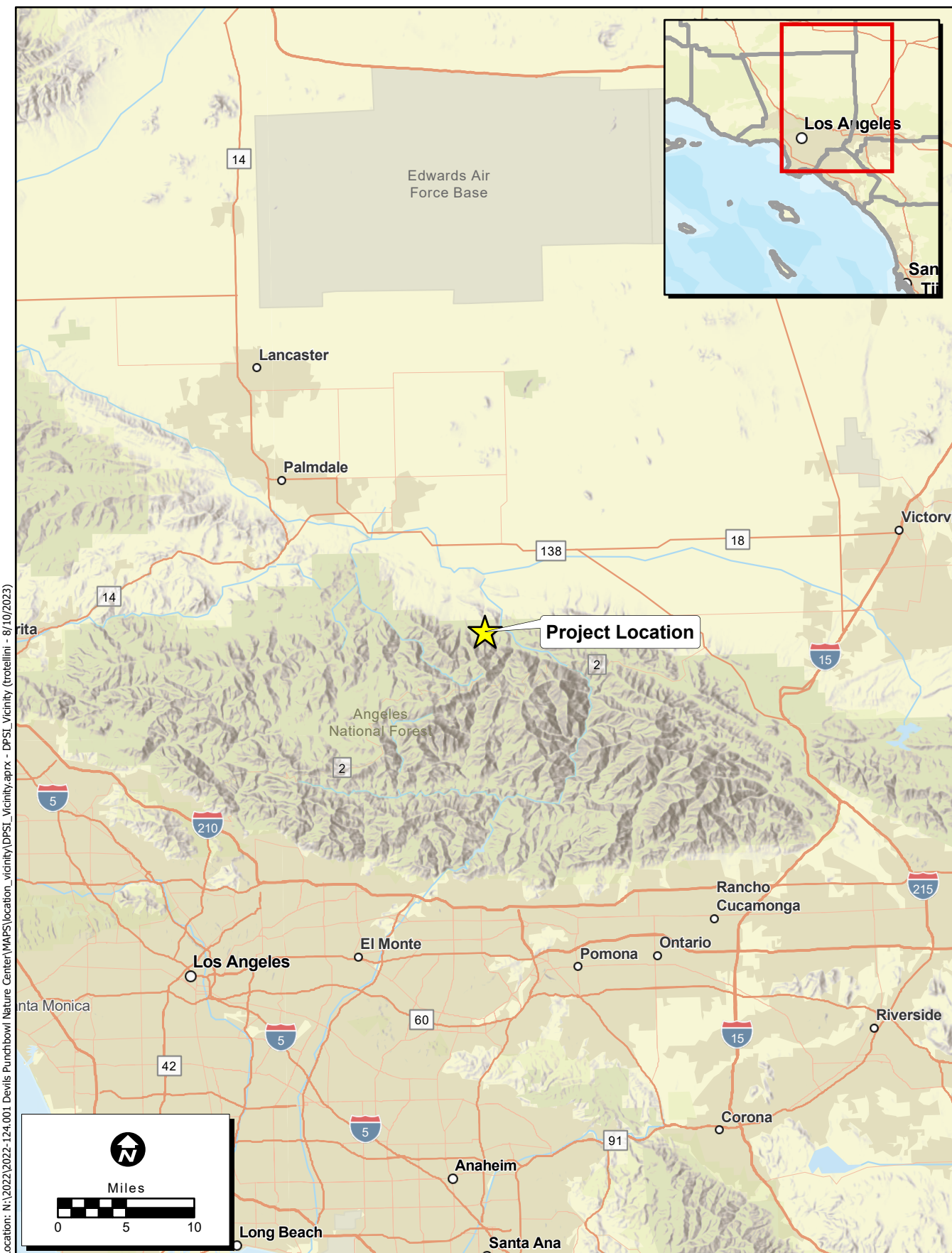
2.2 Project Objectives and Design Goals

The proposed concept builds on the theme of site transformation, rebirth, and a new way to experience the landscape of Devils Punchbowl. This 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 trailheads, ADA access to buildings and trails, picnic areas, and shade structures (Figure 2-3, Site Plan; Figure 2-4, Project Components).

2.2.1 Objectives

- **Objective 1 – Site Resilience and Restoration.** Replace the former Nature Center with a new facility that incorporates design and preventative measures that increase fire-resilience and prevention and restore the vegetation destroyed by the Bobcat Fire.
- **Objective 2 – Interpretive/Outdoor Education.** The proposed Nature Center and site improvements will meet the needs of staff and visitors, especially school children visiting for field trips.

THIS PAGE INTENTIONALLY LEFT BLANK



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

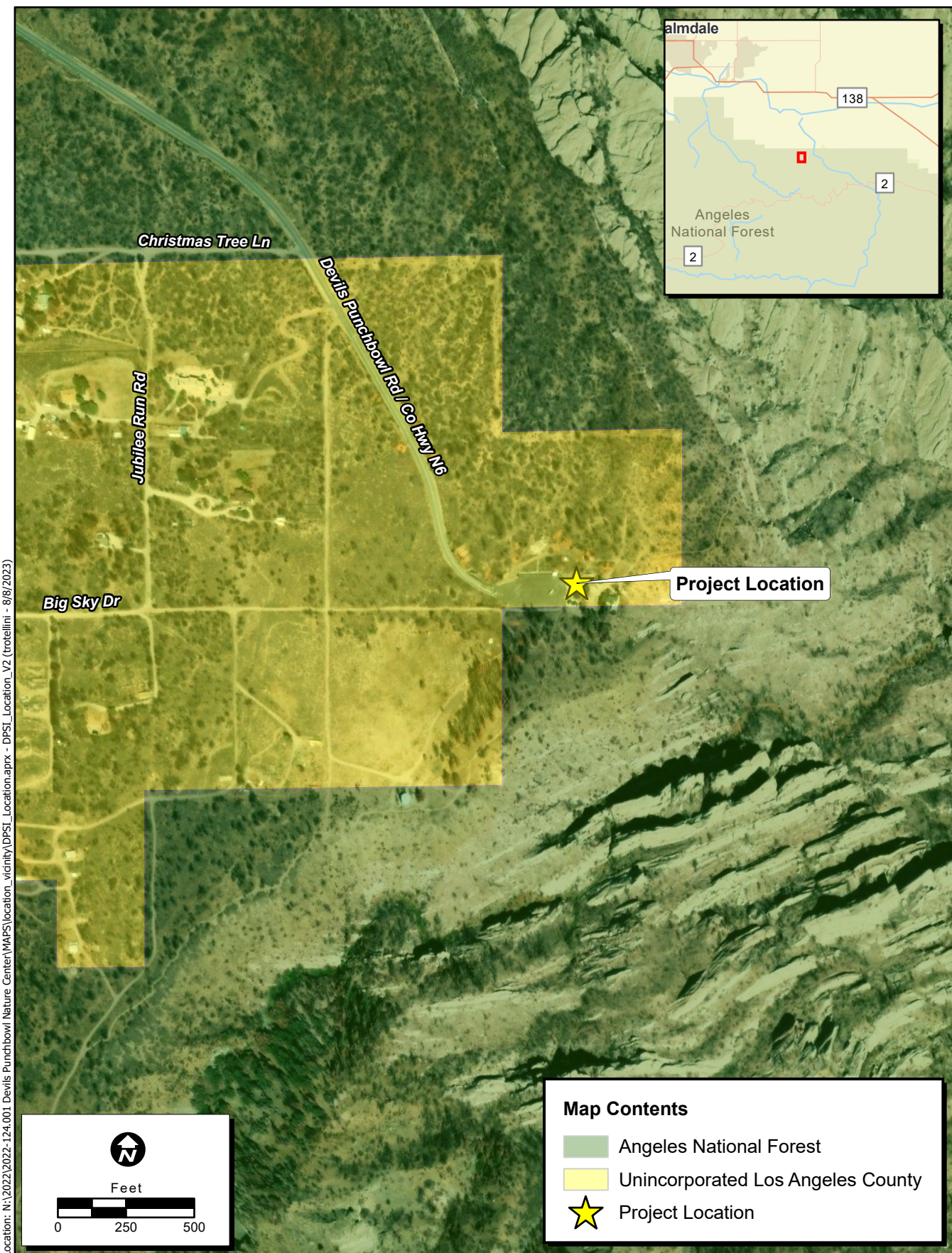
Map Date: 8/10/2023

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 2-1. Project Vicinity

THIS PAGE INTENTIONALLY LEFT BLANK



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

Map Date: 8/7/2023

©FNT Style="Basic" Service Layer Credits: County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, Maxar

Figure 2-2. Project Location

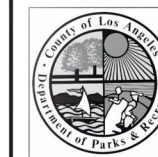
2022-124.001 Devil's Punchbowl Nature Center

THIS PAGE INTENTIONALLY LEFT BLANK



**DEVILS PUNCHBOWL
NATURE CENTER
REPLACEMENT
PLANNING PROJECT**
28000 DEVIL'S PUNCHBOWL ROAD
VALYERMO, CA 93563

COUNTY OF LOS ANGELES
PARKS & RECREATION
DEPARTMENT



CONSULTANT TEAM



**WITHERS &
SANDGREN**
WITHERS & SANDGREN, LTD.
LANDSCAPE ARCHITECTURE &
PLANNING
20948 Tulsa Street
Chatsworth, CA 91311
(818) 291-0200
Lacey Withers, Principal
lacey@withersandsandgren.com

**SPARANO + MOONEY
ARCHITECTURE**
642 Moulton Ave, Studio W4
Los Angeles, CA 90031
(323) 221-6600
(323) 221-7600
Ludwing Juarez, Project Architect
ludwing@sparanomoonney.com

**KIMLEY-HORN
& ASSOCIATES, INC.**
CIVIL ENGINEERING
600 S Figueroa St #2050
Los Angeles, CA 90017
(213) 261-4040
Michael Choi, P.E., LEED AP
michael.choi@kimley-horn.com

Map Date: 08/21/2023
Credits: Los Angeles County Dep. Parks and Recreation



Figure 2-3. Site Plan

2022-124.001 Devil's Punchbowl Nature Center

THIS PAGE INTENTIONALLY LEFT BLANK

THIS PAGE INTENTIONALLY LEFT BLANK

- **Objective 3 – Natural Design.** The proposed Nature Center will complement the natural beauty of the Devil's Punchbowl Natural Area.

2.2.2 Design Goals

- Protect existing significant vegetation onsite
- Provide greater accessibility to site and proposed Nature Center
- Sustainable building and site design
- Increase fire-resilience and prevention
- Separate vehicles and pedestrians
- Provide a rich experience from parking lot to rim of Punchbowl

2.3 Project Description

2.3.1 Demolition of Existing Structures (Ranger's Residence)

The Proposed Project includes plans to demolish an existing historic age structure, the Ranger's Residence, to accommodate the new structures and improvements. The Rangers Residence is located within the proposed Nature Center footprint and currently functions as an office for park staff and partially as storage space.

2.3.2 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, green roof, and gift shop. 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. The Nature Center would also include natural ventilation, natural lighting provided via skylights, and shade structures on the viewing platform. An accessible circular path to the south would provide access to visitors from the parking lot to the viewing platform overlooking the punchbowl rim and allow visitors to explore the desert landscape restored along the edges of the path and adjacent to the new building. The inset design allows 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 in accordance with county, state, and federal building codes.

2.3.3 Fire Mist System

The proposed Nature Center would be equipped with a fire mist system for fire suppression. The fire suppression system would connect to the existing 100,000-gallon water tank approximately 150-feet south of the Natural Area's parking lot.

Conventional fire sprinkler systems put out or suppress the growth of fires by drenching them and the surrounding area with water, removing heat and potential fuel sources. Comparatively, Water-Mist systems work by cooling the room temperature and displacing oxygen with steam. Both systems use water but in different ways. The key difference being the size of the water droplets used for fire suppression, with mist systems dispersing smaller droplets for fire suppression. This allows a Water-Mist system to spray a greater quantity of tiny droplets over a larger surface area that can reduce the interior temperature during a fire.

2.3.4 Utilities

The Proposed Project would include the following utility connections and improvements:

2.3.4.1 Domestic Water

A new domestic water building connection from the existing 100,000-gallon aboveground storage tank (AST), with a 2-inch water line with 2-inch backflow device. This domestic water line would also include a 2-inch water pump, rated for 40 gallons per minute (gpm) at 40 pounds per square inch (psi). The Nature Center's domestic water connection would fork off from the Fire Water Line to interior plumbing.

2.3.4.2 Fire Water

A new fire water line connection from the existing 100,000-gallon AST, with a 10-inch water pump rated at 280-gmp at 60-psi. A new fire hydrant and fire department connection would be installed at the proposed asphalt driveway. The proposed asphalt driveway would have gated access and provide site access for maintenance and fire-fighting vehicles. A new 50-gallon skid pump with solenoid-driven metering pump would be installed south of the parking lot before the primary water line forks into domestic and fire-specific water pipes.

2.3.4.3 Sanitary Sewer / Wastewater

Currently, DPR is considering two alternatives for wastewater collection / sanitary sewers. The preferred concept would include the installation of internal Foam-Flush toilets, with no septic tank or sanitary sewer connections. The second option includes the removal and replacement of the existing septic tank.

2.3.4.4 Stormwater / Runoff

The Project would include rain-water collection and capture for use. The Proposed Project would feed all captured runoff into one of four catch basins along the perimeter of the replacement Nature Center building that would terminate at an 8-foot by 29-foot subterranean cistern for stormwater collection.

2.3.4.5 Overhead Utilities – Electric

Electrical services would be provided to the Proposed Project via the existing overhead power lines with a new connection to the south of the Nature Center. This electric power connection will be coordinated with an Electrical Engineer from Southern California Edison to determine a suitable transformer and any necessary electrical equipment.

2.3.5 Parking Lot Improvements

The Proposed Project includes the construction of a solar canopy over the existing parking lot. However, no additional visitor parking will be included as part of the Proposed Project. Additionally, the Proposed Project would include parking lot resurfacing and restriping in addition to the relocation of two ADA parking spaces that would meet at-grade with the proposed Nature Center's entrance and overlook.

A new County standard monument sign featuring the new Devil's Punchbowl logo would be constructed in compliance with County standards at the parking lot entrance on County Sign Route N6 (Figure 2-3 Site Plan). The monument sign would be constructed with a stone veneer base and pier with laminated sign in a metal frame.

Photo-voltaic panels over parking spaces would provide power to the new Nature Center and to shade vehicles and asphalt reducing heat gain. ADA accessible parking and appropriate signage would be relocated closer to the new Nature Center entrance. The porous asphalt portion of the existing parking lot would be cleaned and vacuumed. The existing parking lot would be slurry-sealed and re-striped. A 6-inch concrete curb would be constructed along the southern edge of the parking lot to control soil erosion and design the edge between planting areas south of the parking lot.

Parking lot improvements would also include the construction of a new, cinder block walled, split-face trash enclosure for solid waste and recyclable dumpsters. The trash enclosure would be located at the parking lot exit and built with a metal gate and roof.

2.3.6 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 Proposed Project's landscape design would incorporate native plant species that would blend into the surrounding landscape. As the species establish themselves over time, the Project's landscape screening would imbed the Nature Center's architecture into the Project Site and surrounding Natural Area. The Los Angeles County Code specifies that the Director of the County 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.

The Nature Center's Landscape Plan includes a green roof planted with native grasses; these areas are indicated to be planted in plugs 8-inch on center. Additionally, the Nature Center concept incorporates larger trees and native vegetation that survived the 2020 Bobcat Fire. Following the Bobcat Fire, DPR Staff collected native seeds from in and around the Natural Area and banked them for the restoration of the Natural Area. These seeds will be used for replanting and seeding in the areas immediately adjacent to the new and reconstructed hiking trails. The Nature Center would also include re-planted, landscaped areas in and around the Nature Center building, new accessible paths of travel, picnic area, and parking lot.

2.3.7 Circulation Improvements and Site Access

The Project would construct a new accessible path of travel from the relocated ADA parking spaces to the roof overlook and integrated building ramp. Walkway access would be provided from lower site levels to the Punchbowl edge, picnic area, hiking trails, restored landscapes, and amphitheater.

Circulation improvements include 900-feet of new stabilized, decomposed granite pathways with metal edging constructed to the north of the proposed Nature Center. Walkways would be a minimum of 5-foot wide, and provide ADA access east of the telescope pad, north of the parking lot, and around the new Nature Center. These proposed walkways are not full trails; however, they would intersect with the Devil's Punchbowl Loop trailhead (Figure 2-3, Site Plan). The County would also construct a new accessible exposed aggregate (top-cast) concrete ramp from the parking lot to the edge of the punchbowl. A laser-cut cantilever metal gate would be installed at the new roof entry to control site access from the parking lot. Additionally, the Project would add and reconstruct 2,250-feet of hiking trails following National Forest standards or California State trail design standards. New and reconstructed trails would be built to be a minimum of 3-feet wide. Trails would be re-graded and compacted to direct runoff towards adjacent swales.

A new asphalt driveway, fire vehicle-rated gravel drive, and maintenance parking would be built at southeast corner parking lot, near the existing pit toilets. The new driveway and gravel drive would provide maintenance and fire access to the Project Site. Maintenance parking would be gated to control vehicular access onsite. The 675-foot fire vehicle-rated gravel drive and maintenance parking would be a minimum of 8 feet wide, with 6 inches of crushed rock aggregate. The parking lot's existing stone veneer wall would be extended to include the maintenance vehicle parking area along the edge of the Nature Center's circular ramp walkway. Stone used would match the existing stone of the parking lot wall.

2.3.8 Support Facilities / Park Amenities

The Project would include the construction of supporting facilities and park amenities, including new trailheads, walkways, ADA compliant site access to buildings and trails, interpretive signage, shade structures, and picnic areas. Please refer to Figure 2-3, Site Plan.

As part of the Proposed Project the picnic area would be re-graded, as needed, to provide a level surface for picnic tables. The 16 existing concrete picnic tables would then be relocated throughout the picnic area with some tables grouped in pairs.

Corrugated metal shade structures would be provided above picnic tables, at trailheads, and on top of the proposed Nature Center's viewing platform. Three matching picnic shade structures would be installed in the picnic area. Two of these shade structures would be installed over single tables, and one larger shade structure would be installed over a pair of tables.

Three new metal trailhead shade structures would be provided at trailheads. The trailhead shade structures would include a trail map of the area, points of interest, rules, regulations, and safety measures. These informational signs would be installed underneath the metal shade structures and provide shaded

bench and boulder seating for group gatherings. Additionally, four new interpretive signs would be installed in metal frames with shade visors to protect laminated graphics and provide shade for visitors.

The Proposed Project would replace the Amphitheater/Telescope Pad's bleachers with 12 new wooden benches. Two companion spaces would be provided in the front row, adjacent to shortened benches. Additionally, the Project would construct a new concrete ramp for ADA access to the amphitheater's raised stage platform along its back edge.

The Conceptual Site Plan includes a new, 377-foot, metal fence. The new fence would be built along the edge of the punchbowl formation, with two coin-operated 10 x 40 power binoculars along the new fence line.

2.4 Construction

Construction of the Proposed Project is anticipated to take approximately 18 months. The County will determine future funding sources for construction.

THIS PAGE INTENTIONALLY LEFT BLANK

3.0 ENVIRONMENTAL IMPACT ANALYSIS

This is the main chapter of the Draft EIR and will include separate sections for each environmental topic.

3.1 Biological Resources and 3.2 Cultural Resources provide a detailed discussion of the environmental issues found to be potentially significant in the Initial Study (Appendix A), and those environmental concerns received as comment letters during the Project's scoping period (Appendix A). These sections also include a detailed discussion of the environmental setting, impacts associated with the Proposed Project, and mitigation measures designed to reduce a significant impact to a less than significant level (as required) for Biological Resources and Cultural Resources.

Determinations regarding levels of significance will be developed for each issue area analyzed in the Draft EIR. These determinations will be based upon existing technical studies and reports related to the Project. Local/regional plans and ordinances were reviewed, as well as consultation with representatives from responsible agencies, to conduct the environmental analysis. Furthermore, direct, indirect, and cumulative effects of the project will be discussed.

To assist the reader in comparing information about the various environmental issues, each section presents information under the following headings:

Environmental Setting

- The existing environment within and in the vicinity of the Devil's Punchbowl Natural Area is described.

Regulatory Setting

- Relevant federal, state, and local regulations pertaining to each issue area.

Thresholds of Significance

- Relevant thresholds of significance as identified by CEQA and the County DPR.

Environmental Impact Analysis

- The nature and extent of project impacts relative to the issue areas listed above are analyzed. These analyses address direct, or primary effects of the proposed project, as well as indirect, or secondary effects. Where applicable, impacts are identified as either short-term or long-term.

Mitigation Measures

- Mitigation measures to reduce or eliminate project impacts are provided, as applicable.

Residual Impacts / Level of Significance After Mitigation

- A discussion of the significance of each impact after mitigation is provided.

Cumulative Impacts

- A discussion of the cumulative impacts for each resource area.

3.1 Biological Resources

3.1.1 Introduction

This section describes biological resources in the vicinity of the Project Area and evaluates the impacts that implementation of the Proposed Project may have on these resources. Biological resources examined in this section include sensitive plant and animal species, wildlife habitats, migration corridors, vegetation communities, and aquatic resources under the jurisdiction of state and federal resource protection agencies. A general biological resources assessment was completed for the Proposed Project including a vegetation mapping effort immediately following the Bobcat fire as part of the Bobcat Fire Recovery Plan (ECORP 2021), as well as two biological reconnaissance surveys, one in May of 2022 and one in September of 2023. A focused special-status plant survey was conducted during the May 2022 reconnaissance survey. The general biological resources assessment results were summarized in a Biological Technical Report included as Appendix B (ECORP 2023b).

For the purposes of this biological resources analysis, the Project Area includes the existing parking lots and structures onsite, a grading area where new facilities would be developed, areas of new accessible paths of travel, new and re-construction hiking trails, signs, and re-planting areas. The footprint of the Project Area extends beyond areas where direct impacts would occur.

3.1.2 Environmental Setting

The Proposed Project is located in the Devil's Punchbowl Natural Area within the San Gabriel Mountains Wilderness Area in the northeastern portion of the County. 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. 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's Punchbowl feature (Los Angeles County 2015a).

Immediately following the Bobcat Fire, the Project Area was mapped by ECORP botanists to determine what communities were present prior to the fire. Based on this mapping effort it was determined that the Project Site primarily consisted of single-leaf pinyon – juniper woodland vegetation communities (ECORP 2021). There are remnants of previously existing structures present on the Project Site, including the nature center. There are also other facilities onsite including a parking lot, Ranger's Residence, and restroom facilities.

3.1.2.1 Vegetation Communities

During the biological reconnaissance survey conducted in May 2022, the Project Area consisted of burned and resprouting vegetation, and the plant species dominating those areas were typical of chaparral communities. Between the 2022 and 2023 surveys, the Project Area characteristics were largely consistent; however, during the updated survey in September 2023 further vegetation recovery and growth within the chaparral communities were observed. Native vegetation communities present in the Project Area

include recovering chaparral communities and yerba santa scrub (*Eriodictyon* spp. Shrubland Alliance) with additional areas falling under the land cover types landscaped, developed, or disturbed.

Chaparral

Areas mapped as chaparral did not fit into any of the alliances listed in *A Manual of California Vegetation, Second Edition* (Sawyer et al. 2009). Due to the high level of disturbance caused by the Bobcat Fire, which burned from September 2020 to December 2020, these areas are still recovering and are currently dominated by species typically observed in chaparral communities. Many of these areas were previously mapped as single-leaf pinyon – juniper woodland (Global [G] Rank 5, State [S] Rank 4); however, single-leaf pinyon (*Pinus monophylla*) and California juniper (*Juniperus californica*) do not readily resprout following fire and the plant species currently dominating these areas are typical of chaparral communities. Common plant species observed within the areas mapped as chaparral included flannel bush (*Fremontodendron californicum*), chaparral bush mallow (*Malacothamnus fasciculatus*), Tucker's oak (*Quercus john-tuckeri*), fragrant sumac (*Rhus aromatica*), and thickleaf yerba santa (*Eriodictyon crassifolium*). A high level of herbaceous cover was also present including Douglas' milk-vetch (*Astragalus douglasii*), field primrose (*Camissonia campestris*), sanddune wallflower (*Erysimum capitatum*), Fremont's phacelia (*Phacelia fremontii*), and splendid woodland gilia (*Saltugilia splendens*). In addition, several individuals of single-leaf pinyon pine and bigberry manzanita (*Arctostaphylos glauca*) had been planted in these areas in an effort to restore them to their pre-fire condition. Approximately 6.6 acres of chaparral were mapped within the Project Area; however only 0.5 acre occurs within proposed impact areas of the Project design (grading areas, new trails, etc.).

Yerba Santa Scrub (*Eriodictyon* spp. Shrubland Alliance)

Due to the high level of disturbance caused by the Bobcat Fire, these areas are still recovering. Some of these areas were previously dominated by Coulter's pine (*Pinus coulteri*); however, this species does not readily resprout following fire. Common plant species observed within the areas mapped as yerba santa scrub (G4, S4) included thickleaf yerba santa, common phacelia (*Phacelia distans*), Fremont's phacelia, fragrant sumac, and desert stipa (*Stipa speciosa*). Approximately 1.0 acre of yerba santa scrub was mapped within the Project Area; however less than 0.1 acre occurs within proposed impact areas of the Project design (grading areas, new trails, etc.).

Landscaped

Landscaped is not a vegetation classification, but rather a land cover type. Landscaped areas were present within the Project Area near and adjacent to the existing structures onsite. Landscaped areas were made up of various native species including bigberry manzanita, mountain mahogany (*Cercocarpus betuloides*), single-leaf pinyon, black oak (*Quercus kelloggii*), and western Joshua tree. Approximately 0.4 acre of landscaped areas were mapped within the Project Area, of which 0.2 acre falls into proposed impact areas of the Project design (grading areas, new trails, etc.).

Disturbed

Disturbed is not a vegetation classification, but rather a land cover type. Areas mapped as disturbed were found to have been heavily influenced by human activities and were mostly devoid of native vegetation

but lacked any development. Soils in these areas typically showed some level of compaction and vegetation was mostly limited to nonnative herbaceous species including foxtail brome (*Bromus madritensis*), cheatgrass (*Bromus tectorum*), and false barley (*Hordeum murinum*). Approximately 0.2 acre of disturbed areas were mapped within the Project Area, of which less than 0.1 acre falls into proposed impact areas of the Project design (grading areas, new trails, etc.).

Developed

Developed is not a vegetation classification, but rather a land cover type. Areas mapped as developed were found to have infrastructure present and were devoid of vegetation due to lack of growing substrate. Developed areas within the Project Area include the parking lot, Devil's Punchbowl Road, and the existing structures onsite. Approximately 1.3 acres of developed areas were mapped within the Project Area, of which approximately 0.4 acre falls into proposed impact areas of the Project design (grading areas, new trails, etc.).

3.1.2.2 Plants

Plant species observed in the Project Area were those typically observed in chaparral communities for the times of the year in which the surveys were conducted. Dominant species included flannel bush, thickleaf yerba santa, chaparral bush mallow, Tucker's oak, and fragrant sumac. Nonnative species observed in the Project Area included lamb's quarters (*Chenopodium album*), false barley, foxtail brome, and cheatgrass. A full list of plant species observed on and immediately adjacent to the Project Area is included as an appendix to the Biological Technical Report (Appendix B).

Special-Status Plants

There were 50 special-status plant species that appeared in the literature review and database searches for the Project Area (CDFW 2023a; California Native Plant Society [CNPS] 2023). A list was generated from the results of the literature review and the Project was evaluated for suitable habitat that could support any of the special-status plant species on the list. Of the 50 special-status plants identified, three were present in the Project Area and three have a low potential to occur due to the presence of limited suitable habitat in the post-fire transitional habitat. The remaining 44 species identified in the literature review are presumed absent from the Project Area. Species were presumed to be absent if suitable habitat, including soils and elevation factors, were not present in the Project Area and/or if that species was not observed during the focused special-status plant survey, if conducted at the appropriate bloom period for that species.

Western Joshua Tree

Western Joshua trees were identified within the Project Area during the 2021 habitat mapping effort (ECORP 2020), the 2022 and 2023 reconnaissance surveys, and 2022 rare plant survey. Based on the existing conditions and vegetation communities in the Project Area, it is likely that these western Joshua trees are previously planted individuals and are not naturally occurring in the Project Area. Western Joshua trees are currently a candidate for state listing under the California Endangered Species Act (ESA), which affords the species the same protection as a listed species until an official decision regarding the

listing of the species has been confirmed. The western Joshua tree is a member of the agave family that blooms from March to June. It is found in desert flats and slopes.

Southern California Black Walnut

Southern California black walnut (*Juglans californica*) was identified along the southwestern edge of the Project Area during the 2022 and 2023 reconnaissance surveys and 2022 rare plant survey. Southern California black walnut is a CNPS 4.2 species, indicating that it is uncommon and moderately threatened in California (CNPS 2023). Southern California black walnut is a perennial deciduous tree that blooms from March to August. It is found in chaparral, cismontane woodland, coastal scrub, and riparian woodland habitats.

Short-Joint Beavertail

Short-joint beavertail (*Opuntia basalaris* var. *brachyclada*) was identified within the Project Area during the 2020 habitat mapping effort (ECORP 2021), the 2022 and 2023 reconnaissance surveys, and 2022 rare plant survey. Short-joint beavertail is a CNPS 1B.2 species, indicating that it is rare and moderately threatened in California (CNPS 2023). Short-joint beavertail is a perennial stem species that blooms from April to June (occasionally into August). It is found in chaparral, Joshua tree woodland, Mojavean desert scrub, and pinyon and juniper woodland habitats. Suitable habitat for this species is present within the chaparral habitat in the Project Area.

San Gabriel Mountains Monardella

San Gabriel Mountains monardella (*Monardella australis* ssp. *gabrielensis*) is a shrub that is a CNPS 1B.2 species. San Gabriel Mountains monardella was determined to have a low potential to occur in the Project Area because limited or marginal habitat for that species occurs within the transitional chaparral scrub habitat on the Project Area, and only historic records have been observed within 5 miles of the Project Area. The limited size and existing disturbances of the recovering chaparral habitat on the Project Area likely preclude this species from occurring within the Project Area.

Mojave Monardella

Mojave monardella (*Monardella exilis*) is an annual herb CNPS 4.2 species that was determined to have a low potential to occur in the Project Area because limited or marginal habitat for that species occurs within the transitional chaparral scrub habitat in the Project Area, but no records have been observed within 5 miles of the area. The limited size and existing disturbances of the recovering chaparral habitat in the Project Area likely preclude this species from occurring within the Project Area.

Crowned Muilla

Crowned muilla (*Muilla coronata*) is a perennial herb CNPS 4.2 species that was determined to have a low potential to occur on the Project Area because limited or marginal habitat for that species occurs within the transitional chaparral scrub habitat on the Project Area, but no records have been observed within 5 miles of the area. The limited size and existing disturbances of the recovering chaparral habitat in the Project Area likely preclude this species from occurring within the Project Area.

3.1.2.3 Wildlife

Wildlife species observed and detected in the Project Area were characteristic of chaparral and scrub habitat. Nine invertebrate species were identified during the 2023 survey including northern white skipper (*Heliopetes ericetorum*), variegated meadowhawk (*Sympetrum corruptum*), funereal duskywing (*Erynnis funeralis*), acmon blue (*Plebejus acmon*), and valley carpenter bee (*Xylocopa sonorina*). Thirty bird species were also detected on and in the vicinity of the Project Area across the two surveys including yellow warbler (*Setophaga petechia*), white-throated swift (*Aeronautes saxatalis*), California scrub-jay (*Aphelocoma californica*), California quail (*Callipepla californica*), California towhee (*Melospiza crissalis*), Costa's hummingbird (*Calypte costae*), common raven (*Corvus corax*), house finch (*Haemorhous mexicanus*), and mourning dove (*Zenaidura macroura*). Four reptile species were observed onsite: Blainville's horned lizard (*Phrynosoma blainvillii*), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), Great Basin fence lizard (*Sceloporus occidentalis longipes*), and western side-blotched lizard (*Uta stansburiana elegans*). One mammal species, California ground squirrel (*Otospermophilus beecheyi*), was also observed. A complete list of wildlife species observed on or immediately adjacent to the Project Area is included as an appendix to the Biological Technical Report (Appendix B).

Special-Status Wildlife

There were 26 special-status wildlife species that appeared in the literature review and database searches for the Project Area (CDFW 2023a). A list was generated from the results of the literature review and the Project was evaluated for suitable habitat that could support any of the special-status wildlife species on the list. Of the 26 special-status wildlife species identified in the literature review, one was observed during the 2023 reconnaissance survey, one was found to have a high potential to occur, one was found to have a moderate potential to occur, four were found to have a low potential to occur, and the remaining 19 species are presumed absent from the Project Area. In addition, two special-status wildlife species that were not identified in the literature review were observed during the 2022 reconnaissance survey: San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*) and yellow warbler (*Setophaga petechia*), both CDFW Species of Special Concern (SSC). The remaining sensitive wildlife species with a potential to occur in the area were not observed during the reconnaissance surveys.

Blainville's Horned Lizard

Two individual Blainville's horned lizards were observed within the Project Area during the September 2023 reconnaissance survey. Blainville's horned lizard is a CDFW SSC reptile. This lizard occurs in open scrub and riparian habitats and other open areas with ample ant prey base (Zeiner et al. 1990).

San Diegan Tiger Whiptail

One individual San Diegan tiger whiptail was observed within the Project Area during the May 2022 reconnaissance survey. San Diegan tiger whiptail is a CDFW SSC reptile. This lizard occurs in woodland, riparian, and arid open areas with sparse vegetation (Stebbins 2003).

Yellow Warbler

One individual yellow warbler was observed foraging within and adjacent to the Project Area and singing during the May 2022 biological reconnaissance survey. Yellow warbler is a California SSC bird species. In southern California, yellow warbler breeds in lowland and foothill riparian woodlands dominated by cottonwoods, alders, or willows and other small trees and shrubs typical of low, open-canopy riparian woodland (Small 1994).

Crotch Bumble Bee

Crotch bumble bee (*Bombus crotchii*) is a CDFW candidate species for listing as endangered. This species is associated with open grassland and scrub habitats and occurs primarily in California, including the Mediterranean region, Pacific Coast, Western Desert, Great Valley, and adjacent foothills through most of southwestern California (Williams et al. 2014). Crotch bumble bees primarily nest underground, and may occupy cavities in a variety of substrates including: thatched grasses, abandoned rodent burrows or bird nests, brush piles, rock piles, and fallen logs (Sladen 1912; Free and Colin Gasking Butler 1959; Alford 1975; Fussell and Corbet 1992; Lye et al. 2012; Williams et al. 2014) and have also been found nesting in manmade structures such as walls, rubble, or abandoned furniture (Fussell and Corbet 1992; Williams et al. 2014). Bumble bee nests are annual and conclude with deaths of the queen, workers, and drones at the end of the season with only the mated gyne (future queen) surviving the winter (overwintering) to emerge the following spring to start the next year's colony. Similar to other bumble bee species, Crotch bumble bee is a generalist forager and reportedly visits a variety of flowering plants including *Asclepias*, *Chaenactis*, *Lupinus*, *Medicago*, *Phacelia*, and *Salvia*. The recovering chaparral and scrub habitat in the Project Area provides suitable nectaring, foraging, and overwintering habitat for this species. Additionally, several recent California Natural Diversity Database (CNDDDB) records of this species have been documented within 5 miles of the Project Area.

California Glossy Snake

California glossy snake (*Arizona elegans occidentalis*) is a CDFW SSC reptile species. This species typically occurs in rocky washes, chaparral, scrub, and grassland habitats often with loose or sandy soils. Limited suitable habitat is present in the Project Area in the recovering chaparral areas. One recent occurrence was documented in the CNDDDB within 5 miles of the Project Area. As a result, this species was determined to have a moderate potential to occur in the Project Area.

Loggerhead Shrike

Loggerhead shrike (*Lanius ludovicianus*) is a CDFW SSC bird species. Loggerhead shrike occurs in open country, with scattered shrubs and trees or other perches for hunting. Habitat for loggerhead shrike includes agricultural fields, deserts, grasslands, savanna, and chaparral. Loggerhead shrike was determined to have a low potential to occur as the recovering chaparral habitat provides marginally suitable nesting habitat and no CNDDDB records of this species have been documented within 5 miles of the Project Area.

Western Mastiff Bat

Western mastiff bat (*Eumops perotis californicus*) is a CDFW SSC mammal species. Western mastiff bats occur in many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, annual and perennial grasslands, palm oases, chaparral, desert scrub, and urban habitats. Western mastiff bats roost primarily in cliff faces and rock crevices but have occasionally been found to roost in tall buildings. While suitable roosting habitat is present in the nearby cliff habitat close to the Project Area, the Project Area itself does not provide suitable roosting habitat. This species, if present, may forage above the Project Area but would not be expected to roost within the Project Area. As a result, this species was determined to have a low potential to occur in the Project Area.

Desert Bighorn Sheep

Desert bighorn sheep (*Ovis canadensis nelsoni*) is a CDFW Fully Protected mammal species. Desert bighorn sheep are found in open, steep, and rocky terrain in arid desert mountains. While the steep mountainous terrain surrounding the Project Area provides suitable habitat for this species, the Project Area itself would not be suitable to support desert bighorn sheep. While this species may pass through the Project Area the potential for the species to occur within the Project Area was determined to be low.

American Badger

American badger (*Taxidea taxus*) is a CDFW SSC mammal species. American badger occurs in open habitats with friable soil such as grasslands, brushlands with sparse ground cover, open chaparral, and sometimes riparian zones. Suitable habitat for American badger is present in the recovering chaparral areas in the Project Area and in the surrounding area. There are no CNDDDB records of American badger within 5 miles of the Project Area but there is potential for this species to pass through. As a result, this species was determined to have a low potential to occur.

Raptors and Migratory Birds

Suitable nesting habitat for numerous species of migratory birds and raptors protected under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code is present in the Project Area in some of the resprouting shrubs and trees, unburned trees, surrounding buildings and landscaping, and other anthropogenic structures. Therefore, nesting birds could use the Project Area during the nesting bird season (typically February 1 through August 31).

3.1.2.4 Wildlife Movement Corridors, Linkages, and Significant Ecological Areas

The concept of habitat corridors addresses the linkage between large blocks of habitat that allow the safe movement of mammals and other wildlife species from one habitat area to another. The definition of a corridor varies, but corridors may include such areas as greenbelts, refuge systems, underpasses, and biogeographic land bridges. In general, a corridor is described as a linear habitat, embedded in a dissimilar matrix, which connects two or more large blocks of habitat. Wildlife movement corridors are critical for the survivorship of ecological systems for several reasons. Corridors can connect water, food, and cover sources, spatially linking these three resources with wildlife in different areas. In addition, wildlife movement between habitat areas provides for the potential of genetic exchange between wildlife

species populations, thereby maintaining genetic variability and adaptability to maximize the success of wildlife responses to changing environmental conditions. This is especially critical for small populations subject to loss of variability from genetic drift and effects of inbreeding. The nature of corridor usage and wildlife movement patterns vary greatly among species.

The Project Area was assessed for its ability to function as a wildlife corridor. The Project Area is located within the Devil's Punchbowl Natural Area, managed by the County DPR. The Project Area is part of the San Gabriel Wilderness Area that provides habitat for several wildlife species and functions as a wildlife corridor allowing free movement between connected open space areas, Angeles National Forest to the northwest, and the San Bernardino National Forest to the east. The Project Area is not located within a Significant Ecological Area (SEA). The Project Area is located adjacent to, but not within, the Antelope Valley SEA.

3.1.3 Regulatory Setting

Regulations protecting biological resources are summarized below.

3.1.3.1 Federal

The Federal Endangered Species Act

The federal ESA protects plants and animals that are listed as endangered or threatened by the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service. Section 9 of the ESA prohibits the taking of endangered wildlife, where taking is defined as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct" (50 Code of Federal Regulations [CFR] 17.3). For plants, this statute governs removing, possessing, maliciously damaging, or destroying any endangered plant on federal land and removing, cutting, digging up, damaging, or destroying any endangered plant on non-federal land in knowing violation of state law (16 U.S. Code 1538). Under Section 7 of the ESA, federal agencies are required to consult with the USFWS if their actions, including permit approvals or funding, could adversely affect a listed (or proposed) species (including plants) or its critical habitat. Through consultation and the issuance of a biological opinion, the USFWS may issue an incidental take statement allowing take of the species that is incidental to an otherwise authorized activity provided the activity will not jeopardize the continued existence of the species. Section 10 of the ESA provides for issuance of incidental take permits (ITPs) where no other federal actions are necessary provided a Habitat Conservation Plan (HCP) is developed.

Migratory Bird Treaty Act

The MBTA implements international treaties between the U.S. and other nations devised to protect migratory birds, any of their parts, eggs, and nests from activities including hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. As authorized by the MBTA, the USFWS issues permits to qualified applicants for the following types of activities: falconry, raptor propagation, scientific collecting, special purposes (rehabilitation, education, migratory game bird propagation, and salvage), take of depredating birds, taxidermy, and waterfowl sale and disposal. The regulations governing migratory bird permits can be found in 50 CFR Part 13 General Permit Procedures

and 50 CFR Part 21 Migratory Bird Permits. The State of California has incorporated the protection of birds of prey in Sections 3800, 3513, and 3503.5 of the California Fish and Game Code.

Federal Clean Water Act

Under Section 404 of the federal Clean Water Act (CWA), potential Waters of the U.S., including wetlands, may be regulated by the U.S. Army Corps of Engineers (USACE). The limit of USACE jurisdiction for non-tidal watercourses (without adjacent wetlands) is defined in 33 CFR 328.4(c)(1) as the "ordinary high-water mark" (OHWM).

The OHWM is defined as the *line on the shore established by the fluctuations of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas*. The upstream limits of other waters are defined as the point where the OHWM is no longer perceptible.

Jurisdictional Waters of the U.S. are delineated in accordance with the "Revised Definition of 'Waters of the United States'" rule, published in the *Federal Register* in 2022, which became final on January 18, 2023. This rule, set forth by the U.S. Environmental Protection Agency (USEPA) and USACE, was consistent with the pre-2015 regulatory definition as all waters that are currently used, or were used in the past, or may be susceptible to use in interstate commerce, including all waters subject to the ebb and flow of the tide. This definition also includes all interstate waters, including interstate wetlands, interstate lakes, rivers, streams (including all intermittent and ephemeral streams), mudflats, sand flats, sloughs, and prairie potholes, wet meadows, playa lakes, or natural ponds where the use, degradation, or destruction of which could affect interstate or foreign commerce. Under this rule, Waters of the U.S. (WOTUS) do not include prior converted cropland.

The definition of WOTUS in accordance with this rule (40 CFR 230.3[s]), is summarized below.

1. All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
2. All interstate waters including interstate wetlands;
3. All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters: (i) Which are or could be used by interstate or foreign travelers for recreational or other purposes; or (ii) From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or (iii) Which are used or could be used for industrial purpose by industries in interstate commerce;
4. All impoundments of waters otherwise defined as waters of the U.S. under the definition;
5. Tributaries of waters identified in paragraphs (s)(1)-(4) of this section;

6. The territorial sea; and
7. Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (s)(1) through (6) of this section; waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR 423.11(m) which also meet the criteria of this definition) are not WOTUS.

On May 25, 2023, the U.S. Supreme Court adopted a narrower definition of WOTUS in the case *Sackett v. Environmental Protection Agency*. Under the majority opinion, WOTUS refers to "geographical features that are described in ordinary parlance as 'streams, oceans, rivers, and lakes' and to adjacent wetlands that are 'indistinguishable' from those bodies of water due to a continuous surface connection." On August 29, 2023, the agencies issued a final rule to amend the final "Revised Definition of 'Waters of the United States'" rule to conform the definition of "waters of the United States" to the U.S. Supreme Court's May 25, 2023, decision in the case of *Sackett v. Environmental Protection Agency*.

Parts of the January 2023 Rule are invalid under the Supreme Court's interpretation of the CWA in the *Sackett* decision. Therefore, the agencies have amended key aspects of the regulatory text to conform to the Court's decision. Key changes under the amendment include:

- Definition of "adjacent" is now "having a continuous surface connection;"
- Only tributaries that are relatively permanent, standing or continuously flowing bodies of water (or tributaries with a continuous surface connection to those) are considered jurisdictional;
- Interstate wetlands are no longer jurisdictional just by virtue of being interstate; and
- Significant nexus test is eliminated.

Where areas jurisdictional to the USACE are present, and will be impacted by a project, the project proponent must usually apply for permitting with the agency, which generally consists of submittal of a Pre-Construction Notification under Section 404 of the CWA.

3.1.3.2 State

California Endangered Species Act

The California ESA generally parallels the main provisions of the ESA but, unlike its federal counterpart, the California ESA applies the take prohibitions to species proposed for listing (called "candidates" by the state). Section 2080 of the California Fish and Game Code prohibits the taking, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or in the regulations. Take is defined in Section 86 of the California Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." The California ESA allows for take incidental to otherwise lawful development projects. State lead agencies are required to consult with CDFW to ensure that any action they undertake is not likely to jeopardize the continued existence of any endangered or threatened species or result in destruction or adverse modification of essential habitat.

Fully Protected Species

The State of California first began to designate species as *fully protected* prior to the creation of the federal and California ESAs. Lists of fully protected species were initially developed to provide protection to those animals that were rare or faced possible extinction, and included fish, amphibians, reptiles, birds, and mammals. Most fully protected species have since been listed as threatened or endangered under the federal and/or California ESA. Previously, the regulations that implement the Fully Protected Species Statute (California Fish and Game Code § 4700) provide that fully protected species may not be taken or possessed at any time. However, as of July 10, 2023, Senate Bill (SB) 147 was signed into law, authorizing CDFW to issue take permits under the California ESA for fully protected species for qualifying projects through 2033. As stated in section 2081.15 of SB147, qualifying projects include:

- A maintenance, repair, or improvement project to the State Water Project, including existing infrastructure, undertaken by the Department of Water Resources;
- A maintenance, repair, or improvement project to critical regional or local water agency infrastructure;
- A transportation project, including any associated habitat connectivity and wildlife crossing project, undertaken by a state, regional, or local agency, that does not increase highway or street capacity for automobile or truck travel;
- A wind project and any appurtenant infrastructure improvement, and any associated electric transmission project carrying electric power from a facility that is located in the state to a point of junction with any California based balancing authority; and
- A solar photovoltaic project and any appurtenant infrastructure improvement, and any associated electric transmission project carrying electric power from a facility that is located in the state to a point of junction with any California-based balancing authority.

Western Joshua Tree Conservation Act

The Western Joshua Tree Conservation Act (WJTCA) (SB122) was passed by California state legislation on June 27, 2023 and went into effect on July 10, 2023. The WJTCA was developed to conserve western Joshua trees (*Yucca brevifolia*) while streamlining the permitting process for projects involved with renewable energy and housing development. The WJTCA works alongside the California ESA while the western Joshua tree remains a Candidate for listing. While the western Joshua tree is under review for official listing, projects involving the take of western Joshua tree may obtain authorization as provided by the California ESA (i.e., Incidental Take Permit) or elect to pay fees for impacted trees as outlined in the WJTCA, according to impacted tree height. Projects involving the take of western Joshua tree must demonstrate compliance with conditions outlined in the WJTCA. At a minimum, this includes submittal to the CDFW, for approval, a census of all western Joshua trees on a project site.

California Fish and Game Code

Native Plant Protection Act

The Native Plant Protection Act (NPPA) of 1977 (California Fish and Game Code §§ 1900-1913) was created with the intent to “preserve, protect and enhance rare and endangered plants in this State.” The NPPA is administered by CDFW. The California Fish and Game Commission has the authority to designate native plants as “endangered” or “rare” and to protect endangered and rare plants from take. The California ESA of 1984 (California Fish and Game Code § 2050-2116) provided further protection for rare and endangered plant species, but the NPPA remains part of the California Fish and Game Code.

Streambed Alteration Agreement

Pursuant to Section 1602 of the California Fish and Game Code, a Streambed Alteration Agreement (SAA) application must be submitted for “any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake” (CDFW 2021). In Title 14 of the California Code of Regulations (CCR), Section 1.72, the CDFW defines a *stream* (including creeks and rivers) as “a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation.”

In Chapter 9, Section 2785 of the Fish and Game Code, *riparian habitat* is defined as “lands which contain habitat which grows close to, and which depends upon, soil moisture from a nearby freshwater source.”

The CDFW’s jurisdiction includes drainages with a definable bed, bank, or channel and areas associated with a drainage channel that support intermittent, perennial, or subsurface flows; supports fish or other aquatic life; or supports riparian or hydrophytic vegetation. It also includes areas that have a hydrologic source.

The CDFW will determine if the proposed actions will result in diversion, obstruction, or change of the natural flow, bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. If warranted, the CDFW will issue an SAA that includes measures to protect affected fish and wildlife resources; this SAA is the final proposal agreed upon by the CDFW and the applicant.

Migratory Birds

The CDFW enforces the protection of nongame native birds in §§ 3503, 3503.5, and 3800 of the California Fish and Game Code. Section 3513 of the California Fish and Game Code prohibits the possession or take of birds listed under the MBTA. These sections mandate the protection of California nongame native birds’ nests and also make it unlawful to take these birds. All raptor species are protected from “take” pursuant to California Fish and Game Code § 3503.5 and are also protected at the federal level by the MBTA of 1918.

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Control Act requires “any person discharging waste, or proposing to discharge waste, within any region that could affect the waters of the State to file a report of discharge”

with the Regional Water Quality Control Board (RWQCB) through State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (Procedures) (CCR, title 23, § 3855) (State Water Resources Control Board [SWRCB] 2021). *Waters of the State* is defined as any surface water or groundwater, including saline waters, within the boundaries of the state (California Water Code § 13050[e]). Pollution is defined as an alteration of the quality of the waters of the state by waste to a degree that unreasonably affects its beneficial uses (California Water Code § 13050) and includes filling in Waters of the State. Note that CCR, title 23, § 3855 applies only to individual water quality certifications, but the new Procedures extend the application of § 3855 to individual waste discharge requirements for discharges of dredged or fill material to Waters of the State and waivers thereof.

A permit for impacts to Waters of the State of California would likely be required under the CWA and/or Porter-Cologne Water Quality Control Act. To determine whether a project should be regulated pursuant to the Porter-Cologne Water Quality Control Act, the RWQCB considers whether project activities could impact the quality of Waters of the State.

On September 27, 2023 the USEPA published its final 2023 Clean Water Act Section 401 Quarter Quality Certification Improvement Rule (88 Fed. Reg. 66558.) The final 2023 Rule revises and replaces the 2020 Rule's regulatory requirements for water quality certification that were adopted by the prior federal administration. The updates realign the scope of the Section 401 certification process with established practices, while also restoring the roles of states, territories, and authorized Tribes as certifying agencies.

3.1.3.3 Local

Los Angeles County Oak Tree Ordinance

Any tree of the oak tree genus (*Quercus*) which is 8 inches or more in diameter at breast height (dbh), or in the case of oaks with multiple trunks, a combined diameter of 12 inches or more of the two largest trunks; on any lot or parcel of land within the unincorporated area of Los Angeles County; or any tree that has been provided as a replacement tree, pursuant to Section 22.56.2180, on any lot or parcel of land within the unincorporated area of Los Angeles County is protected under this ordinance. Dbh is defined as diameter of the tree when measured 4.5 feet above mean natural grade. Pursuant to the Los Angeles County Oak Tree Ordinance, a person shall not cut, destroy, remove, relocate, inflict damage, or encroach into the protected zone of any oak tree, without first obtaining a permit. The protected zone is defined as 5 feet from the dripline or 15 feet from the trunk, whichever is greater.

Los Angeles County Oak Woodlands Conservation Management Plan (OWCMP)

The Oak Tree Ordinance (Section 22.56.2050 of the County Code) is intended to protect individual trees while the OWCMP (Los Angeles County Oak Woodlands Habitat Conservation Strategic Alliance 2011) is intended to protect oak woodlands. A project may be subject to both the ordinance and plan requirements. This plan defines oak woodlands as an oak stand, including its understory, which consists of two or more oak trees of at least 5 inches dbh, with greater than 10 percent canopy cover or that may have historically supported greater than 10 percent canopy cover as early as January 1, 2005. The main goal of OWCMP is to preserve and restore oak woodlands so they are conserved in perpetuity with no net loss of existing woodlands.

Los Angeles County Significant Ecological Areas (SEA)

SEAs are officially designated areas within the County identified for their biological value. These areas warrant special management because they contain biotic resources that are considered to be rare or unique; are critical to the maintenance of wildlife; represent relatively undisturbed areas of County habitat types; or serve as linkages (Los Angeles County 2015b).

The SEA Program is the name given to the regulations, policies, and maps by the County used to guide development within SEAs. As stated in the Chapter 9 of the County's General Plan:

"The objective of the SEA Program is to conserve genetic and physical diversity by designating biological resource areas that are capable of sustaining themselves into the future. However, SEAs are not wilderness preserves. Much of the land in SEAs is privately held, used for public recreation, or abuts developed areas. The SEA Program must therefore balance the overall objective of resource preservation against other critical public needs. The General Plan goals and policies are intended to ensure that privately held lands within the SEAs retain the right of reasonable use, while avoiding activities and developments that are incompatible with the long-term survival of the SEAs."

The County relies on the SEA Program to balance preservation of the County's natural biodiversity with the development rights of property owners located within the SEAs. There are three main components of the SEA Program; 1) SEA Boundary Map, 2) General Plan Policies, and 3) SEA Ordinance.

The General Plan establishes the location of the SEAs, the description of SEA (habitat types, unique resources, etc.), and program policies. The SEA Ordinance, a component of the County Zoning Code (Title 22), is the implementation tool of the SEA Program which establishes the permitting standards and process for development within SEAs.

3.1.4 Thresholds of Significance

According to Appendix G of the CEQA Guidelines and County of Los Angeles thresholds, a project would have significant effect on the biological environment if it would:

- 1) 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 CDFW or USFWS;
- 2) 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;
- 3) 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;
- 4) 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;
- 5) 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.);
- 6) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (County Code, Title 22, Ch. 22.174), the SEAs (County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (County General Plan, Figure 9.3); or
 - 7) Conflict with the provisions of an adopted HCP, Natural Community Conservation Plan (NCCP), or other approved state, regional, or local habitat conservation plan.

3.1.5 Impacts Analysis

3.1.5.1 Special Status Plant and Wildlife Species

Impact BIO-1 Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

Less Than Significant Impact with Mitigation.

Special-Status Plant Species

The Project Area is generally classified as in a state of recovery; the recovering land cover is predominately chaparral habitat.

Three special-status plant species (western Joshua tree, short-joint beavertail, and southern California black walnut) were observed on or adjacent to the Project Area during the biological reconnaissance surveys, rare plant survey, and previous habitat mapping efforts immediately following the Bobcat Fire. Although located within the Project Area, the current project design would avoid impacts to the individual short-joint beavertails, western Joshua trees, and southern California black walnuts during Project construction. However, if during final Project design, construction cannot avoid these individuals, then direct impacts in the form of ground disturbance, vegetation removal, habitat loss, and mortality and indirect impacts from dust may occur to these species. Impacts to western Joshua trees would be less than significant with the implementation of Mitigation Measure BIO-1. Impacts to short-joint beavertail would be less than significant with the implementation of Mitigation Measure BIO-2. The mitigation measures for the Proposed Project are discussed in Section 3.1.6. Only three southern California black walnut tree individuals were noted straddling the western Project boundary, and not immediately adjacent to improvement or development areas. No direct impacts to California black walnut trees are likely and would be considered less than significant with implementation of Mitigation Measure BIO-3.

Fifty special-status plant species were identified in the literature review and database searches, including those described above. Based on the results of previously conducted rare plant surveys, the condition of the Project Area, and the available habitat three species (San Gabriel Mountains monardella, Mojave monardella, and crowned muilla) were determined to have a low potential to occur. No special-status

plant species have a high potential to occur in the Project Area. However, as the chaparral habitat continues to recover onsite, there is the potential for additional rare plant species to be present. The project design would avoid impacts to native vegetation within the Project Area to the extent feasible. However, should these species occur within the Project Area, direct impacts in the form of ground disturbance, vegetation removal, habitat loss, and mortality and indirect impacts from dust may occur to these species. Impacts to special-status plant species would be less than significant with the implementation of Mitigation Measure BIO-3.

Special-Status Wildlife Species

The only native vegetation communities in the Project Area are the recovering chaparral communities. The majority of the Project footprint is within existing disturbed, developed, or landscaped areas that were present in the Project Area prior to the Bobcat Fire. The slow 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 Area. The Proposed 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 – activities that would involve ground disturbance within the previously disturbed Project footprint and adjacent to the recovering chaparral communities.

One California SSC species, Blainville's horned lizard, was observed during the September 2023 biological reconnaissance survey. Additionally, two special-status wildlife species not identified in the literature review, San Diegan tiger whiptail and yellow warbler, were observed during the May 2022 biological reconnaissance survey. The literature review and database searches identified 26 special-status wildlife species that have previously been documented in the vicinity of the Project Area. One species (Crotch bumblebee) was determined to have a high potential to occur in the Project Area, one species (California glossy snake) was determined to have moderate potential to occur in the Project Area, and four species (loggerhead shrike, western mastiff bat, desert bighorn sheep, and American badger) were determined to have low potential to occur in the Project Area. The remaining 19 species were presumed absent from the Project Area.

Crotch bumble bee is a candidate for state listing and therefore afforded all the protections as though it were listed under the California ESA. It was determined that this species has a high potential to occur in the recovering chaparral and scrub habitats surrounding the previously developed areas. As such, direct impacts to Crotch bumble bee through ground disturbance and indirect impacts from habitat loss may occur. If present, direct impacts to this species could occur as a result of the Project in the form of mortality or injury due to ground-disturbing activities in areas that serve as nesting, overwintering, and foraging habitat. Indirect impacts may include loss of habitat and ground vibrations. Because this species is a generalist forager that chooses nesting and overwintering locations on an annual basis, temporary and permanent loss of habitat would not be expected to contribute substantially to the overall decline of this species in the area unless an active nest or overwintering gyne (future queen) were to be impacted. Impacts to Crotch bumble bee would be less than significant with the implementation of Mitigation Measures BIO-4, -5, -7, and -8.

San Diegan tiger whiptail and Blainville's horned lizards were observed in the Project Area in the recovering chaparral communities surrounding the previously developed areas. As such, direct impacts to San Diegan tiger whiptail and Blainville's horned lizard through ground disturbance and indirect impacts from habitat loss may occur. The Proposed Project has the potential to impact the vegetation surrounding the previously developed portions of the Project Area during the construction of and reconstruction of new and existing hiking trails, replanting of areas, and installation of signs. If present, direct impacts to these species could occur as a result of the Proposed Project in the form of mortality or injury due to ground-disturbing activities. Indirect impacts may include loss of habitat, ground vibrations, increased human activity, and noise. Impacts to San Diegan tiger whiptail and Blainville's horned lizard would be less than significant with the implementation of Mitigation Measures BIO-5, -7, and -8.

Yellow warbler was observed during the biological reconnaissance survey. Yellow warbler would not be expected to nest within the Project Area itself due to lack of suitable nesting habitat but may use tree habitat adjacent to the Project Area for nesting. Indirect impacts to yellow warbler may occur from construction noise and vibrations should the species nest within 500 feet of the Project Area. 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 may occur. Impacts to yellow warbler and loggerhead shrike would be less than significant with the implementation of Mitigation Measures BIO-5, -6, -7, and -8.

The Project Area is located within and adjacent to suitable habitat for desert bighorn sheep, American badger, and western mastiff bat, but habitat features within the Project Area itself are not sufficient to sustain populations of these species. As such, these species may be expected to pass through the Project Area but would not be expected to be directly affected by the Project. Indirect impacts may occur if the species are present through ground vibrations, increased human activity, and noise. These impacts would be less than significant with the implementation of Mitigation Measures BIO-5, -7, and -8.

The approximately 6.6 acres of recovering chaparral habitat provides marginally suitable habitat for California glossy snake. As such, direct impacts to this species through ground disturbance and indirect impacts from habitat loss may occur. The Proposed Project has potential to impact the vegetation surrounding the previously developed portions of the Project Area during the construction and reconstruction of new and existing hiking trails, replanting of areas, and installation of signs. If present, direct impacts to this species may occur as a result of the Proposed Project in the form of mortality or injury due to ground-disturbing activities. Indirect impacts may include loss of habitat, ground vibrations, increased human activity, and noise. Impacts to special-status wildlife species would be less than significant with the implementation of Mitigation Measures BIO-5, -7, and -8.

The Project Area also contained suitable nesting habitat for bird species protected under the MBTA. Development of the Project Area will be required to comply with the MBTA and avoid impacts to nesting birds. If construction of the Proposed 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. Impacts to

yellow warbler, loggerhead shrike, and other nesting birds would be less than significant with the implementation of Mitigation Measure BIO-6, -7, and -8.

3.1.5.2 Sensitive Natural Communities

Impact BIO-2 Would the Project 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 Area consists of recovering chaparral vegetation communities with landscaped, disturbed, and developed land cover present. The Project Area does not contain any riparian habitat, oak woodland, 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 2023b). No impact would occur.

3.1.5.3 Federally Protected Wetlands

Impact BIO-3 Would the Project 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 Area (ECORP 2023b). Therefore, no impacts to state or federally protected wetlands and Waters of the U.S. would occur during development of the Project Area.

3.1.5.4 Wildlife Corridors and Nursery Sites

Impact BIO-4 Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact.

The Project Area is located within the Devil's Punchbowl Natural Area, a County DPR-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 2023b). 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 Area. 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 Project Area's ability to function as a wildlife corridor. Impacts would be less than significant.

3.1.5.5 Oak Woodlands

Impact BIO-5 Would the Project convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10 percent 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.

No oak woodlands are present in the Project Area. While individual Tucker's oaks and black oaks were documented spaced throughout the Project Area, these individuals do not constitute oak woodlands as defined by the state. Further, there are no other unique native woodlands (juniper, Joshua, southern California black walnut, etc.) present in the Project Area. As such, the Project would not convert oak woodlands or other unique native woodlands. No impact would occur.

3.1.5.6 Local Policies and Ordinances

Impact BIO-6 Would the Project conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (County Code, Title 12, Ch. 12.36), the County Oak Tree Ordinance (County Code, Title 22, Ch. 22.174), the SEAs (County Code, Title 22, Ch. 102), Specific Plans (County Code, Title 22, Ch. 22.46), Community Standards Districts (County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (County General Plan, Figure 9.3)?

Less Than Significant Impact with Mitigation.

The County Sensitive Environmental Resource Areas are located within the Santa Monica Mountain region, and thus do not fall within the Project Area. According to the County Code of Ordinances section 12.36.020, the Project Area is not located in a designated Wildflower Reserve Area. SEA is a County land use designation for areas that the County determines to be biologically valuable. The Project Area is located adjacent to, but not within, the Antelope Valley SEA.

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 County Municipal Code protects all oak trees with a diameter at breast height of 8 inches or greater, or 12 inches or greater for multiple trunks (combination of two largest trunks). No oak woodlands are present in the Project Area. However, individual oak trees (Tucker's oak and black oak) that may be protected by the County Municipal Code are present along the existing trail edges and in the landscaped areas. The Proposed Project would avoid impacts to native vegetation within the Project Area to the extent feasible. The Project does not involve tree removal and onsite grading would be limited to disturbed areas. Impacts to individual oak trees would be avoided during Project construction. However, should any alterations to the final design result in the encroachment of the tree protection zone of any individual oak trees, potential direct or indirect impacts to individual trees may occur. Impacts to oak trees in the Project Area would be less than significant with the implementation of Mitigation Measure BIO-9.

3.1.5.7 HCPs and NCCPs

Impact BIO-7 Would the Project 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 Area is not located within a HCP or NCCP. Therefore, development of the Project Area would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP (ECORP 2023b). No impact would occur.

3.1.6 Mitigation Measures

BIO-1 Western Joshua Tree Incidental Take Permit: Prior to the start of Project construction, individual western Joshua trees located within the Project Area shall be mapped using submeter Global Positioning System (GPS) units. Impacts to individual western Joshua trees shall be avoided to the greatest extent feasible. If Project-related impacts are unavoidable to the western Joshua trees present within the Project Area, an Incidental Take Permit from CDFW under the WJTCA will be required as long as western Joshua tree remains a candidate or listed species under the California ESA. Projects involving the take of western Joshua tree must demonstrate compliance with conditions outlined in the WJTCA. At a minimum, this includes submittal to the CDFW, for approval, a census of all western Joshua trees on a Project site and payment of fees for impacted trees as outlined in the WJTCA, according to impacted tree height.

BIO-2 Short-Joint Beavertail Protection: Prior to the start of Project construction, individual short-joint beavertails located within the Project Area shall be mapped using submeter GPS units. Impacts to individual short-joint beavertails shall be avoided to the greatest extent feasible. If impacts to short-joint beavertail individuals cannot be avoided during Project design, the following shall be implemented. To avoid impacting the seed bank, the upper 3 inches of soil for areas of soil disturbance that overlap with mapped populations of short joint beavertail shall be scraped, and the soil returned to the same location once work is complete. If direct impacts are unavoidable, transplanting or translocation of short joint beavertail specimens can be accomplished and is recommended during spring and early summer. A successful transplant will include a 6-inch buffer clod with at least a 6-inch depth around the specimen, to ensure the salvage of the main shoot, and transplanting the individual within a nearby location that contains the same soil and habitat affinities as its original location. If transplanting is deemed too difficult based on settings and/or health of the specimen, propagation through a stem/pad cutting can also be accomplished by cutting the pad as an entire segment from the plant, drying the segment, and placing it upright with the cut portion below the ground, within the first two to three inches of soil. Initial irrigation of the transplanted specimen and/or segment is not required but shall be established every other week if nighttime temperatures are above 60 degrees Fahrenheit. Monitoring of the

transplant shall be conducted for at least two years until signs of establishment (i.e., new growth) are apparent.

BIO-3 Preconstruction Rare Plant Surveys: A preconstruction rare plant survey shall be conducted within suitable habitat in the Project Area during the year immediately prior to construction in order to ensure the protection of the root zone of walnut trees and detect any additional special-status species that may reestablish as the burn area recovers. Ideally, the surveys shall be done during the spring (late April/early May) and late summer (July/August) to capture the blooming periods of target plants with potential to occur. The survey shall be conducted by a botanist or qualified biologist in accordance with the USFWS Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants; the CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities; and the CNPS Botanical Survey Guidelines.

If special-status (non-listed) plant species are observed during the rare plant survey, locations of individual plants or populations will be mapped using submeter GPS units and a no-disturbance buffer around locations of individuals or a population shall be established. A biological monitor shall be present during heavy equipment operations (including but not limited to grading activities). As-needed compliance inspections shall be conducted at least monthly throughout construction to ensure no-disturbance buffers are intact and adhered to. In the unlikely event that a listed plant species is detected and cannot be avoided, then agency consultation would be required to develop a mitigation plan or additional avoidance and minimization measures.

BIO-4 Focused Crotch Bumble Bee Surveys: If the Crotch bumble bee is no longer a candidate or listed species under the California ESA at the time ground-disturbing activities, then no additional protection measures are proposed for this species.

If the Crotch bumble bee is legally protected under the California ESA as a candidate or listed species at the time of Project construction, focused surveys shall be conducted in accordance with CDFW's Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023b) the season immediately prior to ground disturbing activities are scheduled to occur. A minimum of three Crotch bumble bee focused surveys shall be conducted at two to four week intervals (ideally monthly) during the colony active period (April through August) when Crotch bumble bees are most likely to be detected. Non-lethal, photo voucher surveys shall be completed by a biologist who holds a Memorandum of Understanding to capture and handle Crotch bumble bee (if nesting and chilling protocol is to be utilized) or by a CDFW-approved biologist experienced in identifying native bumble bee species (if surveys are restricted to visual surveys that will provide high-resolution photo documentation for species verification). The surveyor shall walk through all areas of suitable habitat focusing on areas with floral resources. Surveys shall be completed at a minimum of one person-hour of searching per three acres of suitable habitat during suitable weather conditions (sustained

winds less than 8 miles per hour, mostly sunny to full sun, temperatures between 65 and 90 degrees Fahrenheit) at an appropriate time of day for detection (at least an hour after sunrise and at least two hours before sunset, though ideally between 9:00 a.m. and 1:00 p.m.).

If Crotch bumble bees are detected, CDFW shall be notified by the designated biologist as further coordination may be required to avoid or mitigate certain impacts. At a minimum, two nesting surveys shall be conducted with focus on detecting active nesting colonies within one week and 24 hours immediately prior to ground-disturbing activities that are scheduled to occur during the same flight season (February through October). If an active Crotch bumble bee nest is detected, an appropriate no disturbance buffer zone (including foraging resources and flight corridors essential for supporting the colony) shall be established around the nest to reduce the risk of disturbance or accidental take and the designated biologist shall coordinate with CDFW to determine if an ITP under Section 2081 of the California ESA will be required. Nest avoidance buffers may be removed at the completion of the flight season and/or once the qualified biologist deems the nesting colony is no longer active and CDFW has provided concurrence of that determination. If no nests are found but the species is present, a full-time qualified biological monitor shall be present during vegetation removal or ground disturbing activities that are scheduled to occur during the queen flight period (February through March), colony active period (March through September), and/or gyne flight period (September through October). Because bumble bees move nest sites each year, three preconstruction nesting surveys shall be required during each subsequent year of construction, regardless of the previous year's findings, whenever vegetation removal and ground disturbing activities are scheduled to occur during the flight season (February through October).

BIO-5 Preconstruction Sensitive Wildlife Survey: A preconstruction survey for sensitive wildlife species shall 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 Scientific Collecting Permits allow). 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 shall describe all wildlife species that could occur within the Project Area and proper handling and relocation protocols. The Wildlife Relocation Plan shall include species-specific relocation areas, at least 200 feet outside of the Project Area 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 may employ 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 Area, the Project will be temporarily halted until agency consultation can be completed. Observations of any 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-6 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 Area 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. As-needed nest monitoring shall be conducted at least weekly throughout construction to ensure no-disturbance buffers are intact and adhered to and to update the status of the nest. The no-disturbance buffer shall be removed, and work may continue in that area once the qualified avian biologist determines the nest is no longer active and has removed the flagging or staking.
- BIO-7 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 shall 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-8 Biological Monitoring:** A biologist shall be present to monitor all vegetation trimming and removal 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 trimming or removal activities and their presence shall continue as necessary to maintain protective measures and to monitor for species in harm's way. If protection measures require capturing and relocating wildlife to areas outside the work area, the biological monitor shall possess the appropriate Scientific Collecting Permit to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project-related activities. Any captured species shall be relocated out of harm's way to adjacent appropriate habitat that is outside of Project impact areas. If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area shall stop

immediately, the qualified biologist shall be notified, and dead or injured wildlife documented immediately. A formal report shall be sent to CDFW within 3 calendar days of the incident or finding. The report shall 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.

BIO-9 Protection of Oak Trees: The tree protection zone (diameter of the tree canopy plus 5 feet) of each oak tree within the Project Area shall be avoided to the greatest extent feasible. If oak trees cannot be avoided, an oak tree survey and report shall be prepared by an International Society of Arboriculture Certified Arborist prior to construction. An oak tree permit will be obtained prior to cutting, destroying, removing, relocating, inflicting damage, or encroaching into the protected zone of any oak trees with a dbh of 8 inches or more. All protection and replacement measures shall be consistent with the County Oak Tree Ordinance.

3.1.7 Level of Significance After Mitigation

With implementation of the above mitigation measures, the Proposed Project would result in less than significant impacts to biological resources.

3.1.8 Cumulative Impacts

The cumulative setting for biological resources includes the bioregions within the San Gabriel Mountains Wilderness Area. Development associated with implementation of the Proposed Project would be primarily concentrated on previously developed and disturbed areas within the footprint of the previously existing nature center. The scope of development of the Proposed Project is considerably narrow in the context of the San Gabriel Mountains Wilderness Area region which remains principally undeveloped. A wide range of mitigation measures that must be implemented to reduce impacts to special-status species are described in Section 3.1.6. Those mitigation measures identify the regulatory roles of agencies such as the CDFW in issuing permits and providing guidance regarding species and habitat avoidance. The implementation of the range of mitigation measures required by the Proposed Project would reduce impacts to biological resources to a less than significant level because there would be no net loss of biological habitat. As such, this is considered a less than cumulatively considerable impact, and no additional mitigation measures beyond those identified are required.

3.2 Cultural Resources

3.2.1 Introduction

This section discusses the potential impacts of the Proposed Project on existing cultural resources. This section provides an overview of the environmental setting to describe existing cultural resources; a summary of the applicable federal, state, and local regulations; the potential impacts to cultural resources from the Proposed Project; and identifies mitigation measures to minimize potential impacts. This section's cultural resources analysis is based on the Archaeology and Built Environment Resources Inventory and Evaluation Report prepared for the Proposed Project (ECORP 2023c; Appendix C).

3.2.2 Environmental Setting

The Project Area includes the intersection of Devil's Punchbowl Road and Big Sky Drive, in a relatively level area northwest of Punchbowl Canyon, near the northern end of Devil's Punchbowl Park. Project Area elevations range from 4,520 to 4,800 feet above mean sea level. For regional and local pre-contact history, ethnographical context, and regional history, please refer to Appendix C.

3.2.2.1 Local History

Ethnographic data attributes the land in and around Devil's Punchbowl Natural Area to the Mamaviatam clan. This was a sub-group of the Vanyume, who were a part of the Serrano Native American group (Bean and Smith 1978; Whitley 1996). The Vanyume territory is not definitively determined, however, they were believed to occupy an area near the Mojave River in the western Mojave Desert. While ethnographic information about the Vanyume is sparse, it is believed that they lived very similarly to the Serrano, and they have sometimes been referred to as the Desert Serrano. The name Serrano has also been used to describe all Takic speaking groups, including the Serrano, Vanyume, Kitanemuk, and Tataviam (Bean and Smith 1978). Broad usage of the term Serrano in this EIR is to include the Vanyume, as the only known distinction between these groups is in political affiliation (Bean and Smith 1978).

The Serrano groups settled in this area likely had their first contact with Euro-Americans in the early nineteenth century. While the San Gabriel mission had been established decades earlier, the asistencia built in 1819 near Redlands was the catalyst for the Spanish to begin influencing the nearby Native American groups. By the mid-1830s, Serrano culture was nearly extinct.

One of California's initial gold discoveries occurred in Placerita Canyon in 1842 (State Lands Commission 1982). This portion of the San Gabriel Mountains then became inundated with prospectors, but the mines they established did not yield a great quantity of gold, and mining in the area was entirely abandoned by the 1930s (U.S. Forest Service 2004). In the 1850s, major roads were being constructed in the southern portion of the San Gabriel range. Shortly after, major railroads lines were established through Cajon Pass and Soledad Canyon, increasing industrial access to the area. The first road leading into the forest of this area was established in 1864 by Don Benito Wilson. Wilson's objective was to harvest wood, but the chaparral environment was not fruitful for this endeavor. By the mid-1950s, commercial timbering was abandoned in the region (U.S. Forest Service 2004).

In 1892, public concern over the watershed value of the land in the San Gabriel Mountains led President Harrison to establish the San Gabriel Timberland Reserve. The Reserves were renamed National Forest in 1907 after being transferred from the Department of the Interior to the Department of Agriculture two years prior. The San Gabriel National Forest was later divided and became portions of the Angeles and San Bernardino National Forests (Robinson 1991; U.S. Forest Service n.d.). These events coincided with increased public interest in outdoor recreation. From the 1880s through the 1930s, residents of the foothill communities began to regularly engage in hiking, fishing, and other recreational activities in the mountains. Six major hiking trails were established, and homesteads, ranches, and resorts were established within forest boundaries (U.S. Forest Service n.d.).

In addition to its watershed and recreational values, the San Gabriel Mountains also served as the nucleus of American astronomy in the late nineteenth century. The same year the San Gabriel Timberland Reserve was established, construction was completed on the Mount Wilson Observatory. This would later be the site of the world's largest telescope and research hub of famous astronomer Edwin Hubble. His research at Mount Wilson would become the basis upon which he established the Big Bang theory (Mount Wilson Institute 2022). Additional scientific value has been garnered from Angeles National Forest via the San Dimas Experimental Forest. Established in 1933, this 25 square mile portion of the forest contains two vital watersheds and is used to study the effects of air pollution, wildfires, and habitat use. Today the Angeles National Forest covers 1,026 square miles (700,176 acres), including five national wilderness areas, and encompasses portions of the San Gabriel and Sierra Pelona Mountain ranges (U.S. Forest Service 2004).

3.2.2.2 Property-Specific History

In 1918, Lee A. Watkins, a Littlerock rancher, paid cash for 100 acres of public land in the south half of Section 19 (Township 4 North, Range 9 West), a gently sloping area that overlooked Devil's Punchbowl (Bureau of Land Management [BLM] 2022). Watkins built a rough stone house on the property. Later a man named Ben Miller occupied the house; Miller unsuccessfully attempted to graze cattle and develop an orchard in Section 19 (Gordon 1973).

Around 1950, Bill and Helen Guy of East Whittier acquired 20 acres in Section 19. At a point along the edge of the rim overlooking Devil's Punchbowl, the couple built a concrete brick house and three-car garage as their weekend vacation home. Bill and Helen Guy also graded a rough dirt road to the property and built a cistern in a nearby stream to supply the house with water; otherwise, they left the property "in its natural, pristine condition other than what was needed for fire prevention" (Guy 2023). During the 1950s, a woman named Helen MacGregor intermittently occupied the house with her teenage sons (Gordon 1973). Helen's husband, Donald MacGregor, was a chemical engineer. Donald MacGregor may have had a professional relationship with Bill Guy, but he does not appear to have lived at the house during the 1950s (Ancestry 2023). Members of the MacGregor family might have assisted Bill and Helen Guy with the house's construction (Guy 2023).

Charles William "Bill" Guy, an M.I.T.-trained rocket scientist, was a longtime business executive at Rocketdyne, a Canoga Park subsidiary of North American Aviation. Rocketdyne developed liquid fuel rocket engines that powered all the initial U.S. space missions, beginning with Explorer I (1958) and followed by the Mercury (1958-1963), Gemini (1961-1966), and Apollo (1968-1972) projects, culminating

in the Apollo 11-17 missions that placed astronauts on the moon. Famously, Rocketdyne developed the F-1 engines that powered the Saturn V rockets that delivered Apollo spacecrafts into space. For more than two decades, Guy served as Rocketdyne's second-in-command under company president Sam Hoffman. The company's advertising slogan was "Builders of Power for Outer Space." By 1957, Rocketdyne employed more than 10,000 workers in the San Fernando Valley (Mirror News 1957). Guy is credited with supervising the company's workforce and directing its functional operations (Valley Times 1967).

Born and raised in Cincinnati, Bill Guy attended M.I.T. during the 1930s and began his career as an engineer at Lockheed, where, according to family lore, he was "placed" by government officials to conduct classified rocket propulsion research. During World War II, Guy served in the U.S. Army Air Corps (forerunner of the U.S. Air Force). After the war, he joined Sam Hoffman at North American Aviation's rocket division, which North American spun off as Rocketdyne in 1955. In 1970, Guy briefly succeeded Hoffman as president of Rocketdyne before retiring (Guy 2023).

Although Bill and Helen Guy's primary place of residence remained in the San Fernando Valley, the couple spent numerous weekends at their Devil's Punchbowl house during the 1950s. The couple became fixtures in Antelope Valley social circles. They were among the founders of the Crystalair Country Club in Llano. Bill and Helen also frequently entertained guests from Los Angeles at their weekend house. A newspaper profile observed that the couple "often combine golf with business and entertain guests for golfing weekends at their Antelope Valley cabin" (Valley Times 1961). Their son, Bill Guy Jr., recalls his parents hosting numerous guests who "were clearly involved in Rocketdyne activities as high-ranking civilians or military officers" (Guy 2023).

In 1957, the Los Angeles County Board of Supervisors, noting the "distinctive beauty of the rock formations" at Devil's Punchbowl, began exploring ways to preserve the area as a county park (Valley Times 1957). In December 1959, the Board secured a lease on 1,270 acres under Angeles National Forest management. Months later, they purchased Bill and Helen Guy's 20-acre parcel, including the house and three-car garage, for \$30,000 (according to their son, Bill Jr., the couple used the proceeds to build a new weekend house on lands nearby). The dirt road established by Bill and Helen Guy became the basis for a paved 2-lane road built by Los Angeles County crews in 1960 (Independence Star 1960). In September 1960, Los Angeles County commissioner Warren M. Dorn announced plans to lease Bill and Helen's house for \$45 per month as a rental property; reports described the house as containing a living room, kitchen, bedroom, and three-car garage (Van Nuys News 1960).

In August 1962, the Los Angeles County Board of Supervisors approved a motion to develop Devil's Punchbowl as a county park at a cost of \$71,000. The work involved remodeling the interior of Bill and Helen's house and three-car garage to provide the park with an information center, office, public lounge, and staff facilities. Public restrooms, an entrance road, parking spaces for 50 cars, and "a complete water system" rounded out the plans (Van Nuys News 1962). The park's dedication occurred on December 4, 1963. A week prior to the opening, Southern California naturalist and author Russ Leadabrand toured the facilities and recorded his impressions. "The Charles Guy family," Leadabrand noted, "had a weekend cabin right on the western edge of the Punchbowl for years...That will become the caretaker's cabin when the county takes over December 4" (Pasadena Independent 1963). It continued serving in that capacity for 60 years.

Due to its remote setting, Devil's Punchbowl remained lightly visited during the 1960s. A 1970s housing boom in the Antelope Valley region, however, made the park "a popular local destination for hiking, mountain biking, nature walks, picnics, bird-watching, and photography" (Los Angeles Times 1992). By 1990, the park hosted approximately 70,000 annual visitors, making it an important local recreational resource for the region.

3.2.2.3 Architectural Context: Organic Architecture

The manner in which Bill and Helen Guy's 1950s single-story Ranch-style home relates to its immediate surroundings at Devil's Punchbowl illustrates Organic architectural principles. As such, this architectural context provides a frame of reference for discussing the house's architectural qualities.

Less a style than a guiding principle, Organic architecture takes its cues from the natural world. Its practitioners design buildings that relate to, rather than subvert, local landscapes. Organic architecture traces its origins to the turn-of-the-century Modern movement, which embraced new building materials, designs, and methods of construction. Alan Hess describes Organic architecture as "the interrelation of practical architecture, mystical nature, and progressive technology" (Hess 2006:6-7). The Chicago architect Louis Sullivan (1856-1924) is credited as its pioneer. Echoing the Romanticism of his time, Sullivan looked to nature as "the ultimate source of all beauty" and referenced it in subtle ways (Gelernter 1999: 212-213). In the spandrels and friezes of his high-rise commercial buildings, Sullivan placed terracotta plant forms, Celtic imagery, and other symbols of nature (Gelernter 1999). His protégé, Frank Lloyd Wright (1867-1959), made Organic architecture the basis of his life's work. Wright did more than adorn his buildings with symbols of nature. He related his buildings to the natural world itself. Wright's Prairie-style houses of the early 20th century, built on open prairie lands on the edges of midwestern cities, emphasized long, low horizontal lines that made the houses appear "married to the ground" (Frost 2015). Wright's best example of Organic architecture remains "Fallingwater," a 1935 house that consisted of locally-quarried stone walls anchored to a rock outcropping above a waterfall in the Laurel Highlands forest of southwest Pennsylvania (Gelernter 1999).

The Kaufman House was a weekend retreat for a wealthy Pittsburgh department store owner. Organic architecture often appeared in remote settings where architects situated buildings in the foregrounds of dramatic landscapes. In 20th-century California, Organic architecture flourished among affluent homebuilders who enjoyed multiple scenic wonders close at hand. By the early 20th century, "Californians had come to revere their rugged natural setting, and valued opportunities to escape into the wilderness where they camped or stayed in small rustic cabins and inns" (Gelernter 1999). As the 20th century progressed, Organic architecture in California's mountains, deserts, and coastlines exhibited familiar Ranch-style forms built from mass-produced materials. As Alan Hess observes, "the machine is as much a part of Organic architecture as is raw nature" (Hess 2006:7). Its practitioners sought to employ new building materials and methods of construction in ways that related to immediate surroundings.

3.2.3 Regulatory Setting

A review of the regulatory context is provided below; however, the inclusion of any of these laws and regulations in this EIR does not make a law or regulation apply when it otherwise would not. Similarly, the omission of any other laws and regulations from this section does not mean that they do not apply.

Rather, the purpose of this section is to provide context in explaining why the analysis was carried out in the manner documented herein.

3.2.3.1 Federal

National Environmental Policy Act

The National Environmental Policy Act (NEPA) establishes national policy for the protection and enhancement of the environment. Part of the function of the federal government in protecting the environment is to “preserve important historic, cultural, and natural aspects of our national heritage.” Cultural resources need not be determined eligible for the National Register of Historic Places (NRHP) through the National Historic Preservation Act (NHPA) of 1966 (as amended) to receive consideration under NEPA. NEPA is implemented by regulations of the Council on Environmental Quality (40 Code of Federal Regulations [CFR] 1500-1508).

The definition of effects in the NEPA regulations includes adverse and beneficial effects on historic and cultural resources (40 CFR 1508.8). Therefore, the Environmental Consequences section of an Environmental Impact Statement [see 40 CFR 1502.16(f)] must analyze potential effects to historic or cultural resources that could result from the proposed action and each alternative. In considering whether an alternative may “significantly affect the quality of the human environment,” a federal agency must consider, among other things:

- Unique characteristics of the geographic area, such as proximity to historic or cultural resources (40 CFR 1508.27(b)(3)), and
- The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the NRHP (40 CFR 1508.27(b)(8)).

Therefore, because historic properties are a subset of cultural resources, they are one aspect of the human environment defined by NEPA regulations.

National Historic Preservation Act

The federal law that covers cultural resources that could be affected by federal undertakings is the National Historic Preservation Act (NHPA) of 1966, as amended. Section 106 of the NHPA requires that federal agencies take into account the effects of a federal undertaking on properties listed in or eligible for the NRHP. The agencies must afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on the undertaking. A federal undertaking is defined in 36 CFR 800.16(y):

A federal undertaking means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license, or approval.

The regulations that stipulate the procedures for complying with Section 106 are in 36 CFR 800. The Section 106 regulations require:

- definition of the APE;
- identification of cultural resources within the APE;
- evaluation of the identified resources in the APE using NRHP eligibility criteria;
- determination of whether the effects of the undertaking or project on eligible resources will be adverse; and
- agreement on and implementation of efforts to resolve adverse effects, if necessary.

The federal agency must seek comment from the State Historic Preservation Officer (SHPO) and, in some cases, the ACHP, for its determinations of eligibility, effects, and proposed mitigation measures. Section 106 procedures for a specific project can be modified by negotiation of a Memorandum of Agreement or Programmatic Agreement between the federal agency, the SHPO, and, in some cases, the project proponent.

Effects to a cultural resource are potentially adverse if the lead federal agency, with the SHPO's concurrence, determines the resource eligible for the NRHP, making it a Historic Property, and if application of the Criteria of Adverse Effects (36 CFR 800.5[a][2] et seq.) results in the conclusion that the effects will be adverse. The NRHP eligibility criteria, contained in 36 CFR 63, are as follows:

The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess aspects of integrity of location, design, setting, materials, workmanship, feeling, association, and

- A. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. that are associated with the lives of persons significant in our past; or
- C. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. that have yielded, or may be likely to yield, information important in prehistory.

In addition, the resource must be at least 50 years old, barring exceptional circumstances (36 CFR 60.4). Resources that are eligible for, or listed on, the NRHP are historic properties.

Regulations implementing Section 106 of the NHPA (36 CFR 800.5) require that the federal agency, in consultation with the SHPO, apply the Criteria of Adverse Effect to historic properties within the APE.

According to 36 CFR 800.5(a)(1):

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association.

3.2.3.2 State

California Environmental Quality Act

CEQA is the state law that applies to a project's impacts on cultural resources. A project is an activity that may cause a direct or indirect physical change in the environment and that is undertaken or funded by a state or local agency, or requires a permit, license, or lease from a state or local agency. CEQA requires that impacts to Historical Resources be identified and, if the impacts will be significant, then apply mitigation measures to reduce the impacts.

A Historical Resource is a resource that 1) is listed in or has been determined eligible for listing in the California Register of Historical Resources (CRHR) by the State Historical Resources Commission, or has been determined historically significant by the CEQA lead agency because it meets the eligibility criteria for the CRHR, 2) is included in a local register of historical resources, as defined in Public Resources Code (PRC) 5020.1(k), or 3), and has been identified as significant in a historical resources survey, as defined in PRC 5024.1(g) (California Code of Regulations [CCR] Title 14, Section 15064.5(a)).

The eligibility criteria for the CRHR are as follows (CCR Title 14, Section 4852(b)):

- (1) It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
- (2) It is associated with the lives of persons important to local, California, or national history;
- (3) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
- (4) It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition, the resource must retain integrity, which is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association (CCR Title 14, Section 4852(c)). Resources that have been determined eligible for the NRHP are automatically eligible for the CRHR.

Impacts to a Historical Resource, as defined by CEQA (listed in an official historic inventory or survey or eligible for the CRHR), are significant if the resource is demolished or destroyed or if the characteristics that made the resource eligible are materially impaired (CCR Title 14, Section 15064.5(b)). Demolition or alteration of eligible buildings, structures, and features so that they would no longer be eligible would result in a significant impact. Whole or partial destruction of eligible archaeological sites would result in a significant impact. In addition to impacts from construction resulting in destruction or physical alteration of an eligible resource, impacts to the integrity of setting (sometimes termed visual impacts) of physical features in the Project Area could also result in significant impacts.

3.2.3.3 Local

County of Los Angeles General Plan

The County of Los Angeles General Plan contains goals and policies to guide the management of cultural resources. The General Plan includes goals to protect cultural heritage resources and to promote the

preservation and enhancement of landmarks, sites, and areas of cultural, historical, archaeological, and urban design significance. The Conservation and Natural Resources Element includes six policies (C/NR 14.1 through C/NR 14.6) to promote public awareness and protection of cultural resources (County of Los Angeles 2015b). The policies are:

- Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
- Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.
- Support the preservation and rehabilitation of historic buildings.
- Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18.
- Promote public awareness of historic, cultural, and paleontological resources.
- Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

County of Los Angeles Historic Preservation Ordinance

The County of Los Angeles Historic Preservation Ordinance (County of Los Angeles Municipal Code Chapter 22.124) established the Historical Landmarks and Records Commission which evaluates nominations for the Los Angeles County Register of Landmarks and Historic Districts (LACRLHD). The Commission also considers and recommends to the County of Los Angeles Board of Supervisors local landmarks that are defined to be worthy of registration by the State of California Department of Parks and Recreation, either as a "California Historical Landmark" or as a "Point of Historical Interest." The commission may also consider and comment for the Board of Supervisors on applications relating to the NRHP. The subsection below from the Historic Preservation Ordinance defines the criteria for designating landmarks and historic districts.

22.124.070 - Criteria for Designation of Landmarks and Historic Districts

- A. A structure, site, object, tree, landscape, or natural land feature may be designated as a landmark if it is 50 years of age or older and satisfies one or more of the following criteria:
1. It is associated with events that have made a significant contribution to the broad patterns of the history of the nation, State, County, or community in which it is located;
 2. It is associated with the lives of persons who are significant in the history of the nation, State, County, or community in which it is located;
 3. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the nation, State, County, or community in which it is located; or possesses artistic values of significance to the nation, State, County, or community in which it is located;
 4. It has yielded, or may be likely to yield, significant and important information regarding the prehistory or history of the nation, State, County, or community in which it is located;

5. It is listed, or has been formally determined eligible by the United States National Park Service for listing, in the National Register of Historic Places, or is listed, or has been formally determined eligible by the State Historical Resources Commission for listing, on the California Register of Historical Resources;
 6. If it is a tree, it is one of the largest or oldest trees of the species located in the County; or
 7. If it is a tree, landscape, or other natural land feature, it has historical significance due to an association with a historic event, person, site, street, or structure, or because it is a defining or significant outstanding feature of a neighborhood.
- B. Property less than 50 years of age may be designated as a landmark if it meets one or more of the criteria set forth in Subsection A, above, and exhibits exceptional importance.
- C. The interior space of a property, or other space held open to the general public, including but not limited to a lobby, may be designated as a landmark or included in the landmark designation of a property if the space qualifies for designation as a landmark under Subsection A or B, above.
- D. Historic Districts. A geographic area, including a noncontiguous grouping of related properties, may be designated as a historic district if all of the following requirements are met:
1. More than 50 percent of owners in the proposed district consent to the designation;
 2. The proposed district satisfies one or more of the criteria set forth in Subsections A.1 through A.5, above; and
 3. The proposed district exhibits either a concentration of historic, scenic, or sites containing common character-defining features, which contribute to each other and are unified aesthetically by plan, physical development, or architectural quality; or significant geographical patterns, associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of parks or community planning. (Ord. 2019-0004 § 1, 2019.)

3.2.4 Thresholds of Significance

According to Appendix G of the CEQA Guidelines and County of Los Angeles thresholds, a project would have significant effect on cultural resources if it would:

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

3.2.5 Impact Analysis

3.2.5.1 Historic Resources

Impact CUL-1: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?

Significant and Unavoidable Impact.

As a result of the thorough field survey conducted for the Proposed Project (ECORP 2023c), three distinct resources were identified within the Project Area, each subject to evaluation based on the NRHP, and CRHR eligibility criteria, and Los Angeles County criteria. The three resources are discussed below.

DPB-001: Existing Ranger's Station

DPB-001, a 1950s single-story Ranch-style home that served as a ranger station in the Devil's Punchbowl Natural Area and is proposed for demolition as part of the Proposed Project, was found eligible for inclusion in the NRHP under Criterion A and C and CRHR under Criterion 1 and 3. Additionally, DPR-001 is eligible for inclusion in the Los Angeles County Register of Landmarks and Historic Districts (LACRLHD) under Criterion 1 and 3.

DPB-001, a circa 1950 Ranch-style house built by Bill and Helen Guy and acquired by the County of Los Angeles in 1960, is locally significant for its association with Devil's Punchbowl, a popular Los Angeles County park and wilderness area. Beginning in 1963, when Devil's Punchbowl opened to the public, the house served as the park's ranger station and administrative headquarters. A subsequent housing boom in the Antelope Valley region made the park "a popular local destination for hiking, mountain biking, nature walks, picnics, bird-watching, and photography" (Los Angeles Times 1992). By 1990, the park hosted approximately 70,000 annual visitors, making it an important recreational resource for the region. For its association with Devil's Punchbowl Park as an administrative headquarters, DPB-001 is eligible for the NRHP under Criterion A, the CRHR under Criterion 1, and the LACRLHD Criterion 1.

As a concrete brick Ranch-style house situated on the edge of a rim overlooking the sandstone formations of Devil's Punchbowl, DPB-001 embodies the distinctive characteristics of 20th-century Organic architecture in California. Organic architecture, as defined by Alan Hess, involves "the interrelation of practical architecture, mystical nature, and progressive technology" (Hess 2006:6-7). 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" (Hess 2006:4). Likewise, DPB-001's Ranch-style form and its use of concrete bricks (a material invented in 1900 but little used before achieving widespread recognition in U.S. building codes after 1940) make DPB-001 an example of modern architecture (Rosell 2012). DPB-001's architect remains unknown, and the house does not represent the work of a master or represent a significant and distinguishable entity whose components may lack individual distinction. Nevertheless, as

an example of Organic architecture that relates to the rugged sandstone formations of Devil's Punchbowl, DPB-001 is eligible for the NRHP under Criterion C and CRHR under Criterion 3.

DPB-001 possesses integrity of location, setting, design, materials, workmanship, feeling, and association. The house remains in its original location, set against the backdrop of Devil's Punchbowl, an area only lightly developed for recreational activities by the Los Angeles County Department of Parks and Recreation after 1963. With the exception of two windows removed, a chain-link fence installed on the western elevation, and mortared boulder landscaping added below the house's northern elevation, DPB-001 retains integrity of design, materials, and workmanship. Furthermore, these modifications do not compromise the house's integrity of feeling; the mortared boulder landscaping, likely accomplished in c. 2000 as a Boy Scout project, abides by the Organic architectural principles of the house's original design. Lastly, DPB-001 still conveys the aesthetic of a mid-20th-century Ranch-style vacation house and park headquarters set against the backdrop of Devil's Punchbowl. Therefore, DPB-001 meets NRHP or CRHR eligibility criteria as an individual resource.

Additionally, DPR-001 is eligible for inclusion in the LACRLHD under Criterion 1 for its association with events that have made a significant contribution to the broad patterns of the history of the Devil's Punchbowl Natural Area; and Criterion 3 for embodying the distinctive characteristics of Organic Architecture.

The Proposed Project would demolish DPB-001. DPB-001 was found eligible for the NRHP/CRHR/LA County 22.124.070 under Criterion A/1/1 and Criterion C/3/3. This demolition will cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5 resulting in a significant and unavoidable impact. According to CEQA Guidelines § 15126.4(b)(2), documentation in the form of photographs and historic narrative will not mitigate the effects of demolition to a point where no significant effect would occur. However, CEQA generally requires all feasible mitigation be undertaken even if it does not mitigate below a level of significance. As such, Mitigation Measures HIS-1 and HIS-2 will be implemented to be proportionate with the level of significance of the resource prior to its demolition.

DPB-002: Foundation of Old Devil's Punchbowl Nature Center

DPB-002 consists of the foundation of former Devil's Punchbowl Nature Center, which was destroyed in the 2020 Bobcat Fire. This resource was reviewed and found ineligible for inclusion in the NRHP, CRHR, or LA County Chapter 22.124 Historic Preservation criteria. Impacts would be less than significant.

DPB-003: Large Water Tank

DPB-003, a large water tank in the survey area's southwestern corner, was also reviewed and found ineligible for inclusion in the NRHP, CRHR, or under LA County Chapter 22.124 Historic Preservation criteria. No impact would occur.

3.2.6 Mitigation Measures

HIS-1 Historical Documentation: Prior to the demolition of DPB-001, provide documentation of the buildings character defining features, architectural aspects, and historical significance

using detailed pictures, and a written historical narrative. The documentation shall generally follow the National Parks Service (NPS) Historic American Building Survey (HABS) short format and content style (referred to herein as "HABS like"). The photographs shall be digitally taken from a high-resolution digital camera and may be provided in print or electronic format with photograph log. The written historical narrative shall follow the HABS short format style and may be provided on archival quality paper in hard copy, or electronic copy on an archival quality DVD. The HABS like documentation shall be developed by a qualified expert that meets the Secretary of the Interior's Professional Qualification Standards in History or Architectural History. One copy shall be provided to the County and at least one additional copy provided to a local archival repository or historical society for public consumption, including the Seaver Center for Western History at the Natural History Museum.

HIS-2 Interpretive Panels: Prior to the demolition of DPB-001, develop interpretive panels that document and narrate key historical aspects of DPB-001. The interpretive panels shall include aerial imagery showing the spatial arrangement of DPB-001 at the park, as well as relevant historical and modern images and historical narrative. The placement locations of the interpretive panels shall be determined by the County, but it is recommended that they be placed near the new Nature Center for public education.

3.2.7 Level of Significance After Mitigation

According to CEQA Guidelines § 15126.4(b)(2), documentation in the form of photographs and historic narrative will not mitigate the effects of demolition to a point where no significant effect would occur. Impacts would remain significant and unavoidable.

3.2.8 Cumulative Impacts

The Proposed Project was assessed for potential impacts to cultural resources. With the implementation of mitigation measures in Section 3.2.6, potential impacts to historical resources would remain significant and unavoidable. It is anticipated that cultural resources mitigation measures would be implemented for projects in the surrounding jurisdictions and that cumulative impacts would be less than significant.

4.0 ALTERNATIVES TO THE PROPOSED PROJECT

4.1 Introduction

In accordance with the requirements of CEQA, an evaluation of alternatives to the Proposed Project must be conducted. CEQA Guidelines Section 15126.6(a) states:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.

The No Project Alternative is required by CEQA Guidelines. The Guidelines define the No Project Alternative as "the circumstance under which the project does not proceed" (Guidelines Section 15126.6(e)(3)(B)). The environmentally superior alternative is the alternative having the fewest significant environmental impacts from among the alternatives evaluated. The Guidelines state that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

4.2 Alternatives Considered but Rejected

As described above, alternatives were identified and evaluated as to whether the alternative would attain most of the project objectives, avoid or substantially lessen significant effects identified for the Proposed Project, and would be feasible. The Proposed Project was found to result in significant and unavoidable historic impacts and no feasible mitigation measures were identified. The impact resulted from the proposed demolition of the existing Ranger's Residence (DPB-001). The No Project Alternative is considered in this analysis to address the impact on Cultural Resources as a result of DPB-001 demolition.

Coordination between multiple agencies, policy makers, experts, communities, and local and regional stakeholders was conducted as part of the Proposed Project. Creation of the preferred vision of the replacement nature center and park amenities was reliant on the early outreach efforts with these groups. Over a three-month period in Summer 2022, the County sought and documented the public's needs and interest through community meetings and other means to shape the preferred park concept. Five distinct design goals emerged from the initial community visioning meeting on June 4, 2022 (Withers & Sangren 2022):

- Protect existing significant vegetation onsite
- Provide greater accessibility to site and proposed Nature Center
- Sustainable building and site design
- Increase fire-resilience and prevention
- Separate vehicles and pedestrians
- Provide a rich experience from parking lot to rim of the Devil's Punchbowl

4.2.1 Alternative Project Site Locations

Alternative plan development sought diverse opinions from three potential site locations originally presented at the first Community Workshop. The alternative site locations presented include the northeast corner of the parking lot, the original Nature Center site, and the open unpaved area behind the existing Ranger's Residence. The site analysis conducted for all alternative site locations concluded that the Ranger's Residence is a deterrent to the development of an environmentally sensitive, state-of-the-art facility at any of the alternative site locations. The Ranger's Residence building would require extensive reconstruction from the ground up to meet current building codes. Analysis of all potential sites assumed the removal of the Ranger's Residence, so that the rim of the Devil's Punchbowl would be available for public access and that the spatial organization along the rim would support accessible visitor gathering spaces, outdoor events, and picnicking (Withers & Sandgren 2022). The three site locations are discussed below.

4.2.1.1 Northeast Corner of the Parking Lot

Construction of a replacement nature center at this location would minimize its footprint on the land by constructing two-stories with visitors entering on the top floor level from the parking lot. Staff and administrative spaces would be below, and accessible from the existing dirt road to the north. Access to the rim would require removal of the existing driveway to the east and replacing it with a newly graded walkway. Vehicle access would be allowed to serve the facilities along the rim via a new road alignment from the southeast corner of the parking lot.

This location was determined to be too far away from the main park amenities and activities and would require the duplication of gathering spaces to meet current program objectives.

4.2.1.2 Original Nature Center Location

This building location would be close to the original Nature Center footprint. However, based on preliminary grading studies, it was determined that this location would be difficult to provide ADA accessibility without creating ramps with handrails. The area of development is smaller and therefore would require a two-story building to accommodate the square footage. Furthermore, this location would also likely require duplicating gathering spaces.

4.2.1.3 Near Existing Ranger's Residence

Locating the replacement Nature Center close to the rim was determined to be undesirable and is unlikely to be feasible due to geotechnical limitations. The area adjacent to the Ranger's Residence was determined to be a more desirable location than the current building footprint as it best meets the circulation needs, is already disturbed, and frees up the rim for a continuous access and a variety of gathering spaces.

4.2.2 Alternative Building Concepts

The second workshop presented two building concepts for the proposed Nature Center. Building Concept 1 proposed a new way to experience the landscape of the Devil's Punchbowl by creating a linear Nature Center extending from the parking lot to the edge of the Devil's Punchbowl rim. Building Concept 2 (Preferred Concept, Proposed Project, Project) builds on Building Concept 1's theme of site transformation and rebirth by grouping and sinking the building into areas previously disturbed by the 2020 Bobcat Fire and previous development. The "green" roof tops integrate the building into the landscape. A wide stairway would descend into the shade of a covered courtyard wrapped around a series of incense cedars. The courtyard, set slightly below grade, would be edged with stone seat walls. A circular walkway would wrap around the building starting at the top of the stairs. As the walkway descends, the formally constructed walls begin to disintegrate first to rough stone and then the pathway's demarcation would become only an edge lined with cobbles (Withers & Sandgren 2022).

The two Building Concept Alternatives were discussed at the second Community Workshop, held on July 16, 2022. The prospect of a novel vantage point in Building Concept 1 was lauded and the green roof and circulation plan of Building Concept 2 was attractive to many. Concerns focused on the protection and preservation of the existing trees. Demolition of the existing Ranger's Residence raised issues that included the waste of a functioning building, loss of the structure, and the assumption that all "modern architecture" was cold and sterile.

Because the Ranger's Residence building has been substantially altered already, the suggestion that an exhibit focused on the original property owners, coupled with recorded interviews, could serve to preserve their memory, and illustrate the culture of the times.

Specific discussion on the individual concepts included Park Staff safety concerns about having their offices underneath the entry point of Building Concept 1, because staff need a direct line of sight to the Nature Center's entrance. Additionally, concerns were raised over the preservation of existing vegetation, specifically healthy standing trees, and inclusion of a breezeway in the event of high winds. Furthermore, the lack of shade in Building Concept 1 was of serious concern. Building Concept 1 would not substantially reduce or eliminate significant adverse impacts. Building Concept 1 would also include the demolition of the existing Ranger's Residence. Comparatively, the Preferred Concept would be constructed within previously disturbed areas to the extent practical. When put to a vote at the third Community Workshop on August 27, 2022 Building Concept 1 and 2 were tied with the same number of votes for both. However, the Devil's Punchbowl staff preferred Building Concept 2 because they felt it would suit their exhibits and needs better than Building Concept 1. Therefore, Building Concept 2 was selected to develop further (Withers & Sandgren 2022). Due to these reasons, the Building Concept 2 (Proposed Project) was selected by DPR over Building Concept 1, as Concept 1 would not meet the project goals when compared to the Proposed Project. No other alternatives, other than the No Project Alternative, are being carried forward for analysis.

4.2.3 No Project Alternative

4.2.3.1 Description

CEQA requires that the No Project Alternative be analyzed in an EIR. In accordance with Section 15126.6(e)(3)(B), the No Project Alternative consists of an analysis of the circumstance under which the project does not proceed.

With the No Project Alternative, the Devil's Punchbowl Natural Area would remain open to the public from Tuesday to Sunday during normal park hours. No trail or ADA access improvements would be constructed. Proposed landscaping improvements and park amenities would not occur. The existing Ranger's Residence building would remain, and no new structures would be built. County events and programming would remain unchanged compared to the post-fire reopening in Spring 2022. The No Project Alternative would not meet any of the Proposed Project objectives.

4.2.3.2 Impacts Analysis

The No Project Alternative would avoid the significant and unavoidable Cultural Resources impact from the demolition of DPB-001. Impacts to aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas, hazards and hazardous waste, hydrology, land use/planning, noise, public services, transportation, tribal cultural resources, utilities and service systems, and wildfire would be less with the No Project Alternative because the construction of park amenities and replacement Nature Center would not occur.

4.3 Comparison of Alternatives

Table 4-2 provides a comparison of anticipated impacts of the No Project Alternative with the Proposed Project. Table 4-3 provides a comparison of Project objectives between the Proposed Project and the No Project Alternative.

Table 4-2. Comparison of No Project Alternative with Proposed Project	
Category	No Project
Aesthetics	-
Agriculture and Forestry Resources	○
Air Quality	-
Biological Resources	-
Cultural Resources	-
Energy	-
Geology/Soils	-
Greenhouse Gas Emissions	-
Hazards and Hazardous Materials	-
Hydrology/Water Quality	-

Table 4-2. Comparison of No Project Alternative with Proposed Project	
Category	No Project
Land Use/Planning	-
Mineral Resources	○
Noise	-
Population/Housing	○
Public Services	-
Recreation	○
Transportation	-
Tribal Cultural Resources	-
Utilities/Services Systems	-
Wildfire	-

Notes:

- ⊕ = Impacts would be greater than the Proposed Project
- = Impacts would be the same as the Proposed Project
- = Impact would be less than the Proposed Project

Table 4-3. Comparison of Project Objectives by Alternative		
Project Objective	Proposed Project	No Project
Objective 1 – Site Resilience and Restoration. Replace the former Nature Center with a new facility that incorporates design and preventative measures that increase fire-resilience and prevention and restore the vegetation destroyed by the Bobcat Fire.	Y	N
Objective 2 – Interpretive/Outdoor Education. The proposed Nature Center and site improvements will meet the needs of staff and visitors, especially school children visiting for field trips.	Y	N
Objective 3 – Natural Design. The proposed Nature Center will complement the natural beauty of the Devil's Punchbowl Natural Area.	Y	N
Design Goal 1. Protect existing significant vegetation on site.	Y	N
Design Goal 2. Provide greater accessibility to site and proposed Nature Center.	Y	N
Design Goal 3. Sustainable building and site design.	Y	N
Design Goal 4. Increase fire-resilience and prevention.	Y	N
Design Goal 5. Separate vehicles and pedestrians.	Y	N
Design Goal 6. Provide a rich experience from parking lot to rim of Punchbowl	Y	N

Notes: Y = meets objective; N = does not meet objective

4.4 Environmentally Superior Alternative

CEQA Guidelines require that an EIR identify the environmentally superior alternative. The No Project Alternative would be the environmentally superior alternative because it would avoid all impacts associated with the Proposed Project. However, the No Project Alternative would not meet any of the project objectives. According to the CEQA Guidelines, if the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives. The Proposed Project has been identified as the environmentally superior alternative because no other building design concept or site location would meet the Project objectives when compared to the Proposed Project and eliminate significant adverse impacts. Implementation of the Proposed Project would result in a beneficial impact to recreation and meet all the Project goals.

5.0 OTHER CEQA CONSIDERATIONS

5.1 Growth-Inducing Impacts

According to Section 15126.2(e) of the CEQA Guidelines, growth-inducing impacts of a Project shall be discussed in the EIR. Growth-inducing impacts are those effects of the Project that might foster economic or population growth or the construction of new housing, either directly or indirectly, in the surrounding environment. Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without implementation of the project. For example, development of a project may require additional housing, goods, and services associated with the population increase caused by, or attracted to, the new project. Growth induced from a project may result in significant adverse impacts if the growth is not consistent with the land use plans and growth management plans and policies for the area affected. Thus, it is important to assess the degree to which the growth accommodated by a project would conflict with any applicable land use plan, policy, or regulation.

The environmental effects of induced growth are indirect impacts of a project. Indirect effects of growth could result in significant, adverse environmental impacts, which could include increased demand on community or public services, increased traffic and noise, degradation of air and water quality, and conversion of agricultural land and open space to developed uses. Section 14 of the Initial Study, *Population and Housing*, discusses the potential for unplanned population growth in the Project Area, either directly or indirectly. As described previously, the Project Site is located within unincorporated Los Angeles County. The Devil's Punchbowl Natural Area is predominantly surrounded by undeveloped Angeles National Forest land. The Project Site is a County-owned and operated park facility that is not undergoing, nor is it slated to undergo, substantial growth over the coming years. The Proposed Project would include the construction of a replacement Nature Center and associated park amenities on the Project Site and would not substantially change or affect surrounding properties, nor would it conflict with other localized residential construction. The Proposed Project would not employ substantial numbers of people. Upon completion, existing County staff would maintain the new park facilities and amenities. Therefore, the potential for unplanned growth would be less than significant.

5.2 Significant Irreversible Effects

Pursuant to Section 15126.2(d) of the CEQA Guidelines, an EIR must address any significant irreversible environmental change that would be caused by the Proposed Project should it be implemented. This discussion would typically include uses of nonrenewable resources during the initial and continued phases of a project that may be irreversible where a large commitment of such resources makes removal or nonuse thereafter unlikely. Examples cited include 1) primary impacts and secondary impacts (such as highway improvements that provide access to a previously inaccessible area), that generally commit future generations to similar uses; and 2) irreversible damage that could result from environmental accidents associated with a project.

The Proposed Project would include the construction of new structures and park amenities, including a replacement Nature Center, to the existing Devil's Punchbowl Natural Area. While consumption of energy supplies and non-renewable or slowly renewable resources would occur with Project implementation and construction, the Project Site's land use has been used historically as a County park facility, which offers recreational opportunities and outdoor education programs. The Project's operational utility impacts are determined to be less than significant.

Pursuant to Section 15127 of the CEQA Guidelines: Limitations on Discussion of Environmental Impact, the information required by Section 15126.2(d) concerning irreversible changes need to be included in EIRs prepared only in connection with any of the following activities:

- The adoption, amendment, or enactment of a plan, policy or ordinance of a public agency;
- The adoption by a Local Agency Formation Commission of a resolution making determinations; or
- A project which will be subject to the requirement for preparing an environment impact statement pursuant to the requirements of the National Environmental Policy Act of 1969, 42 U.S. Code 4321-4347.

In the instance of the Proposed Project, none of the foregoing activities apply. In particular, and as discussed previously, the Project is consistent with the existing General Plan and zoning, and does not require adoption, amendment, or enactment of any plan, policy, or ordinance of the County. Therefore, no further discussion of this topic in this EIR is required.

5.3 Unavoidable Significant Adverse Effects

Implementation of the Proposed Project would result in new significant impacts to Cultural Resources, resulting from the demolition of the existing Ranger's Residence (DBP-001). Based on the analysis in Section 3.2 of this EIR, implementation of the Proposed Project would result in an unavoidable significant adverse effect. There is no feasible mitigation measure that would effectively reduce the resulting impact of DPB-001's demolition. Therefore, impacts to Cultural Resources are considered to be significant and unavoidable for the Proposed Project.

6.0 LIST OF PREPARERS AND PERSONS CONSULTED

6.1 County of Los Angeles Department of Parks and Recreation

Clement Lau, AICP, Departmental Facilities Planner

Jui Ing Chien, Park Planner

Ansley Davies, Associate Curator

Jonathan Numer, Regional Park Superintendent I

6.2 Withers & Sandgren

Lacey Withers, Landscape Architect

6.3 ECORP Consulting, Inc.

Freddie Olmos, Principal Environmental Planner/Project Manager

Jeremy Adams, Senior Architectural Historian

Andrew Bursan, Staff Architectural Historian

Karla Green, Technical Editor

Nathan Hallam, Senior Architectural Historian

Laura Hesse, Technical Editor

Devin Keogh, Technical Editor

Sonia Sifuentes, Senior Archaeologist

Lauren Simpson, Senior Biologist

Anne Surdzial, Quality Assurance/Quality Control

Christopher Uminski, Assistant Environmental Planner

THIS PAGE INTENTIONALLY LEFT BLANK

7.0 REFERENCES

- Alford, D. V. 1975. *Bumblebees*. Davis-Poynter, London.
- Ancestry.com. 2023. Donald M Macgregor in the 1950 United States Federal Census. www.ancestry.com/discoveryui-content/view/262929214:62308. Accessed January 27, 2023.
- Bean, Lowell J. and Charles R. Smith. 1978. Serrano. In *Handbook of North American Indians, Volume 8, California*, edited by Robert F. Heizer, pp. 570-574. Smithsonian Institution, Washington, D.C.
- Bureau of Land Management (BLM). 2022. Bureau of Land Management, General Land Office Records, Records Automation website. <http://www.glorerecords.blm.gov/>. Accessed October 31, 2022.
- California Department of Fish and Game (CDFW). 2023a. RareFind California Department of Fish and Game Natural Diversity Database (CNDDDB). California. Sacramento, CA, California Department of Fish and Wildlife, Biogeographic Data Branch. Accessed: June 24, 2022 and November 7, 2023.
- _____. 2023b. Survey Considerations for California ESA Candidate Bumble Bee Species. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>.
- _____. 2021. Lake and Streambed Alteration Program. <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>.
- California Native Plant Society (CNPS) 2023. Rare Plant Program. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). California Native Plant Society, Sacramento, CA. Website <http://www.rareplants.cnps.org>.
- California Mirror News. 1957. Space Is Their Business. October 25, 1957.
- ECORP Consulting, Inc. 2023a. *Initial Study and Notice of Preparation for the Devil's Punchbowl Nature Center Replacement Planning Project*. Prepared for Los Angeles County Parks and recreation Department. August.
- _____. 2023b. *Biological Technical Report for the Devil's Punchbowl Nature Center*, Prepared for Los Angeles County Parks and Recreation Department. November.
- _____. 2023c. *Archeology and Built Environment Resources Inventory and Evaluation Report Devil's Punchbowl Nature Center Replacement Project*. December.
- _____. 2021. *Bobcat Fire Recovery Plan for the Devil's Punchbowl Natural Area and Nature Center*. Prepared for Los Angeles County Parks and Recreation Department. September.
- _____. 2020. *Habitat Mapping Effort for the 2022 Biological Technical Report for the Devil's Punchbowl Nature Center*, prepared for Los Angeles County Parks and Recreation Department. September.
- Free, J. B., and Colin Gasking Butler. 1959. *Bumblebees*. Collins.

- Frost, Susan. 2015. Prairie Style. <https://www.architecture.org/learn/resources/architecture-dictionary/entry/prairie-style/>. Accessed January 27, 2023.
- Fussell, M., and S.A. Corbet. 1992. Flower Usage by Bumble-Bees: A Basis for Forage Plant Management. Source: *Journal of Applied Ecology*. Volume 29.
- Gelernter, Mark. 1999. *A History of American Architecture: Buildings in the Cultural and Technological Context*. University Press of New England, Hanover, Massachusetts.
- Gordon, J. Shelton. 1973. *Second Edition of 'Incredible Tales' of some of the Antelope Valley Pioneers*. http://www.archive.org/details/doc_20190806_201908. Accessed January 25, 2023.
- Guy, Bill. 2023. ECORP Internal Correspondence with Bill Guy, January 22, 23, and 24, 2023.
- Hess, Alan. 2006. *Organic Architecture: The Other Modernism*. Gibbs Smith, Layton, Utah.
- Independence Star*. 1960. 'Punchbowl' To Become New Park. April 3, 1960.
- Los Angeles County. 2015a. *June 2015 Town & Country Antelope Valley Area Plan*. Available at https://case.planning.lacounty.gov/assets/upl/project/tnc_draft-20150601.pdf.
- _____. 2015b. 2035 General Plan. Updated July 14, 2022. Available at <https://planning.lacounty.gov/generalplan/generalplan>. Accessed November 20, 2023.
- The Los Angeles County Oak Woodlands Habitat Conservation Strategic Alliance. 2011. *Los Angeles County Oak Woodlands Conservation Management Plan*. Lye, G.C., J.L. Osborne, K.J. Park, and D. Goulson. 2012. Using citizen science to monitor *Bombus* populations in the UK; nesting ecology for and relative abundance in the urban environment. *Journal of Insect Conservation* 16:697-707.
- Los Angeles Times*. 1992. Dip into the Punchbowl. January 5, 1992.
- Mount Wilson Institute. 2022. *Mount Wilson Observatory: Our Story*. <https://www.mtwilson.edu/about-mwo/>. Accessed January 10, 2023.
- Pasadena Independent*. 1963. Russ Leadabrand Off the Beaten Path. November 26, 1963.
- Robinson, John W. 1991. *The San Gabriels: The Mountain Country from Soledad Canyon to Lytle Creek*. Big Santa Anita Historical Society. Arcadia, California.
- Rosell, Thomas. 2012. A Little Contest: Like a Ton of (Concrete) Bricks. <https://misspreservation.com/2012/05/11/a-little-contest-like-a-ton-of-bricks/>. Accessed January 23, 2023.
- Sawyer, J.O., T. Keeler-Wolf, and J.M. Evens. 2009. *A Manual of California Vegetation, 2nd ed*. California Native Plant Society, Sacramento, CA. Sibley, D. A. (2003).
- Sladen, F.W. Lambert 1912. *The Humble-bee: its Life-history and how to Domesticate it*. Macmillan and Company, Ltd.
- Small, A. 1994. *California Birds: Their Status and Distribution*. Ibis Publ., Vista, CA.

- State Lands Commission. 1982. *Grants of Land in California made by Spanish or Mexican Authorities*. Prepared by the California State Lands Commission. <https://www.slc.ca.gov/land-types/grants-of-land-in-california-made-by-spanish-or-mexican-authorities/>. Accessed May 13, 2022.
- State Water Resources Control Board. 2021. State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State. Retrieved from: https://www.waterboards.ca.gov/water_issues/programs/cwa401/wrapp.html.
- United States Forest Service. 2004. San Dimas Experimental Forest, Pacific Southwest Research Station. https://www.fs.usda.gov/psw/ef/san_dimas/index.shtml. Accessed May 13, 2022.
- _____. n.d. Angeles National Forest Cultural History. <https://www.fs.usda.gov/detail/angeles/learning/history-culture/?cid=stelprdb5161139>. Accessed October 27, 2023
- United States Geological Survey (USGS). 1995. Valyermo, California 7.5-minute Quadrangle. United States Department of the Interior, Geological Survey, Denver.
- Valley Times*. 1967. Rocketdyne Names New Executives. October 3, 1967.
- _____. 1961. Executive's Wife Must Learn Self-Discipline, Organization. October 17, 1961.
- _____. 1957. Facility Urged at Pearblossom. September 12, 1957.
- Van Nuys News*. 1962. Approve 2 Proposals for Parks. August 5, 1962.
- _____. 1960. County Will Rent Home in Devil's Punch Bowl Area. September 15, 1960.
- Whitley, David S. 1996. *Final Report on Angeles National Forest Pit Rock Art Recording Project, Los Angeles County, California*. Prepared for Michael McIntyre, Angeles National Forest. Prepared by W and S Consultants.
- Williams, P. H., R. W. Thorp, L. L. Richardson, and S.R. Colla. 2014. *The Bumble bees of North America: An Identification guide*. Princeton University Press, Princeton.
- Withers & Sangren. 2022. *Devil's Punchbowl Community Workshops 1, 2, 3 Outreach Summary Reports. For Workshop 1, June 4, 2022. Workshop 2, July 16, 2022. Workshop 3 August 27, 2022*. Prepared for the Los Angeles County Department of Parks and Recreation.
- Zeiner D.C., W.F. Laudenslayer Jr., K.E. Mayer, and M. White, editors. 1990. *California's Wildlife. Volume I, Amphibians and Reptiles*. Sacramento (CA): State of California, the Resources Agency, Department of Fish and Wildlife.

THIS PAGE INTENTIONALLY LEFT BLANK

8.0 ACRONYMS AND ABBREVIATIONS

Term	Description
AB	Assembly Bill
ADA	Americans with Disabilities Act
AIN	Assessor's ID Number
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CNDDDB	California Natural Diversity Database California Natural Diversity Database
CNPS	California Native Plant Society
County	County of Los Angeles
CRHR	California Register of Historical Resources
CWA	Clean Water Act
dbh	diameter at breast height
DPR	Los Angeles County Department of Parks and Recreation
EIR	Environmental Impact Report
ESA	Endangered Species Act
FTBMI	Fernandeño Tataviam Band of Mission Indians
GPS	Global Positioning System
gpm	gallons per minute
HCP	Habitat Conservation Plan
ITP	incidental take permit
LACRLHD	Los Angeles County Register of Landmarks and Historic Districts
MBTA	Migratory Bird Treaty Act
MLD	most likely descendants
MMRP	Mitigation, Monitoring, and Reporting Program
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NOP	Notice of Preparation
NPPA	Native Plant Protection Act
NRHP	National Register of Historic Places
OHWM	ordinary high-water mark
OWCMP	Oak Woodlands Conservation Management Plan
OS-NF	Open Space – National Forest
OS-PR	Open Space – Parks and Recreation
Proposed Project	Devil's Punchbowl Nature Center Replacement Planning Project
RMC	Rivers and Mountains Conservancy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SEA	Significant Ecological Areas
SSC	Species of Special Concern
SWRCB	State Water Resources Control Board
TCR	Tribal Cultural Resource

Term	Description
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
WJTCA	Western Joshua Tree Conservation Act
WOTUS	Waters of the U.S.



www.ecorpc consulting.com

REDLANDS, CA
(909) 307-0046

SAN DIEGO, CA
(858) 275-4040

ROCKLIN, CA
(916) 782-9100

CHICO, CA
(530) 805-2585

FLAGSTAFF, AZ
(858) 232-9602

SANTA ANA, CA
(714) 648-0630

SANTA FE, NM
(714) 222-5932