DRAFT

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

CHATSWORTH PARK SOUTH REMEDIAL ACTION PLAN PROJECT

22360 West Devonshire Street
City of Los Angeles
County of Los Angeles, California

Prepared for

City of Los Angeles
Department of Recreation and Parks
221 North Figueroa Street, Suite 100
Los Angeles, California 90012

March 2013

URS

915 Wilshire Boulevard, Suite 700
Los Angeles, CA 90017

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CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

MITIGATED NEGATIVE DECLARATION

(Article I, City CEQA Guidelines)

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City Clerk's Office
CITY CLERK'S USE

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Date: MAR 15 2013

FORM RP 7-31-02

LEAD CITY AGENCY AND ADDRESS: Department of Recreation and Parks, 221 N. Figueroa Street, Suite 100, Los Angeles, CA 90012	**COUNCIL DISTRICT:** 12
PROJECT TITLE: CHATSWORTH PARK SOUTH—Remedial Action Plan	**CASE NUMBER:**

PROJECT LOCATION: 22360 W. Devonshire St., Los Angeles, CA 91311. The Assessor Parcel Number is 2723-010-904. The Project site is in the northwestern corner of the San Fernando Valley, in the community of Chatsworth. It is approximately 72 acres and is bounded to the north, west, and south by the Santa Susana Mountains and Santa Susana Pass State Historic Park. The Project site is bounded to the east by a residential neighborhood.

PROJECT DESCRIPTION:

The proposed Project consists of the implementation of a Remedial Action Plan (RAP) that will be approved by the California Environmental Protection Agency Department of Toxic Substances Control (DTSC) under a Voluntary Cleanup Agreement with LADRP. The RAP proposes to cap in-place the soil impacted principally by lead and polycyclic aromatic hydrocarbons,(PAHs) discovered in the park from a former Small Arms Firing Range. The surface cap would provide a permanent solution that reduces the accessibility and mobility of the impacted soils, and therefore, the threat to human health and the environment. The surface cap would be installed over remediation areas and would include utility clearance, security measures, rough grading and excavation, installation of a drainage system, construction of a surface cap, and installation of fencing. The proposed Project would also grub and remove non-protected, non-Heritage trees, protect remaining trees, and mitigate demolition of trees with construction of native groves on-site. The existing parking lot would be expanded and included as part of the surface cap. A rocky outcrop on-site would be grubbed of shrubs and vegetation, then scoured and vacuumed. Drainage on-site would be improved to control runoff from upslope areas and protect the surface cap. Contaminated soils and wastes would be hauled off-site and would be disposed of at appropriate solid waste facilities. The DTSC would provide a No Further Action (NFA) letter and certify that all remedial actions have been completed and that the Project site does not pose a significant risk to employees, visitors, and nearby residents. The City of Los Angeles would be required to record a Land Use Covenant and prepare an associated Operations and Maintenance (O&M) Plan.

Although the proposed Project could have a significant effect on the environment (particularly during construction) related to air quality, biological resources, cultural resources, hydrology and water quality, and noise, the Project has incorporated mitigation measures that will reduces these environmental effects to a level less than significant.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:

FINDING: The Department of Recreation and Parks of the City of Los Angeles has determined that this project will not have significant effect on the environment for the following reasons:

SEE ATTACHED INITIAL STUDY

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED

Any written objections received during the public review period are attached together with the response of the lead City Agency.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

NAME OF PERSON PREPARING THIS FORM: Paul Davis	TITLE: Environmental Specialist	TELEPHONE NUMBER: (213) 202-2667
ADDRESS: Department of Recreation and Parks 221 N. Figueroa St., Suite 100 Los Angeles, CA 90012	SIGNATURE (OFFICIAL): Paul J. Davis	DATE: March 7, 2013

PROPOSED MITIGATION MEASURES FOR THE PROPOSED PROJECT

AIR QUALITY (CONSTRUCTION)

MM-AQ-01 Though localized concentrations would be below the SCAQMD localized significance thresholds, the presence of contaminated soils warrants the following mitigation measures to ensure that excessive concentrations of contaminated dust would not be generated by construction activities:

- Sampling and monitoring of airborne particulate matter (PM_{10}) at the perimeter shall be conducted during working hours. If the upwind and downwind differential concentrations of PM_{10} exceed 50 micrograms per cubic meter, construction activities will cease until more stringent mitigation measures are implemented to reduce the concentrations to levels below 50 micrograms per cubic meter.
- During construction activities, monitoring and recording of wind speed and direction shall be conducted at least every 2 hours on-site.
- The ambient dust concentrations measured at each of the ambient air monitoring stations shall not exceed 50 micrograms per cubic meter at the Project site's fenceline during construction.
- If any daily ambient air monitoring results show the dust concentration to exceed 50 micrograms per cubic meter two times or more on any one day, excavation activities shall cease until additional mitigation measures are implemented which will reduce the concentrations below 50 micrograms per cubic meter.

BIOLOGICAL RESOURCES

MM-BIO-01 Prior to grubbing of vegetation in Area E, focused plant surveys shall be conducted to determine the presence/absence of special-status plants in Area E. If the focused plant surveys determine the presence of special status plant species, the areas occupied by special-status plant species shall be avoided to the extent possible by modifying/reducing the scope of /not implementing the planned construction activities of Area E. The construction activities related to Area E that shall be modified/reduced in scope/not implemented would include but not be limited to grubbing, removal of groundscape, and/or removal of soils.

MM-BIO-02 Prior to remediation activities in Area E, pre-construction surveys shall be conducted for special-status wildlife species including: the arroyo toad (*Anaxyrus californicus*), silvery legless lizard (*Anniella pulchra pulchra*), pallid bat (*Antrozous pallidus*), golden eagle (*Aquila chrysaetos*), western mastiff bat (*Eumops perotis californicus*), San Diego desert woodrat (*Neotoma lepida intermedia*), coast horned lizard (*Phrynosoma blainvillii*), coastal California gnatchatcher (*Polioptila californica californica*), Gertsch's socalchemmis spider (*Socalchemmis gertschi*), and two-striped garter snake (*Thamnophis hammondii*). If the pre-construction wildlife surveys determine the presence of special status wildlife species, the areas occupied by special-status wildlife species shall be avoided to the extent possible by modifying/reducing the scope of /not implementing the planned construction activities of Area E. The construction activities related to Area E that shall be modified/reduced in scope/not implemented would include but not be limited to grubbing, removal of groundscape, and/or removal of soils.

MM-BIO-03 If the pre-construction wildlife surveys conducted under mitigation measure **MM-BIO-02** determine that arroyo toads are present in Area E, no grubbing activities shall be conducted in suitable habitat during the breeding season for arroyo toad, March 15 through July 31.

MM-BIO-04 If the pre-construction wildlife surveys conducted under mitigation measure **MM-BIO-02** determine that arroyo toads are present in Area E, then prior to any remediation activities, exclusion fencing shall be installed around all suitable habitat for the arroyo toad within Area E. The exclusion fencing shall consist of plastic or fabric at least 2 feet high, firmly staked to the ground with the lower one foot of the fencing stretched out along the ground and held in place with a continuous line of gravel bags. Once the exclusion fencing is installed in the suitable arroyo toad habitat within Area E, an Agency approved arroyo toad biologist shall conduct three site visits to determine if any arroyo toads remain in the exclusion area. All fencing material shall be removed after the remediation and restoration work is completed for the areas of suitable habitat.

MM-BIO-05 If the pre-construction wildlife surveys conducted under mitigation measure **MM-BIO-02** determine that coastal California gnatcatchers are present in Area E, no work shall be conducted in the suitable coastal California gnatcatcher habitat within Area E during the breeding season, February 15 through August 31.

MM-BIO-06 Prior to commencing grubbing activities during nesting season (February 15 through August 31) in Area E, a qualified biologist shall conduct a survey of the area to be grubbed to check for the presence of active nests for special-status bird species, including coastal California gnatcatcher and all species covered under the MBTA. If evidence of nesting is found, no grubbing work shall take place in the nest area or within an appropriate buffer zone, to be determined by the biologist, until the biologist determines that the nests are no longer in active use.

MM-BIO-07 Prior to removal of any trees on site during the nesting season (February 15 through August 31), a qualified biologist shall survey the trees to be removed for the presence of active nests for raptors or other bird species protected under the MBTA. If a nest is found, no tree removal work will take place in the nest area or within a buffer zone, to be determined by the biologist, until the biologist determines that the nest is no longer in active use.

CULTURAL RESOURCES

MM-CR-01 In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 10-meter radius shall be temporarily suspended or redirected until a qualified archaeologist has been provided the opportunity to assess the significance of the find and implement appropriate measures to protect or properly remove the find per federal and state regulations. Construction personnel shall be informed that unauthorized collection of cultural resources is prohibited.

If the resource is determined to be significant, the archaeologist, as appropriate, shall prepare a program for recovery of the resources in consultation with the State Office of Historic Preservation that satisfied the requirements of CEQA Section 21083.2. The archaeologist shall complete a report of excavations and findings, and shall submit the report for peer review by three County-certified archaeologists or paleontologists, as appropriate. Upon approval of the report, the County shall submit the report to the South Central Coastal Information Center (SCCIC). The SCCIC shall maintain the report on file. After the find has been appropriately mitigated, as prescribed in this measure, work in the area may resume.

MM-CR-02 In the event that paleontological resources are unearthed during project subsurface activities, all earth-disturbing work within a 10-meter radius shall be temporarily suspended or redirected until the paleontologist can assess the significance of the find and implement appropriate measures to protect or properly remove the find per Federal and State regulations. Construction personnel must be informed that unauthorized collection of cultural resources is prohibited.

If the resource is determined to be significant, the paleontologist, as appropriate, shall prepare a research design for recovery of the resources in consultation with the State Office of Historic Preservation that satisfied the requirements of CEQA Section 21083.2. The paleontologist must complete a report of excavations and findings, and shall submit the report for peer review by three County-certified archaeologists or paleontologists, as appropriate. Upon approval of the report by the State Office of Historic Preservation, the County certified paleontologist shall submit the report to the South Central Coastal Information Center, or another appropriate repository. The SCCIC shall maintain the report on file. After the find has been appropriately mitigated, as prescribed in this measure, work in the area may resume.

MM-CR-03 If human remains are encountered, H&SC Section 7050.5 states that no further disturbance shall occur until the County Coroner has made necessary findings as to origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. The following actions must be taken in the event that human remains are discovered on private or State land:

- Stop work immediately and contact the County Coroner. The County Coroner must be notified immediately of the find;
- The Coroner has two working days to examine human remains after being notified by the responsible person. If the remains are determined to be prehistoric or Native American, the coroner will notify the Native American Heritage Commission (NAHC);
- The NAHC will immediately notify the person it believes to be the most likely descendent (MLD) of the deceased Native American. With the permission of the landowner or agency or an authorized representative, the MLD may inspect the site of the discovery; and
- The MLD makes recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

If the commission is unable to identify a descendent, or the descendent identified fails to make a recommendation, or the landowner rejects the recommendations of the descendent and the mediation provided for in subdivision (k) of Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with the Native American burial(s) with appropriate dignity on the property in a location not subject to further subsurface disturbance.

NOISE (CONSTRUCTION)

MM-NO-02 In order to reduce noise levels generated by construction traffic, the trucks going to and from the proposed Project site will reduce their noise levels along Devonshire Street, in between Larwin Avenue and Shadow Oak Drive, by traveling at speeds of 25 mph and under. By decreasing the trucks speeds to 25 mph along that roadway segment, the increase in CNEL will be 2.5 dBA and will be less than the significance threshold of 3 dBA CNEL.

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ACRONYMS AND ABBREVIATIONS

ADT	Average Daily Trips
AQMP	Air Quality Management Plan
ARARs	Applicable or Relevant and Appropriate Requirements
B(a)P-TE	benzo(a)pyrene toxicity equivalent
bgs	Below ground surface
BMP	Best Management Practice
BSA	Biological Survey Area
BSS	City of Los Angeles Department of Public Works, Bureau of Street Services
CA	California
Cal/EPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CGs	cleanup goals
CHHSL	California Human Health Screening Level
CHRIS	California Historical Resources Information System
City of Los Angeles	City of Los Angeles Department of Recreation and Parks
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
COCs	Contaminants of Concern
COPCs	chemicals of potential concern
County	County of Los Angeles
cu.yd.	cubic yards
CWA	Clean Water Act
dBA	A-weighted decibels
Dig Alert	Underground Service Alert
DTSC	State of California Department of Toxic Substances Control
EIR	Environmental Impact Report
ERA	Ecological Risk Assessment
ESA	Endangered Species Act
Farmland	Prime Farmland, Unique Farmland, or Farmland of Statewide Importance
FEMA	Federal Emergency management Agency
FIRM	Flood Insurance Rate Map
GHG	Greenhouse Gas
H&SC	California Health and Safety Code
HASP	Health and Safety Plan
HHRA	Human Health Risk Assessment
Homestead Property	Hill-Palmer Homestead Acre
HOV	High-Occupancy Vehicle
I-	Interstate
IS/MND	Initial Study/Mitigated Negative Declaration
LACMTA	Los Angeles Metropolitan Transportation Authority
LADBS	City of Los Angeles Department of Building and Safety
LADRAP	City of Los Angeles Department of Recreation and Parks
LAFD	City of Los Angeles Fire Department
LAHCM	Los Angeles Cultural Historic Monument
LAMC	City of Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department

LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LOS	Level of Service
LSTs	localized significance thresholds
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles Metropolitan Transportation Authority
MLD	most likely descendent
mph	miles per hour
MRZ	Mineral Resource Zone
MTons	Metric Tons
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NFA	No Further Action
NIOSH	National Institute of Occupational Safety and Health
NOx	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NRPH	National Register of Historic Places
O&M	Operations and Maintenance
OS	Open Space
OSHA	Occupational Safety and Health Administration
PAHs	polycyclic aromatic hydrocarbons
PEA	Preliminary Endangerment Assessment
PM_{10}	Particulate matter of 10 microns or less in size
$PM_{2.5}$	Particulate matter of 2.5 microns or less in size
ppm	parts per million
proposed Project	Chatsworth Park South Remedial Action Plan Project
RACR	Remedial Action Completion Report
RAOs	remedial action objectives
RAP	Remedial Action Plan
RCP	Reinforced Concrete Pipe
RCRA	Resource Conservation and Recovery Act
ROG	Reactive Organic Gases
ROW	right-of-way
SAFR	small arms firing range
SCAG	Southern California Association of Governments
SCAQMD	Southern California Air Quality Monitoring District
SCCIC	South Central Coastal Information Center
SOx	Sulfur Oxides
SR-	State Route
SSI	Supplemental Site Investigation
SWPPP	Storm Water Pollution Prevention Plan
TCDD-TEQ	Tetrachlorodibenzodioxin toxicity equivalency quotient
U.S.	United States
US-	United States Highway
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
V/C	volume to capacity ratio
VCA	Voluntary Cleanup Agreement
V-ditch	concrete swales
VOC	Volatile Organic Compound

1.0 INTRODUCTION

Project Information

Project Title:	Chatsworth Park South Remedial Action Plan
Project Location:	22360 West Devonshire Street, Los Angeles, California
Lead Agency:	City of Los Angeles Department of Recreation and Parks

Overview

The City of Los Angeles Department of Recreation and Parks (LADRAP) has prepared this Initial Study/ Mitigation Negative Declaration (IS/MND) to evaluate the potential environmental consequences associated with the Chatsworth Park South Remedial Action Plan[1] (proposed Project). The proposed Project would construct a one-foot surface cap over contaminants in Chatsworth Park South (the Project site), an existing City of Los Angeles park currently with limited public access due to contamination. As part of the permitting process, the proposed Project is required to undergo environmental review pursuant to the California Environmental Quality Act (CEQA). One of the main objectives of CEQA is to disclose the potential environmental effects of proposed activities to the public and to decision makers. CEQA requires that the lead agency prepare an Initial Study (IS) to determine whether a Negative Declaration (ND), a Mitigated Negative Declaration (MND), or an Environmental Impact Report (EIR) is needed. LADRAP is the lead agency for the proposed Project.

Authority

The preparation of this IS/MND is governed by two principal sets of documents: CEQA (Public Resources Code Section 21000, et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of initial studies is guided by Section 15063 of the State CEQA Guidelines, and Sections 15070–15075 of Article 6 guide the process for the preparation of an MND. Where appropriate and supportive to an understanding of the issues, reference will be made either to the statute, the State CEQA Guidelines, or appropriate case law.

This IS/MND contains all of the contents required by CEQA, which includes a project description, a description of the environmental setting, potential environmental impacts, mitigation measures for any significant effects, consistency with plans and policies, and names of preparers.

The mitigation measures included in this IS/MND are designed to reduce or eliminate the potentially significant environmental impacts described herein. Where a mitigation measure described in this document has been previously incorporated into the proposed Project, either as a specific feature of design or as a mitigation measure, it is noted in the discussion. Mitigation measures are structured in accordance with the criteria in Section 15370 of the State CEQA Guidelines.

Scope of the IS/MND

This IS/MND evaluates the proposed Project's effects on the following resource areas:

[1] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- 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 and Traffic
- Utilities and Service Systems
- Mandatory Findings of Significance

Terminology of Impacts

The following terminology is used to describe the level of significance of impacts:

- **No Impact**: this finding is appropriate if the analysis concludes that the proposed Project would not affect the particular topic area in any way.
- **Less Than Significant**: this finding is appropriate if the analysis concludes that the proposed Project would cause no substantial adverse change to the environment and requires no mitigation.
- **Less Than Significant With Mitigation**: this finding is appropriate if the analysis concludes that the proposed Project would cause no substantial adverse change to the environment with the inclusion of environmental commitments that have been agreed to by the applicant.
- **Potentially Significant**: this finding is appropriate if the analysis concludes that the proposed Project could have a substantial adverse effect on the environment.

Organization of IS/MND

The content and format of this report are designed to meet the requirements of CEQA. The report contains the following sections:

Chapter 1.0 – Introduction: this chapter identifies the purpose and scope of the IS/MND and the terminology used in this report.

Chapter 2.0 – Project Description: this chapter identifies the location, discusses the background, and describes each component of the proposed Project in detail.

Chapter 3.0 – Initial Study Environmental Checklist: this chapter presents the checklist responses for each resource topic and identifies the impacts of implementing the proposed Project.

Chapter 4.0 – References: this chapter identifies all printed references and individuals cited in this IS/MND

Chapter 5.0 – List of Preparers: this chapter identifies the individuals who prepared this report and their area of technical specialty.

Thresholds of Significance

This IS/MND uses the standard thresholds of significance for the resource areas described above. These thresholds are provided in Appendix G of the 2013 CEQA Guidelines. These thresholds are presented in section one of each resource topic.

This IS/MND also evaluates the 2006 City of Los Angeles CEQA thresholds established by the City of Los Angeles. Where appropriate, these thresholds are incorporated into and addressed by the CEQA Guidelines Appendix G thresholds. City of Los Angeles CEQA Thresholds which require additional analysis and explanation have been included as separate thresholds of significance, as section two of each resource section.

2.0 PROJECT DESCRIPTION

2.1 Overview

The Chatsworth Park South Remedial Action Plan Project (proposed Project) is the implementation of a Remedial Action Plan (RAP)[2] to address contaminated soil at Chatsworth Park South (Project site), which is a City of Los Angeles Department of Recreation and Parks (LADRAP or City of Los Angeles) facility encompassing approximately 72 acres in the northwestern portion of the San Fernando Valley. The proposed Project involves containment of contaminated soils through capping of the contaminated soil surface. The RAP was prepared pursuant to the terms of a Voluntary Cleanup Agreement (VCA) between LADRAP and the State of California Department of Toxic Substances Control (DTSC). The proposed Project includes activities associated with removal of approximately 12,900 cubic yards (cu.yd.) of contaminated soils and their disposal in appropriate landfills, import of approximately 27,800 cu.yd. of clean soil and approximately 16,750 cu.yd. of aggregate base to be used for the capping process, installation of a drainage system, removal of approximately 166 non-Heritage, non-protected trees, replacement of these trees with at least an equal number of native trees, installation of an irrigation system for the new trees, and installation of fencing around trees and areas where capping will not be implemented. The proposed Project also includes rough grading the top 18 inches of soil to destroy the existing burrowing animal network and to prevent future settlement by installing a layer of steel hardware cloth beneath the capping base. Portions of the Project site with steep terrain will not be remediated and will be fenced off to restrict public access. The proposed Project includes paving of an expanded parking lot adjacent to the existing parking lot. The proposed Project does not include demolition or modification of existing Project site structures or construction of new facilities (other than the additional parking lot) at the Project site.

2.2 Project Site

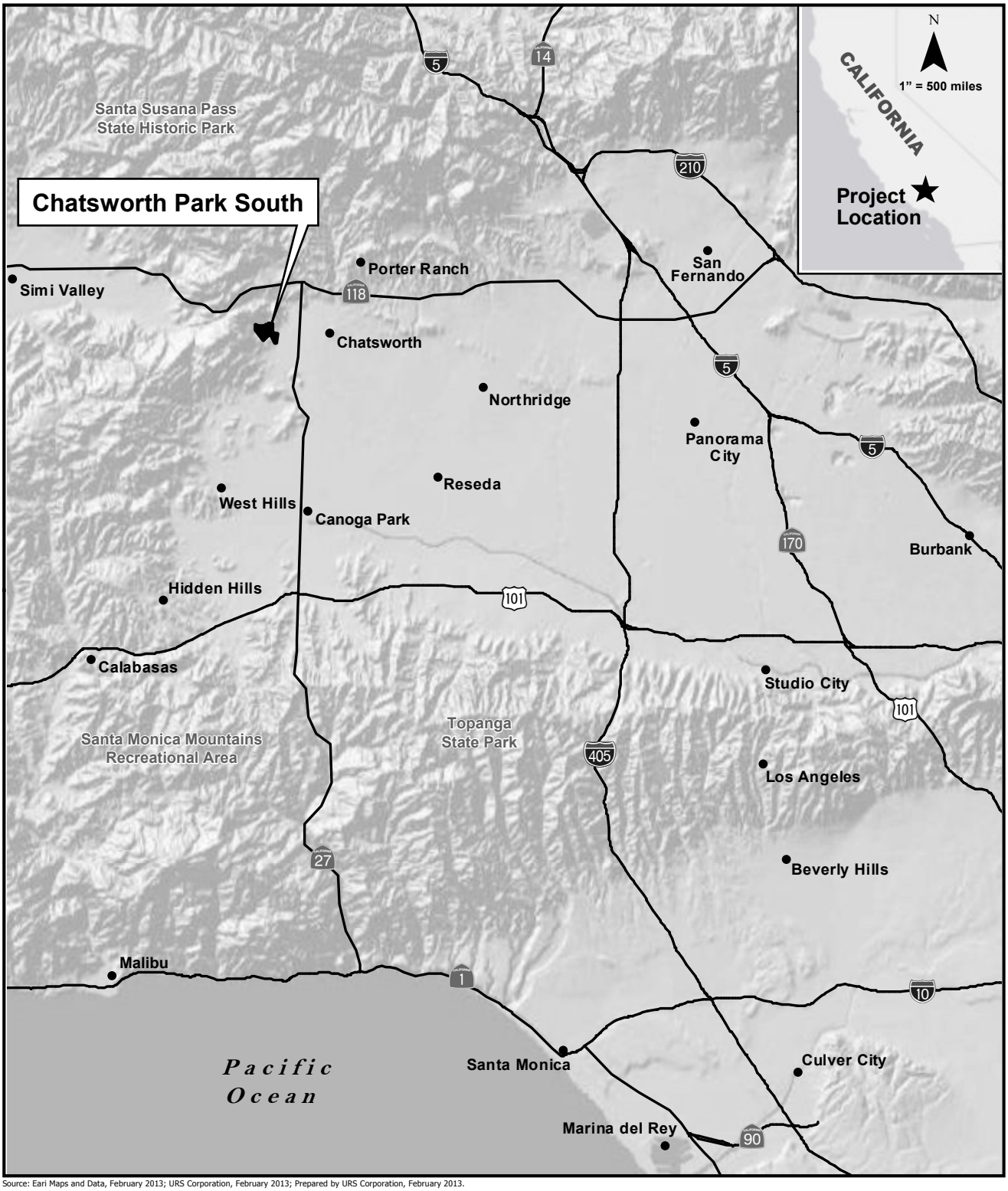
2.2.1 Site Location

The Project site is located at 22360 West Devonshire Street in the community of Chatsworth, in the City of Los Angeles, County of Los Angeles, CA (**Figure 2-1**). The Project site is located where the San Fernando Valley floor abuts the adjacent Simi Hills/Santa Susana Mountains. The Project site is bounded to the east by single-family residences and to the north, west, and south by undeveloped hillside terrain that is part of the Santa Susana Pass State Historic Park. Various recreational trails for pedestrians, hikers, and equestrians surround the areas of the Project site which are level. A railroad right-of-way (ROW) is located adjacent to the Project site to the north.

2.2.2 Existing Site Conditions

Approximately 21 acres of the Project site are developed and include a 10,000-square-foot recreation facility, tennis courts, a basketball court, picnic areas, children play areas, parking areas, and open space (**Figure 2-2**). The open space areas of the Project site include level areas which contain trees, including oaks and other Heritage trees. The Project site also includes hilly terrain and a rock outcropping. Chatsworth Park South was closed to public access and use during the spring of 2008 because of contamination concerns; however, the recreation building was reopened in February 2013 on a limited-use basis. The Project site is surrounded by a chain-link fence and remains closed pending completion of a remedial action.

[2] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.



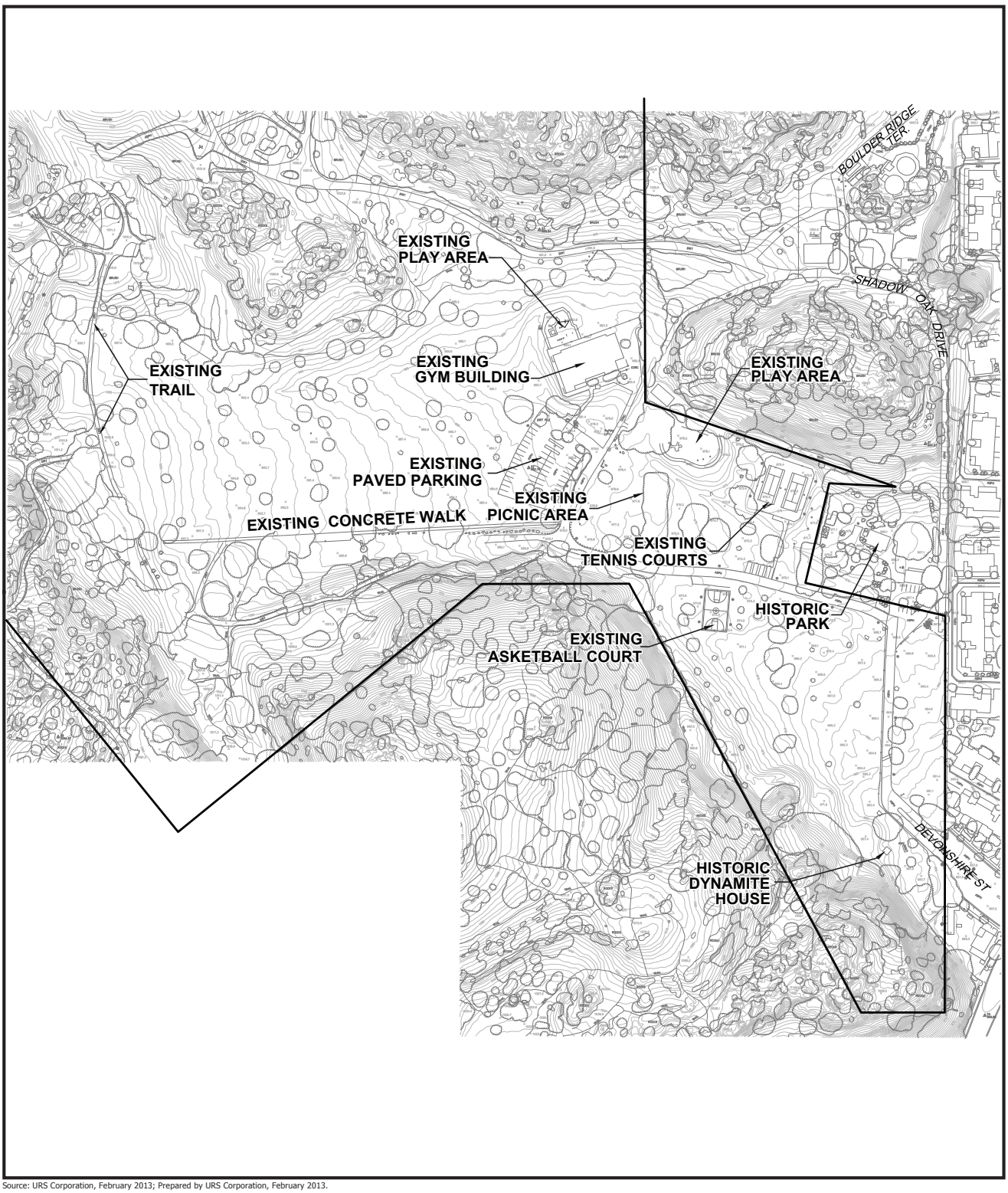
Source: Earl Maps and Data, February 2013; URS Corporation, February 2013; Prepared by URS Corporation, February 2013.

north
0 3 mi.
1" = 3 mile

LEGEND

Chatsworth Park South (Project Site)

Figure 2-1
Regional Location



Source: URS Corporation, February 2013; Prepared by URS Corporation, February 2013.

north
0 400 ft.
1" = 400 feet

LEGEND

Chatsworth Park South Boundary

Figure 2-2
Existing Project Site

2.2.3 Site Background

A small arms firing range (SAFR) occupied a portion of the Project site from the early to mid-1950s until the mid-1960s. The operation of the SAFR resulted in wide surficial spread of lead shot and clay target debris containing elevated polycyclic aromatic hydrocarbons (PAHs). The City of Los Angeles acquired the Project site in 1973 and developed the relatively level portions of the Project site with recreational improvements during the 1970s and 1980s. The construction activities at the Project site included those associated with the leveling of the former skeet range area, planting of trees, removal and compaction for development of the existing recreation building, and preparation for a parking area, play areas, a basketball court, and tennis courts. Construction activities at the Project site have also included grading for placement of the water/oil transmission pipelines. These construction activities resulted in the distribution of the firing range waste products (lead shot and clay target debris) deeper into the soil and over portions of the Project site which were not part of the former SAFR.

2.2.4 Previous Site Environmental Investigations

Characterization and delineation of chemicals of potential concern (COPCs) at the Project site occurred during the following investigations:

- Preliminary investigation conducted in February and March 2008;
- Supplemental Site Investigation (SSI) and a Preliminary Endangerment Assessment (PEA) in December 2009 and January 2010;
- A Human Health Risk Assessment (HHRA) prepared as part of the SSI/PEA in 2010;
- An Ecological Risk Assessment (ERA) prepared as part of the SSI/PEA in 2010; and
- Supplemental sampling conducted in October 2012.

These reports are referenced in the Chatsworth Park South RAP.[3]

2.3 Description of Remedial Action Plan (RAP)

2.3.1 Overview

The RAP was prepared in general accordance with DTSC's *Remedial Action Plan (RAP) Policy*, and in a manner consistent with the Comprehensive Environmental Response Compensation and Liability Act (CERCLA, 42 U.S.C. 9601 et seq.), as amended, the National Contingency Plan (NCP, 40 Code of Federal Regulations [CFR] Part 300), as amended, the California Health and Safety Code (H&SC) Section 25300 et seq., as amended, applicable U.S. Environmental Protection Agency (USEPA) guidance (USEPA, 1988), and other applicable state and local laws and regulations. The remedial action objectives (RAOs), that are protective of human health and the environment, have been established as:

- Mitigate and/or remediate impacted media (i.e., soil) with concentrations that exceed residential land-use cleanup levels derived for the risk-driving COCs to minimize potential human exposure to non-volatile COCs in soil via direct contact (soil ingestion, dermal contact, and inhalation of particulates). Based on the results of the SSI/PEA HHRA, the risk-driving COCs for the direct contact pathway are lead, antimony (co-located with the lead), PAHs (evaluated as benzo(a)pyrene toxicity equivalent [B(a)P-TE] concentration), and dioxins/furans (which were determined to be within the range typically observed in urban areas).
- Minimize potential for migration of COCs in soil to other media (air and surface water).

[3] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.

The proposed risk-based cleanup goals (CGs) for the COPCs in response to the RAOs for the Project site are:

- Lead – 80 mg/kg (California Environmental Protection Agency [Cal/EPA] California Human Health Screening Level [CHHSL] 2009)
- Antimony (co-located with lead) – 30 mg/kg (HHRA risk-based cleanup goal for onsite residents)
- PAHs (as B(a)P-TE) – 0.9 mg/kg (Southern California regional background)
- Naphthalene (co-located with PAHs) – 1.9 mg/kg (HHRA risk-based cleanup goal for onsite residents)

The RAP focuses on capping the COPC-impacted soils in place to reduce the threat to human health and the environment and to provide a permanent solution that reduces the accessibility and mobility of the impacted soils. To facilitate the discussion of remedial actions, the portions of the Project site proposed for remediation are sub-divided into Remediation Areas A through N (**Figure 2-3**).

2.3.2 RAP Elements

The proposed Project combines containment of the impacted soils and recording of a Land Use Covenant to adequately remedy the Project site for future recreational uses. The proposed Project elements and activities that would be conducted to implement are described below.

2.3.2.1 Installation of Cap

The following elements are related to installation of the cap.

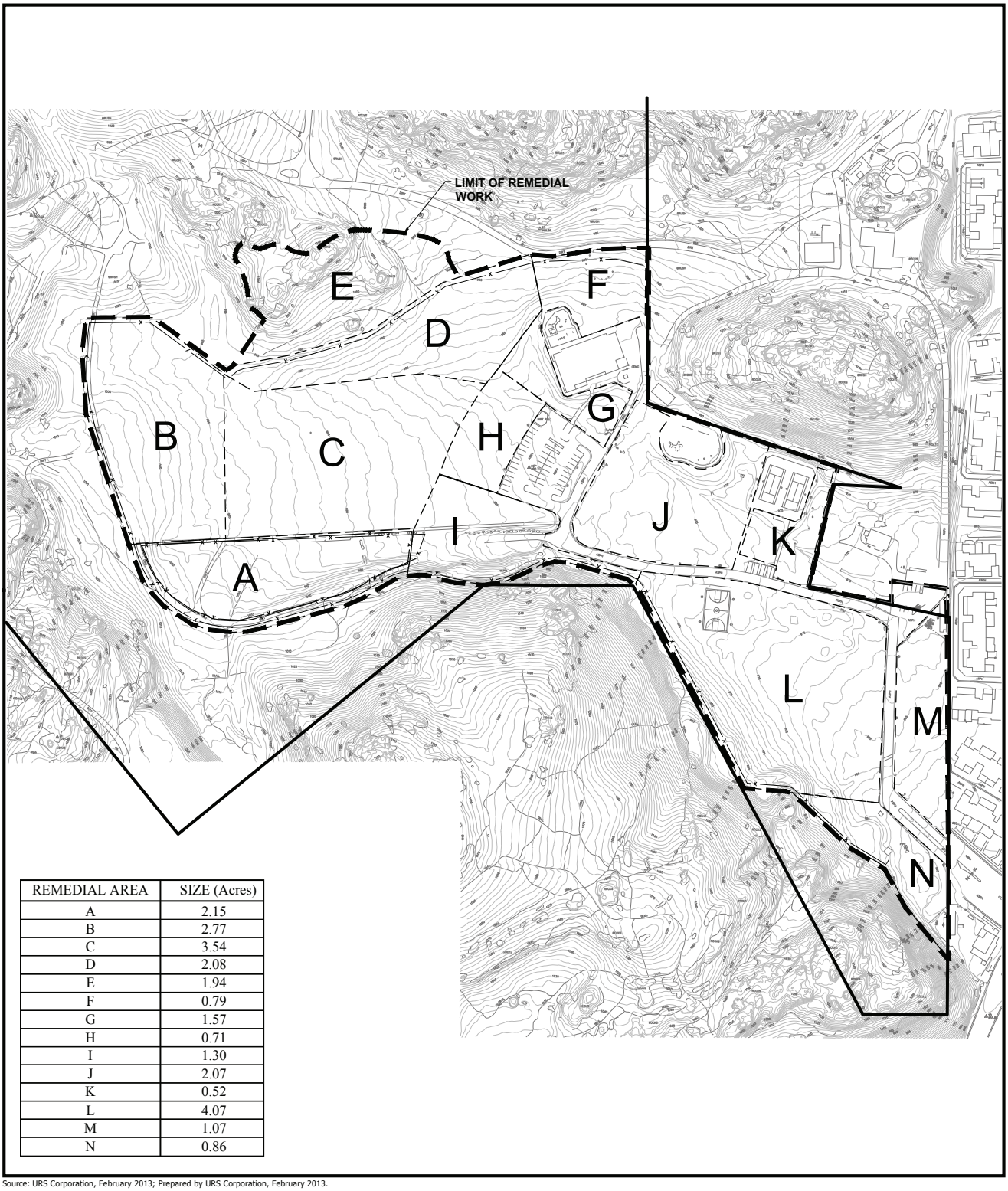
- **Utility Clearance.** As required, Underground Service Alert (Dig Alert) will be notified prior to the start of remedial activities to allow for member utility companies to mark underground lines that may conflict with the proposed remedial action. Dig Alert will mark each utility with the proper identification and coloring. A geophysical survey will also be conducted on areas subject to remediation.

- **Security Measures.** Temporary fencing with windscreen will be used to limit unauthorized entry into the Project site. Fencing will be locked and secured when Project site personnel are not present. During remedial activities, access will be restricted to work personnel. Daily logs will be recorded to monitor personnel entering and leaving the Project site.

- **Rough Grading and Excavation for Drainage System.** Prior to rough grading the Project site, soil excavation will be conducted to construct utility trenches for the subsurface portion of the drainage system. Soil from the utility trenches will be stockpiled temporarily along the alignment of the trenches and used to backfill the trenches following installation of the drainage pipes. Any excess soil remaining after pipe installation will be included in the rough grading operations. The upper 18 inches of native terrain in all areas (except Areas A and E) of the Project site will be rough graded in accordance with the grading plan and the soil will be compacted to approximately 90 percent relative compaction to remove existing burrowing animal tunnels.

- **Cap Construction**. For all remedial areas other than Areas A and E, and the protected and replacement tree areas, a 1-foot surface cap will be constructed. From top to bottom, the cap will consist of 4 inches of top soil to support turf growth, 8 inches of aggregate base to provide a wear-resistant foundation layer and to allow drainage, and a layer of steel hardware cloth (with 1-inch square mesh) to prevent burrowing animals from disturbing the cap (**Figure 2-4**). Approximately 8,400 cu.yd. of clean soil and 16,750 cu.yd. of aggregate base will be imported to the Project site for construction of the cap. The sprinkler system distribution piping will be installed on top of the hardware cloth over the base native soil prior to placement of the aggregate base.

- Install fencing around the perimeter of Areas A through N to restrict public access to the portions of the Site outside these Areas that are not proposed for remediation because of steep terrain. Drainage features will also be implemented along the perimeter of Areas A through N.



REMEDIAL AREA	SIZE (Acres)
A	2.15
B	2.77
C	3.54
D	2.08
E	1.94
F	0.79
G	1.57
H	0.71
I	1.30
J	2.07
K	0.52
L	4.07
M	1.07
N	0.86

Source: URS Corporation, February 2013; Prepared by URS Corporation, February 2013.

north
0 400 ft.
1" = 400 feet

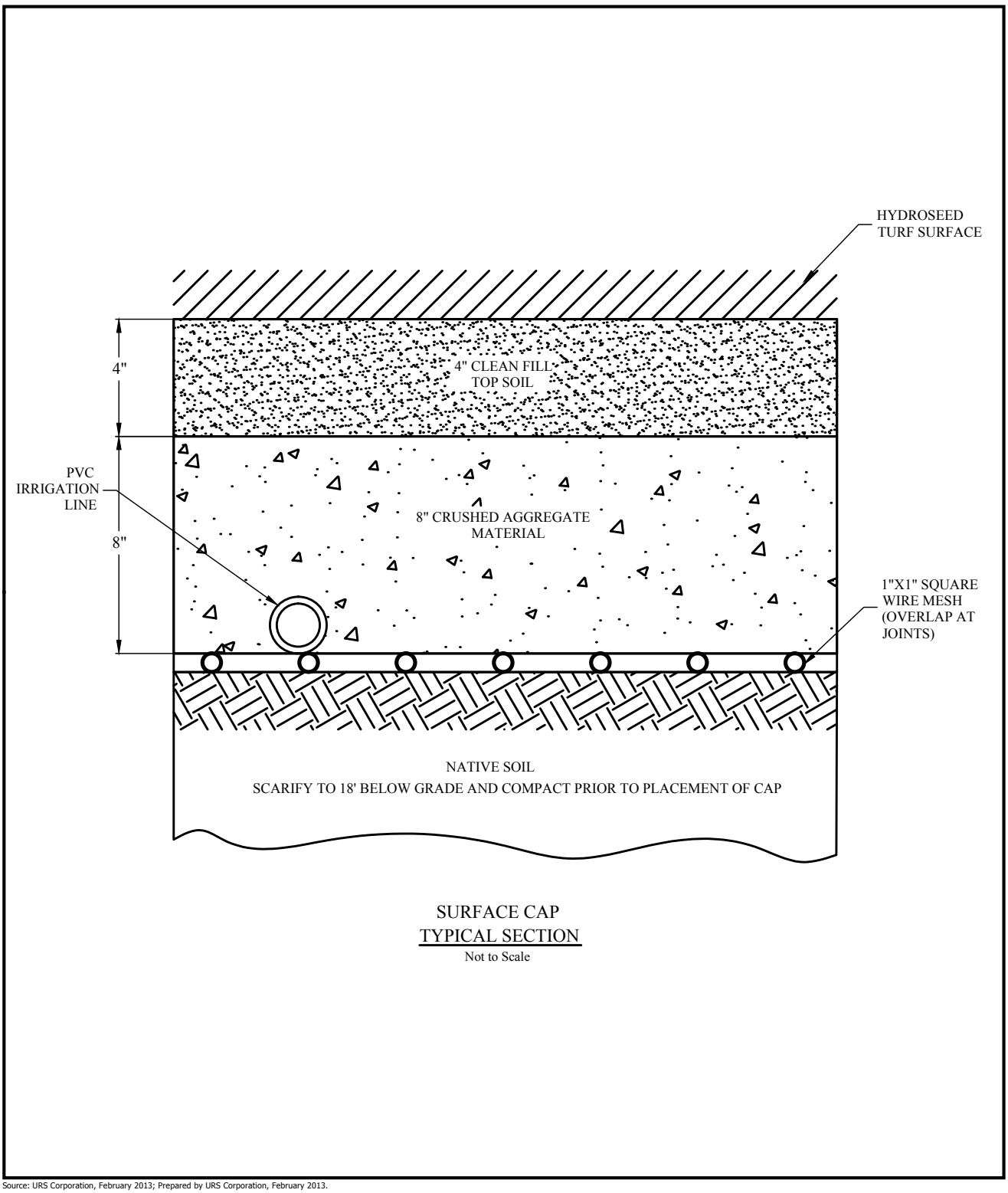
LEGEND

Chatsworth Park South Boundary

Project Site

A Proposed Remediation Areas

Figure 2-3
Project Site Remediation Areas



Source: URS Corporation, February 2013; Prepared by URS Corporation, February 2013.

Figure 2-4
Cap Illustration

2.3.2.2 Tree Removal and Planting

The following elements are related to the removal and replacement of trees at the Project site.

- **Tree Demolition.** Grub and remove trees (with the exception of protected and Heritage trees as designated by the City of Los Angeles) from the proposed remedial areas with the exception of Area A (an oak grove) and Area E (a rocky outcrop).
- **Remaining Tree Protection.** Install fencing around the entirety of Area A (an oak grove) and individual trees retained due to their protected or Heritage status.
- **Replacement Tree Groves**. Construct native tree groves to mitigate tree removal required for remedial implementation as shown conceptually in **Figure 2-5**. T The final design will include sufficient tree grove area to accommodate approximately 200 replacement trees. Areas located within the boundary of the surface cap will be prepared for planting of native tree species as required by the City of Los Angeles. The trees will be planted in areas excavated and backfilled with 3 feet of clean soil, i.e., 2 feet of soil to fill the original excavation and 1 foot to match the grade of the surface cap using traditional excavation methods. This will include the excavation and offsite disposal of approximately 12,900 cu.yd. or 850 truckloads of impacted soil from the tree grove areas. The impacted soil will be transported to an approved offsite facility for disposal. The groves will be protected from burrowing animals by installing vertical sections of hardware cloth around the perimeter of each tree or grove that ties into the surface cap's underlying horizontal hardware cloth. The surface cap sprinkler system will be extended into the tree groves to supply irrigation water.

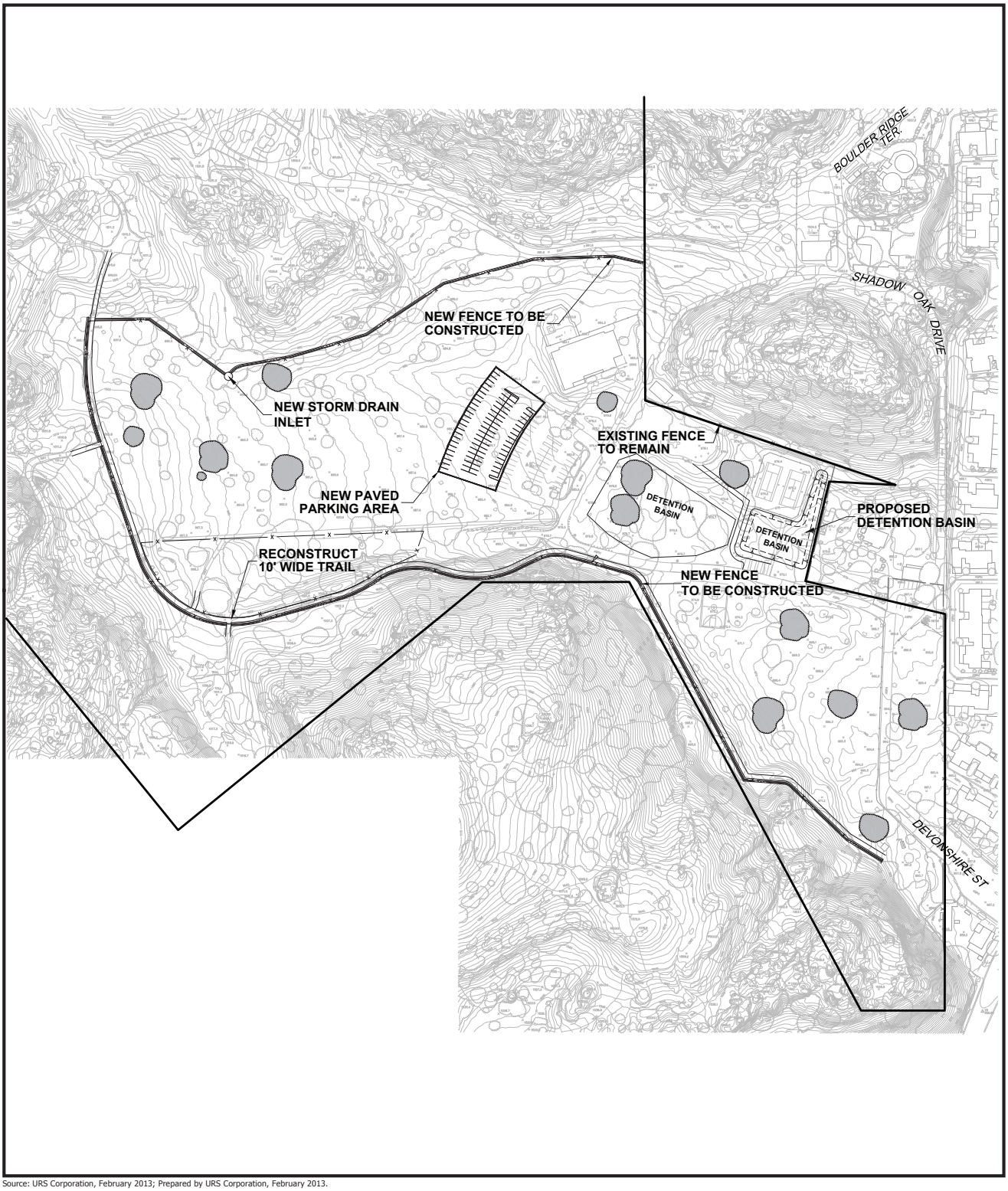
2.3.2.3 Parking Lot Expansion

As shown in **Figure 2-5**, an area that will be paved over for use as a parking lot is included as part of the RAP in Area H (**Figure 2-3**). Area H would not use a cap system shown in **Figure 2-4**. Instead, remediation of Area H will be done by paving the area.

2.3.2.4 Area E (Rocky Outcrop) Remediation

Area E represents a rocky outcrop with extensive accumulation of visible lead pellets on the rock surface and shallow soil. Remediation of Area E will include the following activities:

- Grub the area by removing all short shrubs and seasonal vegetation to expose the underlying surface
- Scour the area and remove all visible lead pellets and surficial soil using manual labor equipped with vacuums, rakes, and shovels
- Contain all recovered lead pellets, surficial soil, and any associated debris in U.S. Department of Transportation (USDOT)-approved drums or roll-off bins for lawful offsite disposal, and
- Profile waste and dispose offsite as Resource Conservation and Recovery Act (RCRA) hazardous waste or non-RCRA California hazardous waste, as appropriate.



Source: URS Corporation, February 2013; Prepared by URS Corporation, February 2013.

Figure 2-5
Proposed Site Plan

2.3.2.5 Drainage System Improvements

Upon completion of the surface cap, the surface portions of the drainage system will be constructed. The drainage system has been designed to control runoff from upslope areas for a 10-year storm event and, thereby, protect the surface cap from erosion. Surface runoff will be captured at the base of the abrupt elevation changes along the perimeter of the surface cap and will also capture runoff on the southern side of Area A (the oak grove).

The proposed Project will not alter current drainage patterns or significantly impact the rate of stormwater runoff. The portion of the Project site north and west of the access road will drain to a below ground conveyance pipe system (two 36-inch reinforced concrete pipes) whose alignment follows the original drainage swale roughly west to east through the northern portion of the Project site. Storm drain inlets set flush in the surface cap will promote drainage of the relatively flat areas of the Project site. The below ground conveyance pipe will discharge into a detention basin near the eastern property line. The purpose of the detention basin is to capture sediment entrained in the runoff and modulate flow to the offsite drainage channel that drains to the City of Los Angeles' public stormwater system. The detention basin will be constructed as part of grading operations and will be grass-lined. The detention basin will be fenced off and accessible only by maintenance staff.

The portion of the Project site south of the access road will continue to drain as surface water flow to the east with little modification. Except for the upslope flows captured along the western property line, stormwater will sheet flow over the surface cap and drain to the stormwater channel located along the eastern property line.

The stormwater drainage system includes the following improvements:

- Two belowground 36-inch reinforced concrete pipe (RCP) drain pipes
- Catch basins and connection pipes
- Perimeter concrete swales ("V-ditch")
- Perimeter fencing integrated with the concrete swales, and
- Earthen/grass-lined detention basin and outlet structure.

2.3.2.6 Applicable or Relevant and Appropriate Requirements (ARARs) – Permits and Plans:

All necessary construction permits or approvals will be obtained prior to the planned remedial activities. As the Project site is located within the City of Los Angeles, it is anticipated that the following permits will be secured prior to start of construction:

- Grading Permit and Haul Route Approval – Issued by the City of Los Angeles Department of Building and Safety (LADBS)
- Fugitive Dust Rule 403 Permit – Issued by the Southern California Air Quality Monitoring District (SCAQMD)
- Tree Removal Permit – Issued by City of Los Angeles, Department of Recreation and Parks, Urban Forestry Division
- Storm Water Pollution Prevention Plan (SWPPP) – Notice of intent filed with Los Angeles Regional Water Quality Control Board (LARWQCB).

2.3.2.7 Post Implementation Activities

After implementation of the RAP and submittal of the Remedial Action Completion Report (RACR), DTSC will provide a letter to City of Los Angeles indicating that No Further Action (NFA) is required if the impacted areas have been adequately addressed in accordance with the approved RAP prior to re-opening the Project site. As part of the NFA decision, DTSC will certify that all necessary response actions have been completed in accordance with the approved RAP and that Project site conditions do not pose a significant risk to employees, visitors, and nearby residents. In addition, the City of Los Angeles will be required to record a Land Use Covenant and prepare an associated Operations and Maintenance (O&M) Plan.

3.0 INITIAL STUDY ENVIRONMENTAL CHECKLIST

1. Project Title:	Chatsworth Park South Remedial Action Plan Project
2. Lead Agency Name and Address:	City of Los Angeles Department of Recreation and Parks 221 N. Figueroa Street, Suite 100 Los Angeles, CA 90012
3. Contact Person and Phone Number:	Mr. Paul Davis, Environmental Specialist (213) 202-2667
4. Project Location:	22360 West Devonshire Street Chatsworth, CA 91311
5. Project Sponsor's Name and Address:	City of Los Angeles Department of Recreation and Parks 221 N. Figueroa Street, Suite 100 Los Angeles, CA 90012
6. General Plan Designation:	Open Space
7. Zoning:	Open Space (OS)
8. Description of Project:	See Chapter 2, Project Description
9. Surrounding Land Uses and Setting:	See Chapter 2, Project Description
10. Other Public Agencies Whose Approval is Required	California Department of Toxic Substances Control Cleanup Program - Chatsworth Office 9211 Oakdale Avenue Chatsworth, CA 91311-6505

Environmental Factors Potentially Affected:

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

☐ Aesthetics	☐ Agricultural and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ 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 and Traffic	☐ Utilities and Service Systems	☐ Mandatory Findings of Significance

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

☐ I find that although the proposed project could have a significant effect on the environment because all potentially significant effects (1) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Paul J. Davis
Signature

March 15, 2013
Date

PAUL DAVIS
Print Name

Los Angeles, Dept. Recreation and Parks
For

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact' answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., based on a project-specific screening analysis the project would not expose sensitive receptors to pollutants.)
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significant.

3.1 Aesthetics

3.1.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

DISCUSSION

I.a. **No Impact.** The Project area's primary scenic vista is of the Santa Susana Mountains, which are located adjacent to the Project site. The nearest scenic vista sensitive receptors are the residents of primarily multi-family homes directly adjacent to both the Project site and the Santa Susana Mountains. The proposed Project would install a one-foot surface cap on the Project site, and would remove existing non-Heritage or protected trees which will be replaced on-site. Fencing would be installed and modified during remedial activities and remain during operations. No new buildings would be constructed or existing structures modified. The proposed Project would not block or substantially affect the existing scenic vista, as the majority of Project elements are two-dimensional, including the cap and the paved parking lot. The type of fencing that would be installed would have gaps, and not be a solid wall. The maximum height of any fencing would be approximately 6 feet, which would not affect views of the Santa Susana Mountains. Therefore, impacts to scenic vistas would not occur.

I.b. **No Impact.** The Project area's primary scenic resources include the Santa Susana Mountains, rocky outcroppings, and historic elements located within and adjacent to the Project site. The proposed Project would be implemented primarily on the flat portions of the Project site and would not damage known scenic resources. The activities associated with Area E (Rocky Outcropping) would not substantially modify the character of Area E. The nearest Caltrans designated State Scenic Highway is State Route (SR-) 2, located approximately 24.5 miles to the east of the Project site; however, the Project site is not visible from SR-2. The Project site is not visible from the nearest Caltrans County Scenic Highways, Las Virgenes Highway and Mulholland Highway, located approximately 10 miles southwest and 13 miles south from the Project site, respectively.[4] The Project site is also not visible from the nearest City of Los Angeles designated Scenic Highways, Santa Susana Pass Road and Valley Circle Boulevard located approximately 0.75 miles north and 0.45 miles southeast of the Project site, respectively.[5] Therefore, impacts to scenic resources within a state scenic highway would not occur.

I.c. **No Impact.** The Project site is an existing park and includes existing trees and fencing as well as a rocky outcropping (Area E). The proposed Project would construct a one-foot high surface cap capable of supporting turf growth. Fencing would include 6-foot high chain-linked fencing with wind screening during remedial activities, and would include guard cable, chain-linked,

[4] California Department of Transportation, Officially Designated Scenic Highways, July 11, 2012, Online at *http://www.dot.ca.gov/hq/LandArch/scenic/schwy.htm*, accessed February 2013.

[5] City of Los Angeles, Planning Division website, Transportation Element, *http://cityplanning.lacity.org/cwd/gnlpln/TransElt/TEMaps/E_Scnc.gif,* Accessed February 2013.

metal handrail, and cedar split rail fencing during operations.[6] Several existing non-Heritage trees would be removed as part of the proposed Project, but would be replaced onsite with new trees on at a minimum of a one-to-one ratio. No existing buildings would be modified or demolished and no new buildings would be constructed. Area E, including the rocky outcropping, would be remediated in such a way as to not affect the outcropping. Only short shrubs and seasonal vegetation would be removed and the surface scoured in Area E, as described in the Project Description Section 2.3.2.3. The Project site would remain a park with trees and fencing, and the rock outcropping will remain intact. Therefore, impacts related to substantial degradation of the existing visual character or quality of the site and its surroundings would not occur.

I.d. **Less Than Significant Impact.** The Project site is currently closed, but since the reopening of the recreation center, there exist security lighting on Chatsworth Park South with typical light fixtures for a park located adjacent to a residential area (as required under the City of Los Angeles Municipal Code, LAMC). Construction of the surface cap and removal and replacement of trees would not require the addition of any temporary light sources, as the construction would be limited to daylight hours. The proposed Project would include construction of a parking lot adjacent to the existing parking lot and, thus, would introduce new permanent lighting to the Project site. The lighting for the new parking lot would be similar to existing lighting and would be constructed per requirements for lighting in parks and near residential uses to avoid spillover. However, spillover is not likely, as the new parking lot would be located in the interior of the park and not adjacent to residences.

Impacts to sensitive uses related to glare are typically caused by the type of material utilized in the exterior of buildings. The proposed Project does not propose to modify any existing buildings or construct any new buildings. The top (ground level) layer of the surface cap would be topsoil capable of supporting turf, and therefore the surface cap would not be a source of glare. Therefore, impacts related to new sources of lighting or glare would be less than significant.

3.1.2 City of Los Angeles CEQA Thresholds

In addition to the thresholds in Appendix G of the CEQA Guidelines, the following analysis was completed in compliance with the 2006 City of Los Angeles CEQA Thresholds.[7] The City of Los Angeles CEQA Thresholds presented below are not the complete thresholds for this environmental topic, but rather those that require additional analysis beyond that which was conducted for the Appendix G thresholds above.

A.1: The determination of significance shall be made on a case-by-case basis, considering the following factors:

- *The amount of natural open space to be graded or developed*

Less Than Significant Impact. The Project site is an existing park, comprised of developed open space, trees, and recreational facilities. There is an undeveloped rocky outcropping on-site and the Santa Susana Mountains border the Project site on the northern, western, and southern sides. The proposed Project would include remedial actions in Area E, the location of the rocky outcropping. Short shrubs and seasonal vegetation would be grubbed and the surface scoured. The other natural open space surrounding the Project site would not be impacted. While the rocky outcropping would be affected by the proposed Project, it would not change significantly and would remain ungraded, undeveloped open space. Therefore, impacts related to the amount of natural open space to be graded or developed would be less than significant.

[6] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.
[7] City of Los Angeles, *2006 City of Los Angeles CEQA Thresholds*, page 13, 2006.

- *The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image*

Less Than Significant Impact. The Project site has existing trees, including oak trees and other trees that have protected or Heritage status. Some recreational and historical structures are present on-site, as well as developed recreational facilities. The Project site also has existing fencing. The largest element of the proposed Project is a remediation cap that, when installed, would be a two-dimensional element that will not change the aesthetic value of the park. Also, the proposed Project would involve the removal of approximately 166 non-Heritage, non-protected trees. New trees would be planted on-site to mitigate for the removal of the existing trees. No new structures would be constructed and no existing structures would be modified. The proposed Project would include fencing during construction and operations (Refer to Section I.c). The new fencing would not create a large degree of contrast between existing features and new features. Therefore, impacts related to the degree of contrast between proposed features and existing features that represent the area's valued aesthetic image would be less than significant.

A.3: A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).

Less Than Significant Impact. The Project site is an existing park, comprised primarily of undeveloped open space, a recreational building, play areas, historic properties, and fencing. As a park, the Project site is considered a shadow-sensitive use. The proposed Project would not modify any of the existing buildings or play area structures or construct new buildings or structures. The surface cap would be one-foot high and would not cast any significant shadow. The proposed Project would include fencing (refer to Response I.c.). Temporary fencing during construction would include windscreening and would be six feet high, casting limited shadow on the open space areas of the Project site. Fencing during operations would be open, and not a solid wall. The amount of shadow that could be potentially cast by any fencing on site would be negligible compared to the shadow that is cast by the Santa Susana Mountains. Therefore, impacts related to casting shadows on sensitive uses would be less than significant.

3.2 Agricultural and Forestry Resources

3.2.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURAL AND FORESTRY RESOURCES – Would the project**:**				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resource Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

DISCUSSION

II.a, II.b. **No Impact**. The Project site is currently developed as a park and is zoned as Open Space.[8] There are no farmlands or agricultural uses on the Project site or in the immediate vicinity. The nearest farmland is approximately one mile to the north and would not be affected by the proposed Project. The Project site is not considered protected under the Williamson Act contract, as there are no agricultural uses on-site.[9] Therefore, impacts related to farmland or agricultural uses would not occur.

II.c, II.d **No Impact.** The Project site is not zoned as forest land, timberland, or timberland zoned Timberland Production. The only remaining conifer and big tree forests in the immediate area of the City of Los Angeles are outside City boundaries, in the Angeles National Forest and the north slope of the Santa Susana Mountains. [10] The proposed Project does not change existing land use, which is Open Space. Therefore, impacts related to conflicts with existing zoning for, or cause rezoning of forest land, timberland, or timberland zoned Timberland Production, or loss of forest land or conversion of forest land to non-forest use would not occur.

II.e. **No Impact.** Refer to responses IIa through IId above.

3.2.2 City of Los Angeles CEQA Thresholds

The 2006 City of Los Angeles CEQA Thresholds does not have specific thresholds related to Agricultural Resources. Therefore, the discussion of CEQA Guidelines Appendix G thresholds above is sufficient. No further discussion is required.

3.3 Air Quality

3.3.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Would the project:				
a. Conflict with or obstruct implementation of the applicable air-quality plan?	☐	☐	☒	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

[8] City of Los Angeles, ZIMAS website, http://zimas.lacity.org/, Accessed February 2013.
[9] State of California Department of Conservation Williamson Act Program website, http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx, Accessed February 2013.
[10] City of Los Angeles Department of City Planning, Conservation Element website, *http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf*, p. II-26, Accessed February 2013.

DISCUSSION

III.a. Less Than Significant Impact. The SCAQMD has developed two main indicators to determine a project's consistency with the *2007 Air Quality Management Plan*:

- Indicator 1: Whether the project would increase the frequency or severity of existing air-quality violations or cause or contribute to new violations, or delay timely attainment of air-quality standards or the interim emission reductions specified in the *2007 Air Quality Management Plan*; and
- Indicator 2: Whether the project would exceed the 2007 *Air Quality Management Plan*'s (AQMP) assumptions for 2030 or yearly increments based on the year of project build out and phase.

The proposed Project involves the remediation of contaminated soils at an existing park. New sources of air pollutant emissions are only associated with the construction phase because the operations phase of the proposed Project will not generate emissions. As such, there would be no net increase in work-related trips, vehicle miles traveled or additional energy consumption during the operations phase of the proposed Project. The proposed Project would not exceed the SCAQMD's thresholds of significance for construction and consequently is not considered by the SCAQMD to be a substantial source of air pollution.

Because the proposed Project is not considered a substantial air-pollutant emitter, the proposed Project would not increase the frequency or severity of existing air-quality violations and would not cause or contribute to new violations. Therefore, the proposed Project's air-pollutant emissions would be consistent with the first indicator.

In terms of the second indicator, according to the City of Los Angeles Chatsworth-Porter Ranch Community Plan, the Project site is currently designated as Open Space. The proposed Project involves soils remediation and will enable its continued use as park open space. Because the development detailed in a City's General Plan is used to develop the SCAQMD's AQMP emissions estimates, if a project is consistent with the General Plan's land-use designations, it would be consistent with the AQMP that incorporated General Plan development projections in the emissions inventory. As such, the proposed Project is consistent under the second indicator. Furthermore, the proposed Project is not considered by the Southern California Association of Governments (SCAG) to be a regionally significant project that would require a review for air-pollutant emissions that are consistent with SCAG's adopted regional plans.[11] Consequently in regards to Indicator 2, the project would not exceed AQMP's assumptions for air pollutant emissions. Therefore, impacts related to conflicts with or obstruction of implementation of an applicable air-quality plan would be less than significant.

III.b. Less Than Significant Impact.

Construction Emissions:

Construction activities from the proposed Project that would generate short-term air-quality impacts include:

- Exhaust emissions from the use of construction vehicles, material delivery vehicles, and construction worker commutes; and
- Dust generated from soil disturbance during grading.

Construction activities would include grading and excavation activities. **Table III-A** shows anticipated construction activities and the amount of pollutant emissions that would be generated during these activities. Grading activities are estimated to occur over a four month period (December 2013 to March 2014). As shown, construction of the proposed

[11] Southern California Association of Governments website, *http://www.scag.ca.gov/igr/*, accessed February 2013.

Project would not exceed SCAQMD thresholds for all criteria pollutants. Therefore, construction impacts related to regional air quality emissions would be less than significant.

Table III-A
Construction Air Pollutant Emissions

Emissions Source	Pollutant (pounds / day)					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Grading	11	98	60	<1	142	8
SCAQMD Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROG = reactive organic gases; NOx = nitrogen oxides; CO = carbon monoxide $S0_2$ = sulfur dioxide; PM_{10} = particulate matter; up to 10 microns; $PM_{2.5}$ = particulate matter; up to 2.5 microns
Emissions were calculated using the CalEEMod emissions inventory model as recommended by the South Coast Air Quality Management District.
Source: URS, 2013.

Operational Emissions

There would be no additional trip generation or energy consumption following remediation of the Project site beyond those that were occurring when the park was in operation. As such, there would be no additional air pollutant emissions associated with the proposed Project following construction activities. Therefore, impacts related to operational emissions would not occur.

III.c. **Less Than Significant Impact.** The South Coast Air Basin is in a state of nonattainment for ozone and particulate matter (PM_{10} and $PM_{2.5}$). Based on SCAQMD methodology, any project that does not exceed SCAQMD significance thresholds for either the construction or operations phase would not contribute significantly toward a cumulative air-quality impact. As discussed in Response III.b., neither construction nor operations of the proposed Project would result in air pollution that exceeds SCAQMD significance thresholds. Therefore, impacts related to cumulative emissions would be less than significant.

III.d. **Less Than Significant With Mitigation Incorporated.** The nearest sensitive receptors to the Project site are the multi-family residential areas approximately 50 feet to the east.

Construction

As shown in **Table III-B**, construction-related emissions for criteria pollutants would not exceed localized significance thresholds (LSTs) for NOx and CO. These thresholds are applicable for project areas that are 5 acres or less. The area that would be graded at the Project site is approximately 21 acres. When these thresholds are used for project areas that are larger than 5 acres, it results in a conservative use of the significance thresholds. These thresholds are not used for PM_{10} and $PM_{2.5}$, and thus monitoring would be require during the proposed Project's construction period to ensure that the SCAQMD's limits for dust and lead contaminated dust are not exceeded for workers on-site and for the sensitive receptors off-site (residences). The RAP includes a monitoring plan for workers on-site that would meet OSHA thresholds for lead dusts exposure of approximately 50 micrograms/cubic meter. Using the maximum reported onsite lead concentration in soil of 2,000 mg/kg, the potential lead concentration is 0.10 microgram/cubic meter for a dust concentration of 50 micrograms/cubic meter.[12] This calculated lead concentration is less than the CAAQS lead limit for residences and other sensitive receptors of 0.15 micrograms/cubic meter. Consequently, the use of a dust threshold of 50 micrograms/cubic meter would be adequate to estimate potential impacts related to lead dust exposure of residences and other sensitive receptors. As sensitive receptors are located in close proximity to the construction areas, construction impacts related to

[12] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.

exposing sensitive receptors to substantial pollutant concentrations (lead borne dust) would be significant without mitigation.

Table III-B
Summary of Localized Significance of Construction Emissions

Construction Phase	Pollutant (pounds/day)	
	NOx	**CO**
Maximum Project Emissions	47	29
Localized Significance Threshold [a]	*584*	*1,677*
Thresholds Exceeded?	**No**	**No**

Notes: NO_x = nitrogen oxides; CO = carbon monoxide;
[a] The Localized Significance Threshold was determined using Appendix C of the SCAQMD *Final Localized Significant Threshold Methodology* (October 2009) guidance document for pollutants NO_x and CO. The Localized Significance Thresholds were based on a receptor distance of 82 feet, 5 acre project site, and the source receptor area (SRA 6).
Source: URS, 2013.

MITIGATION MEASURES

MM-AQ-01 Though localized concentrations would be below the SCAQMD localized significance thresholds, the presence of contaminated soils warrants the following mitigation measures to ensure that excessive concentrations of contaminated dust would not be generated by construction activities:

- During activities, monitoring and recording of wind speed and direction shall Sampling and monitoring of airborne particulate matter (PM_{10}) at the perimeter shall be conducted during working hours. If the upwind and downwind differential concentrations of PM_{10} exceed 50 micrograms per cubic meter, construction activities will cease until more stringent mitigation measures are implemented to reduce the concentrations to levels below 50 micrograms per cubic meter.
- During construction activities, monitoring and recording of wind speed and direction shall be conducted at least every 2 hours on-site.
- The ambient dust concentrations measured at each of the ambient air monitoring stations shall not exceed 50 micrograms per cubic meter at the Project site's fenceline during construction.
- If any daily ambient air monitoring results show the dust concentration to exceed 50 micrograms per cubic meter two times or more on any one day, excavation activities shall cease until additional mitigation measures are implemented which will reduce the concentrations below 50 micrograms per cubic meter.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measure **MM-AQ-01**, construction impacts related to exposing sensitive receptors to substantial pollutant concentrations (lead borne dust) would be reduced to a less than significant level.

III.e. **Less Than Significant Impact.** The construction activities associated with the proposed Project would not result in emission that would create a public nuisance. The cap that is installed would not generate odors. Therefore, impacts related to objectionable odors would be less than significant.

3.3.2 City of Los Angeles CEQA Thresholds

All of the City of Los Angeles CEQA Thresholds related to Cultural Resources (Sections B.1 through B.3) have been explicitly or substantially addressed in the CEQA Guidelines Appendix G thresholds discussion above. No further discussion is required.

3.4 Biological Resources

3.4.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

DISCUSSION

IV.a. **Less Than Significant With Mitigation Incorporated.** The Project site is adjacent to large open space areas that are known to have species of plants and wildlife that are considered sensitive. As part of this environmental analysis, a Biological Resources Technical Memorandum (Appendix D) was conducted to assess the potential presence of sensitive species on site. As discussed in Appendix D, suitable habitat for five special-status plant species and for ten special-status wildlife species may potentially occur within the Biological Survey Area (BSA), defined as the Project site plus a 100-foot buffer to account for any potential indirect impacts due to activities associated with the proposed Project. The entire suitable habitat for these special-status plant and wildlife species occurs within Remedial Plan Areas A and E and the surrounding 100-foot buffer area of the BSA and not where the cap would be installed.

Fencing is the primary activity that would occur at Remedial Plan Area A. However, the planned activities in Remediation Plan Area E have the potentially to affect the sensitive species of plants that may exist there. The presence and extent of potential impacts cannot be fully determined without further studies during the appropriate blooming season (March through November) for plants. The planned activities in Remediation Plan Area E also would potentially to impact the ten special-status wildlife species. Two of these species are listed under the Endangered Species

Act (ESA): the arroyo toad (Endangered) and coastal California gnatcatcher (Threatened). Area E provides suitable habitat for both of these species, although the presence and extent of the potential impacts cannot be determined without further studies during the appropriate survey period (February 15 to August 31 for the coastal California gnatcatcher and March 15 to July 31 for the arroyo toad) (Appendix D). Therefore, impacts related to substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) would be significant without mitigation.

MITIGATION MEASURES

MM-BIO-01 Prior to grubbing of vegetation in Area E, focused plant surveys shall be conducted to determine the presence/absence of special-status plants in Area E. If the focused plant surveys determine the presence of special status plant species, the areas occupied by special-status plant species shall be avoided to the extent possible by modifying/reducing the scope of /not implementing the planned construction activities of Area E. The construction activities related to Area E that shall be modified/reduced in scope/not implemented would include but not be limited to grubbing, removal of groundscape, and/or removal of soils.

MM-BIO-02 Prior to remediation activities in Area E, pre-construction surveys shall be conducted for special-status wildlife species including: the arroyo toad (*Anaxyrus californicus*), silvery legless lizard (*Anniella pulchra pulchra*), pallid bat (*Antrozous pallidus*), golden eagle (*Aquila chrysaetos*), western mastiff bat (*Eumops perotis californicus*), San Diego desert woodrat (*Neotoma lepida intermedia*), coast horned lizard (*Phrynosoma blainvillii*), coastal California gnatchatcher (*Polioptila californica californica*), Gertsch's socalchemmis spider (*Socalchemmis gertschi*), and two-striped garter snake (*Thamnophis hammondii*). If the pre-construction wildlife surveys determine the presence of special status wildlife species, the areas occupied by special-status wildlife species shall be avoided to the extent possible by modifying/reducing the scope of /not implementing the planned construction activities of Area E. The construction activities related to Area E that shall be modified/reduced in scope/not implemented would include but not be limited to grubbing, removal of groundscape, and/or removal of soils.

MM-BIO-03 If the pre-construction wildlife surveys conducted under mitigation measure **MM-BIO-02** determine that arroyo toads are present in Area E, no grubbing activities shall be conducted in suitable habitat during the breeding season for arroyo toad, March 15 through July 31.

MM-BIO-04 If the pre-construction wildlife surveys conducted under mitigation measure **MM-BIO-02** determine that arroyo toads are present in Area E, then prior to any remediation activities, exclusion fencing shall be installed around all suitable habitat for the arroyo toad within Area E. The exclusion fencing shall consist of plastic or fabric at least 2 feet high, firmly staked to the ground with the lower one foot of the fencing stretched out along the ground and held in place with a continuous line of gravel bags. Once the exclusion fencing is installed in the suitable arroyo toad habitat within Area E, an Agency approved arroyo toad biologist shall conduct three site visits to determine if any arroyo toads remain in the exclusion area. All fencing material shall be removed after the remediation and restoration work is completed for the areas of suitable habitat.

MM-BIO-05 If the pre-construction wildlife surveys conducted under mitigation measure **MM-BIO-02** determine that coastal California gnatcatchers are present in Area E, no work shall be conducted in the suitable coastal California gnatcatcher habitat within Area E during the breeding season, February 15 through August 31.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures **MM-BIO-01** through **MM-BIO-05**, impacts related to substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species would be reduced to a less than significant level.

IV.b. **Less Than Significant Impact.** The Project site contains riparian habitat within Area E and adjacent to the Project site (Appendix D). The activities related to installation of the cap would not extend into Area E. Therefore, these riparian areas would not be directly affected by the proposed Project. The remediation activities in Area E would be near the rocky outcropping and not near the riparian area and, thus, these riparian areas would not be directly affected.

The other sensitive habitat area is the oak woodland in Area A. The proposed Project would not remove any oak trees and would place fencing around the oaks in Area A. The installation of fencing would be done as required by the County of Los Angeles Oak Tree Ordinance and the City of Los Angeles Department of Recreation and Parks Tree Preservation Policy. Therefore, impacts related to a substantial adverse effect on any riparian habitat or other sensitive natural community would be less than significant.

IV.c. **No Impact.** No federally protected Section 404 wetlands are present on the Project site. Therefore, impacts related to a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act would not occur.

IV.d. **Less Than Significant Impact with Mitigation Incorporated.** The Project site contains trees and vegetation that could potentially provide habitat for nesting birds protected by the Migrating Bird Treaty Act (MBTA). There are no wildlife corridors through the Project site and the blue-line stream does not provide a suitable migration path for migratory fish. The proposed Project would install fencing during construction and operations. Fencing would not close off the Project site, and land animals would be able to either jump over fencing or go around the Project site. The surface cap would add a one-foot cap to the Project site, which would not be a significant barrier. The proposed Project would also remove approximately 166 trees. Removal of trees would impact nesting sites for MBTA-protected migratory birds. Therefore, impacts related to substantial interference 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 would be significant without mitigation.

MITIGATION MEASURES

MM-BIO-06 Prior to commencing grubbing activities during nesting season (February 15 through August 31) in Area E, a qualified biologist shall conduct a survey of the area to be grubbed to check for the presence of active nests for special-status bird species, including coastal California gnatcatcher and all species covered under the MBTA. If evidence of nesting is found, no grubbing work shall take place in the nest area or within an appropriate buffer zone, to be determined by the biologist, until the biologist determines that the nests are no longer in active use.

MM-BIO-07 Prior to removal of any trees on-site during the nesting season (February 15 through August 31), a qualified biologist shall survey the trees to be removed for the presence of active nests for raptors or other bird species protected under the MBTA. If a nest is found, no tree removal work will take place in the nest area or within a buffer zone, to be determined by the

biologist, until the biologist determines that the nest is no longer in active use.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures **MM-BIO-06** and **MM-BIO-07**, impacts related to substantial interference with the movement of any native resident or migratory fish or wildlife species would be reduced to a less than significant level.

IV.e. **Less Than Significant Impact.** The local policies and ordinances which apply to the Project site are the County of Los Angeles Oak Tree Ordinance, the City of Los Angeles General Plan, and the City of Los Angeles Department of Recreation and Parks Tree Preservation Policy. The City of Los Angeles General Plan includes objectives and supporting policies regarding endangered species, ocean fisheries, and habitat. The County of Los Angeles Oak Tree Ordinance preserves and maintains healthy oak trees and provides oak trees with protected status based on a minimum 25 inch circumference. The City of Los Angeles Department of Recreation and Parks Tree Preservation Policy protects trees covered by City of Los Angeles Ordinances, Heritage trees, special habitat value trees, and all other common park trees. Consultation with LADRAP is required for removal of these trees. The Project site has a considerable number of existing trees, including both common trees and various protected and Heritage trees, such as oaks. Coastal Live Oak Woodland is a sensitive natural community present on the Project site (refer to section IV.b).

The proposed Project would remove approximately 166 non-Heritage, non-special status trees. The oak grove in Area A as well as individual protected and Heritage trees would not be removed. As a result, no oak trees or other protected or Heritage trees would be removed and the Coastal Oak Woodland sensitive natural community would remain intact. The approximately 166 trees that would be removed would be common park trees, and consultation with LADRAP Urban Forestry has occurred. All common park trees on the Project site would be replaced on-site. Therefore, impacts related to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would be less than significant.

IV.f. **No Impact.** The Project site is not in any established Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, impacts related to a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan would not occur.

3.4.2 City of Los Angeles CEQA Thresholds

In addition to the thresholds in Appendix G of the CEQA Guidelines, the following analysis was completed in compliance with the 2006 City of Los Angeles CEQA Thresholds.[13] The City of Los Angeles CEQA Thresholds presented below are not the complete thresholds for this environmental topic, but rather those that require additional analysis beyond that which was conducted for the Appendix G thresholds above.

C. A project would normally have a significant impact on biological resources if it could result in the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community.

No Impact. The Coastal Live Oak Woodland vegetation community is a local designated plant community and individual oak trees on the Project site are locally designated species (refer to Section IV.e). The proposed Project would not remove oaks or Coastal Live Oak Woodland. As discussed in Section IV.b above, Area A

[13] City of Los Angeles, *2006 City of Los Angeles CEQA Thresholds*, page 13, 2006.

would be fenced off to protect the existing oak grove. As a result, individual oak trees would not be lost and the Coastal Live Oak Woodland would not be reduced. Therefore, impacts related to the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community would not occur.

C. A project would normally have a significant impact on biological resources if it could result in interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

Less Than Significant With Mitigation Incorporated. As discussed in Appendix D, the Project site provides suitable habitat for five special-status plant species and ten special-status wildlife species. The proposed Project would generate noise, light, and other potential disruptions during the construction phase. These construction impacts would be temporary and would occur over a short time frame. During operations, the proposed Project would not generate noise, and additional light emissions would be limited to new lighting for the proposed parking lot. This lighting would be similar to existing lighting (refer to Section I.d). As the only potential disruptions to normal species behavior would be short-term, the chances for long-term survival of sensitive species would not be substantially diminished. In addition, Mitigation Measures **MM-BIO-01** through **MM-BIO-07** would reduce impacts during construction to a less than significant level. Therefore, impacts related to interference with habitat such that normal species behaviors are disturbed to a degree that may diminish the chances for long-term survival of a sensitive species would be less than significant.

3.5 Cultural Resources

3.5.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

DISCUSSION

V.a. **Less Than Significant Impact.** The Project site contains a recreational building, playground facilities (north and south), a basketball court, a tennis court, picnic areas, and a storage shed. The recreational building, north and south playgrounds, basketball court, and tennis court are less than 50 years old and therefore are not considered to be from the historic-period (Appendix C).

Two structures, the Old Powder House (built between 1890 and 1900, **Figure V-A**) and the Shooting Range Firing Line (built between 1952 and 1959, **Figure V-B**) are from the historic-period. While the Old Powder House may be associated with a significant event or person, the property no longer conveys its historic integrity aspects of workmanship, design, feeling, and setting, materials have not been retained due to the replacement of the door and roof, and major changes to the area's surrounding environment from the formation of the park and its related landscaping and other improvements. The Old Powder House has experienced physical alterations to major elements, along the façade and roof, and major changes to the area's surrounding environment from the formation of the park and its related landscaping and other improvements. The continuous use of the Shooting Range Firing Line over time has resulted in

drastic alterations to the surrounding environment and it no longer reflects the period in which the structure was constructed. The Shooting Range Firing Lane's original and historic integrity, character defining features, and overall setting and visual narrative are no longer extant. All visual indicators that connect the property with its previous use as a firing range, with the exception of the Shooting Range Firing Line, are no longer extant (Appendix C).

The proposed Project would not modify any existing structures or construct new structures. The proposed Project would not result in the demolition, destruction, relocation, or alteration of the Old Powder House or the Shooting Range Firing Line nor would it cause further losses to aspects of their historic integrity. Therefore, impacts related to substantial adverse changes to the significance of historical resources would be less than significant.

Figure V-A
Old Powder House (East Elevation) Facing West
Source: URS Corporation, 2013.

Figure V-B
View of Remains of the Shooting Range Firing Line Facing North
Source: URS Corporation, 2013.

V.b. **Less Than Significant With Mitigation Incorporated.** Previously conducted investigations within and around the Project site show the presence of several archaeological resources in its vicinity. However, the only resource within the boundaries of the Project site is the Old Powder House (refer to Section V.a above; Appendix C). One previously unrecorded historic archaeological site was identified on-site in addition to the historical properties discussed above in Section V.a. The site consists of fragments of clay pigeons and lead shot visible in soil disturbed by animal burrows throughout the Project site. The clay pigeon fragments and lead shot are from as early as 1952. The Project site has been significantly disturbed by rodent burrows and from grading and development during the construction of Chatsworth Park South during the 1970s. Therefore, the archaeological site spans nearly the entire boundaries of the former shooting range and target locations, and much of the fragments are located immediately below the ground surface, but are heavily disturbed. The materials found are typical remains from a recreational shooting range, and do not reflect any unique or important trends or themes. The artifacts identified during the field survey were found to have no ties to any event or person of historic significance, and they will not facilitate the testing of a hypothesis or corroborate and amplify currently available information regarding skeet shooting. The archaeological resource has no physical or historic integrity, and does not have data potential, as the materials are typical of mid-twentieth century recreational shooting, and do not have any subsurface value for research purposes.

The proposed project would have no more than two feet of ground disturbance, primarily to support the removal of trees and the installation of replacement tree groves, and is anticipated to use several bull-dozers and rollers to complete the work; which, based on current conditions of the Project site, would not cause a new significant impact or a substantial adverse change to the archaeological resource. However, ground-disturbing activities, such as grading or excavation, would potentially disturb previously unidentified subsurface resource. While the known archaeological resource on the Project site would not be adversely changed by the proposed Project, there is a potential for impacts to previously unidentified subsurface archaeological resources. Therefore, impacts related to a substantial adverse change in the significance of an archaeological resource would be significant without mitigation.

MITIGATION MEASURES

MM-CR-01 In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 10-meter radius shall be temporarily suspended or redirected until a qualified archaeologist has been provided the opportunity to assess the significance of the find and implement appropriate measures to protect or properly remove the find per federal and state regulations. Construction personnel must be informed that unauthorized collection of cultural resources is prohibited.

If the resource is determined to be significant, the archaeologist, as appropriate, shall prepare a program for recovery of the resources in consultation with the State Office of Historic Preservation that satisfied the requirements of CEQA Section 21083.2. The archaeologist shall complete a report of excavations and findings, and shall submit the report for peer review by three County-certified archaeologists or paleontologists, as appropriate. Upon approval of the report, the County shall submit the report to the South Central Coastal Information Center (SCCIC). The SCCIC shall maintain the report on file. After the find has been appropriately mitigated, as prescribed in this measure, work in the area may resume.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of **MM-CR-01** would reduce impacts related to archaeological resources to a less than significant level.

V.c. **Less Than Significant With Mitigation Incorporated.** Paleontological resources are the fossilized remains of prehistoric plants and animals; common examples include fossilized bones, teeth, shells, tracks, trails, casts, molds and impressions. Paleontological resources are scientifically significant because they provide important morphological and phylogenetic information on extinct organisms, as well as valuable data on ancient paleoenvironments and the local and regional geologic history of an area.

A review of the Los Angeles Sheet of the Geologic Atlas of California revealed the Project site is underlain by Alluvium (Qal) consisting of Quaternary deposits commonly formed from fluvial, lake, playa, and terrace deposits. More specifically, Qal falls into the Recent Quaternary or Holocene, which is a geologic unit that dates generally to younger than 10,000 years Before Present. That geologic unit does not have a high likelihood of producing unique paleontological or geologic resources or sites. Based on the Society for Vertebrate Paleontology categories of sensitivity, this geologic unit is rated as "Low Sensitivity" for paleontological resources, meaning they have low potentials for yielding significant fossils, and these deposits generally will not require protection or salvage operations.

Further, ground disturbance and improvements associated with the proposed Project would not extend more than two feet beneath the surface, in order to support the removal of a tree, and will generally be twelve to eighteen inches in areas where grading will occur, in order to destroy the existing burrowing animal network to prevent future settlement. Therefore, based on the area's geology and physiography, as well as the nature and extent of the proposed Project improvements, it is unlikely the proposed Project would result in the permanent loss of, or loss of access, to a paleontological resource, particularly of regional or statewide significance. However, ground-disturbing activities, such as grading or excavation, could potentially disturb previously unidentified subsurface resources, including fossils, and impacts would be significant without mitigation.

MITIGATION MEASURES

MM-CR-02 In the event that paleontological resources are unearthed during project subsurface activities, all earth-disturbing work within a 100-meter radius shall be temporarily suspended or redirected until the paleontologist can assess the significance of the find and implement appropriate measures to protect or properly remove the find per Federal and State regulations. Construction personnel must be informed that unauthorized collection of cultural resources is prohibited.

If the resource is determined to be significant, the paleontologist, as appropriate, shall prepare a research design for recovery of the resources in consultation with the State Office of Historic Preservation that satisfied the requirements of CEQA Section 21083.2. The paleontologist must complete a report of excavations and findings, and shall submit the report for peer review by three County-certified archaeologists or paleontologists, as appropriate. Upon approval of the report by the State Office of Historic Preservation, the County certified paleontologist shall submit the report to the South Central Coastal Information Center, or another appropriate repository. The South Central Coastal Information Center shall maintain the report on file. After the find has been appropriately mitigated, as prescribed in this measure, work in the area may resume.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of **MM-CR-02** would reduce impacts related to paleontological resources to a less than significant level.

V.d. **Less Than Significant With Mitigation Incorporated.** A California Historical Resources Information System (CHRIS) records search identified no formal or informal cemeteries (Appendix C). A review of historic maps and literature also identified no formal or informal cemeteries. The proposed Project would have no more than two feet of ground disturbance, primarily to support the removal of trees, and is anticipated to use several bull-dozers and rollers to complete the work. Ground-disturbing activities, such as grading or excavation, would potentially disturb previously unidentified subsurface human remains interred outside of a formal cemetery. Therefore, impacts related to disturbance of any human remains, including those interred outside of formal cemeteries, would be significant without mitigation.

MITIGATION MEASURES

MM-CR-03 If human remains are encountered, H&SC Section 7050.5 states that no further disturbance shall occur until the County Coroner has made necessary findings as to origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. The following actions must be taken in the event that human remains are discovered on private or State land:

- Stop work immediately and contact the County Coroner. The County Coroner must be notified immediately of the find;
- The Coroner has two working days to examine human remains after being notified by the responsible person. If the remains are determined to be prehistoric or Native American the coroner will notify the Native American Heritage Commission (NAHC);
- The NAHC will immediately notify the person it believes to be the most likely descendent (MLD) of the deceased Native American. With the permission of the landowner or agency or an authorized representative, the MLD may inspect the site of the discovery; and
- The MLD makes recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

If the commission is unable to identify a descendent, or the descendent identified fails to make a recommendation, or the landowner rejects the recommendations of the descendent and the mediation provided for in subdivision (k) of Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with the Native American burial(s) with appropriate dignity on the property in a location not subject to further subsurface disturbance.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of **MM-CR-03** would reduce impacts related to disturbance of any human remains, including those interred outside of formal cemeteries, to a less than significant level.

3.5.2 City of Los Angeles CEQA Thresholds

All of the City of Los Angeles CEQA Thresholds related to Cultural Resources (Sections D.1 through D.3) have been explicitly or substantially addressed in the CEQA Guidelines Appendix G thresholds discussion above. No further discussion is required.

3.6 Geology and Soils

3.6.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS – Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b. Would the project result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

DISCUSSION

VI.a.i. **No Impact.** The Project site is not in an Alquist-Priolo Earthquake Fault Zone.[14] The nearest fault to the Project site is the Santa Susana Fault, approximately four miles to the northeast of the Project site.[15] The Project site does not sit on a fault, so there is little likelihood that the Project site would experience rupture. However, the Project site is located in Southern California which is an area of high seismic activity. The proposed Project does not include construction of new structures. Furthermore, although the proposed Project would temporarily place construction employees within the Project site, it would not increase the number of residents or permanent employees. The proposed Health and Safety Plan (HASP) that is part of the RAP contains information to ensure education and protocols in case of a seismic event during construction. Therefore, impacts related to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, would not occur.

VI.a.ii. **Less Than Significant Impact.** As discussed in Response VI.a.i. above, the Project site is not in a fault zone. However, Southern California is known as a highly seismically active area, and the Project site, located in the Los Angeles Basin, is likely to experience ground shaking from seismic events. The proposed Project would not modify any existing structures and would not construct new structures. The proposed Project would not include any elements that would increase

[14] California Department of Conservation, Division of Mines and Geology, Alquist-Priolo Earthquake Fault Zone Maps, Oat Mountain (1976) and Simi Valley East (1999) Quadrangles, online at http://www.quake.ca.gov/gmaps/ap/ap_maps.htm, accessed February 2013.

[15] City of Los Angeles Department of City Planning, Safety Element website, *http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf*, Accessed February 2013.

exposure to seismic ground shaking. Therefore, impacts related to strong seismic ground shaking would be less than significant.

VI.a.iii. **Less Than Significant Impact.** The Project site is in the Oat Mountain Quadrangle and is in a liquefaction zone. The Project site, therefore, has "a potential for permanent ground displacements."[16] The proposed Project does not include construction of new structures. Furthermore, although the proposed Project would temporarily place construction employees within the Project site, there would not be an increase in the number of residents or permanent employees. The proposed Health and Safety Plan that is part of the RAP contains information to ensure education and protocols in case of a seismic event during construction. Therefore, impacts related to liquefaction would be less than significant.

VI.a.iv. **Less Than Significant Impact.** The Project site abuts the Santa Susana Mountains to the north, west, and south, and is, therefore, located in a City of Los Angeles designated Landslide Area which can be prone to clusters of small, shallow, surficial landslides. [17] The proposed Project would not include any new structures that would be impacted by potential landslides. Furthermore, although the proposed Project would temporarily bring construction employees into the Project site there would not be an increase in the number of residents or permanent employees. The proposed HASP that is part of the RAP contains information to ensure education and protocols in case of a seismic event during construction. The proposed Project would also only include sites that are feasible for remediation; areas with steep terrain would not be remediated and would be fenced off to restrict public access.[18] Therefore, impacts related to exposure of people or structures to landslides would be less than significant.

VI.b. **Less Than Significant with Mitigation Incorporated.** The area of the Project site where the cap would be installed is generally flat and covered in vegetation including trees, shrubs and turf. As part of the proposed Project, some grading would be required that would ensure the necessary contour for optimal installation of the cap. During construction, soils would be exposed to short-term wind and water erosion and loss of topsoil. Standard Best Management Practices (BMPs) and the proposed Project's Storm Water Pollution Prevention Plan (SWPPP) would be used to reduce erosion and loss of topsoil due to surface water runoff during this period. BMPs for fugitive dust control would also be implemented in order to control wind-related erosion and loss of topsoil (Refer to Section III for these BMPs). For Area E which is generally sloped, removal of shrubs and some soil would be part of the proposed Project. Similar to the flat areas where the cap would be installed, erosion control BMPs would be applied to reduce the potential for erosion. Therefore, impacts during construction related to soil erosion would be less than significant.

As part of the proposed Project, the cap that would be installed would contain soil that supports turf growth and all removed trees will be replaced removed trees.[19] For Area E, re-planting of shrubs would be required under mitigation measure **MM-BIO-01**. Therefore, impacts during operations related to soil erosion would be less than significant in the areas that are being capped and less than significant with mitigation for Area E.

VI.c. **Less Than Significant.** The Project site is in a liquefaction zone as discussed in Section VI.a.iii above. The proposed Project would not modify any existing structures or construct any new structures. Structures would therefore not be exposed to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Rough grading would occur to a depth of 18

[16] California Department of Conservation, Division of Mines and Geology, State of California Seismic Hazard Zones, Oat Mountain Quadrangle (1998), online at *http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_oatm.pdf*, accessed February 2013.

[17] City of Los Angeles Department of City Planning, Safety Element website, *http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf*, Accessed February 2013

[18] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.

[19] *Ibid.*

inches and soil would be compacted to 90 percent relative compaction. Excavation for tree wells would be two feet below ground surface (bgs) for tree wells.[20] Consequently, grading, excavation, and installation associated with the one-foot surface cap would not cause the geologic unit or soil under the proposed Project to become unstable. Finally, all construction activities would also conform to all applicable Uniform Building Codes for construction on liquefaction areas. Therefore, impacts related to location on an unstable geologic unit or soil, or impacts resulting in instability due to the proposed Project, potentially resulting in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

VI.d. **Less Than Significant Impact.** As described in Section VI.a.iii above, the Project site is in a liquefaction area. Therefore, there is a potential for expansive soils. The proposed Project would not construct any new structures or modify any existing structures. The one-foot surface cap would be placed on top of existing soil after it has been graded and compacted to provide a firm foundation. Finally, all construction activities would also conform to all applicable Uniform Building Codes for construction on expansive soils. Therefore, impacts related to substantial risks to life or property due to location on expansive soils would be less than significant.

VI.e. **No Impact.** The Project site connects to the existing City of Los Angeles sanitary sewer system for wastewater disposal. The proposed Project would not include septic tanks or alternative disposal systems.[21] Therefore, impacts related to septic tanks or alternative wastewater disposal systems would not occur.

3.6.2 City of Los Angeles CEQA Thresholds

In addition to the thresholds in Appendix G of the CEQA Guidelines, the following analysis was completed in compliance with the 2006 City of Los Angeles CEQA Thresholds.[22] The City of Los Angeles CEQA Thresholds presented below are not the complete thresholds for this environmental topic, but rather those that require additional analysis beyond that which was conducted for the Appendix G thresholds above.

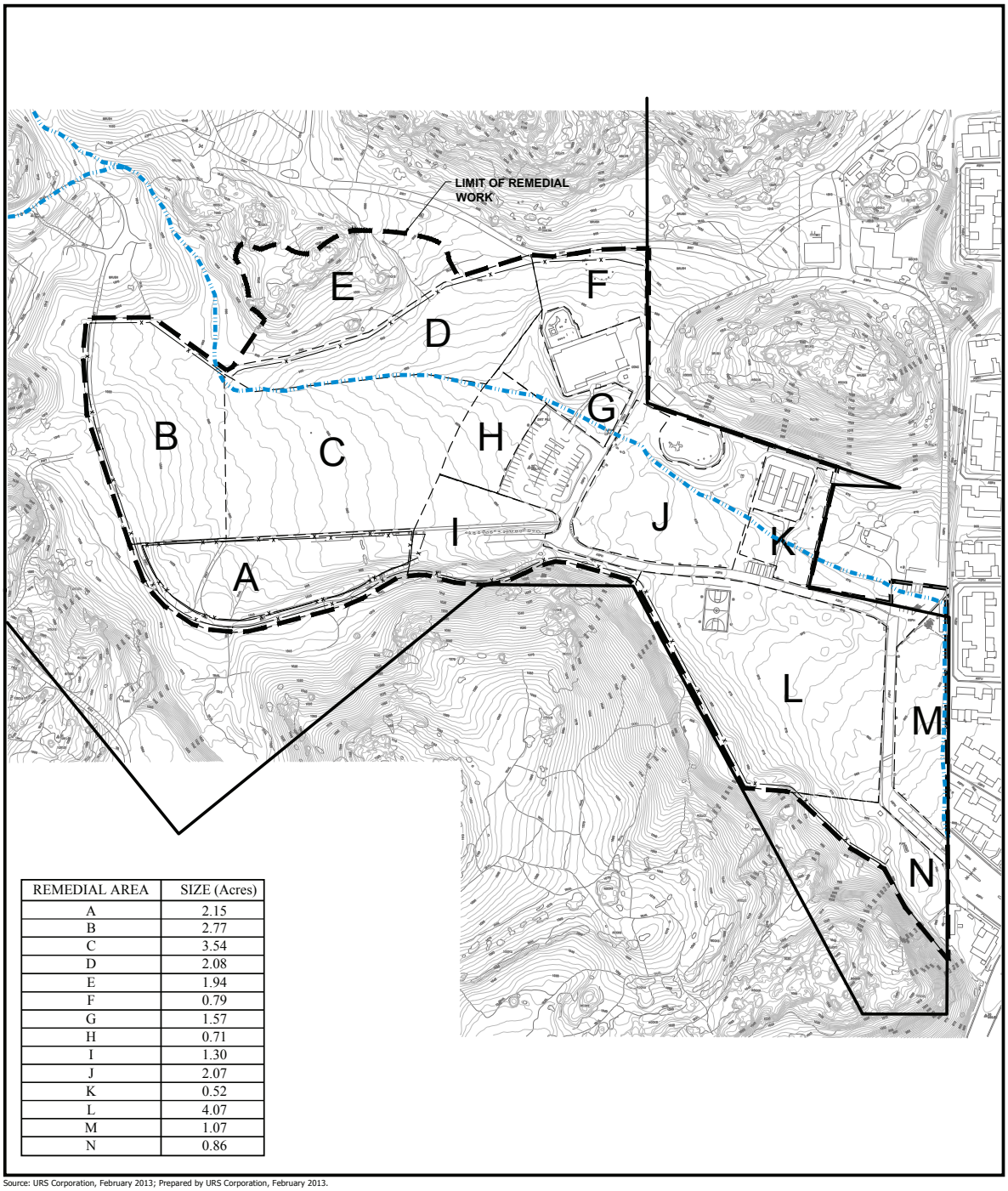
E3 (Landform Alteration). A project would normally have a significant impact on landform alteration if one or more distinct and prominent geologic or topographic features would be destroyed, permanently covered or materially and adversely modified. Such features may include, but are not limited to, hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds and wetlands.

Less Than Significant Impact. The Project site would be grubbed and rough graded during construction and the surface cap would be on the relatively flat portions of the Project site. The surface cap would raise the remediated areas by one foot in elevation, but would not substantially change the landform. The proposed Project would involve remediation activities that would grub vegetation and scour the rocky outcropping. However, the landform of the rocky outcropping would remain intact.

A blue-line stream runs through the Project site in a general east-west direction (**Figure VI-A**; Refer to Appendix D). Under the proposed Project, the blue-line stream would be placed in a reinforced concrete pipe to maintain the same general course it does under existing conditions. Although the blue-line stream would not be eliminated, it will be permanently covered. As part of the permitting process a jurisdictional determination of the unnamed blue-line stream would be required for consultation with the U.S. Army Corps of Engineers. The construction permitting will include appropriate measures that will be implemented to satisfactorily mitigate potential impacts to this resource.

Overall, impacts related to significant landform alteration would be less than significant.

[20] *Ibid.*
[21] *Ibid.*
[22] City of Los Angeles, *2006 City of Los Angeles CEQA Thresholds*, page 13, 2006.



REMEDIAL AREA	SIZE (Acres)
A	2.15
B	2.77
C	3.54
D	2.08
E	1.94
F	0.79
G	1.57
H	0.71
I	1.30
J	2.07
K	0.52
L	4.07
M	1.07
N	0.86

Source: URS Corporation, February 2013; Prepared by URS Corporation, February 2013.

north
0 400 ft.
1" = 400 feet

LEGEND

Chatsworth Park South Boundary
Existing Blue-Line Stream
Project Site
A Proposed Remediation Areas

Figure VI-A
Existing Blue-Line Stream

3.7 Greenhouse Gas Emissions

3.7.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS – Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an application plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

DISCUSSION

VII.a. **Less Than Significant Impact.** Construction activities associated with the proposed Project would generate approximately 477 Metric Tons (MTons) of Greenhouse Gases (GHGs). Proposed Project construction emissions were amortized over a 30-year period which would result in 16 MTons/year, as per SCAQMD methodology. There are no new GHG emissions after construction of the proposed Project because the operations do not include generators of GHG emissions. The proposed Project emissions are evaluated against the SCAQMD draft significance threshold of 10,000 MTons per year. Because the proposed Project's GHG emissions are below the SCAQMD's GHG threshold (Table VII-A), it is not considered a substantial source of GHGs and impacts related to GHG emissions would be less than significant.

Table VII-A
Project-Related GHG Emissions

Sources	GHG emissions (Metric Tons/Year)[a] MTons/Year
Construction Emissions[b]	16
Total Proposed Project Emissions	16
SCAQMD Thresholds	*10,000*
Thresholds Exceeded?	**No**

Notes:
[a] Based on CalEEMod modeling conducted by URS, February 2013.
[b] Construction emissions amortized over a 30 year time period per SCAQMD methodology.
Source: URS using CalEEMod, 2013.

VII.b. **No Impact.** As discussed in Section VII.a, GHG emissions associated with the proposed Project would not exceed SCAQMD's GHG significance threshold and the proposed Project would not be considered a substantial emitter of GHGs. The proposed Project would also facilitate the Project site's continued used for recreation. The vegetation at the Project site acts as to sequester GHG emissions, convert CO_2 to oxygen, and reduce heat generation from sunlight. Therefore, impacts related to conflict with an application plan, policy, or regulation adopted for the purpose of reducing GHG emissions would not occur.

3.7.2 City of Los Angeles CEQA Thresholds

The 2006 City of Los Angeles CEQA Thresholds does not have specific thresholds related to Greenhouse Gases. Therefore, the discussion of CEQA Guidelines Appendix G thresholds above is sufficient. No further discussion is required.

3.8 Hazards and Hazardous Materials

3.8.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

DISCUSSION

VIII.a. **Less Than Significant Impact.** The Project site does not routinely transport, use, or dispose of hazardous materials. Construction of the proposed Project would involve excavation and off-site disposal of contaminated soils from the proposed Remediation Areas. The haul route for this disposal process would be approved with the Grading Permit and Haul Route Approval from the City of Los Angeles Department of Building and Safety (LADBS) prior to the start of construction. There would be approximately 890 truckloads of contaminated export soil. Vehicles would also transport DOT-approved drums or roll-off bins with recovered lead pellets and any associated soil and debris from Area E (rocky outcrop).[23] Trucks would travel to and from the Project site would go to the nearest freeway (SR-118) for access to source and approved disposal facilities. The transport of contaminated soils would be in one direction, away from the Project site, and would occur only during a short period of time, and thus would not constitute a routine transport of hazardous materials.

In addition, a site-specific HASP has been prepared for the Project site under the direct supervision of a certified industrial hygienist. The HASP was prepared in accordance with the safety standards and guidelines of USEPA, Occupational Safety and Health Administration

[23] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.

(OSHA), National Institute of Occupational Safety and Health (NIOSH), and CCR, Section 5192, Title 8. The contractor that would be selected to perform the proposed Project would also prepare an HASP consistent with the proposed Project's HASP, under the direct supervision of the corporate health and safety officer or a certified industrial hygienist. Soil imported to the Project site would be tested for Title 22 metals, VOCs, and TPHcc following USEPA methodology and samples would be reviewed and approved by DTSC prior to import. Soil placed in transport trucks would be misted and all vehicles would be cleaned to remove any soil on their tires prior to leaving the Project site. [24]

The proposed Project is a remediation project intended to improve the Project site and reduce hazards to the public and the environment from hazardous wastes. The proposed Project would not routinely transport, use, or dispose of hazardous materials. In addition, there would be substantial controls in place to ensure that hazards due to construction-related hazardous materials transport and disposal would be minimized, including Haul Route Approval, a transportation plan, the existing HASP, the contractor HASP, soil testing, and watering and cleaning of soil leaving the Project site. Therefore, impacts related to routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public would be less than significant.

VIII.b. **Less Than Significant Impact.** The Project site has known contaminants on-site including nineteen COPCs in soil and eight COPCs in surface water. Construction would potentially disturb these COPCs in soil and surface water, posing a hazard to construction workers. It is also anticipated that hazardous materials typical of construction sites (such as gasoline) would be used. These materials would be brought on-site in ordinary quantities.

Construction of the proposed parking lot would additionally involve typical construction materials, such as asphalt. Construction of the proposed Project would follow the established HASP in order to minimize the risk of accident or upset conditions involving these factors. An accidental release of hazardous materials would be subject to federal, state, and local health and safety requirements. In addition, the proposed Project would be constructed in compliance with DTSC requirements.

For potential impacts due to transport of contaminated soils, refer to Response VIII.a.

Overall, impacts related to creation of a significant hazard to the public or the environment through release of hazardous materials into the environment due to reasonably foreseeable upset and accident conditions would be less than significant.

VIII.c. **No Impact.** The closest school to the Project site is Chatsworth Park Elementary School, located approximately 0.47 miles to the east. Therefore, impacts related to emission of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of an existing or proposed school would not occur.

VIII.d. **Less Than Significant Impact.** The Project site is listed as an EnviroStor Clean Up Site with DTSC (ID number 60000893). The proposed Project is a RAP intended to cap the contaminants on-site and to prevent human health and ecological impacts. Construction of the proposed Project would potentially expose the public and the environment to hazardous wastes (refer to Response VIII.b). However, the intention of the proposed Project is to remediate and improve the contaminated nature of the Project site. The standard safety measures discussed above would apply to the construction phase of the proposed Project, reducing hazards to the public or the environment. Operation of the proposed Project would not create a significant hazard to the public or the environment as it would decrease the risk of exposure to contaminated soils.

[24] *Ibid.*

Therefore, impacts related to creation of a significant hazard to the public or the environment due to location on a hazardous materials site list would be less than significant.

VIII.e. **No Impact.** The closest public airport to the Project site is Van Nuys Airport, approximately ten miles to the southeast. The Project site does not lie within an airport land use plan for Van Nuys Airport and is not within two miles of an airport. Therefore, for impacts related to safety hazards for people residing or working in the Project area would not occur.

VIII.f. **No Impact.** There are no private airstrips in the vicinity of the Project site. Therefore, impacts related to safety hazards for people residing or working in the Project area would not occur.

VIII.g. **Less Than Significant Impact.** SR-118 and Topanga Canyon Boulevard are identified by the City of Los Angeles as Primary Disaster Routes, routes prioritized for bringing equipment, supplies, and emergency personnel to impacted areas. Valley Circle Boulevard and Devonshire Street are identified as Secondary Disaster Routes.[25] The proposed Project would not remove or add any emergency access points to or from the Project site. Access for emergency vehicles is currently considered adequate and will remain as such during the construction phase. In addition, the proposed Project design would be approved by the City of Los Angeles Fire and Police Departments for incorporation of adequate emergency access. Vehicular access along any and all transport haul routes would be maintained during construction via a City of Los Angeles Traffic Handling Plan which will maintain full function of roadways and allow unimpeded two-way traffic flow. During operations of the proposed Project, the remediation actions would not contribute to vehicle capacity (Refer to Appendix B). Therefore, impacts related to impairment of implementation of or physical interference with an adopted emergency response plan or emergency evacuation plan would be less than significant.

VIII.h. **Less Than Significant Impact.** The Project site is classified as a Very High Fire Hazard Severity Zone by the City of Los Angeles Fire Department (LAFD), based on criteria including fuel loading, slope, fire weather, and other relevant factors. The Project site must therefore comply with the Brush Clearance Requirements of the Fire Code, which regulate brush clearance up to 200 feet away from structures.[26] The Project site is located at where wildlands are adjacent to urbanized areas; the northern, western, and southern boundaries of the Project site are adjacent to undeveloped areas with brush, and the eastern boundary borders an urbanized residential area. The Project site has multiple structures which could be endangered by fire. Brush clearance zones around existing structures would remain the same. The proposed Project would include replanting trees, which would need to comply with LAFD brush clearance requirements (for branch trimming, etc.).

Construction of the proposed Project could potentially increase the risk of fire from the presence of construction crews and equipment. Hazards include smoking (i.e. cigarette butts), sparks from construction equipment, and heat from equipment. The proposed HASP for the proposed Project includes BMPs and specific guidelines for smoking near combustible operations and/or areas with high fire risk. The HASP will be implemented as part of the Project design. Therefore, impacts related to exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires would be less than significant.

3.8.2 City of Los Angeles CEQA Thresholds

In addition to the thresholds in Appendix G of the CEQA Guidelines, the following analysis was completed in compliance with the 2006 City of Los Angeles CEQA Thresholds.[27] The City of Los Angeles CEQA

[25] County of Los Angeles, Department of Public Works, Disaster Routes with Road Districts, North Los Angeles County, September 24, 2012, Online at *http://dpw.lacounty.gov/dsg/disasterroutes/*, Accessed February 2013.

[26] City of Los Angeles Fire Department, Brush Clearance Unit, 2007 Online at *http://lafd.org/brush/index.htm*#, accessed February 2013.

[27] City of Los Angeles, *2006 City of Los Angeles CEQA Thresholds*, page 13, 2006.

Thresholds presented below are not the complete thresholds for this environmental topic, but rather those that require additional analysis beyond that which was conducted for the Appendix G thresholds above.

F1 (Risk of Upset/Emergency Preparedness). The determination of significance shall be made on a case-by-case basis, considering the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

Less Than Significant Impact. All construction activities would comply with the established HASP for the proposed Project. Proper use of construction equipment and materials, such as gasoline and heavy machinery, would reduce the danger of accidental release or explosion of a hazardous substance. As discussed in the Chatsworth Park South Transportation Plan[28], compliance with the HASP would be ensured through daily tailgate health and safety meetings. All workers on-site would be required to sign the site-specific HASP to demonstrate familiarity and that they participated in, or were briefed on, the daily tailgate meeting. Haul trucks would be fully licensed and insured to transport excavated soils and fill materials. Hazardous wastes would be hauled by a registered hazardous waste hauler. Each transporter would also be required to have a contingency plan for dealing with:

- When there are emergency situations (vehicle breakdown, accident, waste spill, waste leak, fire, explosion, etc.) during transportation of excavated soils from the Project site to the destined disposal facility or during transportation of fill materials from a source to the Project site;
- When the volumes of excavated soils change; or
- When waste characteristics change.

The Contingency Plan would be prepared in accordance with DTSC's guidance for preparing transportation plans on for site remediation. All remedial activities on the Project site would comply with DTSC requirements. Therefore, impacts related to frequency or severity of a potential accidental release or explosion of a hazardous substance would be less than significant.

F2 (Human Health Hazards.)The determination of significance shall be made on a case-by-case basis, considering the probable frequency and severity of consequences to people from exposure to the health hazard and the degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

Less Than Significant Impact. Refer to Response VIII.b and Response to F1 above. The Project site contains contaminated soils and the proposed Project would introduce typical construction materials, equipment, and activities. The proposed Project would require compliance with the HASP and all DTSC requirements. While there is potential for people to be exposed to the health hazards on-site, the HASP and Project design would reduce the probable frequency and severity of consequences to people from exposure to the health hazard. Therefore, impacts related to consequences to people from exposure to the health hazard would be less than significant.

[28] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.

3.9 Hydrology and Water Quality

3.9.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY –Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒	☐
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h. Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

DISCUSSION

IX.a. **Less Than Significant.** As a park, the Project site is composed of mostly pervious surfaces, with some developed and impermeable areas. During construction, the proposed Project would have the potential to affect water quality or waste discharge through erosion, siltation, and sedimentation, during earthwork and until turf covers the top soil in the surface cap. BMPs and the proposed Project's SWPPP would be implemented and used to prevent violation of water quality standards or waste discharge requirement. BMPs would include:

- Soil stabilization (erosion control) techniques such as seeding and planting, mulching, and check dams,
- Sediment control methods such as detention basins, silt fences, and dust controls,
- Earth dikes and drainage swales to divert runoff, and
- Contractor training programs.

The proposed Project would slightly increase the impervious surface area of the Project site through the addition of an expanded parking lot. The 0.71-acre parking lot addition would result in a small increase in runoff from the Project site during operations of the proposed Project. The proposed Project would follow all DTSC clean up procedures and standards, and would thus exceed all water quality standards and waste discharge requirements. Therefore, impacts related

to violation of water quality standards and waste discharge requirements would be less than significant.

IX.b. **Less Than Significant.** Geotechnical borings in 1994 found groundwater five to eight feet below ground surface (bgs) below the blue-line stream channel as well as alluvial deposits that extend to depths of 57 feet bgs near the recreation building. Groundwater flow generally follows surface topography of the Project site. The SSI found groundwater 11.5 to 13.5 feet bgs. The remaining 42 exploratory borings extending ten feet bgs did not encounter groundwater.[29] The proposed Project would not use any groundwater during construction or operations. Therefore, impacts related to substantial depletion of groundwater supplies would not occur.

The proposed parking lot would slightly increase the impervious surface area of the Project site, increasing surface water runoff and potentially reducing groundwater recharge. However, the proposed parking lot would be approximately one percent of the total surface area of the 72-acre Project site, and would thus result in a negligible decrease in groundwater recharge. The one-foot surface cap would be composed of four inches of top soil, eight inches of base, and a bottom layer of steel hardware cloth. This surface cap would be permeable and designed to allow for drainage to the groundwater below. Therefore, impacts related to substantial interference with groundwater recharge would be less than significant.

IX.c. **Less Than Significant**. Historical topographic maps and aerial photographs indicate that surface drainage historically flowed from the upland areas to the north, south, and west into the alluvial canyon bottom with surface flow generally towards the east. Current surface water flow conditions were observed during July 2009 and during the sampling activities conducted between December 2009 and January 2010. Surface water discharge enters a re-entrant canyon located on the northern side of the Project site adjacent to the railroad right-of-way. This discharge emanates from the adjacent railroad tunnel dewatering system. Flow from the discharge pipe was estimated at 5 to 10 gallons per minute. This surface flow continues in a southeasterly direction where it infiltrates into the alluvium on the northern side of the former SAFR.[30] The groundwater then flows within the backfilled stream channel to the east towards Santa Susana Creek (currently channelized).

Under the proposed Project, the portion of the Project site north and west of the access road will drain to a belowground conveyance pipe system (two 36-inch RCP pipes) whose alignment follows the original drainage swale roughly west to east through the northern portion of the Project site. Storm drain inlets set flush in the surface cap will promote drainage of the relatively flat areas of the Project site. The belowground conveyance pipe will discharge into a detention basin near the eastern property line. The purpose of the detention basin is to capture sediment entrained in the runoff and modulate flow to the offsite drainage channel that drains to the City of Los Angeles' public stormwater system. For a 10-year storm, the peak discharge into the detention basin is approximately 188 cubic feet per second (cfs). The maximum water depth within the detention basin will be approximately 3 feet. The detention basin constructed as part of grading operations will be grass-lined, fenced-off, and accessible only by maintenance staff. The portion of the Project site south of the access road will continue to drain as surface water flow to the east with little modification. Except for capturing the upslope flow along the western property line, stormwater will sheet flow over the surface cap and drain to the stormwater channel located along the eastern property line.

As discussed in Response IX.a, during construction, activities on-site (for example: piling of dirt, installation of fencing, removal of turf) would alter drainage patterns and potentially cause runoff into the stormwater system. However, BMPs and the SWPPP would be implemented to ensure

[29] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.
[30] *Ibid.*

that impacts to the existing drainage pattern, and the subsequent effect on erosion and siltation, would be reduced. As discussed in Response VI.b, the proposed Project would be designed for turf growth on the surface cap and would help prevent erosion. The drainage system would be designed to control runoff from upslope areas for a 10-year storm event and, thereby, protect the surface cap from erosion. Though the proposed Project would modify and improve the existing storm drainage system, historical drainage patterns of the Project site would remain the same and stormwater runoff rates would not change substantially. Therefore, impacts related to substantial erosion or siltation on- or off-site due to substantial alteration of the existing drainage pattern of the Project site would be less than significant.

IX.d. **Less Than Significant.** Refer to Responses IX.a and IX.c. The proposed Project will follow historic drainage patterns on-site, and will slightly increase the impervious surface area of the Project site, thereby increasing the amount of surface runoff. Drainage system improvements that are part of the proposed Project have been designed to control runoff from upslope areas for a 10-year storm event as well.[31] Therefore, impacts related to flooding on- or off-site due to substantial alteration of the existing drainage pattern or substantial increase in the rate or amount of surface run-off would be less than significant.

IX.e. **Less Than Significant Impact.** Refer to Response IX.a. There would be a slight increase in surface water runoff during construction and during operations. During construction, BMPs and the SWPPP would be implemented to manage runoff. During operations, the only increase in surface water runoff would be due to the addition of the proposed parking lot. Therefore, impacts related to exceeding the capacity of existing or planned stormwater drainage systems would be less than significant.

BMPs and the SWPPP would also be used to control and reduce pollution in runoff during construction. These measures would reduce impacts related to pollutants in contaminated soil that is excavated, graded, or tilled during the construction process. During operations, the proposed Project would not change the historical drainage pattern or substantially surface water runoff, and would therefore not substantially increase or change pollution in runoff. The proposed Project would not add any new sources of dry or wet weather flows. Therefore, impacts related to substantial additional sources of polluted runoff would be less than significant.

IX.f. **Less Than Significant Impact.** Refer to Responses IX.a, IX.c, IX.d, and IX.e. Implementation of BMPs and the proposed Project's SWPPP would reduce impacts on water quality due to construction equipment, grading, and other activities by properly managing pollutants from dry and wet weather sources. During operations, the proposed Project would not generate new dry or wet weather flows that would degrade water quality. The use of the Project site would remain as a park with turf and trees. Therefore, impacts related to substantial degradation of water quality would be less than significant.

IX.g. **No Impact.** The Project site falls under the Zone A designation from the Federal Emergency Management Agency (FEMA) on the Flood Insurance Rate Map (FIRM). Zone A is a Special Flood Hazard Area where with a one percent annual flood chance (also known as a 100-year flood area). The base flood elevation for the Project site has not been determined..[32, 33] The proposed Project does not propose to create or expand any housing on the Project site. The Project site will retain its existing use as a park. Therefore, impacts related to placement of housing within a 100-year flood hazard area would not occur.

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[31] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.

[32] Federal Emergency Management Agency, Flood Insurance Rate map 06037C1040F, September 28, 2008, Online at *https://msc.fema.gov/webapp/wcs/stores/servlet/CategoryDisplay?catalogId=10001&storeId=10001&categoryId=12001&langId=-1&userType=G&type=1&future=false*, accessed February 2013.

[33] According to Exhibit F of the City of Los Angeles General Plan Safety Element, the Project site is not located in a 100-year or 500-year flood hazard zone. The FEMA FIRM data has been used here for a conservative approach.

IX.h. **No Impact.** The Project site is in a 100-year flood hazard zone, as discussed in Response IX.g above. The proposed Project would not create any permanent structures or modify any existing structures. It would include construction and permanent fencing. Construction fencing would be chain link with wind screening. During operations guard cable, chain-linked, metal handrail, and cedar split rail fencing would be implemented. These types of fencing would all allow the passage of flood waters and would not impede or redirect flood flows. Trees planted as part of the proposed Project would be replacing existing trees removed by the proposed Project, and would not change flood flows. Therefore, impacts related to placement of structures in a 100-year flood hazard area would not occur.

IX.i. **No Impact.** Though the Chatsworth Reservoir area is approximately 1.5 miles to the south of the Project site, it has been out of service since the 1971 Sylmar-San Fernando earthquake. The closest dam to the Project site is Van Norman Lake Reservoir, part of the Los Angeles Aqueduct system, located approximately 10 miles to the east. The inundation area, should this dam fail, would be several miles away from the Project site.[34] The Project site is not in the inundation zone of any other dam or levee. Therefore, impacts related to exposure of people or structures to a significant risk of loss, injury, or death as a result of the failure of a dam or levee would not occur.

IX.j. **Less Than Significant Impact.** The Project site is approximately 15.38 miles away from the Pacific Ocean, the nearest potential source of a tsunami. The Project site is thus not susceptible to tsunami-related damage. Therefore, impacts related to inundation by a tsunami would not occur.

As discussed in Response IX.i above, the closest body of water to the Project site is Van Norman Lake Reservoir in Sylmar, approximately 10 miles to the east. The inundation area of this water body is several miles away from the Project site, and the Project site is not in the inundation zone of any other body of water.[35] Therefore, impacts related to inundation due to a seiche would not occur.

The Project site is located in a landslide area, as discussed in Response VI.a.iv, which makes the Project site susceptible to potential mudflows. The hillsides around the Project site have vegetation, which reduces the risk of a mudflow. The proposed Project would not remove vegetation on hillside areas, except for Area E, the rocky outcrop, where trees will be left but vegetation and shrubs will be grubbed. This increases the risk of a mudflow. The loss of shrubs would not significantly change the stability of the hillside as other vegetation, including trees would remain. Therefore, impacts related to inundation by a mudflow would be less than significant.

3.9.2 City of Los Angeles CEQA Thresholds

In addition to the thresholds in Appendix G of the CEQA Guidelines, the following analysis was completed in compliance with the 2006 City of Los Angeles CEQA Thresholds.[36] The City of Los Angeles CEQA Thresholds presented below are not the complete thresholds for this environmental topic, but rather those that require additional analysis beyond that which was conducted for the Appendix G thresholds above.

[34] City of Los Angeles Department of City Planning, Safety Element website, *http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf*, Accessed February 2013

[35] City of Los Angeles Department of City Planning, Safety Element website, *http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf*, Accessed February 2013

[36] City of Los Angeles, *2006 City of Los Angeles CEQA Thresholds*, page 13, 2006.

G1 (Surface Water Hydrology). A proposed project would normally have a significant impact on surface water hydrology if it would cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources.

Less Than Significant Impact. Refer to Response IX.c. The proposed Project would not change the historical drainage pattern of the existing Project site and would not significantly impact the rate of stormwater runoff. No new structures would be constructed and no existing structures would be modified. Therefore, impacts related to causing flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources, would be less than significant.

G1 (Surface Water Hydrology). A proposed project would normally have a significant impact on surface water hydrology if it would substantially reduce or increase the amount of surface water in a water body.

Less Than Significant Impact. The Project site currently drains to the City of Los Angeles' public stormwater drainage system generally following the existing drainage channel and enters a subsurface storm drain east of the Project site. The City of Los Angeles' public stormwater drainage system leads to the Los Angeles River, which flows to the Pacific Ocean. The proposed Project would slightly increase the amount of impermeable surface area through installation of the proposed parking lot. The proposed Project would not change the historical drainage pattern of the Project site, and would thus not change the water body receiving surface water runoff from the Project site. The Project site would continue to discharge runoff to the Los Angeles River, and thus the Pacific Ocean. The increase in runoff would be minimal, and the Los Angeles River would receive a negligible increase in surface water. The increase in runoff from the Project site would not alter the volume of surface water in the Pacific Ocean in any measureable way. Therefore, impacts related to a substantial reduction or increase in the amount of surface water in a water body would be less than significant.

G3 (Groundwater Level). A project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to:

- *Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or to respond to emergencies and drought;*
- *Reduce yields of adjacent wells or well fields (public or private); or*
- *Adversely change the rate or direction of flow of groundwater.*

No Impact. Refer to Response IX.b. The Project site is contaminated with 19 COPCs, discussed in the Project Description, and surface water on-site has also been found to contain contaminants. Therefore, it is anticipated that the groundwater underlying the Project site is contaminated by the presence of hazardous materials and is thus not potable. The proposed Project would potentially cause a negligible reduction in groundwater levels due to the addition of an impermeable parking lot, but would not use or deplete groundwater supplies which are not likely potable. Therefore, impacts related to changes in potable water levels would not occur.

G4 (Groundwater Quality).A project would normally result in a significant impact on groundwater quality if it would:

- *Affect the rate or change the direction of movement of existing contaminants;*
- *Expand the area affected by contaminants;*
- *Result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion);*

Less Than Significant Impact. Groundwater depth varies on the Project site, ranging from five feet to eight feet bgs below the buried stream channel to 11.5 feet to 13.5 feet bgs in other locations. Several geotechnical borings also encountered no groundwater within 10 feet of the surface. Groundwater samples at the Project site provided enough groundwater to analyze for metals and PAHs. Both groundwater samples

showed low concentrations of PAHs, but no metals were detected above the method detection level.[37] Concentrations of PAHs were above the USEPA Tap Water Regional Screening Level but were not quantitatively evaluated.[38] Soil in the Project site is contaminated with 19 COPCs, which have the potential of being transported to groundwater through infiltration of surface water, including stormwater runoff and water from landscape irrigation.

The proposed Project would cap over existing contaminated soil on-site. The installation of the cap would not change the level of contamination present in the soil or groundwater. Some excavation would occur for the planting of trees, which would reduce the overall amount of contaminated soil on-site. Construction of the proposed Project would include the usage of construction crew vehicles, heavy construction equipment, including a water truck, a dozer, a compactor, generators, and other typical equipment. Oil, metals, and other contaminants would potentially be dropped on the ground surface and subsequently infiltrate groundwater. During operations, the proposed addition to the parking lot would also increase the amount of contaminants released on the Project site. The proposed parking lot would be an expansion on the existing parking lot, which causes this type of contamination under existing conditions.

Given the contaminated nature of the Project site the change in contamination caused by the above would be relatively minor. There would not be substantial changes to the amount of water infiltrated into the ground or to the level of contamination of water that reaches groundwater. The rate and direction of existing contaminant movement, as well as the area affected by contaminants and the level of contamination, are anticipated to remain relatively similar to existing conditions. Therefore, impacts related to affecting the rate or changing the direction of movement of existing contaminants, expanding of the area affected by contaminants, or resulting in an increased level of groundwater contamination would be less than significant.

- *Cause regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations (CCR), Title 22, Division 4, and Chapter 15 and in the Safe Drinking Water Act.*

No Impact. Refer to Response to IX.f. The implementation of BMPs and the proposed Project SWPPP would reduce impacts to water quality at existing wells. In addition, the proposed Project would comply with all DTSC requirements, which would exceed existing water quality standards. Therefore, impacts related to violation of regulatory water quality standards at an existing production well would not occur.

[37] California Environmental Geologists & Engineers, Inc, *Draft Supplemental Site Investigation and Preliminary Endangerment Assessment, Chatsworth Park South*, p. 17, December 2010.

[38] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.

3.10 Land Use and Planning

3.10.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING – Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☒	☐

DISCUSSION

X.a. **No Impact.** The Project site is located on the edge of an established community and the Santa Susana Mountains which abut the Project site already serve as a dividing border. In addition, the proposed Project does not change the existing use of the Project site or construct new elements that would divide a community. Therefore, impacts related to physical division of an established community would not occur.

X.b. **No Impact.** The Project site has a general land use designation of Open Space and is zoned OS.[39] The proposed Project will not change the existing land use of the Project site or its designated land use or zoning. The proposed Project would be consistent with the current Project site land use and use as a park. Therefore, conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project site would not occur.

X.c. **Less Than Significant Impact.** The proposed Project will not change the existing land use of the Project site. The trees that would be removed under the proposed Project would not include protected and Heritage trees, including oaks. In addition, the removed trees would be replaced at least on a one-to-one ratio and would be replaced with the types of trees required by LADRAP Forestry Division. The fencing that is proposed around these trees would be constructed as required by the LADRAP Forestry Division, which is part of the permitting process. Therefore, impacts related to conflicts with applicable conservation plans would be less than significant.

3.10.2 City of Los Angeles CEQA Thresholds

In addition to the thresholds in Appendix G of the CEQA Guidelines, the following analysis was completed in compliance with the 2006 City of Los Angeles CEQA Thresholds.[40] The City of Los Angeles CEQA Thresholds presented below are not the complete thresholds for this environmental topic, but rather those that require additional analysis beyond that which was conducted for the Appendix G thresholds above.

H1 (Land Use Consistency). The determination of significance shall be made on a case-by-case basis, considering whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site

No Impact. The Project site is in the Chatsworth-Porter Ranch Community Plan Area. The Chatsworth-Porter Ranch Community Plan Area Land Use Map shows the Project site as Open Space and the Project

[39] City of Los Angeles Department of City Planning, Chatsworth-Porter Ranch Community Plan website, http://cityplanning.lacity.org/, Accessed February 2013.

[40] City of Los Angeles, *2006 City of Los Angeles CEQA Thresholds*, page 13, 2006.

area as a Regional Park. The Slope Density Ordinance of the City of Los Angeles Municipal Code (LAMC) Section 17.05C therefore applies to the Project site, providing a maximum allowable density for development on hillsides.[41] The Project site is in a Hillside Area, and is not in any specific plan areas[42] or redevelopment areas.[43]

The proposed Project would remediate an existing park on the Project site. The land use and zoning of the Project site would not change, and it would continue to function as a park and open space. No new structures would be constructed and no existing structures would be modified. Hillside terrain would not be impacted by the proposed Project, except for Area E, which would undergo vegetation grubbing and scouring. No development or grading would occur in Area E or any other hillsides. The proposed Project would remain consistent with the adopted land use and density requirements set forth in the Chatsworth-Porter Ranch Community Plan and the LAMC. Therefore, impacts related to inconsistency with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site would not occur.

H2 (Land Use Compatibility).The determination of significance shall be made on a case-by-case basis, considering the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

No Impact. The Project site is an existing park and is compatible with the City of Los Angeles General Plan and the Chatsworth-Porter Ranch Community Plan. The Project site is currently closed to the public and thus has a minimal effect on the surrounding land uses. The Project site represents a transition between the undeveloped Santa Susana Mountains and the residential development to the east. The proposed Project would cause no land use changes to the Project site. As a result, secondary land use impacts would remain the same as under existing conditions. Therefore, impacts related to the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project would not occur.

3.11 Mineral Resources

3.11.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES – Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

DISCUSSION

XI.a. **No Impact.** The Project site is not in a Mineral Resource Zone 2 (MRZ-2) Area[44] or in an Oil Field and Oil Drilling Area.[45] The proposed Project does not change the existing use of the

[41] City of Los Angeles, *Los Angeles Municipal Code Section 17.05 C*, published by American Legal Publishing Corporation, October 29, 2012, Online at *http://www.amlegal.com/library/ca/losangeles.shtml*, Accessed February 2013.

[42] City of Los Angeles, Department of City Planning, *Specific Plans Affecting the Chatsworth - Porter Ranch Community Plan Area*, 1993, Online at *http://cityplanning.lacity.org/complan/specplan/chtsppage.htm*, accessed February 2013.

[43] City of Los Angeles, ZIMAS website, http://zimas.lacity.org/, Accessed February 2013.

[44] City of Los Angeles Department of City Planning, General Plan Framework EIR website, *http://cityplanning.lacity.org/housinginitiatives/housingelement/frameworkeir/FrameworkFEIR.pdf,* Accessed February 2013.

[45] City of Los Angeles Department of City Planning, Safety Element website, *http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf*, Accessed February 2013.

Project site. Therefore, impacts related to loss of availability of a known mineral resource that would be of value to the region and the residents of the state would not occur.

XI.b. **No Impact.** Refer to Response XI.a. Therefore, impacts related to loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan would not occur.

3.11.2 City of Los Angeles CEQA Thresholds

All of the 2006 City of Los Angeles CEQA Thresholds related to Mineral Resources (Section E.4) have been explicitly or substantially addressed in the CEQA Guidelines Appendix G thresholds discussion above. No further discussion is required.

3.12 Noise

3.12.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE – Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

DISCUSSION

XII.a. **Less Than Significant With Mitigation Incorporated.** Activities associated with the proposed Project would generate increases in noise levels due to on-site construction activities in addition to the import and export of materials via truck trips.

On-site Construction Noise

The City of Los Angeles CEQA Thresholds Guide states the following in regards to on-site construction noise:

A project would normally have a significant impact on noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 A-weighted decibels (dBA) or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive land use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday; before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday.

The LAMC exempts construction from noise restrictions between 7:00 a.m. and 9:00 p.m. on weekdays and from 8:00 a.m. to 6:00 p.m. on Saturday, but not on Sundays or federal holidays. The LAMC also states that, during daytime hours, if construction activities are being conducted within 500 feet of a residential zone, equipment or a powered hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet from construction and industrial machinery will be prohibited unless compliance is technically infeasible. Construction activities related to the proposed Project would generate temporary increases in noise levels in the proposed Project vicinity due to on-site construction activities associated with the following activities:

- Grub and remove trees (with the exception of designated oak trees) from the proposed remedial areas with the exception of Area A (an oak grove) and Area E (a rocky outcrop).
- Rough grade the upper 18-inches of native terrain in all areas (except Areas A and E) to remove existing burrowing animal tunnels and to allow the soil to be compacted.
- Proposed remedial areas (except Areas A and E) will be capped (1-foot thick) to cover the impacted soil remaining in place.
- Fencing installed around the entirety of Area A (an oak grove)
- Grubbing and vacuuming activities within Area E to remove lead pellets.
- The portion of the Project site outside Areas A to N is not proposed for remediation because of steep terrain. These areas will be fenced off to restrict public access. Drainage features will also be implemented along the perimeter of Areas A through N.
- The 1-foot surface cap will consist of 4 inches of top soil to support turf growth, 8 inches of base to allow drainage, and a layer of hardware cloth to prevent burrowing animals from disturbing the cap. Considerations would have to be made, however, of integration of the cap with Project site development, including required Site grading and future construction or Site modification.

Construction equipment associated with these activities includes a water truck, wheel-loader, track-mounted dozer, ground compactor, motor grader, track-mounted excavator, dump truck and scraper. Construction activities will be conducted from 7:00 a.m. to 6:00 p.m. The presumed ambient noise levels for residential land uses can be found in Exhibit I.1-3 of the City of Los Angeles CEQA Thresholds Guide. The daytime (7:00 a.m. to 10:00 p.m.) presumed exterior ambient noise levels at the residences located east of the Project site are 50 dBA L_{eq}. Construction activities are anticipated to be conducted for 40 days. Therefore, the threshold for determining noise impacts at noise sensitive land uses is 55 dBA L_{eq} during daytime hours. No construction activities would be conducted during nighttime hours.

Emission levels from the FHWA Road Construction Noise Model (RCNM) and usage factors for each piece of construction equipment were used in order to calculate an L_{eq} for the two loudest two pieces of construction equipment if they would be operating simultaneously. If the specific equipment is not found in the RCNM, then the emission level of similar equipment is used.

The following equation was used to calculate the noise level for two pieces of equipment operating simultaneously. Then the distance to the 55 dBA L_{eq} noise contour was calculated. This formula is used to adjust the noise level generated by the individual pieces of construction equipment based on the estimated time that the equipment is planned to be used during an hour.

$$L_{eq}(equip) = E.L. + 10\log(U.F.)$$

where: $L_{eq}(equip)$ = L_{eq} at a receiver resulting from the operation of a single piece of equipment over a specified time period

$E.L.$ = noise emission level of the particular piece of equipment at a reference distance of 50 feet

$U.F.$ = usage factor that accounts for the fraction of time that the equipment is in use over the specified period of time.

The FTA's General Assessment for construction noise assumes that the two loudest pieces of equipment are operating simultaneously for each construction activity. The associated noise level, in terms of L_{eq}, is calculated and the distance to the daytime 55 dBA L_{eq} noise threshold is calculated. These two pieces of equipment are the motor grader and scraper. At a distance of 50 feet, the two pieces of equipment will generate noise levels of 83.6 dBA L_{eq}. If the scraper and motor grader are operated simultaneously, the distance to the 55 dBA L_{eq} noise contour is 1,425 feet.

All construction activities are proposed to be conducted during construction noise exempt hours and are exempt from the 55 dBA L_{eq} threshold at the property line of nearby noise sensitive land uses, but the noise generated by the construction equipment exceeds the allowable 75 dBA at a distance of 50 feet. BMPs and proposed noise monitoring already part of the proposed Project, including providing a hotline for noise complaints and muffling equipment as feasible would reduce these temporary and short-term impacts to a less than significant level. Therefore, impacts related to exposure of sensitive land uses to increased noise levels related to on-site construction activities would be less than significant.

Construction Noise Related to Off-Site Vehicular Traffic

As part of construction activities, trucks would be importing material and exporting soil and waste. It is anticipated that there would be an average 70 daily truck trips per day throughout the construction activity phase of the proposed Project. The two major local roads that would be used would be Topanga Canyon Boulevard and Devonshire Street.

The City of Los Angeles CEQA Thresholds Guide does not provide a definition or a threshold for "substantial increase" in noise for transportation-related construction traffic noise. Changes in a noise level of less than 3 dBA are not typically noticed by the human ear. Some individuals who are extremely sensitive to changes in noise may notice changes from 3 to 5 dBA. Based on this information, an increase of 3 dBA or greater in noise level that occurs due to the introduction of construction traffic along Devonshire Street and Topanga Canyon Boulevard was used as the threshold to determine impact significance.

Table XII-A lists the 2012 existing Average Daily Trips (ADT) volumes along the least traveled part of Devonshire Street (in between Shadow Oak Drive and Larwin Avenue) and along Topanga Canyon Boulevard just north of Devonshire Street. Also listed in **Table XII-A** are the 2012 ADTs with the average 70 daily round trips that the trucks would be making to and from the Project site. The increase in community noise equivalent level (CNEL) is provided for each roadway segment due to the introduction of construction traffic. It is assumed that traffic along Devonshire Street is traveling at 35 miles per hour (mph) and traffic along Topanga Canyon Boulevard is traveling at 45 mph. As shown in **Table XII-A**, there is an anticipate increase in the CNEL along Devonshire Street in between Shadow Oak Drive and Larwin Avenue of 3.2 dBA. Therefore, impacts related to exposure of sensitive land uses to increased noise levels related to construction traffic would be potentially significant without mitigation.

Table XII-A
Change in CNEL Due to Introduction of Propose Project Construction Traffic Trips

Roadway Segment	Existing ADT	Existing CNEL (dBA)	ADT with Proposed Project Construction	Existing ADT Plus Proposed Project Construction ADT CNEL (dBA)	Change in CNEL (dBA)
Devonshire St. between Shadow Oak Dr & Larwin Ave	1,392	55.3	1,532	58.5	3.2
Topanga Canyon Blvd. (north of Devonshire St.)	45,309	73.1	45,449	73.2	0.1
Source: URS, 2013.					

MITIGATION MEASURES:

MM-NO-01 In order to reduce noise levels generated by construction traffic, the trucks going to and from the proposed Project site will reduce their noise levels along Devonshire Street, in between Larwin Avenue and Shadow Oak Drive, by traveling at speeds of 25 mph and under. By decreasing the trucks speeds to 25 mph along that roadway segment, the increase in CNEL will be 2.5 dBA and will be less than the significance threshold of 3 dBA CNEL.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Upon implementation of **MM- NO-01**, impacts related to construction-related traffic noise would be reduced to less than significant..

XII.b. **Less than Significant Impact.** Construction activities associated with the proposed project could potentially generate ground-borne vibration in the immediate vicinity of the project site, depending on the construction procedure and the construction equipment used. Typical vibration produced by construction equipment is shown in **Table XII-B**. Ground-borne vibration decreases rapidly with distance. At the large distances listed for sensitive land uses, construction activities associated with the proposed Project are not anticipated to generate excessive ground-borne vibration or ground-borne noise levels. Therefore, impacts related to exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels would be less than significant.

Table XII-B
Typical Vibration Levels for Construction Equipment

Equipment	Approximate peak particle velocity at 25 feet (inches/second)	Approximate peak particle velocity at 75 feet (Inches/second)
Large Bulldozer	0.089	0.017
Loaded Trucks	0.076	0.015
Small Bulldozer	0.003	0.001
Auger/Drill Rigs	0.089	0.017
Jackhammer	0.035	0.007
Vibratory Hammer	0.035	0.007

Notes:
1. Peak particle ground velocity measured at 25 feet unless noted otherwise.
2. Root mean square amplitude ground velocity in decibels (VdB) referenced to 1 microinch/second.

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Guidelines,* May 2006.

XII.c. **No Impact.** A project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly

unacceptable" category, or any 5 dBA or greater noise increase (Refer to **Figure XII-A**).The proposed Project would not generate a permanent increase in ambient noise levels in the Project vicinity above levels existing without the proposed Project since the proposed Project is not introducing any additional noise generating activities or sources in the vicinity of the Project site. Therefore, impacts related to a permanent increase in ambient noise levels would not occur.

	Community Noise Exposure CNEL, dh			
Land Use	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Single Family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 70
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging - Motels, Hotels	50 - 65	60 - 70	70 - 80	above 80
Auditoriums, Concert Halls, Amphitheaters	-	50 - 70	-	above 65
Sports Arena, Outdoor Spectator Sports	-	50 - 75	-	above 70
Playgrounds, Neighborhood Parks	50 - 70	-	67 - 75	above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	-	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	-
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	-

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
Clearly Unacceptable: New construction or development should generally not be undertaken.

Figure XII-A
Land Use Noise Compatibility Guidelines

XII.d. **Less-Than-Significant with Mitigation Incorporated.** Refer to Responses XII.a through XII.c. Impacts related to substantial temporary or periodic increase in ambient noise levels at some noise-sensitive locations above levels existing without the proposed Project would be potentially significant without mitigation.

MITIGATION MEASURES

Refer to Mitigation Measures **MM-NO-01** and **MM-NO-02**. No additional mitigation is required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Upon implementation of Mitigation Measures **MM-NO-01** and **MM-NO-02**, impacts related to substantial temporary or periodic increase in ambient noise levels at noise-sensitive locations above levels existing without the project would be reduced to a less-than-significant level.

XII.e. **No Impact.** There are no airports located within two miles of the Project site. The nearest airport is Van Nuys Airport, located approximately ten miles southeast of the Project site.

Therefore, impacts related to exposing people to excessive or high noise impact levels in an airport plan area would not occur.

XII.f. **No Impact.** There are no private airstrips located on or in the vicinity of the project site. Therefore, impacts related to exposing people to excessive noise levels in the vicinity of a private airstrip would not occur.

3.12.2 City of Los Angeles CEQA Thresholds

In addition to the thresholds in Appendix G of the CEQA Guidelines, the following analysis was completed in compliance with the 2006 City of Los Angeles CEQA Thresholds.[46] The City of Los Angeles CEQA Thresholds presented below are not the complete thresholds for this environmental topic, but rather those that require additional analysis beyond that which was conducted for the Appendix G thresholds above.

I3 (Railroad Noise).A project would normally have a significant impact with regard to exterior noise levels resulting from railroad operations if the project causes noise measured at the property line of a noise sensitive receptor to increase by 3 dBA in CNEL, to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase .

No Impact. The proposed Project does not include a rail element. There are no active railroads within the vicinity to the Project site, although there are remnants of a rail line directly adjacent to the north of the Project site. Therefore, impacts related to railroad noise would not occur.

3.13 Population and Housing

3.13.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING – Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

DISCUSSION

XIII.a. **No Impact.** The Project site is a park developed with recreational uses such as a recreation building, tennis courts, playgrounds, and basketball courts. Chatsworth Park South has been closed to the public since 2008. In 2013 the recreation building was reopened to the public but the Project site remains closed.[47] There are no residential uses on the Project nor are there existing plans that would redevelop the Project site for residential uses. The proposed Project will not construct any new structures that will directly induce substantial population growth in the area, including new homes or businesses. In addition, the proposed Project will not indirectly induce substantial population growth in the area because it will not extend any roads or other infrastructure, or cause any other changes that would encourage growth. Therefore, impacts related to substantial population growth would not occur.

[46] City of Los Angeles, *2006 City of Los Angeles CEQA Thresholds*, page 13, 2006.
[47] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.

XIII.b. **No Impact.** There is no housing on the Project site, and no land off-site will be required for construction and operation of the proposed Project. Consequently, no existing housing will be displaced by the proposed Project. Therefore, impacts related to displacement of substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, would not occur.

XIII.c. **No Impact.** The proposed Project would not displace any persons off-site because all construction staging and operations would occur on-site. In addition, no people will be displaced on-site because no housing or businesses are located on-site. Therefore, impacts related to displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere, would not occur.

3.13.2 City of Los Angeles CEQA Thresholds

All of the 2006 City of Los Angeles CEQA Thresholds related to Population and Housing (Sections J.1 and J.2) have been explicitly or substantially addressed in the CEQA Guidelines Appendix G thresholds discussion above. No further discussion is required.

3.14 Public Services

3.14.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

DISCUSSION

XIV.a. Fire Protection

Less Than Significant Impact. The City of Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services to the City of Los Angeles, including fire suppression, paramedic/emergency medical, fire prevention, emergency, and hazardous materials management/environmental safety services. The Project site is served by LAFD Division 3, Battalion 15, Station 96, located at 21800 Marilla Street, Chatsworth, CA 91311-4127,[48] 1.3 miles southeast from the Project site. The proposed Project would not demolish, alter, or construct any buildings. It would not result in any residential or employee change or growth (Refer to Section 3.13 Population and Housing). Consequently, it is anticipated that the demand for fire protection services from the LAFD under the proposed Project would be similar to the demand

[48] City of Los Angeles Fire Department website, *http://lafd.org/fs96.htm*, Accessed February 2013.

for services when the park was open to the public. Therefore, impacts related to fire protection services would be less than significant.

XIV.a. Police Protection

Less Than Significant Impact. The Los Angeles Police Department (LAPD) provides police protection services to the Project site. The Devonshire Community Police Station,[49] of the Valley Bureau serves Chatsworth, including the Project site, which is in Reporting District 1721. The proposed Project would not demolish, alter, or construct any buildings. It would not result in any residential or employee change or growth (see Section 3.13 Population and Housing). During construction, the Project site would be properly secured and access would be controlled. During operations, the Project site would be open to the public and would require no more security than would have been needed when Chatsworth Park South was open to the public. The parking lot associated with the proposed Project would include nighttime safety lighting similar to what exists on-site now for the existing parking lot. Consequently, it is anticipated that the demand for police protection services from the LAPD under the proposed Project would be similar to the demand for services when the park was open to the public. Therefore, impacts related to police protection would be less than significant.

XIV.a. Schools

No Impact. The area where the Project site is located is served by the Los Angeles Unified School District (LAUSD). The Project site is developed as a park with no residential structures. The proposed Project would not include elements such as housing that would directly induce growth and potentially increase demand on public schools. Furthermore, the proposed Project would result in no employee growth and would not indirectly induce population growth. Therefore, impacts related to increased demand for schools would not occur.

XIV.a. Parks

No Impact. The Project site is a park operated by the LADRAP. The proposed Project would not change the use of the Project site as a park, and thus would not change the amount of parkland in the surrounding community. As discussed in Section 3.13 Population and Housing, the proposed Project does not have a housing component that would directly induce growth and potentially increase demand on parks. Furthermore, the proposed Project would result in no employee growth and would not indirectly induce population growth, thereby increasing demand for parks. Therefore, impacts related to increased demand for parks would not occur.

XIV.a. Other Public Facilities

No Impact. The Project site is a park and the proposed Project would not change the use of the Project site as a park. As discussed in Section 3.13 Population and Housing, the proposed Project does not have a housing component that would directly induce growth and potentially increase demand on other public facilities such as libraries, childcare centers, or senior centers. Furthermore, the proposed Project would result in no employee growth and would not indirectly induce population growth, thereby increasing demand for other public facilities. Therefore, impacts related to increased demand for other public facilities would not occur.

3.14.2 City of Los Angeles CEQA Thresholds

All of the 2006 City of Los Angeles CEQA Thresholds related to Public Services (Sections K.1 through K.5) have been explicitly or substantially addressed in the CEQA Guidelines Appendix G thresholds discussion above. No further discussion is required.

[49] City of Los Angeles Police Department website, *http://www.lapdonline.org/devonshire_community_police_station*, Accessed February 2013

3.15 Recreation

3.15.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

DISCUSSION

XV.a. **No Impact**. The Project site is a park operated by LADRAP. The proposed Project would not change the use of the Project site as a park, and thus would not change the amount of parkland in the surrounding community. As discussed in Section 3.13 Population and Housing, the proposed Project does not have a housing component that would directly induce growth and potentially increase demand on recreational facilities. Furthermore, the proposed Project would result in no employee growth and would not indirectly induce population growth, thereby increasing demand on recreational facilities. Therefore, impacts related to increased demand on recreational facilities would not occur.

XV.b. **Less Than Significant.** The Project site is an existing recreational facility. Currently only the recreation building is open to the public; and the Project site where remediation would occur is closed. As discussed in Response XV.a, the proposed Project would not directly or indirectly increase demand for recreational facilities. Use of and demand for park space would thus not change. Therefore, impacts related to requiring the construction or expansion of recreational facilities would not occur.

The proposed Project would not close or reduce access to the Project site because it is already closed. No temporary construction closures or permanent operations closures would occur that are not already in place. However, the proposed Project would remediate an existing recreational facility while retaining its existing use, and increasing the safety of patrons. Therefore, impacts related to inclusion of recreational facilities which might have an adverse physical effect on the environment would be less than significant.

3.15.2 City of Los Angeles CEQA Thresholds

All of the 2006 City of Los Angeles CEQA Thresholds related to Recreation (Section K.4) have been explicitly or substantially addressed in the CEQA Guidelines Appendix G thresholds discussion above. No further discussion is required.

3.16 Transportation and Traffic

3.16.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION AND TRAFFIC – Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e. Result in inadequate emergency access?	☐	☐	☒	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

DISCUSSION

XVI.a. **Less Than Significant Impact.** In the vicinity of the Project site, Devonshire Street and Topanga Canyon Boulevard are the primary roads that provide local and regional access to the park (Appendix B). The proposed transportation plan during construction of the proposed Project would consist of approximately 2,900 transport truckloads of import material and 890 truckloads of impacted export soil and waste using Devonshire Street and Topanga Canyon Boulevard to access SR-118 to the north.

Construction of the proposed Project would cause a temporary increase in truck traffic relative to the existing traffic load and capacity (vehicle trips or volume to capacity [V/C] ratios) along proposed transport haul routes of Devonshire Street and Topanga Canyon Boulevard. This temporary increase would be partially due to vehicle trips associated with workers travelling to and from the Project site, but also due to the proposed hauling activities. These increases are anticipated to be relatively minor and temporary in nature. Vehicular access along any and all transport haul routes would be maintained during construction via a City of Los Angeles Traffic Handling Plan which will maintain full function of roadways and allow unimpeded two-way traffic flow. The proposed Project would increase truck traffic by approximately 9 to 12 peak hour truck trips per day and 70 total daily truck trips for 55 total days. Under City of Los Angeles traffic impact thresholds for intersections, an initial assessment of traffic impacts is deemed unnecessary should the peak hour trips not exceed 25 trips in either the AM or PM peak hours wherein the adjacent intersections are currently operating at Level of Service (LOS) E or F. As anticipated truck trips are far below the minimum threshold, construction traffic effects would not substantially exceed the traffic load and capacity of the existing roadway system.

The proposed Project would not change the land use of the Project site. Operations of the proposed Project would include maintenance of the capped areas and monitoring. These

activities would be completed on a regular but not daily basis, and impacts to traffic load and capacity would be negligible. The proposed Project would not affect or increase the usage of other modes of transportation, such as bicycles, mass transit, and pedestrians, as it does not include any elements that would directly or indirectly induce population growth.

Therefore, impacts related to conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, would be less than significant.

XVI.b. **Less Than Significant Impact.** As discussed in Appendix B, the Project site is within the County of Los Angeles Congestion Management Plan (CMP). Under CMP traffic impact thresholds for intersections, an initial assessment of traffic impacts is deemed unnecessary should the peak hour trips not exceed 50 trips in either the AM or PM peak hour. Furthermore, under CMP traffic impact thresholds for arterial segments, an initial assessment of traffic impacts is deemed unnecessary should the peak hour trips not exceed 50 peak hours trips as a total of both directions.

Construction of the proposed Project would cause a temporary increase in truck traffic relative to the existing traffic load and capacity along proposed transport haul routes that would utilize County congestion management agency designated roadways, Devonshire Street and Topanga Canyon Boulevard. The proposed Project would increase truck traffic by approximately 9 to 12 peak hour truck trips per day and 70 total daily truck trips for 55 total days. The anticipated peak hour truck trips are far below the minimum threshold (50 trips or less in either the AM or PM peak hour) and, consequently, construction traffic would not substantially exceed the traffic load and capacity of the existing roadway system. Therefore, impacts related to conflict with an applicable CMP, including, but not limited to LOS standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways, would be less than significant.

XVI.c. **No Impact.** The nearest airport to the Project site is Van Nuys Airport, located approximately ten miles to the southeast. The proposed Project would not include any air transportation elements or any elements that would interfere with aviation. Therefore, impacts related to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks would not occur.

XVI.d. **Less Than Significant Impacts.** Construction of the proposed Project would cause a temporary increase in truck traffic, but it is anticipated that roadways and intersections would remain functional and not be altered from current existing design features. Construction of the proposed Project would maintain existing functionality of the proposed haul routes, Devonshire Street and Topanga Canyon Boulevard. According to the RAP Project Transportation Plan[50], the proposed Project is not anticipated do affect existing roadway pavement during the construction phase. However, if the Contractor, in coordination with the City of Los Angeles Department of Public Works, Bureau of Street Services (BSS), observes deterioration of the haul route pavement due to the construction activities, the Contractor shall repair and repave the affected areas. Therefore, potential construction traffic impacts related to substantial increase in hazards due to design features would be less than significant.

XVI.e. **Less Than Significant Impact.** Access for emergency vehicles is currently considered adequate and would remain this way during the construction phase, as the proposed Project would not remove or add any access points to or from the Project site. In addition, the proposed Project design would be approved by LAFD and LAPD for incorporation of adequate emergency access

[50] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.

during the permitting process. Therefore, impacts related to inadequate emergency access would be less than significant.

XVI.f. Less Than Significant Impact. Construction activities associated with the proposed Project would be limited to the Project site with the exception of the hauling of soil and waste. As discussed above, the number of daily haul trips would not exceed standards or significantly increase traffic load on local roads. Access to transit on the existing transit corridors, as well as any existing bicycle lanes would be maintained during construction. Therefore, impacts related to conflicts with adopted policies, plans or programs supporting alternative transportation would be less than significant.

3.16.2 City of Los Angeles CEQA Thresholds

In addition to the thresholds in Appendix G of the CEQA Guidelines, the following analysis was completed in compliance with the 2006 City of Los Angeles CEQA Thresholds.[51] The City of Los Angeles CEQA Thresholds presented below are not the complete thresholds for this environmental topic, but rather those that require additional analysis beyond that which was conducted for the Appendix G thresholds above.

L2 (Street Segment Capacity). A proposed project would normally have a significant street segment capacity impact if project traffic causes an increase in the V/C ratio on the street segment operating condition after the addition of project traffic equal to or greater than the following:

- *V/C ratio increase >0.080 if final LOS* is C*
- *V/C ratio increase >0.040 if final LOS* is D*
- *V/C ratio increase >0.020 if final LOS* is E or F*

  **"Final LOS" is defined as projected future conditions including project, ambient, and related project growth but without project traffic mitigation.*

Less Than Significant Impact. The proposed Project would increase peak hour average daily traffic by approximately 24 trips. Under City of Los Angeles CEQA thresholds, the proposed Project would have a significant impact at the roadway segment of Devonshire Street between Topanga Canyon Boulevard and Valley Circle based on an increase of 0.040 in the vehicle over capacity (V/C) ratio. Although the increase of truck trips is initially considered as significant per the City of Los Angeles CEQA thresholds, it is anticipated that impacts are temporary. Furthermore, traffic impacts during the peak hour onto the immediate roadway segments along the proposed transport haul route, adjacent to the proposed Project site, are considered to be less than significant.

L4 (Neighborhood Intrusion Impacts). A project would normally have a significant neighborhood intrusion impact if project traffic increases the average daily traffic (ADT) volume on a local residential street in an amount equal to or greater than the following:

- *ADT increase ≥ 16% if final ADT* <1,000*
- *ADT increase >12% if final ADT* >1,000 and <2,000*
- *ADT increase >10% if final ADT* >2,000 and <3,000*
- *ADT increase >8% if final ADT* >3,000*
  - **"Final ADT" is defined as total projected future daily volume including project, ambient, and related project growth.*
  - *The significance of neighborhood intrusion impacts related to vehicle delay shall be determined on a case-by-case basis.*

Less Than Significant Impact. The proposed Project would increase peak hour average daily traffic by approximately 24 trips. Under City of Los Angeles CEQA thresholds, the proposed Project would not have a significant impact on local residential streets.

[51] City of Los Angeles, *2006 City of Los Angeles CEQA Thresholds*, page 13, 2006.

L5 (Project Access - Operational). A project would normally have a significant project access impact if the intersection(s) nearest the primary site access is/are projected to operate at LOS E or F during the a.m. or p.m. peak hour, under cumulative plus project conditions.

L5 (Bicycle, Pedestrian and Vehicular Safety).The determination of significance shall be on a case-by-case basis, considering the following factors:

- *The amount of pedestrian activity at project access points.*
- *Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.*
- *The type of bicycle facility the project driveway(s) crosses and the level of utilization.*
- *The physical conditions of the site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/ bicycle or vehicle/vehicle impacts.*

Less Than Significant Impact. The Project site is located at the edge of the community and is currently closed to the public. Pedestrian activity at Project site access points is therefore anticipated to minimal. Currently Devonshire Street and Shadow Oaks Road provide access to the Project site. As the existing use is a park, bicycle parking facilities are present on the Project site and bicycling was allowed on-site prior to closure of the park. The accessible areas surrounding the Project site, where vehicular traffic is permitted to travel, is relatively flat and open, providing good visibility and few hazards.

The proposed Project would not change the access points of the Project site and physical configurations and design features would remain similar to those present prior to the closure of the park. Fencing with windscreening would be installed around the Project site, but not in areas that are accessible by vehicles. Signage would be installed at access points indicating which areas have been fenced off to bicycles and pedestrians. Access to the existing and proposed parking lots would be the same as under the existing condition. Therefore, impacts related to operational project access and bicycle, pedestrian, and vehicular safety would be less than significant.

L6 (Transit System Capacity). The determination of significance shall be made on a case-by-case basis, considering the projected number of additional transit passengers expected with implementation of the proposed project and available transit capacity.

No Impact. The Project site is at the western edge of the San Fernando Valley, which is served by the Los Angeles County Metropolitan Transportation Authority (LACMTA or Metro). The nearest transit line is Metro bus line 158.[52] The closest stop for this line is the intersection of Devonshire Street and Topanga Canyon Boulevard, approximately 0.52 miles east of the Project site. It is anticipated that in general, construction workers would utilize company or private vehicles to access the construction areas of the Project site. During operations, minimal maintenance would be required and this would also be done using company or private vehicles. Therefore, impacts related to transit system capacity would not occur.

L7 (Parking). A project would normally have a significant impact on parking if the project provides less parking than needed as determined through an analysis of demand from the project.

Less Than Significant Impact. Parking is available on the Project site in an established parking lot. On-street parking is available on Devonshire Street. The proposed Project would have sufficient parking on-site to accommodate construction period parking needs. Parking would be available for construction activities in parts of the park which are not currently accessible to the general public. The proposed Project would include an expansion of the parking lot on-site. Construction of the new parking lot in the vicinity of the existing parking lot may require temporary closure of this area. However, parking along other parts of the park would be allowed, and this closure would be temporary. Finally, parking along the proposed haul routes (Devonshire Street and Topanga Canyon Boulevard) would not be removed or reduced during construction. During operations of the proposed Project, sufficient parking would exist for the limited vehicular traffic required to

[52]Los Angeles Metropolitan Transportation Authority, Bus and Rail System Map, December 2012, online at *http://www.metro.net/riding_metro/maps/images/System_Map.pdf*, accessed February 2013.

operate and maintain the surface cap. Therefore, impacts related to inadequate parking would be less than significant.

L8 (In-Street Construction Impacts). The determination of significance shall be made on a case-by-case basis, considering the following factors:

Temporary Loss of Access:

- *The length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area;*
- *The availability of alternative vehicular or pedestrian access within ¼ mile of the lost access; and*
- *The type of land uses affected, and related safety, convenience, and/or economic issues.*

No Impact. Parcels fronting the Project site include residences to the east. The proposed Project would be contained on the Project site and would not impact vehicular or pedestrian access to adjacent parcels. Alternative vehicular and pedestrian access would therefore not be required, and no safety, convenience, or economic issues would arise. Therefore, impacts related to temporary loss of access would not occur.

Temporary Loss of Bus Stops or Rerouting of Bus Lines:

- *The length of time that an existing bus stop would be unavailable or that existing service would be interrupted;*
- *The availability of a nearby location (within ¼ mile) to which the bus stop or route can be temporarily relocated;*
- *The existence of other bus stops or routes with similar routes/destinations within a ¼ mile radius of the affected stops or routes; and*
- *Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s).*

No Impact. Refer to Response to L6 above. The proposed Project would not block or remove an existing bus stop. Temporary locations for bus stops or routes would not be required as there would be no interruption of regular service. Therefore, impacts related to temporary loss of bus stops or rerouting of bus lines would not occur.

Temporary Loss of On-Street Parking:

- *The current utilization of existing on-street parking;*
- *The availability of alternative parking locations or public transit options (e.g. bus, train) within ¼ mile of the project site; and*
- *The length of time that existing parking spaces would be unavailable.*

No Impact. Refer to Response to L7. On-street parking is available on Devonshire Street and Topanga Canyon Boulevard. Under the proposed Project, no on-street parking would be temporarily moved or affected by the proposed Project. Therefore, impacts related to temporary loss of on-street parking would not occur.

3.17 Utilities and Service Systems

3.17.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e. Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g. Comply with federal, state, and local statues and regulations related to solid waste?	☐	☐	☐	☒

DISCUSSION

XVII.a. **No Impact.** The Project site is under the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB). The LARWQCB is responsible for water quality throughout the Los Angeles region, including compliance with waste discharge requirements.[53] Though the recreation building has been reopened to the public, the Project site is currently closed to the public and, consequently, there is little to no generation of wastewater on-site. The proposed Project would not create any new structures or generate significant amount of wastewater during construction. The proposed Project will not change the amount or character of wastewater discharged from the Project site, and thus would not bring wastewater discharge in violation of treatment requirements. Therefore, impacts related to exceeding wastewater treatment requirements would not occur.

XVII.b. **Less Than Significant Impact.** Regarding water, **t**he proposed Project would install a new irrigation system in the cap. This irrigation system would replace the existing irrigation system. The new irrigation system would function similarly to the existing conditions, irrigating trees and other park landscaping. The proposed Project would not construct new infrastructure that would expand existing demand or create new demand for water. Therefore, impacts related to requiring construction or expansion of water facilities would be less than significant.

Regarding wastewater, Chatsworth Park South has existing structures (i.e. the recreation building) which can generate wastewater. However, the Project site is currently closed to the public and, consequently, there is little to no generation of wastewater onsite. The proposed Project would

[53] California Environmental Protection Agency, Los Angeles Regional Water Quality Control Board website, http://www.waterboards.ca.gov/losangeles/, Accessed February 2013.

not create any new structures or generate significant amount of wastewater during construction. The proposed Project would not change the amount or character of wastewater discharged from the Project site and, thus, would not bring wastewater discharge in violation of treatment requirements. Therefore, impacts related to requiring construction or expansion of wastewater treatment facilities would not occur.

XVII.c. **Less Than Significant Impact.** The current drainage pattern of the Project site mimics the historic predevelopment drainage conditions. The main drainage swale is unpaved and extends from west to east across the Site. Near the recreation building, the channel is somewhat more incised and is crossed by a small bridge. Several small drainage culverts and pipes were placed across the drainage to facilitate placement of pathways and access points. For the most part, drainage sheet flows towards the central drainage channel where it is conveyed in an easterly direction off the property. The flow enters a subsurface storm drain east of the Project site. There is an existing sprinkler system onsite. The proposed surface cap will be composed of four inches of top soil to support turf growth, eight inches of base to allow drainage, and a layer of hardware cloth, which is a pervious material, and will have a sprinkler system installed within it replacing the existing sprinkler system. As a result, the proposed Project will not substantially change the permeability of the Project site. The surface cap sprinkler system will be extended into the tree groves to supply irrigation water. The proposed Project would not significantly alter the amount of impervious surfaces, and consequently stormwater runoff patterns would be similar to existing conditions.[54] In addition, in compliance with USEPA NPDES requirements, the proposed Project would incorporate BMPs and a SWPPP. Demands on stormwater drainage facilities are anticipated to be similar to existing conditions. Therefore, impacts related to requiring or resulting in construction of new stormwater drainage facilities or expansion of existing facilities would be less than significant.

XVII.d. **Less Than Significant Impact.** Refer to response to XVII.b.

XVII.e. **No Impact.** Refer to responses to XVII.a and XVII.b.

XVII.f. **Less Than Significant Impact.** The Project site does not currently generate solid waste as it has been closed since 2008. As an existing park, the Project site would generate amounts of solid waste typical for recreational areas.

According to the HASP prepared for the proposed Project, the excavated soil that would be exported during construction of the proposed Project would be stockpiled on-site and profiled. Once the soil has been classified as contaminated or not, and once the appropriate landfill has provided written acceptance, copies of waste profile reports used to secure disposal permission from the landfill will be provided to DTSC. Compliance with the land disposal restrictions, as necessary, will be documented and provided to DTSC once written acceptance from the landfill is obtained. All hazardous wastes would be properly managed, manifested, and transported by a registered hazardous waste hauler to a proper waste management facility. Any RCRA hazardous wastes would likely be disposed of at Clean Harbors Buttonwillow, in Buttonwillow, CA, a Class I hazardous waste land disposal facility. Non-RCRA hazardous waste would likely go to a Class I or II facility in California or a permitted Class III out of state landfill. Non-hazardous wastes would likely be transported to Class III facilities: Waste Management – Simi Valley Landfill in Simi Valley, CA or Chiquita Canyon Landfill in Castaic, CA.[55] Landfills other than those specified in the RAP may be approved if lawful for disposal of the classified waste.

Operations of the proposed Project would not generate solid waste. Therefore, impacts related to service by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs would be less than significant.

[54] URS Corporation, *Remedial Action Plan Chatsworth Park South 22360 West Devonshire Street Chatsworth, California*, March 2013.
[55] *Ibid.*

XVII.g. **No Impact.** The City is subject to federal, state, and regional statutes and regulations related to the disposal of solid waste. The proposed Project is not expected to produce waste uncommon to standard demolition and construction. Construction solid waste would be piled onsite and would be handled in compliance with all existing DTSC requirements for contaminated soils. The solid waste would be taken to a landfill that accepts contaminated soils. Therefore, impacts related to compliance with federal, state, or local statutes and regulations would not occur.

3.17.2 City of Los Angeles CEQA Thresholds

In addition to the thresholds in Appendix G of the CEQA Guidelines, the following analysis was completed in compliance with the 2006 City of Los Angeles CEQA Thresholds.[56] The City of Los Angeles CEQA Thresholds presented below are not the complete thresholds for this environmental topic, but rather those that require additional analysis beyond that which was conducted for the Appendix G thresholds above.

M3 (Solid Waste).The determination of significance shall be made on a case-by-case basis, considering the following factors:

- *Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;*
- *Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.*

Less Than Significant Impact. Refer to Response XVII.f. The proposed Project would generate approximately 12,900 cu. yd . of soil to be disposed of during construction of the proposed Project. Operations of the proposed Project would not generate solid waste. The proposed Project would not generate significant amounts of asphalt or concrete waste from demolition of existing infrastructure, and would not demolish any structures, providing recyclable materials such as glass and brick. The trees and other vegetation removed by the proposed Project would generate green waste that would potentially be recycled. Class III facilities such as Chiquita Canyon Sanitary Landfill and Waste Management – Simi Valley Landfill are permitted to recycle these green wastes.[57] The predominant waste types generated by the proposed Project would be hazardous materials (soil and materials such as lead pellets found in Area E) and green waste from tree and vegetation removal. Hazardous wastes would not be recyclable and would be properly disposed of in permitted facilities. Green wastes would be recycled by the identified Class I solid waste disposal facilities. Therefore, impacts related to waste generation, diversion, and disposal during demolition, construction, and operation of the propose d Project and to conflict with the Source Reduction and Recycling Element (SRRE) would be less than significant.

M4 (Energy). The determination of significance shall be made on a case-by-case basis, considering the following factors:

- *The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;*
- *Whether and when the needed infrastructure was anticipated by adopted plans; and*
- *The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.*

Less Than Significant Impact. As a park with limited access, the Project site requires a relatively low amount of power. The Project site currently uses energy to power lighting in the recreation building and in outdoor lights in areas such as the basketball and tennis courts. The proposed Project would require minimal energy usage during construction. Construction equipment would primarily include gasoline and diesel-powered vehicles, such as water trucks, haul trucks, dozers, and compactors. If any temporary electrical

[56] City of Los Angeles, *2006 City of Los Angeles CEQA Thresholds*, page 13, 2006.

[57] California Department of Resources Recycling and Recovery (CalRecycle), Solid Waste Information System, Facility/Site Search, online at *http://www.calrecycle.ca.gov/SWFacilities/Directory/Search.aspx*, accessed February 2013.

power was required during construction, connections to existing electrical outlets would be used and would not require construction of additional connections. Existing lighting would be used for site security at night, and any additional temporary lighting would be powered by generators. The proposed Project would require very little energy usage during operations. Once installed, the surface cap and fencing would require no energy for operation. The proposed parking lot would require energy only for the operation of any newly installed overhead lights. Newly installed lighting would comply with all applicable codes, including City of Los Angeles energy efficiency requirements. As a result, energy usage would be minimally affected by the proposed Project. It is not anticipated that any changes to energy infrastructure, including energy supply facilities and distribution infrastructure, would occur. Therefore, impacts related to the requirement of new off-site energy supply facilities and distribution infrastructure or capacity enhancing alterations to existing facilities, as well as anticipation of the needed infrastructure by adopted plans, would be less than significant.

3.18 Mandatory Findings of Significance

3.18.1 CEQA Guidelines Appendix G Thresholds

Issues & Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

DISCUSSION

XVIII.a. Less Than Significant With Mitigation Incorporated. Refer to Sections 3.4 and 3.5. The Project site is located adjacent to the Santa Susana Mountains and known habitats for sensitive plant and wildlife species. The majority of the Project site is not considered suitable habitat for sensitive species as it has been developed into a park. However, Area E remains primarily undeveloped and contains habitat for sensitive species. In addition, the trees that would be removed could potentially be used as nesting sites. Impacts related to sensitive species would be potentially significant without mitigation.

The Project site contains two historic properties, the Old Powder House and the Shooting Firing Line, which would not be affected by the proposed Project. No known archaeological or paleontological resources, or human remains exist on the Project site. However, given the anthropological and paleontological sensitivity of the County of Los Angeles, it is possible to encounter these resources during construction. Impacts related to archaeological and paleontological resources and human remains would be significant without mitigation.

MITIGATION MEASURES

Refer to mitigation measures in Sections 3.4 and 3.5. No additional mitigations are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the proposed mitigation measures in Sections 3.4 and 3.5 would reduce potentially significant impacts related to the sensitive species and cultural resources to a less-than-significant level.

XVIII.b. Less Than Significant Impact. All impacts associated with the proposed Project would be mitigated to a less-than-significant level and, therefore, the proposed project would not contribute cumulatively to adverse impacts.

XVIII.c. Less Than Significant Impact. The proposed Project could have potentially significant impacts related to air quality, biological resources, cultural resources, and noise. Mitigation measures have been proposed and incorporated in this document in order to reduce all potential impacts on human beings to a less than significant level.

MITIGATION MEASURES

Refer to Mitigation Measures in Sections 3.3, 3.4, 3.5, 3.9, and 3.12.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the proposed mitigation measures in Sections 3.3, 3.4, 3.5, 3.9, and 3.12 would reduce potentially significant impacts related to the implementation of the proposed Project to a less-than-significant level.

3.18.2 City of Los Angeles CEQA Thresholds

The 2006 City of Los Angeles CEQA Thresholds does not have specific thresholds for this topic.[58] Overall, the information required for the Mandatory Findings of Significance are found in the other environmental topic discussions. No further discussion is required.

[58] City of Los Angeles, *2006 City of Los Angeles CEQA Thresholds*, page 30, 2006.

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