Winery Canyon Channel Stormwater Capture and Reuse Project

Addendum No. 1 to the Descanso Gardens Master Plan Initial Study/ Mitigated Negative Declaration

State Clearinghouse Number 2020019072

Prepared for

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APPENDICES

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1.0 INTRODUCTION

Descanso Gardens is a botanical garden situated on an approximate 149-acre property within the City of La Cañada Flintridge (LCF), Los Angeles County (County), as shown on Exhibit 1, Regional Location and Local Vicinity. Descanso Gardens is a Los Angeles County-owned Special Use Facility and is jointly operated by the Descanso Gardens Foundation (formerly known as Descanso Gardens Guild, Inc.) and the County of Los Angeles Department of Parks and Recreation (DPR). The facility is located at 1418 Descanso Drive, La Cañada Flintridge, California, in the northwestern corner of the San Gabriel Valley and immediately southeast of, and regionally accessible by, Interstate (I) 210 and a segment of State Route (SR) 2 known as the Glendale Freeway.

Descanso Gardens is bound on the northwest by Wishing Hill Drive and single-family residences, on the northeast by Descanso Drive, on the east by single-family residences on Encinas Drive, and on the south and west by undeveloped open space. Descanso Gardens is traversed by the Winery Canyon Channel, a concrete flood control channel with 40-foot-wide easement owned and maintained by the Los Angeles County Flood Control District (LACFCD), a City of LCF riding and hiking trail easement, and a 170-foot-wide utility corridor owned by Southern California Edison (SCE).

The *Descanso Gardens Master Plan* (Master Plan), approved by the County of Los Angeles (County) in 2020, included several, often interrelated, water conservation concepts to improve both water quality and non-potable supply. This document analyzes the potential environmental impacts of the proposed Winery Canyon Channel Stormwater Capture and Reuse Project (Project). The Project would divert, treat, and reuse stormwater captured from Winery Canyon Channel (Channel) to offset potable water use for landscape irrigation and Lake level maintenance, while also improving surface water quality downstream of Descanso Gardens by removing pollutant-containing water from the flood control system. Stormwater capture or infiltration would also occur in the Main Parking Lot (or Main Lot) and Auxiliary Parking Lot (or Auxiliary Lot) through new or replacement drainage features to improve surface runoff management and water quality. Descanso Gardens considers the proposed Project as critical to the facility's ongoing water conservation and environmental stewardship efforts.

The overall premise and result of the Project is the same as described in the Master Plan. However, the Project proposes modifications to certain water conservation elements described in the Master Plan, including a different diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan. Therefore, these modifications are being analyzed in this *Addendum No. 1 to the Descanso Gardens Master Plan Initial Study/Mitigated Negative Declaration* (Master Plan IS/MND or IS/MND), which evaluated the environmental impacts associated with full implementation of the Master Plan at a program level. This Addendum has been prepared in accordance with the provisions of the California Environmental Quality Act (CEQA) (*California Public Resources Code* Section 21000 et. seq.) and the CEQA Guidelines (Title 14,

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Regional Location and Local Vicinity

Exhibit 1

Addendum No. 1 to the Descanso Gardens Master Plan IS/MND for the Stormwater Capture and Reuse Project

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California Code of Regulations Section 15000 et. seq.), specifically inclusive of Section 15164 "Addendum to an EIR or Negative Declaration".

1.1 BACKGROUND

1.1.1 DESCANSO GARDENS MASTER PLAN

Descanso Gardens' overarching mission is to practice exemplary stewardship of Descanso's distinctive character and assets; offer people an experience close to nature; and cultivate understanding of the natural world and people's place in it through inspiration, education and example. The *2018-2020 Descanso Gardens Strategic Plan* (2018-2020 Strategic Plan) was developed to create fulfilling "close to nature" experience for guests and encourage engagement with Descanso's unique landscape and botanical collections; display, maintain, and enhance the collections in ways that protect assets and consider the needs and interests of a growing and diverse set of guests; engage in planning and fundraising necessary to sustain operations and invest in major garden improvement projects; establish Descanso Gardens as an important community resource for understanding nature in the Los Angeles region and people's relationship to natural spaces; and strengthen Descanso's infrastructure and organization.

The Descanso Gardens Master Plan, which encompasses the entirety of Descanso's property, was established in 2020 to act as a comprehensive framework to guide the implementation of the proposed improvements and projects within a 15-year timeframe. The Master Plan built upon past planning efforts, including Descanso Garden's mission and the 2018-2020 Strategic Plan, and was jointly developed between DPR and the Descanso Gardens Foundation. The Master Plan includes the following goals to "best define Descanso Gardens for the next generation":

1. **World-Class Botanical Collections:** Preserve and enhance Descanso's unique landscape and botanical collections.
2. **Seamless Visitor Experience:** Create a seamless visitor experience through improved amenities, circulation, and ADA [Americans with Disabilities Act] accessibility.
3. **Exemplary Environmental Stewardship:** Protect and enhance Descanso's natural assets through ecological restoration, water conservation, and habitat considerations.
4. **Resilient Infrastructure:** Enhance the long-term resilience of Descanso by optimizing botanical relationships and reducing off-site dependency of water and energy.
5. **Revealing Stories:** Celebrate Descanso's rich cultural and ecological assets through meaningful storytelling.
6. **Operational Excellence:** Streamline operations to enable a more efficient and productive team.

Additionally, the Master Plan consists of four overarching strategies and tactics:

1. **A New Circulation Framework,** to improve wayfinding, create gateway moments at garden thresholds, and increase accessibility.
2. **Activating the Gardens,** with new and improved gardens and facilities to create new experiences and lasting activation of the gardens.
3. **Weaving Water and Ecology,** to intersect the site's water and ecology with the gardens and circulation in celebratory, educational, and performative ways.
4. **Organizing Operations,** with new buildings, structures, and infrastructure to create new efficiencies in garden operations and vehicular circulation.

The Master Plan describes a series of concepts and projects related to garden areas, parking and circulation, buildings and other facilities, events and programming, and infrastructure (e.g., water, wastewater, lighting, electricity, telecommunications) to preserve and enhance the landscape, experiences, history, and character of Descanso Gardens into the future. to both sustain and enhance Descanso Gardens and its day-to-day operations.

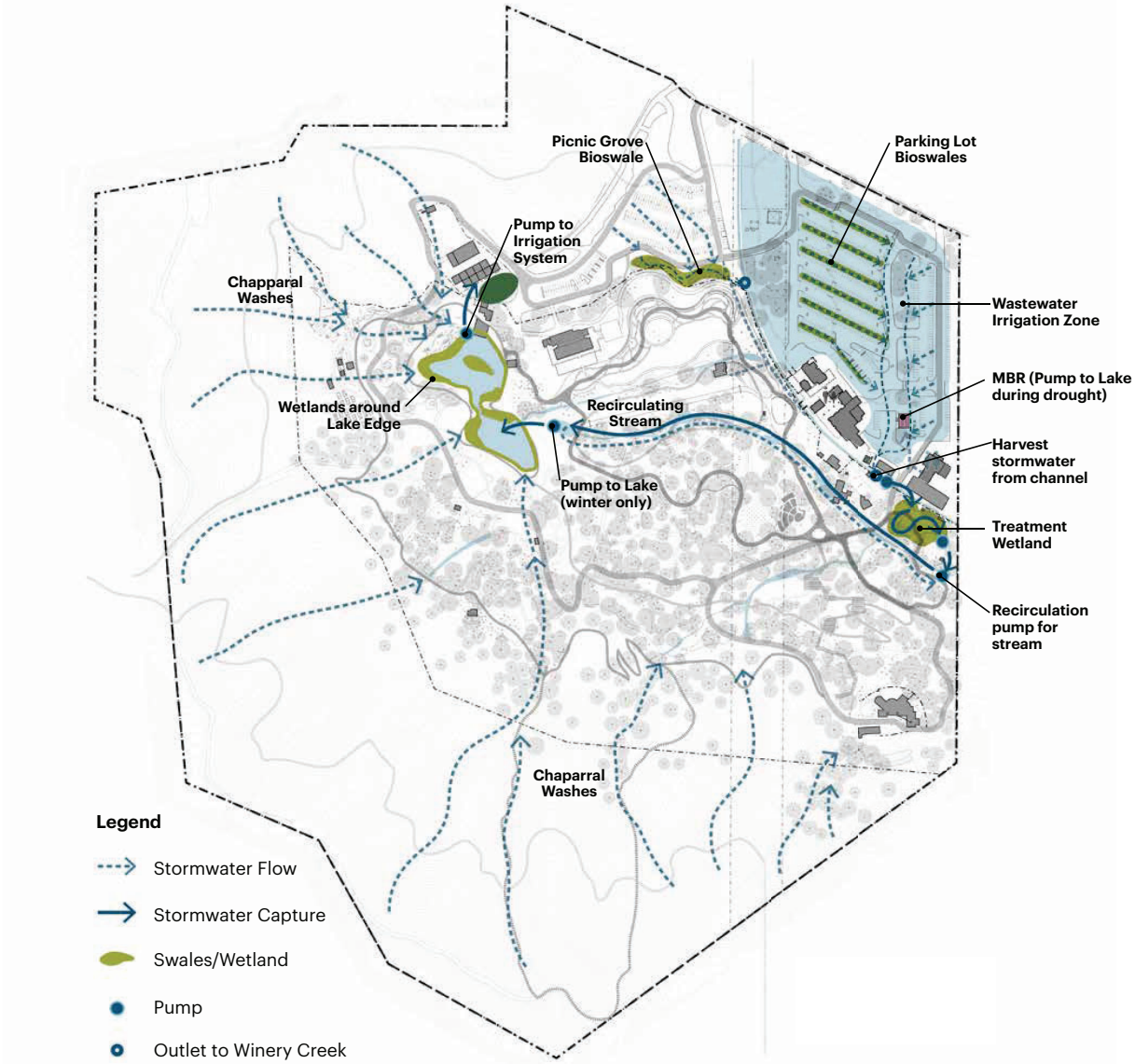
Water Conservation and Infrastructure in the Master Plan

The Master Plan included several, often interrelated, water conservation concepts to improve both water quality and non-potable supply. Exhibit 2, Master Plan Water Conservation Improvements, depicts the range of water-related projects included in the adopted Master Plan. These are grouped into three main categories: Winery Creek and New Treatment Wetland, Lake and Stream Improvements, and Wastewater Management.

As shown in Exhibit 2, the Master Plan contemplated diverting stormwater from Winery Canyon Channel in a location in the east-central portion of the Gardens. The Master Plan proposed installation of a treatment wetland called the Marsh Garden that would function as a diverted stormwater bioretention and detention facility for supplemental water storage and reuse. Other water conservation elements proposed in the Master Plan include a bioswale in the picnic grove near the southern edge of the Auxiliary Parking Lot; parking lot bioswales; expanded stream recirculation using pumps from the eastern end of the Marsh Garden to the Lake; several Lake improvements such as dredging and regrading, installing wetlands around the Lake edge, installing check dams to reduce Lake sedimentation; and improved and new bathrooms and new wastewater treatment system to further supplement non-potable water supply. The description of the March Garden and management of the Lake's water supply as presented in the Master Plan and IS/MND is presented below.

Marsh Garden

As part of the Master Plan, the Lilac Garden was proposed to be replaced with a treatment wetland that would function as a stormwater detention garden and provide an opportunity for ecological interpretive exhibits. Exhibit 3, Master Plan Proposed Marsh Garden, provides a conceptual depiction of the Winery Canyon Channel diversion and associated treatment wetland. The proposed treatment wetland in the Marsh Garden would be used to store and treat diverted runoff from the Winery Canyon Channel so that it can be pumped to the Lake,



Water Quality & Quantity Improvements

Enhance ecological performance of main water features, optimizing the lake for stormwater capture for non-potable use.

Lake & Stream Improvements

- Dredge lake sediments and improve aeration system
- Install new liner in Lake and Stream to reduce leaking
- Regrade Lake to create wetland shelves, sediment bays and floating wetlands
- Install check dams to minimize sedimentation into lake
- Install Irrigation Reuse Pump
- During drought, when the lake levels are low, it is possible to supplement the lake with the treated wastewater

Winery Creek & New Treatment Wetland

- Harvest water from Winery Creek for lake refill and irrigation
- Bioretention and detention basins at the low point of creek for supplemental water storage and irrigation reuse
- Expand stream re-circulation pool to a bioretention basin

Source: Descanso Gardens Foundation 2020

Master Plan Water Conservation Improvements

Exhibit 2

Addendum No. 1 to the Descanso Gardens Master Plan IS/MND for the Stormwater Capture and Reuse Project

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Map not to scale

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via the Southern Recirculating Stream, and stored there to irrigate the gardens. A recirculating pump would convey water from the downgradient pool to the upgradient pool in the Stream, as it does currently. A new pump would convey water from the Southern Recirculating Stream's upgradient pool to the Lake.

During higher magnitude storm events, the treatment wetland would function in reverse and provide retention storage for stormwater before overtopping into the adjacent Winery Canyon Channel. The downgradient pool of the Southern Recirculating Stream would be retrofitted with an overflow conveyance to route excess runoff to the treatment wetland. The presence of water stored in the treatment wetland would be seasonal, similar to a natural vernal pool, and it could be dry during periods of the summer. This is common for stormwater detention/retention facilities in Southern California. During the wet season, water levels in the treatment wetland would be maintained to be less than approximately one to two feet below the overflow spillway crest to allow for detention storage during storm events. The sources of water that could enter the treatment wetland would include:

- Diverted runoff from Winery Canyon Channel,
- Treated wastewater from the membrane bioreactor (MBR) wastewater system,
- Localized runoff from areas that would drain to the treatment wetland by gravity, and
- Overflows from the Southern Recirculating Stream's downgradient pool.

Water in the Marsh Garden would be delivered to the Lake by pumping it to the Southern Recirculating Stream's downgradient pool. A recirculating pump would convey water, from the downgradient pool to the upgradient pool, as it does currently. A new pump would convey water from the Southern Recirculating Stream's upgradient pool to the Lake. The installation of the new Marsh Garden would also include relocation of the existing lilac collection along the Promenade, which would continue to provide seasonally updated displays.

Lake Improvements

Operation of the Lake under the Master Plan is planned to maintain a relatively consistent water surface elevation that is designed to fluctuate up to 2.5 to 3 feet below the overflow spillway crest. The target water surface elevation range would be maintained by adding a new waterproof liner to the lake (to reduce lake seepage) and by addition of water supplies. These water supplies were planned to include runoff entering the Lake from its tributary area; precipitation falling on the Lake; water pumped from the Southern Recirculating stream; and potable water from the Valley Water Company (only supplied during drought periods to maintain critical habitat).

Water pumped from the Southern Recirculating stream was proposed to include runoff diverted from the Winery Canyon Channel; stormwater runoff generated from areas tributary to the Marsh Garden Treatment Wetland and Southern Recirculating stream (i.e., Catchments C and E); and, if needed during drought periods, recycled wastewater from the MBR.

Marsh Garden

This garden collects and treats storm water harvested from the Winery Creek and provides interpretive opportunities around watersheds and the benefits of wetlands.

Source: Descanso Gardens Foundation 2020

Master Plan Proposed Marsh Garden

Exhibit 3

Addendum No. 1 to the Descanso Gardens Master Plan IS/MND for the Stormwater Capture and Reuse Project

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Maintaining water levels in the Lake between low and operating points would be most difficult in drought periods, and specifically during the dry summer season following a winter or spring of significantly below-mean precipitation, particularly with the removal of the Hall-Beckley water supply. However, Lake levels would be more consistent than existing conditions and would be managed using an adaptive strategy.

1.1.2 DESCANSO GARDENS MASTER PLAN IS/MND

On October 13, 2020, the County of Los Angeles Board of Supervisors (Board), the County's decision-making body, adopted the *Descanso Gardens Master Plan Initial Study/Mitigated Negative Declaration* (Master Plan IS/MND or IS/MND) (State Clearinghouse Number 2020019072), which evaluated the environmental impacts associated with full implementation of the Master Plan. The Notice of Determination for the IS/MND was filed on October 19, 2020, at the Los Angeles County Clerk.

The Master Plan IS/MND assessed all components of the Master Plan at a broader program level of detail, which enables streamlined environmental review of individual projects as they are implemented. This form of streamlining under CEQA, called tiering, is a process by which an agency can rely on previously adopted environmental review to approve future discretionary actions, such as individual projects from the Master Plan. In circumstances where a planned project is within the umbrella of the Master Plan and the associated impact(s) were addressed in the IS/MND, pursuant to Section 15162 of the CEQA Guidelines no additional environmental documentation is necessary. Conversely, where there are changes to the characteristics or circumstances under which an individual project will be developed and have the potential to result in new or more severe impacts, preparation of additional CEQA documentation that tiers from the adopted Master Plan IS/MND, such as an Addendum, Supplemental IS/MND, or Subsequent IS/MND, may be required.

Summary of the Master Plan IS/MND

The Master Plan IS/MND determined there would be no impact or less than significant impacts related to the following topics and no mitigation was required: aesthetics, agriculture/forestry, air quality, energy, greenhouse gas emissions, hazards/hazardous materials, hydrology and water quality, land use and planning, mineral resources, population/housing, public services, recreation, transportation/traffic, and utilities and service systems.

The Master Plan IS/MND determined there may be significant impacts related to the following topics, which require mitigation measures to reduce or avoid the impact: biological resources, cultural resources, geology and soils, noise, and tribal cultural resources. Through implementation of the identified mitigation measures (MMs) identified in the Master Plan IS/MND, as appropriate during development of individual projects, there would be less than significant impacts to these topics. The specific mitigation measures that are applicable to the Project are identified in each topical analysis in Section 3.0, Environmental Analysis, of this document.

The adopted Mitigation and Monitoring Reporting Program (MMRP) was prepared to ensure that mitigation measures identified in the Master Plan IS/MND would be implemented in an effective and timely manner, and that identified impacts are avoided or mitigated to a level of insignificance. The MMRP identifies responsible parties for the mitigation program and includes a detailed discussion of monitoring and reporting procedures for each mitigation measure. With implementation of mitigation, all environmental impacts as outlined in the Master Plan IS/MND, would be less than significant.

The following MMs were adopted via the Master Plan's MMRP for implementation as appropriate during construction of individual Master Plan improvements:

MM BIO-1: To mitigate potential impacts of the proposed Wilds Loop trail on listed, sensitive, and locally important species and their habitats:

Species Measures – Wilds Loop

- The Wilds Loop trail shall be designed, constructed, and maintained to avoid disturbance of any sensitive species occupied habitat.
- Directed surveys shall be conducted in the impact area for the proposed Wilds Loop trail and within 50 feet on either side of the trail. Surveys shall be conducted by a qualified biologist using approved USFWS and CDFW protocols to identify any listed, sensitive, and locally important species within the impact area.
- Specifically, for sensitive/rare plants, focused surveys shall be conducted by a qualified biologist using the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018), at the time of year when species are both evident and identifiable.
- For plants afforded protection pursuant to the California or federal Endangered Species Act (CESA/FESA), where disturbance is unavoidable, the CDFW and/or USFWS, based on oversight authority, shall be notified at least 10 days prior to disturbance to facilitate salvage and relocation CESA and/or FESA protected plants to conserved suitable habitat within Descanso Gardens or other comparable habitat within the watershed.
- The results of the survey and any salvage and relocation of CESA and/or FESA protected plants shall be documented in a Survey Memo and submitted to DPR.

Species Measures – Reptiles

- Focused surveys specifically for coastal whiptail, Southern California legless lizard will be conducted between June and July within any construction areas containing suitable habitat within the planned Wilds Loop.
    - To achieve 100 percent visual coverage, focused surveys shall be conducted with parallel transects at approximately 20 feet apart and walked on site in appropriate habitat suitable for each of these species. A minimum of three surveys shall be conducted during the time of year when these species are most likely to be observed.

- If as a result of focused surveys, sensitive reptiles are identified in areas that will be subject to ground disturbance, a Relocation Plan shall be developed in consultation with a qualified biologist familiar with the life history of the identified species, coastal whiptail, and/or Southern California legless lizard. This Relocation Plan shall be submitted to the County for approval 60 days prior to any ground disturbing activities within potentially occupied habitat. The Relocation Plan shall include, but not be limited to:
    - Survey and relocation efforts specific to the high activity period of these reptiles (generally March to November) and to the low activity period (generally December through February)
    - Identification of the locations where more intensive survey efforts will need to be conducted (based on high habitat suitability)
    - Identification of the habitat and conditions in any proposed relocation site(s)
    - Detail the methods that will be utilized for trapping and relocating the individuals of this species
    - Procedure for the documentation and recording of the number of animals relocated.
- In areas where focused surveys have observed individuals of these species, a qualified biologist shall conduct surveys to capture and relocate individual reptiles to avoid or minimize take of these special-status species within thirty days prior to construction activities.
- Where individuals have been detected, exclusion fencing shall be placed to limit the potential for re-colonization of the site prior to construction and a qualified biologist shall be present during ground-disturbing activities immediately adjacent to or within occupied habitat.

<u>Species Measures – General</u>

- The County shall submit an application for an Incidental Take Permit, under Section 2081 of the California Endangered Species Act (CESA) for construction, operation, or maintenance activities that are expected to result in take of an animal species designated as threatened or endangered pursuant to CESA.
- If any sensitive biological resources are observed during preconstruction surveys, fencing and/or flagging shall be used to delineate Environmentally Sensitive Areas (ESAs), which shall be off-limits during construction. Qualified biological monitors shall be required on-site for initial ground disturbance and clearing as well as periods when trail construction would be undertaken within 50 feet of delineated ESAs.

MM BIO-2: To mitigate potential impacts on riparian, state sensitive plant communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS:

- A jurisdictional delineation shall be conducted by a certified wetland delineator to identify any state or federally protected wetlands, and riparian areas, for the Wilds

Loop and Lake Improvements that have the potential for such communities to be present based on hydrologic and wetland features noted on USGS topographic quadrangles, the National Wetland Inventory, or site reconnaissance and documented in an JD memo (if no resources are present, or if resources are present and avoided), or an application for Lake or Streambed Alteration Under Section 1600 of the California Fish and Game Code.

- Where the jurisdictional delineation identifies State-designated sensitive plant communities, riparian habitat, state or federally protected wetlands, or Waters of the United States to be present, and that will not be improved by project activities, impact avoidance, impact minimization, and/or compensatory mitigation (i.e., on-site mitigation) shall be implemented at a ratio of 3:1, such that there is no net loss of habitat functions or values.
- Where impacts are located in areas subject to the jurisdiction of the CDFW pursuant to Section 1600 of the State Fish and Game Code, a Lake or Streambed Alteration (LSA) Agreement shall be obtained prior to commencing ground-disturbing activities or any other alternation of a lake or stream.
- Any LSA permit issued by CDFW may include additional measures such as:
    - Erosion and pollution control measures,
    - Avoidance of specific resources,
    - On-site or off-site creation, enhancement, or restoration, of habitat,
    - As necessary, protection and management of mitigation lands in perpetuity

MM BIO-3: To mitigate potential impacts to federally protected wetlands and Waters of the United States that cannot be avoided:

- A formal jurisdictional delineation shall be undertaken to assess the presence or absence of Waters of the United States in the Master Plan element resulting in dredge or fill within any features subject to Section 404 of the federal CWA.
- Where impacts are located in areas subject to the jurisdiction of the USACE pursuant to Section 404 of the federal CWA, authorization shall be obtained to complete the required work pursuant to a Nationwide or individual permit.
- Where impacts are subject to the jurisdiction of the Regional Water Quality Control Board (RWQCB), a Waiver of Water Quality Certification or Notice of Applicability of Waste Discharge Requirement permit shall be obtained.
- The DPR shall ensure that the project elements result in no net loss of Waters of the State by providing mitigation through impact avoidance; impact minimization; and/or compensatory mitigation (i.e., on-site mitigation) for the impact, as determined in the Streambed Alteration Agreement.
- The DPR retains responsibility for the implementation and success of the mitigation project. Evidence of secured permits shall be provided prior to approval of improvement plans; issuance of grading permits; and/or any clearing, grading, or excavation work.

MM BIO-4: To avoid impacts to nesting birds protected under the MBTA:

- Wherever feasible, suitable nesting habitat for birds afforded protection under the MBTA, shall be removed outside the breeding season, or construction shall be undertaken outside the breeding season, which generally occurs between February 15 and September 1.
- If Project Elements cannot avoid the nesting bird season, pre-construction nesting bird surveys shall be conducted by a qualified biologist no more than three days prior to the start of construction and shall include a 300-foot survey area for non-raptors and a 500-foot survey area for raptors.
- On the first day of construction at any given site, a qualified biologist shall perform a pre-construction "sweep" to identify any bird nests or other resources that may have appeared since the nesting bird survey.
- On each subsequent day of construction during the nesting season, a biological monitor shall first perform a daily sweep at each work site to look for nesting birds. The daily sweeps shall be conducted to identify new nests (partially built, active, or inactive) not detected during the preconstruction survey or clearance sweep.
- Should nesting birds be discovered within or adjacent to the construction footprint during these surveys, a non-disturbance buffer shall be placed around the active nest[1] to prevent impacts to nesting birds.
- Construction shall be halted within the non-disturbance buffer (typically 250 feet for non-raptors and 500 feet for raptors) until the biologist has determined that the young have fledged and are flying well enough to avoid the proposed construction activities. Established buffer sizes depend on site-specific conditions, known tolerances species and individual bird behavior and shall be determined by the qualified biologist.
- Active nests near construction work areas shall be monitored. If a nesting bird appears to be stressed as a result of project activities and is at risk of abandoning its nest, the biologist shall halt activity in the immediate area until the bird resumes its normal behavior or until the nest has been determined to no longer be active.

MM BIO-5: To mitigate for potential impacts to protected bat species as a result of Master Plan Elements (New and Improved Gardens and Facilities; New Buildings, Structures, and Infrastructure; Lake Improvements):

- Focused surveys shall be conducted for hoary bat (*Lasiurus cinereus*) and silver-haired bat (*Lasionycteris noctivagans*) by a qualified biologist, including nighttime

[1] The MBTA does not clearly define what an active (or inactive) nest is. However, the USFWS has clarified that the federal regulations do not pertain to the destruction of nests alone (without birds or eggs), provided that possession of the nests does not occur and the activities do not otherwise result in take of migratory birds covered by the MBTA (see U.S. Fish and Wildlife Service. June 14, 2018. Memorandum: Destruction and Relocation of Migratory Nest Contents. Accessed January 15, 2020. https://www.fws.gov/policy/m0407.pdf). CDFW has not provided clarification on the regulations pertaining to nesting birds. Therefore, for purposes of this measure, non-raptor, non-special-status species nests without eggs or chicks are considered inactive. For raptors, a nest is considered active when raptors exhibit nest construction or nest decorating behavior. The project biologist will determine when a nest is active based upon field observations at each nest.

surveys, at least seven consecutive days prior to the start of project activities near suitable roosting habitat.

- If it is determined during the pre-activity surveys that the area (including oak woodland and riparian habitat) could be used as roost sites by bat species, to avoid the direct loss of bats that could result from disturbance to trees or structures that may provide maternity roost habitat (e.g., in cavities or under loose bark) or structures that contain a hibernating bat colony, the following steps shall be taken:
    - To the extent feasible, demolition or disturbance to suitable bat roosting habitat shall be scheduled between October 1 and February 28, outside of the maternity roosting season.
    - If suitable bat roosting habitat must be encroached during the maternity season (March 1 to September 30), a qualified bat specialist shall conduct a pre-construction survey to identify the habitat proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.
    - Any suitable bat roosting habitat identified as potentially supporting an active maternity roost and each structure potentially supporting a hibernating colony shall be closely inspected by the bat specialist no greater than seven days prior to the habitat's disturbance to more precisely determine the presence or absence of roosting bats.
    - If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, it is preferable to bring down trees, buildings, or structures in a controlled manner using heavy machinery.
    - In order to ensure the optimum warning for any roosting bats that may still be present, trees, buildings, or structures shall be nudged lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. Trees, buildings, or structures may then be pushed to the ground slowly under the supervision of a bat specialist.
    - Felled trees shall remain in place until they are inspected by a bat specialist. Trees that are known to be bat roosts shall not be sown up or mulched immediately. A period of at least 48 hours shall elapse prior to such operations to allow bats to escape.
    - Bats shall be allowed to escape prior to demolition of structures or buildings. This may be accomplished by placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.
    - Maternity season lasts from March 1 to September 30. Trees, buildings, or structures determined to be maternity roosts shall be left in place until the end of the maternity season. A suitable bat roosting habitat containing a hibernating colony shall be left in place until a qualified biologist determines that the bats are no longer hibernating.

MM BIO-6: To mitigate potential impacts on oak and other native woodlands, and ensure compliance with Public Resources Code 21083.4:

- Environmentally Sensitive Area fencing shall be placed around the driplines or trunks of protected oak trees within and adjacent to the limits of disturbance, depending on the scheduled construction activity, such that no work shall occur within the protected area.
- Use of on-site monitors shall be required for periods when construction shall be undertaken within 250 feet of oak woodlands, and native woodlands, and when construction is within 100 feet of the dripline of individual isolated protected native trees.
- To ensure no loss of oak trees within and adjacent to the limits of disturbance after completion of construction activities, trees shall be monitored, for up to 5 years, for mortality and replanted at the appropriate ratios below to compensate as needed.
- Per the County Oak Tree Ordinance, for every protected tree that must be removed, the same species shall be replaced at a minimum of a 2:1 ratio.
    - Compensatory mitigation for protected trees in the jurisdiction of the County may include replacement at a 3:1 ratio for trees with a diameter at breast height of 8 inches or more at an appropriate mitigation site, and replacement at a 10:1 ratio for heritage oaks.
    - Replacement trees shall be monitored by a licensed arborist, for at least one year, to ensure survivability of replacement trees meet success criteria.

MM CULTURAL-1: *Archaeological and Historical Resources – Avoidance and Monitoring.* To mitigate potential impacts on archaeological and historical resources, a Worker Education and Awareness Program (WEAP) shall be used to educate all onsite construction workers regarding the need to protect known historical and archaeological resources within proximity of the construction, operation and maintenance of the Master Plan elements, and protect archaeological resources in the unanticipated event of their discovery.

Completion of a WEAP for all personnel who will be engaged in ground-disturbing activities shall be required prior to the start of ground-disturbing activities. This shall include training that provides an overview of cultural resources that might potentially be found and the appropriate procedures to follow if cultural resources are identified. This requirement extends to any new staff prior to engaging in ground-disturbing activities. This mitigation measure applies to Master Plan Elements including Gardens Loop, Woodland Walk, Native Walk, Service Route, Rose Gardens Improvements, Camelia Strolling Gardens, Japanese Gardens Improvements, California Garden Expansion, Lake Perimeter Walk, Boddy House Improvements, Boddy Lodge Improvements, Descanso Creek Features, and Japanese Minka House Improvements.

Prior to the initiation of ground-disturbing activities, the County of Los Angeles Department of Parks and Recreation (DPR) shall review the construction plans to ensure that any known cultural resources that are required to be avoided have been marked as "off-limits" areas for construction and construction staging. In addition, DPR shall require monitoring of all

ground-disturbing activities by a qualified archaeologist within 60 feet of a known extant unique archaeological resource or significant historical resource.

In the event that previously unknown unique archaeological resources or significant historical resources are encountered during construction, the resources shall either be left in situ and avoided, or the resources shall be salvaged, recorded, and reposited at Descanso Gardens or at the Natural History Museum of Los Angeles County (NHM) or other repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan.[2] Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate adverse effects to cultural resources eligible or listed under Section 106 Criterion D/CRHR Criterion 4, as it preserves important information that will otherwise be lost.

MM CULTURAL-2: *Pre-Construction Surveys, Avoidance, and Salvage and Recovery of Unique Archaeological Resources.* To facilitate avoidance of known archaeological resources and the salvage and recovery of archaeological resources in the unanticipated event of their discovery, in accordance with the County DPR Cultural Resources Management Plan, at the time that any construction activity is proposed that would require ground-disturbing activities in soils that have been predominantly in situ during the past 50 years, records and archival information shall be reviewed to determine if there are any recorded unique archaeological resources and significant historical resources as defined in Section 15064.5(a) of the CEQA Guidelines. At a minimum, the records and archival review shall include a search of the South Central Coastal Information Center if more than five years have passed since the previous records search. The appropriate course of action shall be undertaken in light of the results of the records search:

(A) Where the project study area has been subject to a Phase I Walkover Survey within two years of the proposed activity and no unique archaeological resources or significant historical resources are known within the project footprint, work shall proceed per the provision of Mitigation Measure CULTURAL-1.

(B) Where all or a portion of the project footprint has not been surveyed for cultural resources within two years of a proposed ground-disturbing activity, a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology and shall conduct a Phase I Walkover Survey to ascertain the presence or absence of unique archaeological and/or significant historical resources, as defined in Section 15064.5(a) of the CEQA Guidelines.

   a. If the survey and record searches determine no unique archaeological resources or significant historical resources, including potential Tribal cultural resources, then the work shall proceed consistent with the provisions of Mitigation Measure CULTURAL-1.

[2] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

b. If the survey determines potential unique archaeological resources or significant historical resources, then one of two courses of action shall be employed:

   i. Where avoidance is feasible, construction should avoid the potentially significant cultural resource, and the work shall then proceed consistent with the provisions of Mitigation Measure CULTURAL-1. The project area shall be surveyed by a qualified archaeologist who meets the Professional Qualification Standards of the Secretary of the Interior. An archaeological monitor under direction of a qualified archaeologist who meets the Professional Qualification Standards of the Secretary of the Interior shall be present during ground-disturbing activities within 60 feet of previously recorded cultural resources.

   ii. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken, consistent with the provisions of the County DPR Cultural Resource Management Plan, by a qualified archaeologist who meets the Professional Qualification Standards of the Secretary of the Interior to determine the significance of the cultural resource. If the Phase II investigation identifies a unique/eligible cultural resource within the area proposed for ground-disturbing work, the County shall determine whether to avoid the resource through redesign or to proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of Mitigation Measure CULTURAL-1.

MM CULTURAL-3: *Paleontological Resources – Paleontological Monitoring.* In the unanticipated event of the discovery of paleontological resources during ground-disturbing activities in previously undisturbed native soils located 5 or more feet below the ground surface, which would have the potential to contact geologic units with a high to moderate potential to yield unique paleontological resources, impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the Master Plan shall be reduced to below the level of significance by monitoring, salvage, and curation at the NHM.[3] Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, DPR shall require and be responsible for salvage and recovery of those resources by a qualified paleontologist consistent with standards for such recovery established by the Society of Vertebrate Paleontology.[4]

[3] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

[4] A Qualified Professional Paleontologist (Principal Investigator, Project Paleontologist) is a practicing scientist who is recognized in the paleontological community as a professional and can demonstrate familiarity and proficiency with paleontology in a stratigraphic context. A paleontological Principal Investigator shall have the equivalent of the following qualifications:

   A. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or

Paleontological Resources Sensitivity Training given by a qualified paleontologist or archaeologist cross-trained in paleontology shall be required for all project personnel involved in ground disturbing activities prior to the start of these activities in geologic units with a moderate to high potential to yield unique paleontological resources. This shall include a brief field training that provides an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified. This requirement extends to any new staff involved in earth disturbing that joins the project.

Construction monitoring by a qualified monitor (archaeologist cross-trained in paleontology or paleontologist) shall be implemented during all ground-disturbing activities that affect previously undisturbed geologic units 5 or more feet below the ground surface and have the potential to encounter geologic units with a moderate to high potential to yield unique paleontological resources. In the event that a paleontological resource is encountered during construction, all ground-disturbing activity within 100 feet of the find shall be halted until a qualified paleontologist can evaluate the significance of the discovery. Additional monitoring recommendations may be required. If the resource is found to be significant, the paleontologist shall determine the most appropriate treatment and method for stabilizing and collecting the specimen. Curation of any significant paleontological finds shall be housed at a qualified repository, such as the NHM.

Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to DPR with an appended, itemized inventory with representative snapshots of specimens. The report and inventory, when submitted to DPR, shall signify the completion of the program to mitigate impacts to paleontological resources. A copy of the report/inventory shall be filed with DPR and the NHM.

MM CULTURAL-4: *Regulatory Requirements – Human Remains.* To mitigate potential impacts on human remains encountered during construction activities, in accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

MM GEO-1: To mitigate potential impacts related to expansive soils: Prior to the issuance of building permits, a site-specific geotechnical study shall be prepared by a licensed engineer to outline structural design elements for Master Plan Elements that include building and structural improvements.

The site-specific geotechnical investigation shall provide specific recommendations for avoidance or remediation of expansive soils. During construction of proposed project

geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.

B. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.
C. Proficiency in recognizing fossils in the field and determining their significance.
D. Expertise in local geology, stratigraphy, and biostratigraphy.
E. Experience collecting vertebrate fossils in the field.

elements, and in the event expansive soils are encountered during construction activities such as proposed grading, soil materials shall be removed, mixed with non-expansive soils, or segregated and stockpiled for potential use as low-permeable materials during grading to ensure conformance with the Uniform Building Code.

MM NOISE-1: To mitigate potential impacts of construction of Master Plan Elements on ambient noise levels, construction equipment shall be staged at sufficient distance from sensitive receptors or noise attenuating Best Management Practices shall be utilized to reduce noise to an acceptable 75 dBA at the property boundary. To mitigate noise levels during construction activities at sensitive receptors located within 21 feet of construction, sound walls shall be installed at the construction barrier by the contractor during the construction phase for the demolition of the two buildings and construction projects on the east edge of the Master Plan Area along the property boundary facing the existing residents. Mufflers, blankets, and baffles shall also be implemented to ensure the reduction of noise levels. The noise barriers shall provide noise level reductions up to 20 dBA depending upon the placement and structure of the sound wall to bring construction noise levels below 75 dBA, which is the requirement for sound levels at the nearest sensitive receptors.

MM TRIBAL-1: *Tribal Resources – Avoidance and Monitoring.* To mitigate potential impacts to Tribal cultural resources associated with ground disturbance, DPR shall review the construction plans to ensure that any known TCRs that are required to be avoided have been marked as "off-limits" areas for construction and construction staging prior to the initiation of ground-disturbing activities. DPR shall require monitoring of all ground-disturbing activities by a Native American monitor within 60 feet of a known TCR. Prior to the initiation of ground-disturbing activities that are expected to affect native soils in association with the master plan elements Wilds Loop, the Nature Discovery Garden, the Nursery, and the New Service Yard. The County shall undertake consultation with the Native American local Tribal contacts designated by the NAHC and the Tribe to determine if a Native American monitor shall be present during all or a portion of the ground-disturbing activities within additional areas that are sensitive for TCRs. The County shall consult and move forward with the Mitigation Measure TRIBAL-1 as stated if a response is not received within 30 days.

In the event that previously unknown TCRs are encountered during construction, the resources shall either be left in situ and avoided through redesign, or the resources shall be salvaged, recorded, and reposited at the Natural History Museum of Los Angeles County (NHM) or other repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan.[5] The cultural resource management plan shall include further consultation with the Tribe. Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate adverse effects to cultural resources eligible or listed under Section 106 Criterion D/CRHR Criterion 4, as it preserves important information that will otherwise be lost.

MM TRIBAL-2: *Pre-Construction Surveys.* To mitigate potential impacts to tribal cultural resources from project construction activities resulting in ground disturbance, at the time that any construction activity is proposed for development that would require ground-

[5] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated, and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

disturbing activities in soils that have been predominantly in situ during the past 50 years, records and archival information shall be reviewed to determine if there are any recorded TCRs as defined by AB 52 in the project footprint.[6] At a minimum, the records and archival review shall include a search of the South Central Coastal Information Center if more than five years have passed since the previous records search, a request for Sacred Lands File from the NAHC, and a request for information regarding TCRs from the Native American local Tribal contacts designated by NAHC and the Tribe. The appropriate course of action shall be undertaken in light of the results of the records search:

(A) Where the project study area has been subject to a Phase I Walkover Survey within two years of the proposed activity and no TCRs are known within the project footprint, work shall proceed per the provision of Mitigation Measure TRIBAL-1.

(B) Where all or a portion of the project footprint has not been surveyed for cultural resources within two years of a proposed ground-disturbing activity, a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology and shall conduct a Phase I Walkover Survey to ascertain the presence or absence of TCRs, as defined in Section 15064.5(a) of the CEQA Guidelines.

a. If the survey and record searches determine no potential TCRs, then the work shall proceed consistent with the provisions of Mitigation Measure TRIBAL-1.

b. If the survey determines potential TCRs, then one of two courses of action shall be employed:

i. Where avoidance is feasible, the construction shall avoid the potentially significant TCRs, and the work shall then proceed consistent with the provisions of Mitigation Measure TRIBAL-1. The project area shall be surveyed by a qualified archaeologist who meets the Professional Qualification Standards of the Secretary of the Interior. DPR shall require monitoring of all ground-disturbing activities by a Native American monitor within 60 feet of a known TCR.[7] In addition, consultation shall be undertaken with the Native American local Tribal contacts designated by the Native American Heritage Commission and the Tribe to determine if a Native American monitor shall be present during all or a portion of the ground-disturbing activities within additional areas that are sensitive for TCRs.

ii. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken by a qualified archaeologist who meets the Professional Qualification Standards of the Secretary of the Interior to determine the significance of the cultural resource. If the Phase II investigation identifies a unique/eligible TCR within the area proposed for ground-disturbing work, the County shall in consultation with the Tribe, determine whether to avoid the resource through redesign or to

[6] Fifty years or older is the standard cutoff age for "historic" age resources.

[7] County of Los Angeles Department of Parks and Recreation. 2018. Parks and Recreation Facilities Project Cultural Resources Management Plan.

proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of Mitigation Measure TRIBAL-1.

MM TRIBAL-3: *Regulatory Requirements – Human Remains. To* mitigate potential impacts to tribal cultural resources from ground disturbance associated with construction activities in regards to destroying or disturbing Native American human remains, in accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

If the County Coroner determines that the remains are or are believed to be Native American, s/he shall notify the NAHC in Sacramento within 24 hours. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC shall immediately notify the person(s) it believes to be the most likely descendant (MLD) of the deceased Native American. The descendants shall complete their inspection and make a recommendation within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with DPR, the disposition of the human remains. The MLD's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If DPR rejects the MLD's recommendations, the agency shall rebury the remains with appropriate dignity on the property within a time frame agreed upon between the County and the MLD's in a location that will not be subject to further subsurface disturbance (14 California Code of Regulations §15064.5(e)).

1.2 PURPOSE AND BASIS FOR THE ADDENDUM

CEQA allows for the preparation of an Addendum to an adopted IS/MND to document minor changes in the project characteristics or environmental conditions under which a project will be developed. Specifically, pursuant to Section 15162(b) of the CEQA Guidelines, if changes to a project or its circumstances occur or new information becomes available after adoption of an MND, the lead agency shall prepare a subsequent Environmental Impact Report (EIR) if required under CEQA Guidelines 15162(a). Otherwise, the lead agency shall determine whether to prepare a subsequent MND, an addendum, or no further documentation.

Pursuant to Section 15162(a) of the CEQA Guidelines, no subsequent EIR or negative declaration may be required for a project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, that one or more of the following conditions are met:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The purpose of this Addendum is to analyze and document whether the proposed Winery Canyon Channel Stormwater Capture and Reuse Project would result in environmental impacts that are covered within the environmental impact analysis included in the Master Plan IS/MND, or whether the conditions described in Section 15162 calling for preparation of a Subsequent IS/MND are applicable.

As discussed further in Section 2.0, Project Description and Setting, the Project proposes modifications to certain water conservation elements considered in the Master Plan in 2020. The diversion and use of stormwater flowing in Winery Canyon Channel was originally envisioned in the Master Plan to reduce Descanso Garden's dependence on potable, municipal water for landscape irrigation and water features. However, the Project proposes modifications to certain water conservation elements described in the Master Plan. Specifically, the primary modifications from what was discussed programmatically in the Master Plan and Master Plan IS/MND include:

- Installation of an underground cistern and related distribution infrastructure in the Auxiliary Parking Lot to capture, treat, and store stormwater diverted from Winery Canyon Channel;
- Changing the location of the Channel diversion point to a location along the eastern edge of the Auxiliary Lot from the southeast corner of the Main Parking Lot;
- In the Auxiliary Lot, constructing a longitudinal concrete gutter and catch basins with pretreatment insert filters to manage stormwater runoff instead of the Picnic Grove Bioswale proposed in the Master Plan; and

- In the Main Lot, replacement of 200 linear feet (lf) of existing curb and gutter located near the visitor entrance with a precast porous concrete gutter and removal and reconstruction of remaining longitudinal gutter, with overflow continuing to drain into the Channel in the southwestern corner of the lot, instead of Main Parking Lot runoff being eventually draining into the Marsh Garden.

Further details of the proposed Winery Canyon Channel Stormwater Capture and Reuse Project and comparison to the Master Plan are described in Section 2.0, Project Description and Setting, of this document.

In accordance with Sections 15162 and 15164 of the CEQA Guidelines, based on the analysis and presented in this Addendum No. 1 to the adopted Master Plan IS/MND and substantial evidence in the record, the County has determined there are no substantial increases in the severity of any previously identified significant environmental impacts or new significant environmental impacts; there are no changes in circumstances that would result in new or substantially more severe significant environmental impacts; and there is no new information of substantial importance that would result in new or substantially more severe significant impacts resulting from the proposed Project. The potential impacts associated with the Project would either be the same as or less than the anticipated levels described in the Master Plan IS/MND with implementation of applicable MMs. Therefore, an addendum is the appropriate environmental documentation for the proposed Project and requested approvals.

Pursuant to Section 15050 of the CEQA Guidelines, the County is the Lead Agency for this Addendum No. 1 to the Descanso Gardens Master Plan IS/MND and has the authority for Project approval and approval of the accompanying environmental documentation.

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2.0 EXISTING SETTING AND PROJECT DESCRIPTION

2.1 PROJECT LOCATION

Most of the Project components would be in the Gardens' Auxiliary Parking Lot with additional components located in the southern portion of the Main Parking Lot. These two areas are collectively referred to as the Project site or site. The Project site is located within the northeastern portion of Descanso Gardens. The site is bound on the north by Descanso Drive, on the east by single-family residences within LCF, and to the south and west by existing garden and hillside areas, as shown previously on Exhibit 1. The site also includes a portion of the LACFCD easement that follows Winery Canyon Channel and a portion of the SCE property, both of which follow a north-south alignment in the Project area.

2.2 EXISTING SITE AND AREA CHARACTERISTICS

The Main and Auxiliary Lots are asphalt-paved and developed as existing parking areas serving Descanso Gardens; the two lots are connected via a one-lane paved bridge over Winery Canyon Channel. Vehicular access to Descanso Gardens is provided through three paved driveways on Descanso Drive. Most days there is one public vehicular entrance and exit to the Gardens in use, situated near the east (exit) and west (entrance) limits of the Main Parking Lot. The additional driveway, situated along the northeast portion of the Auxiliary Parking Lot, is used periodically as a supplemental public exit for high-capacity special events and as a private service road. When used as a service road by Descanso Gardens staff and contractors, the driveway provides both ingress and egress. Additionally, a trailhead for the Descanso Trail is located on Descanso Drive about 15 feet northwest of the Auxiliary Lot driveway. This paved trailhead extends about 50 feet into the Gardens and then branches west onto the public, unpaved, designated equestrian/pedestrian Descanso Trail, a City of LCF trail within a County easement where it traverses portions of Descanso Gardens. The trailhead has a gate at the branch, limiting public access, and continues as a paved path along the western edge of the Auxiliary Lot. Additionally, Descanso Drive is a popular bike route for cyclists.

Portions of the Auxiliary Lot are used to provide covered parking for maintenance vehicles (golf carts); additional staff parking; storage of maintenance equipment and horticultural materials; and a maintenance office trailer and additional outbuildings placed along the southernmost extent of the lot. A 20-foot-wide motorized gate leading into the improved gardens is located at the southern terminus of the Auxiliary Parking Lot. This is a primary access point for routine maintenance activities, special events preparation, and some construction activities. Several of Descanso Gardens' facilities are located near the southern end of the Main Lot, including the Visitor Center, The Shop, The Market, Van de Kamp Building, and courtyard; administrative office trailers; and MBR wastewater management system.

Overhead parking lights are distributed throughout both lots; and the Main Lot features vegetated islands along the western and southern edges along with widely-spaced trees of

various species between parking rows. The Auxiliary Lot is largely unvegetated but there are areas of both scattered and dense tree cover along the edges. A tree survey was performed by a Psomas Certified Arborist within and immediately surrounding the proposed site in the Auxiliary Parking Lot. The survey identified three dominant tree species: coast live oak (*Quercus agrifolia*), western sycamore (*Platanus racemosa*), and eucalyptus (*Eucalyptus* sp.). Of these, coast live oak and western sycamore are native tree species. A confined area of dense, mixed vegetation including trees, shrubs, and groundcover occurs towards the northern portion of the Auxiliary Lot. As discussed further below in Section 2.4.3, Proposed Components, no oak trees in or near the Project area would be removed or disturbed including, but not limited to, encroachment into any oak tree protection zone pursuant to the County Oak Tree Permit Ordinance.

Utilities located in the Main and Auxiliary Lots include Valley Water Company potable water lines; SCE electrical conduits for parking lot lights; irrigation lines for trees and vegetation in parking lot; underground telecommunications lines; and a Southern California Gas (SoCalGas) gas line.

2.2.1 HYDROLOGY AND GEOLOGY

Stormwater runoff primarily drains as surface flow, generally to the south-southeast, and an existing catch basin is in the southeast corner of the Main Parking Lot. The Project site is within the Upper Los Angeles River watershed and subwatershed 644439. Runoff from this subwatershed is conveyed via Winery Canyon Channel, which flows southeasterly to the confluence of Flint Canyon Channel. From this confluence, stormwater continues to flow east-southeast and discharges into Devil's Gate Reservoir just upstream of Devil's Gate Dam. Devil's Gate Reservoir is predominantly fed by water inflows from the Arroyo Seco coming out of the mountains on the north, and releases from Devil's Gate Dam flow south-to-southwest until confluence with the Los Angeles River.

Based on the site-specific Geotechnical Report for the Project and summarized in the Draft Basis of Design Report (BODR), both prepared by Geosyntec Consultants, subsurface soils in the Main Parking Lot consist of relatively poor-draining soils, either fine-grained soils or sands with a high fines content, in the upper 38 to 40 feet below ground surface (bgs). Cone penetration tests (CPTs) in the Main Lot indicate soils from 5 to 32 feet bgs consist of sands and silty sands. Subsurface borings conducted in the Auxiliary Lot indicate subsurface soils in the upper 15 feet bgs consist of poor draining soils, clayey sands and silty sands, with fines content between 25 and 50 percent. Below a depth of 15 feet bgs, the subsurface soils consist of better draining soils, including silty sands and poorly graded sand with silt. CPTs in the Auxiliary Lot to depths ranging from 11 to 51 feet bgs indicate soils consist of very dense sand, silty sands, sands, and occasional thin layers of sandy silt. Groundwater elevations are assumed to be below 51 feet bgs for the Auxiliary Parking Lot and deeper than 61.5 feet bgs for the Main Parking Lot. In addition, the Geotechnical Report determined that infiltration rates at the Main and Auxiliary Parking Lot were poor (Geosyntec 2024).

2.2.2 PLANNING CONTEXT

The Parks and Recreation Element of the Los Angeles County General Plan 2035 (County General Plan 2035) classifies arboreta and botanical gardens, such as Descanso Gardens, as Special Use Facilities that serve greater regional recreational or cultural needs and have no defined size criteria or service radius areas. Descanso Gardens is located within the West San Gabriel Valley Planning Area.

Although the County is not subject to City general plans, the City of LCF General Plan information has been provided to inform the County's decision-making process. The Land Use Element of the LCF General Plan designates Descanso Gardens, including the Project site, as an Open Space land use, which allows for and encourages low-intensity public recreation uses with associated staging and parking areas.

A County zoning designation has not been assigned to Descanso Gardens due to its location within an incorporated city. Although the County is not subject to city zoning, LCF's zoning information has been provided to inform the County's decision-making process. The LCF zoning designation for Descanso Gardens, including the Project site, is PS (Public/Semi-public) for County-owned parcels. LCF's PS zoning designation permits one detached single-family dwelling unit per lot and permits arboretums and horticultural gardens if authorized by a conditional use permit.

2.3 PROJECT BACKGROUND

2.3.1 DESCANSO GARDENS WATER USE

The land that would become Descanso Gardens was originally purchased in the mid-1930s as a private estate. In the 1940s, the owner purchased 440 acres in the adjacent canyon (Hall-Beckley), including a spring-fed stream, and built an underground pipeline to move water across the Crescenta Valley to Descanso. In 1949, a 1.5-acre lake (now referred to as the Lake) was constructed on the property that served as a reservoir for Descanso. Several additional water features were constructed in the following years, including an artificial stream, pond, waterfall and several fountains. Descanso Gardens and the Hall-Beckley Canyon property were sold to the County and opened as a public park in 1952.

Descanso Gardens currently uses approximately 100 acre-feet per year (afy) of water, mostly driven by irrigation/water features (90 percent) and domestic use accounting for the remaining 10 percent. Approximately 50 percent of the water comes from Hall-Beckley Canyon for non-potable uses including irrigation, water features, and the Lake. The other 50 percent is imported water from the Valley Water Company (Valley Water) for domestic/potable use as well as irrigation and recirculating water features.

However, the Hall-Beckley water supply has become unreliable as it suffers from aging infrastructure challenges and is occasionally out of service for long periods of time. Due to Descanso Gardens' hydrologic demands and challenges, water infrastructure and sustainability have been key concerns over the past decade. Water infrastructure has been a

large focus of several recent planning efforts including the Long-Range Concept Plan (2009), Entry and Parking Lot Feasibility Study (2014), Lake and Water Concept Plan (2016), and most recently, the Descanso Gardens Master Plan (2020).

The Master Plan's future water budget adapts to the unreliability of the Hall-Beckley supply and, therefore, potential increased dependence on potable water from Valley Water by offsetting between 30 to 53 afy of the estimated 100 afy demand through several water conservation improvements. These include lake improvements to reduce water loss and use non-potable water as much as possible, stream restoration, stormwater capture for non-potable use, irrigation efficiency, and wastewater recycling.

2.3.2 SAFE CLEAN WATER PROGRAM AND PROJECT BENEFITS

The Project would be funded by the Los Angeles County Safe Clean Water Program (SCWP), which was established with the passage of Measure W in 2018. Specifically, the Project is proposed under the SCWP's Regional Infrastructure Program, which has the objective to plan, build, and maintain multi-benefit watershed-based projects that improve water quality and increase water supply and/or enhance communities. The SCWP recognizes nine watersheds within the County, one of which is the Upper Los Angeles River Watershed (ULAR). The City of LCF is an ULAR Enhanced Watershed Management Program Group member and has compliance milestones under the *Upper Los Angeles River Enhanced Watershed Management Plan* (ULAR EWMP) goals.

The Project would provide substantial benefits for the City of LCF while supporting the Descanso Gardens Master Plan goal to improve water supply resiliency by lessening reliance on imported, potable water for irrigation and water features. Implementation of the Project would address LCF's additional need for stormwater management and help achieve the EMWP's critical load reduction goals in the subwatershed for metals and bacteria. This is possible due to both the sizable drainage capture area of 311 acres and available development space within Descanso Gardens adequate to offer runoff capture/reuse and water quality improvements concurrently. Notably, of the 311 acres, approximately 230 acres are tributary to Winery Canyon Channel. To achieve full attainment of load reduction goals for metals and bacteria in subwatershed 644439, the ULAR EWMP prescribes a cumulative 24-hour stormwater best management practice (BMP) capacity of 3.1 acre-feet (af).

The proposed stormwater diversion is designed to capture 100 percent of the 85th percentile, 24-hour storm event from the 311-acre drainage area, which equates to a capture of 4.5 af. Therefore, implementation of the Project would meet and exceed the prescribed capacity target of 3.1 af and, as such, would accelerate compliance with the ULAR EWMP. In total, the Project would capture over 63.5 afy of stormwater. Additionally, over the long term the Project would achieve a pollutant load reduction of approximately 90 percent for metals and approximately 80 percent for trash.

2.4 PROPOSED WINERY CANYON CHANNEL STORMWATER CAPTURE AND REUSE PROJECT

2.4.1 PROJECT SUMMARY AND GOALS

Descanso Gardens' proposed Winery Canyon Channel Stormwater Capture and Reuse Project would result in stormwater runoff reductions, potable water conservation, and water quality improvements. The Project proposes a stormwater diversion from Winery Canyon Channel for treatment and storage in an underground cistern under the Auxiliary Parking Lot. The captured stormwater would be distributed for reuse in the Gardens as non-potable water supply and reduce the demand for potable water.

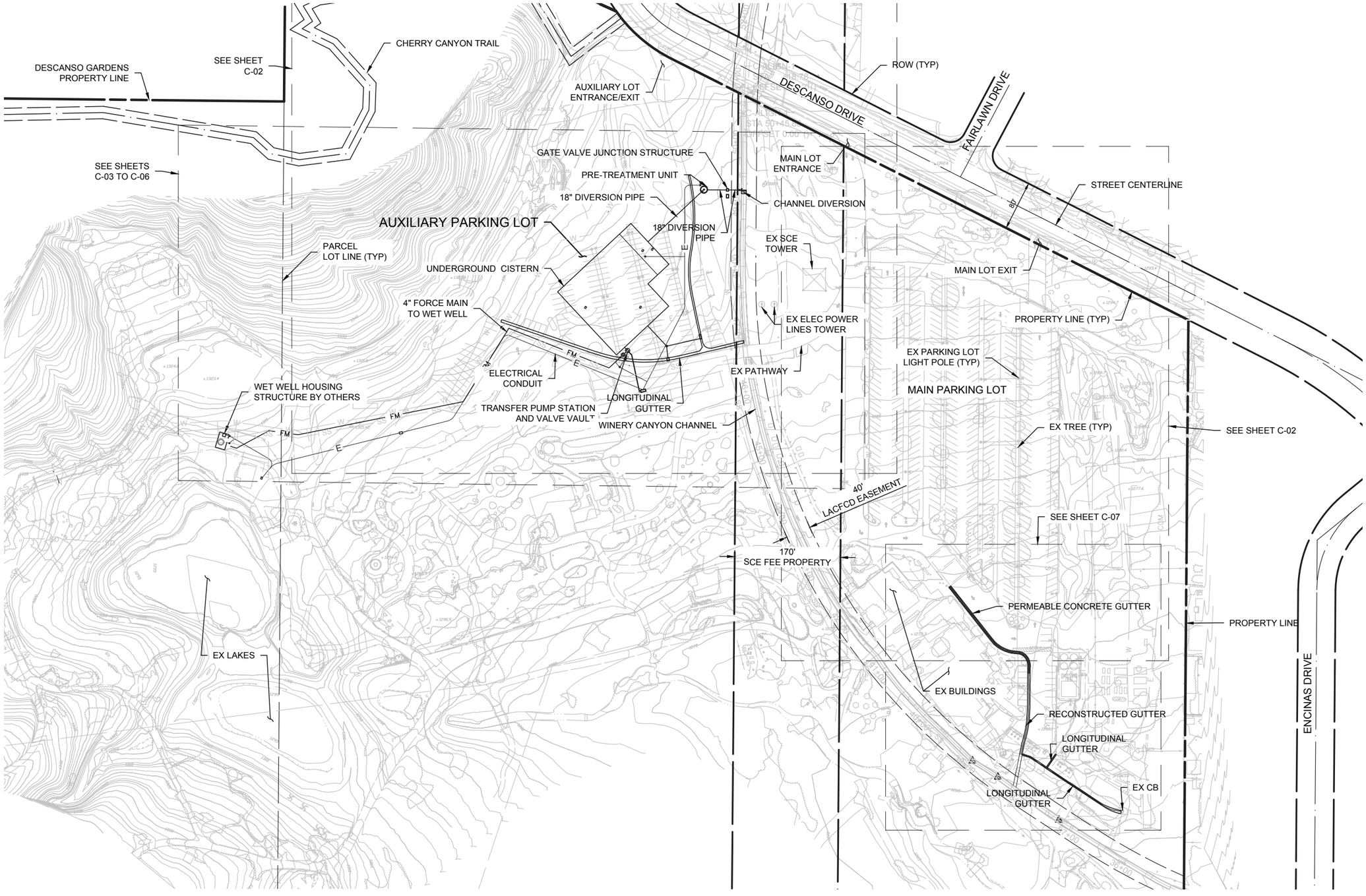
To facilitate reuse of the diverted stormwater in the Gardens, the Project includes distribution infrastructure that would extend from the proposed cistern to the Lake Pump Room to be constructed as part of the ongoing Lake and Nature Discovery Garden (NDG) project (Lake project), a separate but closely related Master Plan project. The Lake Pump Room design has incorporated space for the Project to install a skid-mounted irrigation pump and related equipment to enable further treatment of the diverted stormwater to meet spray irrigation requirements. The Lake Pump Room will house a wet well and related equipment to adaptively maintain the Lake's water levels within two feet of the planned operating depth, consistent with the Master Plan concept and intent for Lake restoration. The proposed Project physically ties into this structure solely to supply the Gardens with captured, treated stormwater for reuse, including contributing the Lake level maintenance when appropriate.

It is important to point out that, beyond utility connections and installing the irrigation skid, the Project is not involved in the design or construction of the Lake Pump Room. It is also noted the Lake project is considered consistent with the planned features described in the Master Plan and the findings of the IS/MND.

The Project would also include small-scale, localized stormwater BMPs in the southern portions of the Main and Auxiliary Parking Lots to improve management of runoff from these asphalt-paved surfaces. The proposed drainage features include longitudinal concrete gutters, precast porous concrete gutters, and catch basins with filter inserts. The surface runoff collected in the Auxiliary Lot would also be stored and additionally treated for reuse by the Gardens. Exhibit 4, Proposed Project Site Plan, depicts the location and overall layout of the main Project components in both the Auxiliary and Main Parking Lots.

The Project supports several Master Plan concepts and objectives related to water conservation; and helps both Descanso Gardens and the City of LCF achieve mutual benefits. Specifically, the Project has the following goals:

1. Improve the quality of stormwater runoff from the local (311-acre) watershed identified in the ULAR EWMP, by diverting flows from Winery Canyon Channel for treatment, storage, and reuse.



Source: Descanso Gardens Foundation 2020

Proposed Project Site Plan

Exhibit 4

Addendum No. 1 to the Descanso Gardens Master Plan IS/MND for the Stormwater Capture and Reuse Project

N W E S

Map not to scale

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2. Reduce the pollutant load in the approximately 63.5 af of captured stormwater. This will benefit the City of LCF by meeting the ULAR EWMP performance goals for the years 2028 and 2037 for metals and bacteria, respectively.
3. Augment water supplies for Descanso Gardens' landscape irrigation and water features. This goal is consistent with the Gardens' adopted 2020 Master Plan by lessening dependence of municipal, potable water.
4. Capture and infiltrate stormwater runoff from selected impervious areas (Main Parking Lot) to reduce pollutant loading.
5. Educate visitors to Descanso Gardens of the facility's implementation of sustainable water management features (i.e., stormwater capture and reuse).

2.4.2 MODIFICATIONS FROM THE ADOPTED MASTER PLAN

The main modification from the Master Plan is the proposed use of an underground cistern for stormwater storage after passing through a pretreatment device. Also, as noted previously, the location of the planned diversion point would be along the eastern edge of the Auxiliary Lot (in the north-central portion of the Gardens). The Master Plan contemplated diverting stormwater from Winery Canyon Channel at a point near the southeast corner of the Main Parking Lot (in the east-central portion of the Gardens); and directing the water into a man-made wetland (i.e., proposed Marsh Garden) for treatment and storage in the area of the existing Lilac Garden, which would be relocated.

The Project proposes to distribute stored water via a pump station and four-inch diameter force main that would connect the Project's diversion infrastructure to the Lake project's Lake Pump Room. To power the proposed equipment, new electrical conduit would also be installed. The Master Plan proposed using pumps to distribute diverted, treated water to the Lake via an expansion of the Gardens' existing recirculating stream. As such, the use of a pump station to facilitate distribution of stored water for reuse in the Gardens was considered in the Master Plan, though in a differing setting. Similarly, while a new electrical conduit and water line in the Auxiliary Lot to distribute captured stormwater was not specifically proposed in the Master Plan, the relocation, replacement, or expansion of both wet (water and sewer) and dry (electric and telecommunications) utilities in various locations throughout the Gardens where needed to support planned improvements was anticipated and was addressed in the Master Plan IS/MND.

The Project also includes small-scale stormwater BMPs in the southern portions of both the Auxiliary and Main Parking Lots to improve management of stormwater runoff that are similar, but not identical, to what was discussed in the Master Plan. The Master Plan proposed the Picnic Grove Bioswale (refer to Exhibit 2) in the southernmost portion of the Auxiliary Lot. The Project proposes longitudinal concrete gutters along the eastern, southern, and southwestern edges of the Auxiliary Parking Lot to route stormwater towards its southeast corner where proposed catch basins with filter inserts and storm drain lines would convey the runoff into the cistern. This runoff would also be stored and additionally treated for reuse by the Gardens.

In the Main Lot, the Master Plan proposed that stormwater runoff would continue to be collected in the southeast corner and drain to the Channel, where it would then be diverted into the Marsh Garden. Because the Marsh Garden would not be constructed, stormwater runoff from the Main Lot would not be captured and treated in this Master Plan element. Therefore, the Project proposes replacement of 200 lf of curb and gutter near the Gardens' visitor entrance with precast porous concrete panels along the curb and gutter; the Project would remove and reconstruct the existing longitudinal concrete gutter in this area. Stormwater that does not infiltrate would continue to discharge south via gravity flow into Winery Canyon Channel. Rather than routing runoff collected in the southeast corner into the Channel and Marsh Garden for treatment, the Project's porous gutter would collect and treat the 85th percentile, 24-hour storm event volume through infiltration prior to reaching Winery Canyon Channel thereby achieving the same goal as the Master Plan concept. Further, the proposed surface drainage BMPs in both Lots are consistent with range of the hydrology and water quality BMPs recommended for incorporation during Master Plan development to address hydrologic/water quality conditions of concern.[8]

The discussion above demonstrates the overall premise and result of the Project is the same as described in the Master Plan and, by extension, addressed in the IS/MND. Additionally, installation of the proposed 4.5-af underground cistern to store diverted stormwater from Winery Canyon Channel, in lieu of a treatment wetland, is the only Project component that is not discussed in the Master Plan in some context. All other proposed Project components, while differing in specific location or use, are in keeping with the type, scale, and purpose of planned Master Plan concepts and features.

2.4.3 PROPOSED COMPONENTS

Stormwater Diversion, Pretreatment, and Storage (Cistern)

The primary Project component is the capture of stormwater flows for storage in an underground cistern prior to reuse. The primary mechanism of stormwater capture would be a two-foot-high diversion gate installed across the Channel. When the gate is in the up position, stormwater would be diverted to an 18-inch diameter opening to be made in the side of the Channel perpendicular and immediately upstream of the diversion gate.

Diverted runoff would flow via an 18-inch diameter gravity pipe with a gate valve junction structure placed along its alignment, to control the passage of stormwater flows into the proposed system, and then to a pretreatment device. The pretreatment device would consist of a 10-inch diameter precast concrete hydrodynamic separator (HDS) unit sized to treat and convey a flow of 10 cubic feet per second (cfs). After pretreatment, flows would continue by gravity and discharge into a proposed modular, underground, precast concrete vault system with a 4.5-af storage capacity located in the southeastern portion of the Auxiliary Parking

[8] The range of recommended stormwater management BMPs are identified in the *Descanso Gardens Master Plan Hydrology Technical Report* and *Descanso Gardens Master Plan Water Quality Technical Report*, both prepared by Geosyntec Consultants, as part of Master Plan preparation and provided as Appendices 6 and 11 of the Master Plan IS/MND, respectively.

Lot. The position of the cistern location was refined during Project development to maximize avoidance of oak trees.

The proposed diversion, pretreatment, and storage components would all be installed in paved or otherwise disturbed areas of the Auxiliary Lot. Installation of the cistern would represent the most intensive period of construction activity for the Project, in terms of heavy construction equipment use, large-scale materials handling, earthmoving, and truck trips and related traffic to and from the Auxiliary Lot.

Distribution Infrastructure

The Project includes distribution infrastructure to enable diverted stormwater stored in the cistern to be reused in the Gardens for irrigation needs and water features. A transfer pump station situated near the southeast corner of the cistern would convey captured stormwater through an approximately 725-foot-long, four-inch diameter force main. This force main would extend in an irregular pattern generally to the west-southwest and connect to the Lake Pump Room being constructed as part of the ongoing Lake project. The force main alignment was designed to maximize avoidance of trees, especially mature and/or native trees.

To provide power for the Project's proposed equipment, electrical conduit would be installed to the east of the cistern and then generally follows the force main alignment towards the Lake to tie into existing electrical supply as well as the Lake Pump Room. Additionally, the Lake Pump Room design has incorporated space for the Project to install a skid-mounted irrigation pump and related equipment to enable further treatment of the diverted stormwater to meet spray irrigation requirements.

A water level sensor would be located in a wet well in the Pump Room that is hydraulically connected to the Lake's water level. When the water level in the wet well drops below a specified point, it would trigger the cistern transfer pump to deliver water via the force main to the Lake. This water source would be available to augment the Lake's water level and feed the Pump Room's irrigation pump and treatment skid to meet spray irrigation requirements of the Los Angeles County Department of Public Health. The required pump flow rate from the cistern to the wet well is up to 200 gallons per minute (gpm) and is intended to meet and exceed anticipated irrigation demand flows.

Parking Lot Stormwater Management

The Project would also include small-scale, localized stormwater BMPs in the southern portions of the Main and Auxiliary Parking Lots to improve management of runoff from these asphalt-paved surfaces. In the Auxiliary Lot, the Project proposes longitudinal concrete gutters along the eastern, southern, and southwestern edges of the lot that would route stormwater towards the southeast corner of this lot where two catch basins with filter inserts would collect, pretreat, and discharge the runoff into new storm drain lines that would convey the runoff into the cistern. This runoff would also be stored and additionally treated for reuse by the Gardens.

Within the Main Lot, the Project proposes to remove and replace 200 lf of existing pavement and gutter located near the Gardens' visitor entrance with four-foot-wide precast porous concrete panels. The permeable concrete panels would provide shallow infiltration–to a depth of approximately five feet–and any stormwater that does not infiltrate would flow into Winery Canyon Channel. The length of porous gutter would provide treatment of collected runoff through infiltration and has been designed to meet the 85th percentile, 24-hour design storm criteria for the Main Lot stormwater capture area. The 200 lf of porous concrete gutter would transition to a regular asphalt concrete gutter. Additional runoff flows would also be collected by a proposed trench drain located at the southeast portion of the Main Parking Lot that would ultimately discharge into Winery Canyon Channel.

The proposed longitudinal gutters and catch basins would be designed and constructed per the Los Angeles County Public Works' current Standard Plans for Public Works Construction (SPPWC), which provides standard plans and specifications for public works construction projects in the County.

Auxiliary Lot Tree Removals and Site Finishing

Numerous mature trees are present within the Auxiliary Parking Lot, primarily along the lot's edges. There are no trees or other vegetation present in the immediate vicinity of the Project's components in the Main Parking Lot. The ALTA Survey prepared in 2020 identified the size and type of most of the existing trees within the Auxiliary Lot. As part of preparing this Addendum, a Psomas Certified Arborist conducted a limited supplemental tree survey within and immediately surrounding the proposed site in the Auxiliary Parking Lot to confirm the identification of non-native trees and collect detailed information on all native trees.

The County Oak Tree Permit Ordinance (+Section 22.174 et. seq. of the Los Angeles County Municipal Code) regulates oak species (i.e., any species in the genus *Quercus*). It is noted that Descanso Gardens considers all native tree species protected, as it relates to decisions during both daily operations of the Gardens and implementation of Master Plan projects. Existing native trees present in and near the Auxiliary Lot include coast live oaks and western sycamores; all other trees in the vicinity are various species of non-native eucalyptus.

A tree protection zone (TPZ) of 10 feet radially extending from the dripline has been established for all native trees located near the boundaries of proposed construction, access, and staging areas in the Auxiliary Parking Lot. There are no native trees in or near the Project components in the Main Parking Lot. The TPZs were collaboratively agreed upon by Descanso Gardens, Geosyntec Consultants (lead Project design/engineering consultant), and the Master Plan landscape architecture firm RIOS. The County Oak Tree Permit Ordinance defines a protected zone as "the area within the dripline of an oak tree and extending therefrom to a point at least five feet outside the dripline, or 15 feet from the trunk of a tree, whichever distance is greater". For the Project, the TPZ coverage meets or exceeds the requirement of the County Oak Tree Permit Ordinance for all applicable trees on the Auxiliary Lot. As noted above, the location of the cistern and force main alignment were specifically positioned during Project development to maximize avoidance of trees, especially mature and/or native trees. Additionally, the limits of asphalt pavement

demolition were carefully developed to avoid encroaching into the TPZs of adjacent native trees. However, there are a total of 26 existing trees, including 22 eucalyptus and 4 western sycamores, that would unavoidably require removal to implement the Project. Based on the results of the arborist tree survey, two of the four sycamores to be removed are severely declining with the main trunk almost dead and one sycamore declining and exhibiting branch failures. No oak trees in the Project area would be removed or disturbed including, but not limited to, encroachment into any oak tree protection zone, and no tree replacements are required pursuant to the County Oak Tree Permit Ordinance. As noted above, Descanso considers all native trees protected. While not required due to regulatory requirements or mitigation measures as part of the Project, Descanso Gardens intends to include replacement trees for the removed western sycamores as well as additional trees and vegetation as part of the Master Plan's Backstage and North Yard project, which is in concept development. To streamline the future construction of the Auxiliary Lot improvements, when the cistern is installed, instead of installing a two-course (i.e., base and finish) the Project would install only a base course of 1.5 to 2 inches that provides a stable and useable, but temporary, surface. This paving would be removed and replaced during construction of these future, Master Plan-related improvements located on the Auxiliary Lot.

2.4.4 PROJECT CONSTRUCTION

Construction of the Project is estimated to require approximately 11 months (June 2025 to May 2026) from initial mobilization through end of construction. Construction of some or all proposed components in the Auxiliary and Main Parking Lots may occur concurrently, and as such are analyzed herein based on this assumption as a worst-case scenario. Project construction would typically occur from Monday through Friday from 7:00 AM and 3:30 PM. There would be no construction activity on Sundays, federal holidays that occur on weekdays, or at nighttime. Consistent with Section 5.02.110 of the LCF Municipal Code (LCFMC), construction activity would be limited to the hours of 7:00 AM and 6:00 PM (7:00PM during Daylight Savings Time) and Monday through Friday and 9:00 AM to 5:00 PM on Saturdays. Off-road construction equipment in use would vary by Project component and include, but not be limited to, excavator(s), front wheel loader(s), dozer(s), skid steer loader(s), backhoe(s), crane(s), boom truck(s), and vibratory roller(s).

Access to the Auxiliary Lot for parking and/or event preparation is critical for the Gardens' operations during May for Mother's Day-related activities and from September through early January for the annual Carved and Enchanted events. Therefore, cistern installation–including paving demolition, excavation, precast vault placement, backfill, and paving–would be targeted for the approximate 90-day period from June 1 through August 31, 2025, and closely coordinated with the Gardens. Other facets of the Project that would not materially affect the available parking/staging area may be implemented during the Gardens' most active periods.

Construction activities, including staging and parking, would be planned to minimize circulation and access limitations for Descanso Gardens visitors and staff as much as feasible. Visitor access to the main entrance would be maintained throughout the construction period, and construction would not interfere with emergency access for first responders. All equipment and material staging and parking would be on currently paved and disturbed

surfaces within the Gardens and proximate to the active construction area(s); the Project would not require staging along the adjacent public right-of-way (ROW). Potential staging areas include the northernmost paved portion of the Auxiliary Lot and the easternmost drive aisle of the Main Parking Lot.

Private construction worker vehicles/pickup trucks, delivery vehicles, and haul trucks would access the Project site via Descanso Drive at the three vehicular ingress/egress points. Construction vehicles would use the paved bridge over the Channel, except where limited by vehicle weight and/or size. The grading plan also includes a 12-foot-wide, approximately 25-foot-long, access road temporarily incorporated into the proposed site contours along the eastern edge of the Auxiliary Lot northwest of the cistern location. This access road would facilitate circulation of dump trucks and other equipment within the limited confines of this work area. When construction in the Auxiliary Lot is complete, finish grading would eliminate the temporary access road.

The Project would involve an estimated 33,000 cubic yards (cy) of cut/excavation, with most of this volume (about two thirds) resulting from excavating the cavity for the precast concrete cistern. Excavation for the cistern, which has a footprint of 20,125 square foot (sf), would extend to depths of 25 feet within an approximate 21,500-sf area. Approximately 14,100 cy of excavated soil would be used as backfill and approximately 22,250 cy of excess soil would be exported for reuse/disposal, including about 11,500 cy during cistern installation.[9] Pavement demolition would generate a total of approximately 3,700 cy of concrete and asphalt debris. It is noted the Master Plan and IS/MND anticipated removal of existing pavement throughout both parking lots to implement the Master Plan's proposed Arrival Grassland Garden in the Main Lot and Backstage and North Yard in the Auxiliary Lot. Other demolition activity, tree removals, tree trimming, and limited vegetation clearing would generate a stream of mixed demolition debris and greenwaste. Descanso Gardens' policy is to reuse and repurpose limbs and other woody debris from fallen or removed trees as much as feasible. This would substantively reduce the amount of greenwaste requiring export for disposal. The Project would comply with the County of Los Angeles Construction and Demolition Debris Recycling and Reuse Ordinance (Chapter 20.87 of the Los Angeles County Municipal Code), updated effective August 19, 2024. Construction of the Project is expected to require import of approximately 3,300 cy of crushed aggregate base and subbase/base materials, 130 cy of cement for concrete pavement, and 1,600 tons of asphalt concrete (AC) pavement.

Because of the Auxiliary Lot's proximity to Descanso Drive, the use of end dump trailers with a capacity of about 21 to 30 tons (or 16 to 22 cy of soil) trucks would be feasible for most of the Project's excess soil removal. Super 10 dump trucks have an 8 to 10 cy capacity and would also be used for some portion of soil export. It is expected that a mixture of smaller and larger payload haul trucks will be used; however, for purposes of this analysis it is assumed only the smaller-capacity Super 10 trucks would be used as a worst-case scenario.

Cistern installation would be the most intensive period of construction activity and would generate the highest daily haul truck trips as well as amount of heavy construction

[9] Volumes of excavation and backfill/export do not add due to swell/shrinkage of soil.

equipment use, large-scale materials handling, and related tasks. Demolition and excavation for the cistern would require an estimated 30 calendar days (or 20 workdays) and involve the off-site export of approximately 3,000 cy of mixed demolition debris/greenwaste and 11,500 cy of soil. The estimated daily export volume would range between 500 cy and 750 cy. Assuming use of only Super 10 trucks, this would generate approximately 55 to 83 one-way haul truck trips per day (or 110 to 166 trip ends). For comparison, use of end dump trailers carrying an average of 20 cy would generate approximately 25 to 38 one-way haul truck trips per day. Daily construction activity for all other Project components would be minimal in comparison.

Exported construction waste from the Project site would be transported to Scholl Canyon Landfill, located at 3001 Scholl Canyon Road, Glendale. There are two, approximately 10-mile routes between the Gardens and the landfill the haul truck operators would likely elect to use. For both, haul trucks would travel on main surface streets, including Descanso Drive, Verdugo Boulevard, and/or Foothill Boulevard to either State Route 2 (SR 2) or Interstate 210 (I-210) traveling south, and continue to the landfill.

As stated in the Master Plan IS/MND, preparation of a Construction Staging and Traffic Management Plan (CSTMP) would be required to ensure that impacts on State facilities and local roadways are minimized and remain less than significant. The Project's construction contractor would prepare the Project's CSTMP consistent with the guidelines provided in the *Descanso Gardens Master Plan Transportation Assessment* (Transportation Assessment), prepared in 2020 as part of Master Plan development (LLG 2020, Appendix 15 to the Final IS/MND). When finalized, the CSTMP would be submitted to the City of LCF by the County and Descanso Gardens for review and approval prior to initiation of construction activities for the Project. Additionally, a Haul Route Permit approval from LCF would also be required for Project implementation. Large-sized trucks would utilize State highways during off-peak commute periods to the maximum extent feasible and comply with regulations pertaining to the use of oversized-transport vehicles on State highways.

2.4.5 PROJECT OPERATIONS

Public access to and use of Descanso Gardens with Project implementation would be the same as in the existing condition. Because the Project would not create new or expanded gardens or public-use facilities and as Descanso is already intensively used by all segments of the community, the Project would not drive a long-term increase in visitation.

Operation and maintenance of the proposed stormwater capture and reuse system, and routine maintenance of the new or replacement gutters and catch basins, would be Descanso Gardens' responsibility. Long-term maintenance of the proposed diversion, treatment, storage, and distribution infrastructure is vital to the system's continued operation. It is anticipated that annual or twice-yearly maintenance visits for the cistern and related infrastructure would be required.

2.4.6 DISCRETIONARY APPROVALS

This Addendum No. 1 to the Master Plan IS/MND is intended to serve as the primary environmental document pursuant to CEQA for actions associated with the Descanso Gardens Stormwater and Reuse Project, including discretionary approvals required to implement the Project. Pursuant to CEQA, the County of Los Angeles has primary discretionary authority over the approval of the Project. In addition, this IS/MND is the primary reference document for the formulation and implementation of a mitigation monitoring and reporting program for the Project, in accordance with Section 15097 of the State CEQA Guidelines.

Discretionary actions subject to County of Los Angeles review and approval include, but are not limited to:

- Adoption of Addendum No. 1 to the Descanso Gardens Master Plan IS/MND;
- Adoption of a Mitigation Monitoring and Reporting Program (MMRP); and
- Other County of Los Angeles discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to grading permit, structural permits, plumbing and electrical permits, and geotechnical report approval.

Additionally, other public agencies may also have discretionary authority over the Project. The Master Plan IS/MND and this Addendum No. 1 can be used by the responsible agencies to comply with CEQA in connection with permitting or approval authority over the Project. These agencies and anticipated discretionary approvals include, but are not limited to:

- California Department of Fish and Wildlife (Clean Water Act/Lake and Streambed Alteration Agreement);
- City of La Cañada Flintridge Department of Building and Safety (Haul Route Permit);
- Los Angeles County Flood Control District (Flood Permit-Channel modifications);
- Los Angeles County Department of Public Health (Spray Irrigation Permit);
- Los Angeles Regional Water Quality Control Board (Clean Water Act/Section 401 Water Quality Certification);
- Southern California Edison (Easement Encroachment Permit);
- State Water Resources Control Board (Construction General Permit); and
- United States Army Corps of Engineers (Clean Water Act/Section 404 Permit).

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3.0 ENVIRONMENTAL ANALYSIS

This section assesses whether the proposed Winery Canyon Channel Stormwater Capture and Reuse Project would result in environmental impacts that are encompassed in the environmental impacts associated with Master Plan implementation as disclosed in the adopted Master Plan IS/MND, or whether the conditions described in Sections 15162 or 15163 calling for preparation of a Subsequent or Supplemental IS/MND are applicable.

The analysis contained within this Addendum relies upon and incorporates by reference the adopted Master Plan IS/MND. This Addendum uses Appendix G, Environmental Checklist Form, pursuant to 15063(d)(3) of the CEQA Guidelines (2024), which includes the environmental topics and significance thresholds included in the Master Plan IS/MND.

For each topical issue, a summary of the environmental analysis from the adopted IS/MND is provided. Following this summary, the comparative analysis for the Project is presented, including any applicable mitigation measures from the Master Plan IS/MND and a conclusion statement.

3.1 AESTHETICS

3.1.1 MASTER PLAN IS/MND

The Master Plan IS/MND stated that there are no designated scenic vista points within Descanso Gardens, as it is not visible from any scenic vistas designated within the County General Plan 2035 or by Caltrans. The nearest designated scenic vistas to Descanso Gardens are County-designated public viewing areas in the Santa Monica Mountains approximately 23.4 miles southwest of the Descanso Gardens and Caltrans-designated Lamont Odett Scenic Vista Point approximately 24.4 miles northeast of Descanso Gardens. Therefore, no impact would occur related to scenic vistas.

Related to regional trails, Descanso Gardens is not visible from three County trails in the City of LCF (Gould Canyon Trail, Horse Lane Trail, or Flint Canyon Trail) due to distance and intervening topography, residential and commercial development, freeway bridges, and tree canopy. Descanso Gardens is visible from Mt. Lukens Connector Trail and Truck Trail along the southern ridge of the San Gabriel Mountains, but the tree canopies blend in with the rest of the Crescenta Valley from this distance. The nearest County trail to Descanso Gardens is the La Canada Open Space Trail, located within the SCE utility corridor to the north, and although the Gardens would be visible, views would not be prominent or create significant obstructions. Therefore, there would be less than significant impacts to aesthetics regarding being visible from or obstructing views from a regional riding, hiking or multi-use trail.

Regarding scenic highways, Descanso Gardens is not prominently visible from the officially designated State Scenic Highways in the site vicinity including the I-210 and SR-2, and therefore would not create any obstructions to the hillside views or views from the scenic,

resulting in less than significant impacts to aesthetics regarding scenic resources within highways a State Scenic Highway.

Related to visual character, due to the limited visibility of Descanso Gardens, impacts to visual character or quality of public views of the site and its surroundings would be predominantly limited to the overall tree canopy, the southern slope of the Descanso Gardens area, and features along the northern edge of the perimeter fence for the ticketed entry points. The temporary construction of individual projects may adversely alter the existing visual quality of the site and its surroundings. However, construction-related activities would be temporary, and the long-term operational activities associated with the Master Plan are designed to enhance the experience and aesthetic character of the site, as Descanso Gardens aims to improve and protect the current resources, including the visual character and quality of the site and its surroundings, for the next 15 years. Therefore, less than significant impacts would occur related to visual character.

As sources of lighting and glare would be minimal and consistent with the current levels at the existing condition at Descanso Gardens, impacts related to creation of substantial shadows or a new source of light or glare would be less than significant.

3.1.2 PROPOSED PROJECT IMPACT ANALYSIS

Consistent with the analysis presented in the Master Plan IS/MND, there are no designated scenic vista points within Descanso Gardens, and the Proposed Project site is located at the northern portion of Descanso Gardens within the Main and Auxiliary Parking Lots. There have been no changes in the aesthetics conditions at the Project site, and no impact to scenic vistas would occur. Therefore, the Project would not create a new significant impact pertaining to scenic vistas that were not previously analyzed, and no mitigation measures are required.

As stated in the Master Plan IS/MND, Descanso Gardens is not visible from three County trails in the City of LCF, would blend into the greater vicinity at views from Mt. Lukens Connector Trail and Truck Trail, and views are not prominent from the La Canada Open Space Trail. As the Project site is located within Descanso Gardens, and existing aesthetics conditions have not changed, impacts pertaining to views from trails would be less than significant. Therefore, the Project would not create a new significant impact pertaining to trails that were not previously analyzed, and no mitigation measures are required.

Similar to the Master Plan IS/MND discussion, Descanso Gardens is not prominently visible from officially designated State Scenic Highways in the vicinity. As the Project site is located within Descanso Gardens, and existing aesthetics conditions have not changed on-site, impacts related to scenic highways would be less than significant. Therefore, the Project would not create a new significant impact pertaining to scenic highways that were not previously analyzed, and no mitigation measures are required.

Consistent with the analysis presented in the Master Plan IS/MND, the Project would aim to improve the existing visual character at the site within the Main and Auxiliary Parking Lots in Descanso Gardens, and although construction activities at the site may create temporary

impacts, the long-term operational impacts are designed to enhance Descanso Gardens. The minor modifications beyond what was discussed programmatically in the Master Plan IS/MND, including a change in the Winery Canyon Channel diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan. Most of the proposed features would be located underground, and therefore not visible, or would be very low profile and would not disrupt existing views in the Project area. Other components such as the diversion and stormwater BMPs are relatively small and blend in with the existing visual character of the Parking Lots. Therefore, the Project would not create a new significant impact pertaining to visual character that were not previously analyzed, and no mitigation measures are required.

Regarding potential light and glare impacts, none of the minor modifications would involve substantively different lighting configurations or intensities beyond what was analyzed in the Master Plan IS/MND. Project sources of lighting and glare would be minimal and consistent with the current levels at the existing condition at Descanso Gardens, and the proposed stormwater components and BMPs would not contribute additional lighting, glare or reflective issues. Therefore, the Project would not create a new significant impact pertaining to lighting and glare that were not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to aesthetics.

Conclusion

The aesthetics impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.2 AGRICULTURE AND FORESTRY RESOURCES

3.2.1 MASTER PLAN IS/MND

The Master Plan IS/MND identified no impacts associated with the topic of Agricultural Resources as Descanso Gardens contains no designated farmland by the California Department of Conservation, Farmland Mapping Program; no land designated Farmland would be converted to non-agricultural use as a result of implementation of the Master Plan; and no sites would be affected by a Williamson Act contract. Additionally, Descanso Gardens does not contain forest land or timberland. Therefore, as detailed in the Master Plan IS/MND, the no impacts pertaining to agriculture resources would occur.

3.2.2 PROPOSED PROJECT IMPACT ANALYSIS

Consistent with the analysis presented in the Master Plan IS/MND, Descanso Gardens contains no farmland, Williamson Act land, forest land or timberland, and the proposed Project site is located at the northern portion of Descanso Gardens within the Main and Auxiliary Parking Lots. The existing conditions on-site have not changed, and no Project impacts to agricultural resources would occur. Therefore, the Project would not create a new significant impact pertaining to agricultural resources that were not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to agriculture and forestry resources.

Conclusion

The agriculture and forestry resources impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.3 AIR QUALITY

3.3.1 MASTER PLAN IS/MND

As stated in the Master Plan IS/MND, the construction, operation, and maintenance of Descanso Gardens would not cause a violation of the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP), the applicable air quality plan for the region, or the South Coast Air Quality Management District (SCAG)'s 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Master Plan would not impede the ability of the basin to achieve the National Ambient Air Quality Standards (NAAQS) attainment deadlines for those pollutants not in attainment. During construction, the Master Plan would be consistent with the AQMP's goals to invest in strategies that improve air quality by supporting transportation control measures to reduce vehicle miles traveled (VMT). During operations, the Master Plan would minimally increase the number of vehicles coming to and from the parks and open space areas. Therefore, the Master Plan would result in less than significant impacts regarding conflict with or obstruction of applicable air quality plans.

The proposed Master Plan's daily construction emissions were generated using CalEEMod, which determined that the daily construction emissions associated would be below the SCAQMD daily constructional emissions thresholds of significance. Similarly, operational emissions are expected to be below the level of significance as determined by the SCAQMD

and would not cause a cumulatively considerable net increase of any criteria pollutants. Given that the Master Plan would involve the operation of recreational and open space uses that would not require any stationary sources for daily operation and maintenance, long-term operation-related air emissions are likely to result from vehicles traveling to and from the park facilities and the parking structures. Construction emissions would be temporary and would be completed over the course of 11 years. As such, the Master Plan would result in less than significant impacts regarding violating air quality standards.

Sensitive receptors within one-quarter mile of Descanso Gardens include the USC Verdugo Hills Hospital, located northwest, and multi-family residential neighborhoods. Due to the short-term nature of the Master Plan construction, sensitive receptors would not be expected to be adversely affected by construction, and BMPs would be required for dust suppression. For operation or maintenance, sensitive receptors would experience a longer duration of exposure but would be considered below the level of significance and impacts related to exposing sensitive receptors to pollutant concentrations would be less than significant.

With respect to the creation of objectionable odors, the Master Plan did not propose any uses that are typically associated with objectionable odors, and impacts would be less than significant.

3.3.2 PROPOSED PROJECT IMPACT ANALYSIS

Development associated with the proposed Project would not conflict with or obstruct implementation of the applicable air quality plan, consistent with the Master Plan IS/MND. The Project, including minor modifications from the Master Plan, would not impede the ability of the basin to achieve the NAAQS attainment deadlines for those pollutants not in attainment. During operations, the Master Plan would minimally increase the number of vehicles coming to and from the site. As the Project involves built (rather than nature-based) water conservation features and does not include a new or improved garden or facility for public use, the proposed Project would not directly increase the number of vehicles traveling to and from the Gardens. Therefore, the Project would not create a new significant impact pertaining to conflict with applicable air quality plans that were not previously analyzed, and no mitigation measures are required.

Regarding the violation of air quality standards or substantial contribution to an existing or project air quality violation during temporary construction and long-term operations, the Project does contain minor additional facilities that were not assessed in the Master Plan IS/MND. Minor modifications beyond what was discussed programmatically in the Master Plan IS/MND, including a change in the Winery Canyon Channel diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan. However, the scope of construction for the proposed Project remains within the Master Plan buildout construction assumptions used in the IS/MND.

Specifically, the Project would be considered part of Phase 1C (see Table 1.11-1, Project Phasing, of the IS/MND), which has an 18-month duration and includes the following Master Plan elements:

- Lake Improvements,
- Lake Perimeter Walk and Pier,
- Irrigation System Upgrades,
- Stream Restoration,
- Marsh Garden, and
- 400 feet of Gardens Loop at Marsh Garden.

The Stream Restoration and Marsh Garden elements are superseded by the proposed Project, which has a projected construction period of 11 months, with a 90-day period of intensive activity during cistern installation from June through August. As mentioned previously, Descanso Gardens is currently implementing the following elements, which are identified in Phase 1C: Lake Improvements, Lake Perimeter Walk and Pier, and Irrigation System Upgrades, with a projected construction period of 16 months. The schedule for the Project's construction is being integrated into and would overlap the Lake and NDG project schedule. The Gardens Loop at the Marsh Garden is not currently in development. Additionally, as part of what is collectively called the Lake project, for purposes of this Addendum, the Nature Discovery Garden element in Phase 2B and Stormwater Management element in Phase 2D are also being implemented.

The IS/MND assumed a worst-case peak scenario involving the concurrent construction of the improvements to gardens and infrastructure in the two phases and the construction of a new administrative facility in the Master Plan Area. This peak construction scenario is comparable to the anticipated construction scenario for the Stormwater Capture and Reuse Project and the Lake project except the simultaneous construction of a new administrative facility is not presently planned. However, the Project involves the excavation and export of approximately 22,250 cy of soil, including about 11,500 cy during cistern installation. Therefore, this anticipated construction scenario can be considered comparable to what was considered in the Master Plan IS/MND.

Additionally, assuming concurrent cistern installation and drainage feature construction in the Auxiliary or Main Lots, the types and numbers of expected demolition and construction equipment in operation in a given day is within the ranges summarized in Table 1.11-3, Demolition Construction Equipment, and Table 1.11-5, Anticipated Construction Equipment, in the Final IS/MND. Finally, as detailed in Section 3.17, Transportation, the Project's estimated, worst-case daily construction traffic generation during the 30-day cistern excavation would be consistent with the peak daily truck trips estimated for Master Plan implementation. The export of sediment and other debris for the Lake project would occur prior to excavation activity for the proposed Project. In summary, while installation of the underground cistern, in lieu of a treatment wetland, is the main modification from the Master Plan and is not a feature discussed in the Master Plan, the resulting construction activity would be within the assumptions used to calculate maximum daily criteria pollutant emissions. Also, effects from construction activities occur over a relatively short period of

time, in this case a total construction period of 11 months from beginning of mobilization through demobilization with a 3-month period of intensive activity during cistern installation.

As such, emissions associated with the construction of the proposed stormwater conservation facilities are not anticipated to exceed SCAQMD's thresholds for criteria air pollutants. Additionally, related to long-term operational emissions, public access to and use of Descanso Gardens with Project implementation would be largely the same as in the existing condition. Although there would be new and improved on-site facilities, because Descanso is already intensively used by all segments of the community, the City does not expect a long-term increase in park visitation due to the Project, and would not significantly increase emissions pertaining to area, energy and mobile source emissions, such as increased vehicle trips to and from the Project site. As such, the minor modifications to the Master Plan IS/MND at the Project site would not substantially affect long-term emissions generated from the Project and would not be anticipated to exceed the SCAQMD's thresholds for criteria air pollutants. As such, construction and operational impacts would be less than significant. Therefore, the Project would not create a new significant impact pertaining to construction and operations air quality emissions that were not previously analyzed, and no mitigation measures are required.

Regarding the Project's impacts to sensitive receptors through localized emissions and consistent with the Master Plan IS/MND analysis, due to the relatively short-term nature of the Project construction, sensitive receptors would not be expected to be adversely affected by construction, and BMPs would be required for dust suppression. The Project is not anticipated to result in a long-term increase in park visitation due to the Project, and maintenance activities would occur infrequently. As such, impacts to sensitive receptors through localized emissions would be less than significant. Therefore, the Project would not create a new significant impact pertaining to localized emissions that were not previously analyzed, and no mitigation measures are required.

With respect to the creation of objectionable odors, similar to the Master Plan IS/MND, the Project does not propose any uses that are typically associated with objectionable odors, and impacts would be less than significant. Therefore, the Project would not create a new significant impact pertaining to objectionable odors that were not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to air quality.

Conclusion

The air quality impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of

substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.4 BIOLOGICAL RESOURCES

3.4.1 MASTER PLAN IS/MND

As stated in the Master Plan IS/MND, there are no federally listed plant or animal species expected to occur besides potentially the Swainson's hawk (*Buteo swainsoni*), and no critical habitat for listed species is recorded within Descanso Gardens. Suitable habitat is present for California legless lizard (*Anniella* sp.) and coastal whiptail (*Aspidoscelis tigris stejnegeri*), which are CDFW Species of Special Concern. A total of 4 of 70 plant species that are considered rare in the State of California or are locally important to the region were identified from the records search have suitable habitat within the undeveloped portion of Descanso Gardens and have a high to moderate potential to be present. Several rare and locally important plant species, including Parish's gooseberry (*Ribes divaricatum* var. *parishii*) have been planted within the botanical garden but may not occur naturally. Suitable habitat is present for the following CNPS rare plants: Plummer's mariposa lily (*Calochortus plummerae*), Engelmann oak (*Quercus engelmannii*), and California black walnut (*Juglans californica*). A total of 29 wildlife that are considered sensitive in the State of California were identified during the records search for the area but were not observed during site surveys. During site surveys, the only special-status species observed were coastal whiptail, Cooper's hawk (*Accipiter cooperii*), and California black walnut. As construction activities would occur near the Wilds Loop trail, which is sensitive habitat, the Master Plan would implement MM BIO-1, where applicable, to reduce impacts related to biological resources identified as a candidate, sensitive, or special status species to less than significant levels.

Based on a review of the information available through the Natural Heritage Division of CDFW, no State sensitive plant communities are present within the Master Plan Area. Vegetation Communities on-site include California buckwheat scrub, laurel sumac scrub, lemonade berry scrub, mulefat thickets, oak woodland, and scrub oak chaparral. Natural communities likely to be impacted because of the Master Plan includes mixed riparian habitat around the Lake and scrub oak chaparral within the undeveloped area; however, the overall goal is to restore and improve aquatic resources and increase the long-term viability of the habitat at the Lake. The Master Plan IS/MND determined that impacts would be less than significant related to a substantial adverse effect on any sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS.

The Master Plan may result in up to 1.39 acres of impacts to the Lake's Freshwater Pond and approximately 0.26 acres of impacts to Freshwater Forested/Shrub Wetland that have the potential to be considered federally and/or State protected wetlands and/or waters of the United States (US), and approximately 3.96 acres of mixed riparian vegetation occurring around the Lake would be impacted, which may be under jurisdiction of CDFW. The Master Plan Area would not result in impacts to Riverine features (Winery Canyon Channel). With implementation of MM BIO-2 and BIO-3, the Master Plan Area would result in less than significant impacts to federally or State protected wetlands or Waters of the United States.

There are no previously recorded nursery sites within Descanso Gardens; however, the Master Plan Area does contain suitable nesting habitat for bird species and suitable for bat roosting and foraging. Nesting birds are protected under the MBTA. Suitable nesting habitat is determined by species and can include, but is not limited to, trees, bushes, the ground, or nest boxes, on balconies or cliffs, as well as in or on buildings and structures. Two bat species, hoary bat (*Lasiurus cinereus*) and silver-hairedbat (*Lasionycteris noctivagans*), afforded protection under the CESA, have potential to occur and roost in the Master Plan Area. For these bat species, suitable roosting habitat includes high cliffs, rocky outcrops, rock crevices, caves, mineshafts, under bridges, in buildings, tall trees, hollow trees, beneath exfoliating bark, abandoned woodpecker holes, or foliage. Impacts to nesting birds and bats by the Master Plan buildout would be mitigated with MM BIO-4 and 5. Additionally, there are no established fish or wildlife movement corridors present within the Master Plan Area, and therefore with mitigation incorporated, impacts related to wildlife movement or nursery sites would be less than significant.

As stated in the Master Plan IS/MND, oak and other native woodlands are present on-site, although not considered pristine habitat, and no direct removal of oak trees is anticipated. The existing oak trees along the northern edge of the Rose Garden and the existing specimen trees in the middle of the Rose Garden would be protected. With implementation of MM BIO-6, impacts related to oak and other native woodlands would be less than significant.

Additionally, the Project would result in no impacts in relation to conflicts with local policies or ordinances protecting biological resources, including Wildlife Reserve Areas, Significant Ecological Areas (SEAs), and Sensitive Environmental Resource Areas (SERAs), as the site is not located within any of these areas/zones.

Similarly, the Master Plan Area would result in no impacts in relation to conflicts with adopted Habitat Conservation Plans (HCPs), Natural Community Conservation Plans (NCCPs), or other approved state, regional, or local habitat conservation plans, as the site does not intersect with any of the described areas.

3.4.2 PROPOSED PROJECT IMPACT ANALYSIS

Regarding impacts to special status/sensitive plant or animal species, the Project site does not contain potentially suitable habitat for any plant or wildlife species that are federally and/or State-listed Endangered, Threatened, or candidate for listing. The Main and Auxiliary Lots are asphalt-paved and developed as existing parking areas serving Descanso Gardens; the two lots are connected via a one-lane paved bridge over Winery Canyon Channel. The Project site lacks potentially suitable habitat to support listed candidate, sensitive or special status plant or wildlife species for the area. There are no known unique, rare, or endangered plant or animal species or habitats on or near the site. There would be no construction activities associated with the Project near the Wilds Loop trail, which contains sensitive habitat, and there would be no impact. Therefore, the Project would not create a new significant impact related to biological resources identified as a candidate, sensitive, or special status species and MM BIO-1 would not be applicable.

The Project site is located within previously disturbed parking lot areas at the Main and Auxiliary Parking Lots. There are no native or otherwise special status vegetation types occurring on the Project site. No riparian habitats or sensitive natural communities identified by regional plans, policies, regulations, or agencies would be impacted by construction and operation of the Project, consistent with the IS/MND. These communities are identified near the proposed Lake Improvements and Wilds Loop projects. Consistent with the Master Plan IS/MND, impacts would be less than significant related to a substantial adverse effect on any sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS. Therefore, the Project would not create a new significant impact related to any sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS.

As part of Project development and preparation of this Addendum, consistent with MMs BIO-2 and BIO-3, a ***Draft*** *Jurisdictional Delineation Report for the Stormwater Capture and Reuse Project* (Psomas 2024, Appendix A to this Addendum) was prepared. During the field survey, a total of three drainage features (i.e., jurisdictional "waters") were identified, including two ephemeral drainages (identified as Drainages A and B) and Winery Canyon Channel, a concrete-lined storm drain channel:

(e) Winery Canyon Channel is a man-made box channel traveling north to south through the survey area. This drainage conveys runoff from the surrounding neighborhoods and hills and discharges to Devil's Gate Reservoir immediately upstream of Devil's Gate Dam approximately 2.5 miles southeast of the Project site. No vegetation is present within this channel.

(f) Drainage A is a small, ephemeral drainage originating from an outlet pipe located at the northern edge of the survey area. This drainage travels southeast through disturbed areas and into Winery Canyon Channel. Vegetation in the vicinity of Drainage A consists of a mix of upland species, consisting mainly of eucalyptus and coast live oak. This vegetation is part of a larger disturbed area and is not directly associated with the drainage. Therefore, no riparian vegetation is present.

(g) Drainage B is a small, ephemeral drainage that originates from runoff from the adjacent parking lot. This drainage travels roughly southeast through disturbed areas and into Winery Canyon Channel. Surrounding vegetation consists of a mix of upland species, consisting mainly of eucalyptus and coast live oak. This vegetation is part of a larger disturbed area and is not directly associated with the drainage. Therefore, no riparian vegetation is present.

The Jurisdictional Delineation Report determined that the total amount of jurisdictional resources on the Project site and the anticipated impacts are as follows:

- USACE Jurisdictional "waters of the U.S.":
    - Wetlands: 0.000 acre
    - Non-wetland waters: 0.096 acre (approximately 0.001 acre of permanent impacts and 0.005 acre of temporary impacts)

- RWQCB Jurisdictional "waters of the State":
    - Wetlands: 0.000 acre
    - Non-wetland waters: 0.136 acres (approximately 0.002 acre of permanent impacts and 0.006 acre of temporary impacts)
- CDFW Jurisdictional Streambeds:
    - Streambeds: 0.158 acres (approximately 0.002 acre of permanent impacts and 0.006 acre of temporary impacts)

Activities on the Project site will involve installation of an underground cistern with an associated channel diversion, pre-treatment unit, and four-inch force main to transport the water to the wet well and housing associated with a separate project at Descanso Gardens; construction of a longitudinal concrete gutter to collect and direct surface runoff into the cistern; and two catch basins with filter inserts that will discharge into the cistern. Most of the Project construction activities, including staging, will occur within pre-disturbed areas (paved parking lots) with the channel diversion being installed within Winery Canyon Channel.

Installation of the 18-inch gravity pipe from the Channel to the pretreatment device and cistern would require trenching through Drainage A. The installation of the water diversion structure in Winery Canyon Channel is considered a permanent impact, while trenching through Drainage A is considered to be a temporary impact. General construction activity will occur within Winery Canyon Channel related to the construction of the diversion structure, which is considered a temporary impact.

Continued implementation of MMs BIO-2 and BIO-3, requiring the County to obtain permits from the USACE, RWQCB, and CDFW prior to Project construction that would affect jurisdictional resources, would ensure there are no significant impacts to jurisdictional resources. Therefore, the Project would not create a new significant impact related to a substantial adverse effect on State or federally protected wetlands.

Regarding wildlife movement, although the Project site is largely disturbed and developed area, the site does contain suitable nesting habitat for bird species and suitable for bat roosting which may be impacted by the Project. There are no established fish or wildlife movement corridors present within the site, consistent with the Master Plan IS/MND. As discussed in the IS/MND, potential impacts would be limited to nesting birds and roosting bats. Implementation of MMs BIO-4 and BIO-5 would reduce potential impacts of the Project, to bats and nesting birds to less than significant. Therefore, the Project would not create a new significant impact related to nesting birds and roosting bats.

Regarding oaks, oak woodlands, and ordinances protecting biological resources, numerous mature trees are present within the Auxiliary Parking Lot, primarily along the lot's edges. The limited supplemental survey performed by a Certified Arborist within and immediately surrounding the Auxiliary Parking Lot site identified three dominant tree species: coast live oak, western sycamore, and eucalyptus. A confined area of dense, mixed vegetation including trees, shrubs, and groundcover occurs towards the northern portion of the Auxiliary Lot.

There are no trees or other vegetation present in the immediate vicinity of the Project's components in the Main Parking Lot. The ALTA Survey prepared in 2020 identified the size and type of most of the existing trees within the Auxiliary Lot. As part of Addendum preparation, a Psomas Certified Arborist conducted a limited supplemental tree survey of the proposed construction footprint in the Auxiliary Lot and adjacent areas to confirm the identification of non-native trees and collect detailed information on all native trees.

The County's Oak Tree Permit Ordinance regulates oak species (i.e., any species in the genus *Quercus*). It is noted that Descanso Gardens considers all native tree species protected, as it relates to decisions during both daily operations of the Gardens and implementation of Master Plan projects. Existing native trees present in this lot include coast live oaks and western sycamores; all other trees in the vicinity are various species of non-native eucalyptus (*Eucalyptus* sp.). A TPZ of 10 feet radially from the dripline has been established for all native trees located near the boundaries of proposed construction, access, and staging areas in the Auxiliary Parking Lot. There are no native trees in or near the Project components in the Main Parking Lot. The TPZs were collaboratively agreed upon by Descanso Gardens, Geosyntec, and the Master Plan landscape architecture firm RIOS. The County Oak Tree Permit Ordinance defines a protected zone as "the area within the dripline of an oak tree and extending therefrom to a point at least five feet outside the dripline, or 15 feet from the trunk of a tree, whichever distance is greater". For the Project, the TPZ coverage meets or exceeds the requirement of the County Oak Tree Permit Ordinance for all applicable trees on the Auxiliary Lot.

As noted above, the position of the cistern location and force main alignment were specifically positioned during Project development to maximize avoidance of trees, especially mature and/or native trees. Additionally, the limits of asphalt pavement demolition were carefully defined to avoid encroaching into the TPZs of adjacent native trees. However, there are a total of 26 existing trees, including 22 eucalyptus and 4 western sycamores, that would unavoidably require removal to implement the Project. Based on the results of the arborist tree survey, two of the four sycamores to be removed are severely declining with the main trunk almost dead and one sycamore declining and exhibiting branch failures. No oak trees in the Project area would be removed or disturbed including, but not limited to, encroachment into any oak tree protection zone, and no tree replacements are required pursuant to the County Oak Tree Permit Ordinance.

As noted above, Descanso considers all native trees protected. While not required due to regulatory requirements or mitigation measures as part of the Project, Descanso Gardens intends to include replacement trees for the removed western sycamores as well as additional trees and vegetation as part of the Master Plan's Backstage and North Yard project, which is in concept development. To streamline the future construction of the Auxiliary Lot improvements, when the cistern is installed, instead of installing a two-course (i.e., base and finish) the Project would install only a base course of 1.5 to 2 inches that provides a stable and useable, but temporary, surface. This paving would be removed and replaced during construction of the Auxiliary Lot improvements. MM BIO-6 would be implemented to reduce potential impacts on oak and other native woodlands to a less than significant level, consistent with the IS/MND. Therefore, the Project would not create a new

significant impact related to oaks, oak woodlands, and ordinances protecting biological resources.

The proposed Project would result in no impacts in relation to conflicts with adopted HCPs, NCCPs, or other approved state, regional, or local habitat conservation plans, as the Master Plan Area does not intersect with any of the described areas. Therefore, the Project would not create a new significant impact related to adopted HCPs, NCCPs, or other habitat conservation plans.

Applicable Mitigation Measures

The following mitigation measures pertaining to biological resources from the Master Plan IS/MND would be applicable to implementation of the Project:

MM BIO-2: To mitigate potential impacts on riparian, state sensitive plant communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS:

- A jurisdictional delineation shall be conducted by a certified wetland delineator to identify any state or federally protected wetlands, and riparian areas, for the Wilds Loop and Lake Improvements that have the potential for such communities to be present based on hydrologic and wetland features noted on USGS topographic quadrangles, the National Wetland Inventory, or site reconnaissance and documented in an JD memo (if no resources are present, or if resources are present and avoided), or an application for Lake or Streambed Alteration Under Section 1600 of the California Fish and Game Code.
- Where the jurisdictional delineation identifies State-designated sensitive plant communities, riparian habitat, state or federally protected wetlands, or Waters of the United States to be present, and that will not be improved by project activities, impact avoidance, impact minimization, and/or compensatory mitigation (i.e., on-site mitigation) shall be implemented at a ratio of 3:1, such that there is no net loss of habitat functions or values.
- Where impacts are located in areas subject to the jurisdiction of the CDFW pursuant to Section 1600 of the State Fish and Game Code, a Lake or Streambed Alteration (LSA) Agreement shall be obtained prior to commencing ground-disturbing activities or any other alternation of a lake or stream.
- Any LSA permit issued by CDFW may include additional measures such as:
    - Erosion and pollution control measures,
    - Avoidance of specific resources,
    - On-site or off-site creation, enhancement, or restoration, of habitat,
    - As necessary, protection and management of mitigation lands in perpetuity

MM BIO-3: To mitigate potential impacts to federally protected wetlands and Waters of the United States that cannot be avoided:

- A formal jurisdictional delineation shall be undertaken to assess the presence or absence of Waters of the United States in the Master Plan element resulting in dredge or fill within any features subject to Section 404 of the federal CWA.
- Where impacts are located in areas subject to the jurisdiction of the USACE pursuant to Section 404 of the federal CWA, authorization shall be obtained to complete the required work pursuant to a Nationwide or individual permit.
- Where impacts are subject to the jurisdiction of the Regional Water Quality Control Board (RWQCB), a Waiver of Water Quality Certification or Notice of Applicability of Waste Discharge Requirement permit shall be obtained.
- The DPR shall ensure that the project elements result in no net loss of Waters of the State by providing mitigation through impact avoidance; impact minimization; and/or compensatory mitigation (i.e., on-site mitigation) for the impact, as determined in the Streambed Alteration Agreement.
- The DPR retains responsibility for the implementation and success of the mitigation project. Evidence of secured permits shall be provided prior to approval of improvement plans; issuance of grading permits; and/or any clearing, grading, or excavation work.

MM BIO-4: To avoid impacts to nesting birds protected under the MBTA:

- Wherever feasible, suitable nesting habitat for birds afforded protection under the MBTA, shall be removed outside the breeding season, or construction shall be undertaken outside the breeding season, which generally occurs between February 15 and September 1.
- If Project Elements cannot avoid the nesting bird season, pre-construction nesting bird surveys shall be conducted by a qualified biologist no more than three days prior to the start of construction and shall include a 300-foot survey area for non-raptors and a 500-foot survey area for raptors.
- On the first day of construction at any given site, a qualified biologist shall perform a pre-construction "sweep" to identify any bird nests or other resources that may have appeared since the nesting bird survey.
- On each subsequent day of construction during the nesting season, a biological monitor shall first perform a daily sweep at each work site to look for nesting birds. The daily sweeps shall be conducted to identify new nests (partially built, active, or inactive) not detected during the preconstruction survey or clearance sweep.
- Should nesting birds be discovered within or adjacent to the construction footprint during these surveys, a non-disturbance buffer shall be placed around the active nest[10] to prevent impacts to nesting birds.

[10] The MBTA does not clearly define what an active (or inactive) nest is. However, the USFWS has clarified that the federal regulations do not pertain to the destruction of nests alone (without birds or eggs), provided that possession of the

- Construction shall be halted within the non-disturbance buffer (typically 250 feet for non-raptors and 500 feet for raptors) until the biologist has determined that the young have fledged and are flying well enough to avoid the proposed construction activities. Established buffer sizes depend on site-specific conditions, known tolerances species and individual bird behavior and shall be determined by the qualified biologist.
- Active nests near construction work areas shall be monitored. If a nesting bird appears to be stressed as a result of project activities and is at risk of abandoning its nest, the biologist shall halt activity in the immediate area until the bird resumes its normal behavior or until the nest has been determined to no longer be active.

MM BIO-5: To mitigate for potential impacts to protected bat species as a result of Master Plan Elements (New and Improved Gardens and Facilities; New Buildings, Structures, and Infrastructure; Lake Improvements):

- Focused surveys shall be conducted for hoary bat (*Lasiurus cinereus*) and silver-haired bat (*Lasionycteris noctivagans*) by a qualified biologist, including nighttime surveys, at least seven consecutive days prior to the start of project activities near suitable roosting habitat.
- If it is determined during the pre-activity surveys that the area (including oak woodland and riparian habitat) could be used as roost sites by bat species, to avoid the direct loss of bats that could result from disturbance to trees or structures that may provide maternity roost habitat (e.g., in cavities or under loose bark) or structures that contain a hibernating bat colony, the following steps shall be taken:
    - To the extent feasible, demolition or disturbance to suitable bat roosting habitat shall be scheduled between October 1 and February 28, outside of the maternity roosting season.
    - If suitable bat roosting habitat must be encroached during the maternity season (March 1 to September 30), a qualified bat specialist shall conduct a pre-construction survey to identify the habitat proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.
    - Any suitable bat roosting habitat identified as potentially supporting an active maternity roost and each structure potentially supporting a hibernating colony shall be closely inspected by the bat specialist no greater than seven days prior to the habitat's disturbance to more precisely determine the presence or absence of roosting bats.

nests does not occur and the activities do not otherwise result in take of migratory birds covered by the MBTA (see U.S. Fish and Wildlife Service. June 14, 2018. Memorandum: Destruction and Relocation of Migratory Nest Contents. Accessed January 15, 2020. https://www.fws.gov/policy/m0407.pdf). CDFW has not provided clarification on the regulations pertaining to nesting birds. Therefore, for purposes of this measure, non-raptor, non-special-status species nests without eggs or chicks are considered inactive. For raptors, a nest is considered active when raptors exhibit nest construction or nest decorating behavior. The project biologist will determine when a nest is active based upon field observations at each nest.

- If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, it is preferable to bring down trees, buildings, or structures in a controlled manner using heavy machinery.
- In order to ensure the optimum warning for any roosting bats that may still be present, trees, buildings, or structures shall be nudged lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. Trees, buildings, or structures may then be pushed to the ground slowly under the supervision of a bat specialist.
- Felled trees shall remain in place until they are inspected by a bat specialist. Trees that are known to be bat roosts shall not be sown up or mulched immediately. A period of at least 48 hours shall elapse prior to such operations to allow bats to escape.
- Bats shall be allowed to escape prior to demolition of structures or buildings. This may be accomplished by placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.
- Maternity season lasts from March 1 to September 30. Trees, buildings, or structures determined to be maternity roosts shall be left in place until the end of the maternity season. A suitable bat roosting habitat containing a hibernating colony shall be left in place until a qualified biologist determines that the bats are no longer hibernating.

MM BIO-6: To mitigate potential impacts on oak and other native woodlands, and ensure compliance with Public Resources Code 21083.4:

- Environmentally Sensitive Area fencing shall be placed around the driplines or trunks of protected oak trees within and adjacent to the limits of disturbance, depending on the scheduled construction activity, such that no work shall occur within the protected area.
- Use of on-site monitors shall be required for periods when construction shall be undertaken within 250 feet of oak woodlands, and native woodlands, and when construction is within 100 feet of the dripline of individual isolated protected native trees.
- To ensure no loss of oak trees within and adjacent to the limits of disturbance after completion of construction activities, trees shall be monitored, for up to 5 years, for mortality and replanted at the appropriate ratios below to compensate as needed.
- Per the County Oak Tree Ordinance, for every protected tree that must be removed, the same species shall be replaced at a minimum of a 2:1 ratio.
    - Compensatory mitigation for protected trees in the jurisdiction of the County may include replacement at a 3:1 ratio for trees with a diameter at breast height of 8 inches or more at an appropriate mitigation site, and replacement at a 10:1 ratio for heritage oaks.

- Replacement trees shall be monitored by a licensed arborist, for at least one year, to ensure survivability of replacement trees meet success criteria.

Conclusion

The biological resources impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.5 CULTURAL RESOURCES

3.5.1 MASTER PLAN IS/MND

The Master Plan IS/MND stated that Descanso Gardens was currently being reevaluated for California Register of Historical Resources (CRHR) status and evaluated for National Register of Historic Places (NRHP) status as an historic district. The Boddy House and Garage were deemed eligible for listing in the NRHP and the CRHR in 2009. Improvements and additions of circulatory routes, new buildings, structures, and infrastructures, and improved gardens would potentially impact the then-known and -eligible historic resources. Therefore, During implementation of improvements involving or adjacent to known historic resources, the Project would be required to incorporate MM CULTURAL-1 and CULTURAL-2, which describe actions to reduce impacts to both known and unknown archaeological and historical resources. For historic built-environment resources, MMs CULTURAL-1 and CULTURAL-2 would require pre-construction site review, construction worker awareness education, and resource avoidance. For the unanticipated encounter of historic-period resources, for projects involving ground-disturbing activities in soils that have been largely in situ for the past 50 years,, MMs CULTURAL-1 and CULTURAL-2 require pre-construction records review and/or survey, and either avoidance and monitoring or Phase II evaluation of the resource and possible Phase III data recovery/salvage. Implementation of MMs CULTURAL-1 and CULTURAL-2 would reduce impacts to known and unknown historic resources to less than significant.

It is noted that on April 23, 2021, after adoption of the Master Plan IS/MND, the Descanso Gardens Historic District was recognized and listed in the NRHP. Pursuant to the NRHP listing, there are 17 resources that contribute to the Descanso Gardens Historic District, including 7 buildings, 9 sites, and 1 structure: the Boddy House, Garage, and associated landscaping (the Boddy Complex), Boddy Lodge, Caretaker's Cottage, Boddy Drive Landscape, Descanso Creek Landscape, Camellia Forest, Japanese Garden, Tea House, Minka House, Japanese Garden Bridge, Lakeside Lookout, California Native Garden, Rose Garden, Undeveloped Cultural Landscape, and Heritage Oak Trees (five 300-500 year old trees). Implementation of all Master Plan projects would be required to implement applicable

requirements of MMs CULTURAL-1 and CULTURAL-2 when involving or adjacent to all identified contributing resources to the Descanso Garden Historic District.

Archival research did not identify any previously recorded archaeological resources within Descanso Gardens. Two newly recorded historic-period archaeological sites (DG Site 1 and DG Site 2) were recorded during the Phase I cultural resources survey for the Project; these sites are not contributing elements to the Descanso Gardens Historic District. The IS/MND states that projects requiring excavation within 60 feet of DG Site 1 and DG Site 2 would require monitoring by a qualified archaeologist consistent with MM CULTURAL-1 and would reduce impacts to known archaeological resources to less than significant.

The IS/MND states the Wilds Loop, Nature Discovery Gardens, Nursery, and New Service Yard would be constructed in the western and northwestern edges of the Master Plan Area, which is largely undeveloped and ground-disturbing activity has not occurred. Construction of the Wilds Loop, Nature Discovery Garden, Nursery, New Service Yard, and projects requiring ground-disturbing activities in soils that have been predominantly in situ during the past 50 years, would be required to incorporate MMs CULTURAL-1 and CULTURAL-2, which require the evaluation, avoidance or recovery, documentation, and curation of unanticipated archaeological resources. MMs CULTURAL-1 and CULTURAL-2 would reduce impacts to archaeological resources to below the level of significance. Additionally, the results of the Sacred Lands File (SLF) record search conducted through the NAHC were positive for the Pasadena USGS quadrangle map in its entirety. The IS/MND states that ground-disturbing work associated with this previously underdeveloped area recommends coordination with the Native American contacts identified by the NAHC. The Natural History Museum (NHM) does not have on file any vertebrate fossil localities that lie directly within the Master Plan Area boundaries, but there are localities nearby from sedimentary deposits similar to those that may occur at depth in the Master Plan Area. Specifically, the IS/MND states the less elevated northeastern portion of the Master Plan Area has surficial deposits that consist of older Quaternary alluvial fan deposits. The NHM identified vertebrate fossil localities in the area from these older Quarternary deposits, with the closest locality having produced fossil specimens at a depth of 14 feet below the surface. As such, construction requiring grading in native (undisturbed) soils greater than five feet deep and located on geologic units having high to moderate potential to yield paleontological resources would be required to incorporate MM CULTURAL-3. MM CULTURAL-3 requires consultation with a qualified paleontologist to determine if additional paleontological studies and/or monitoring are necessary. MM CULTURAL-3 would reduce impacts to paleontological resources to below the level of significance.

Although no resources have been identified as a result of prior investigations; the potential exists to encounter human remains when conducting excavations in native soils, and MM CULTURAL-4, which requires a human remains discovery protocol, would be incorporated. As such, impacts related to disturbing human remains would be less than significant with mitigation incorporated.

3.5.2 PROPOSED PROJECT IMPACT ANALYSIS

The Project site is located at the north-central and northern portion of Descanso Gardens within the Auxiliary and Main Parking Lots, respectively. The outer limit of proposed construction activity on the site, including access and staging, is not within the footprint of any of the 17 historic resources contributing to the Descanso Gardens Historic District. The nearest contributing resource to the Project site, situated immediately west of the Auxiliary Lot, is the northernmost portion of the Undeveloped Cultural Landscape. This is a large C-shaped overlay that encompasses the approximately 83 acres of mostly undeveloped, naturally vegetated hillsides throughout the western and southern margins of the Gardens (referenced on Figures 1.8.2-1 and 1.8.2-4 of the Final IS/MND). The eastern edge of the Undeveloped Cultural Landscape near the site abuts the approximately 10-foot-wide, unnamed, paved trail near the western edge of the Auxiliary Lot. The trail and an approximately 30-foot-wide row of trees lie between this historic resource and the paved portion of the Auxiliary Lot. Construction of the Project would involve grading into, but not beyond, the unpaved tree line. Specifically, the grading footprint along the western side of the Auxiliary Lot would extend up to approximately 10 feet from the trail, at the closest. As such, construction of the Project in the Auxiliary Lot would be 20 feet or more from the Undeveloped Cultural Landscape. Therefore, the Project would not directly impact a known historic resource.

As discussed below, MM CULTURAL-1 is applicable to the Project due to potential for impacts to unknown archaeological resources. As part of MM CULTURAL-1, known cultural resources – such as the limits of the Undeveloped Cultural Landscape – are required to be marked off-limits prior to initiation of construction in the Auxiliary Lot. This can be effectively accomplished with fencing and/or flagging. Additionally, per MM CULTURAL-1, all ground-disturbing activities within 60 feet of the Undeveloped Cultural Landscape would be monitored by a qualified archaeologist. These actions would ensure implementation of the Project would not inadvertently impact the nearby contributing resource to the Descanso Gardens Historic District. As such, impacts related to identified historic resources areas would be less than significant with mitigation incorporated . Therefore, the Project would not create a new significant impact pertaining to historic resources that were not previously analyzed, and no mitigation measures are required.

The Project site does not fall within 60 feet of archaeological sites DG Site 1 and DG Site 2, recorded during preparation of the Master Plan IS/MND. The Project site does not fall within the primarily undeveloped Wilds Loop, Nature Discovery Gardens, Nursery, and New Service Yard areas the IS/MND identified as having potential to impact unknown archaeological resources. However, the Project would require excavation in the Auxiliary Lot to depths of 25 feet within an approximate 21,500-sf area for the cistern, and as such would be expected to encounter soils that have been predominantly in situ during the past 50 years (i.e., since about 1975). The Master Plan envisioned the Backstage and North Yard project in the Auxiliary Lot, which would likely involve shallow grading activity in previously disturbed soils and not represent a potential to encounter unknown archaeological resources. Therefore, the Project would have the potential to impact unknown archaeological resources and would be required to incorporate MMs CULTURAL-1 and CULTURAL-2. As such, impacts related to archaeological resources would be less than significant with mitigation

incorporated Therefore, the Project would not create a new significant impact pertaining to archaeological resources that was not previously analyzed, and no mitigation measures are required.

Similarly, the Project site does not fall within the Nature Discovery Gardens, Nursery, and New Service Yard areas that the IS/MND identified as having potential to impact paleontological resources. However, the Project would require excavation in the Auxiliary Lot immediately to the northeast of these areas. As, as noted above, the IS/MND identifies the less elevated northeastern portion of the Master Plan Area, which includes the Auxiliary Lot, as underlain with older Quaternary deposits that have yielded vertebrate fossils in the area. As discussed above, Project implementation would require excavation to depths of 25 feet, and as such would encounter undisturbed native soils located five feet or more below ground surface that would have the potential to contact paleontologically-sensitive geologic units. The Master Plan envisioned the Backstage and North Yard project in the Auxiliary Lot, which would be expected to involve shallow grading activity in previously disturbed soils. Therefore, the Project would have the potential to impact unknown paleontological resources and would be required to incorporate MM CULTURAL-3. As such, impacts related to paleontological resources would be less than significant with mitigation incorporated. Therefore, the Project would not create a new significant impact pertaining to paleontological resources that was not previously analyzed, and no mitigation measures are required.

Consistent with the Master Plan IS/MND, although no resources have been identified as a result of prior investigations; the potential exists to encounter human remains when conducting excavations in native soils, and MM CULTURAL-4, which requires a human remains discovery protocol, would be incorporated. As such, impacts related to disturbing human remains would be less than significant with mitigation incorporated. Therefore, the Project would not create a new significant impact pertaining to human remains that were not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The following mitigation measures pertaining to cultural resources from the Master Plan IS/MND would be applicable to implementation of the Project:

MM CULTURAL-1: *Archaeological and Historical Resources – Avoidance and Monitoring.* To mitigate potential impacts on archaeological and historical resources, a Worker Education and Awareness Program (WEAP) shall be used to educate all onsite construction workers regarding the need to protect known historical and archaeological resources within proximity of the construction, operation and maintenance of the Master Plan elements, and protect archaeological resources in the unanticipated event of their discovery.

Completion of a WEAP for all personnel who will be engaged in ground-disturbing activities shall be required prior to the start of ground-disturbing activities. This shall include training that provides an overview of cultural resources that might potentially be found and the appropriate procedures to follow if cultural resources are identified. This requirement extends to any new staff prior to engaging in ground-disturbing activities. This mitigation

measure applies to Master Plan Elements including Gardens Loop, Woodland Walk, Native Walk, Service Route, Rose Gardens Improvements, Camelia Strolling Gardens, Japanese Gardens Improvements, California Garden Expansion, Lake Perimeter Walk, Boddy House Improvements, Boddy Lodge Improvements, Descanso Creek Features, and Japanese Minka House Improvements.

Prior to the initiation of ground-disturbing activities, the County of Los Angeles Department of Parks and Recreation (DPR) shall review the construction plans to ensure that any known cultural resources that are required to be avoided have been marked as "off-limits" areas for construction and construction staging. In addition, DPR shall require monitoring of all ground-disturbing activities by a qualified archaeologist within 60 feet of a known extant unique archaeological resource or significant historical resource.

In the event that previously unknown unique archaeological resources or significant historical resources are encountered during construction, the resources shall either be left in situ and avoided, or the resources shall be salvaged, recorded, and reposited at Descanso Gardens or at the Natural History Museum of Los Angeles County (NHM) or other repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan.[11] Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate adverse effects to cultural resources eligible or listed under Section 106 Criterion D/CRHR Criterion 4, as it preserves important information that will otherwise be lost.

MM CULTURAL-2: *Pre-Construction Surveys, Avoidance, and Salvage and Recovery of Unique Archaeological Resources.* To facilitate avoidance of known archaeological resources and the salvage and recovery of archaeological resources in the unanticipated event of their discovery, in accordance with the County DPR Cultural Resources Management Plan, at the time that any construction activity is proposed that would require ground-disturbing activities in soils that have been predominantly in situ during the past 50 years, records and archival information shall be reviewed to determine if there are any recorded unique archaeological resources and significant historical resources as defined in Section 15064.5(a) of the CEQA Guidelines. At a minimum, the records and archival review shall include a search of the South Central Coastal Information Center if more than five years have passed since the previous records search. The appropriate course of action shall be undertaken in light of the results of the records search:

(A) Where the project study area has been subject to a Phase I Walkover Survey within two years of the proposed activity and no unique archaeological resources or significant historical resources are known within the project footprint, work shall proceed per the provision of Mitigation Measure CULTURAL-1.

(B) Where all or a portion of the project footprint has not been surveyed for cultural resources within two years of a proposed ground-disturbing activity, a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology and shall conduct a Phase I Walkover Survey to ascertain

[11] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

the presence or absence of unique archaeological and/or significant historical resources, as defined in Section 15064.5(a) of the CEQA Guidelines.

a. If the survey and record searches determine no unique archaeological resources or significant historical resources, including potential Tribal cultural resources, then the work shall proceed consistent with the provisions of Mitigation Measure CULTURAL-1.

b. If the survey determines potential unique archaeological resources or significant historical resources, then one of two courses of action shall be employed:

    i. Where avoidance is feasible, construction should avoid the potentially significant cultural resource, and the work shall then proceed consistent with the provisions of Mitigation Measure CULTURAL-1. The project area shall be surveyed by a qualified archaeologist who meets the Professional Qualification Standards of the Secretary of the Interior. An archaeological monitor under direction of a qualified archaeologist who meets the Professional Qualification Standards of the Secretary of the Interior shall be present during ground-disturbing activities within 60 feet of previously recorded cultural resources.

    ii. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken, consistent with the provisions of the County DPR Cultural Resource Management Plan, by a qualified archaeologist who meets the Professional Qualification Standards of the Secretary of the Interior to determine the significance of the cultural resource. If the Phase II investigation identifies a unique/eligible cultural resource within the area proposed for ground-disturbing work, the County shall determine whether to avoid the resource through redesign or to proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of Mitigation Measure CULTURAL-1.

MM CULTURAL-3: *Paleontological Resources – Paleontological Monitoring.* In the unanticipated event of the discovery of paleontological resources during ground-disturbing activities in previously undisturbed native soils located 5 or more feet below the ground surface, which would have the potential to contact geologic units with a high to moderate potential to yield unique paleontological resources, impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance by monitoring, salvage, and curation at the NHM.[12] Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, DPR shall require and be responsible for salvage and recovery of those

[12] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

resources by a qualified paleontologist consistent with standards for such recovery established by the Society of Vertebrate Paleontology.[13]

Paleontological Resources Sensitivity Training given by a qualified paleontologist or archaeologist cross-trained in paleontology shall be required for all project personnel involved in ground disturbing activities prior to the start of these activities in geologic units with a moderate to high potential to yield unique paleontological resources. This shall include a brief field training that provides an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified. This requirement extends to any new staff involved in earth disturbing that joins the project.

Construction monitoring by a qualified monitor (archaeologist cross-trained in paleontology or paleontologist) shall be implemented during all ground-disturbing activities that affect previously undisturbed geologic units 5 or more feet below the ground surface and have the potential to encounter geologic units with a moderate to high potential to yield unique paleontological resources. In the event that a paleontological resource is encountered during construction, all ground-disturbing activity within 100 feet of the find shall be halted until a qualified paleontologist can evaluate the significance of the discovery. Additional monitoring recommendations may be required. If the resource is found to be significant, the paleontologist shall determine the most appropriate treatment and method for stabilizing and collecting the specimen. Curation of any significant paleontological finds shall be housed at a qualified repository, such as the NHM.

Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to DPR with an appended, itemized inventory with representative snapshots of specimens. The report and inventory, when submitted to DPR, shall signify the completion of the program to mitigate impacts to paleontological resources. A copy of the report/inventory shall be filed with DPR and the NHM.

MM CULTURAL-4: *Regulatory Requirements – Human Remains.* To mitigate potential impacts on human remains encountered during construction activities, in accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the

[13] A Qualified Professional Paleontologist (Principal Investigator, Project Paleontologist) is a practicing scientist who is recognized in the paleontological community as a professional and can demonstrate familiarity and proficiency with paleontology in a stratigraphic context. A paleontological Principal Investigator shall have the equivalent of the following qualifications:

A. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.
B. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.
C. Proficiency in recognizing fossils in the field and determining their significance.
D. Expertise in local geology, stratigraphy, and biostratigraphy.
E. Experience collecting vertebrate fossils in the field.

discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

Conclusion

The cultural resources impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.6 ENERGY

3.6.1 MASTER PLAN IS/MND

As stated in the Master Plan IS/MND, the Master Plan would comply with all applicable energy standards and regulations, including CALGreen, the 2016 Building Energy Efficiency or the Los Angeles County Green Building Standards Code. The proposed Master Plan involves improvements and the provision of parking spaces, ADA access, a plant nursery, and educational opportunities, and additionally, includes proposed sustainability strategies such as replacing the irrigation system and capturing stormwater for reuse and gathering solar power. As the Master Plan IS/MND improvements would be in line with applicable codes and the SCAG SCS policies and goals, no impact would result related to inefficient consumption of energy resources.

Additionally, the Master Plan aims to decrease overall per capita energy consumption by increasing reliance on renewable energy sources, emphasizing avoidance and reduction of the inefficient, wasteful, and unnecessary consumption of energy, and installation of permanent power hookups to support existing and future programming without temporary generators, as well as on-site energy production to expand Descanso Gardens' use of renewable energy sources. As such, the Project would not conflict or obstruct any State or local plan for renewal energy or energy efficiency, and impacts would be less than significant.

3.6.2 PROPOSED PROJECT IMPACT ANALYSIS

Consistent with the Master Plan IS/MND, all Project improvements including the stormwater diversion, pretreatment, subsurface cistern, parking lot runoff BMPs, and additional parking capacity, would be required to comply with the applicable energy standards and regulations and would be consistent with the SCAG SCS. As the Project improvements including the minor modifications from the Master Plan. would be in line with applicable codes and the SCAG SCS policies and goals, no impact would result related to inefficient consumption of energy resources. Therefore, the Project would not create a new significant impact

pertaining to energy consumption that was not previously analyzed, and no mitigation measures are required.

The proposed Project would provide stormwater treatment and management to reduce dependence on municipal water for landscape irrigation by diverting stormwater flows from the proximate Winery Canyon Channel to for treatment and then storage in a proposed underground cistern prior to distribution for reuse in the landscape irrigation system and water features, including the Lake. As such, consistent with the Master Plan IS/MND, the Project would assist in the goal of decreasing energy consumption and reducing off-site dependency of water and energy. As such, the Project would not conflict or obstruct any State or local plan for renewal energy or energy efficiency, and impacts would be less than significant. Therefore, the Project would not create a new significant impact pertaining to obstruction of an applicable energy plan that were not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to energy.

Conclusion

The energy impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.7 GEOLOGY AND SOILS

3.7.1 MASTER PLAN IS/MND

As stated in the Master Plan IS/MND, Descanso Gardens is not in an Alquist-Priolo Earthquake Zone, and no known active faults are known to existing within the Master Plan Area as identified by the CGS Fault Rupture Hazard California Special Publication 42. As such, impacts related to rupture of a known earthquake fault would be less than significant.

In addition, although Descanso Gardens could be subjected to strong ground shaking in the event of a nearby or more distant regional earthquake as this hazard is common in Southern California, the effects of ground shaking would be limited by proper engineering design and construction in conformance with current building codes and engineering practices. As such impacts related to seismic ground shaking would be less than significant.

Descanso Gardens overlaps with a liquefaction zone as shown on the Earthquake Zones of Required Investigation, Pasadena Quadrangle map; however, prior to the issuance of building permits, a site-specific geotechnical study would be prepared by a licensed engineer

to outline structural design elements that would maintain structural integrity to the maximum extent during seismic ground shaking and the design and construction of the Master Plan would conform to CBC seismic standards, in addition to other applicable codes and standards. As determined in the Master Plan IS/MND, impacts related to liquefaction would be less than significant.

The Descanso Gardens facility improvements are not located within an "Earthquake-Induced Landslide Zone," as shown on the Earthquake Zones of Required Investigation, Pasadena Quadrangle map; however, a portion of the upper hillslope in the southern part of the Master Plan Area is classified within the zone. As such, final project design would be prepared for construction and operation of each Master Plan element, including the installation of the trail paths, to avoid potential impacts related to landslides and include applicable engineering practices and remedial recommendations. Therefore, impacts related to landslides would be less than significant.

During construction activities, as required under the State Water Resources Control Board Construction General Permit, the Master Plan would requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) and would require implementation of construction-related BMPs to control and minimize erosion and siltation and during operations, the Master Plan Area would be addressed for drainage and erosion in accordance with building code requirements and stormwater BMPs relative to potential on- and off-site effects. As such, the Master Plan Project would not result in substantial soil erosion.

The Master Plan would not result in lateral spreading, subsidence, or collapse as it does not include substantial excavation or subterranean structures, and thus, groundwater is not expected to be encountered during construction. Additionally, construction activities would comply with all applicable building codes and standards. Therefore, impacts related to geological failure, including lateral spreading, off-site landslides, liquefaction, or collapse, would be less than significant.

Soils within the Master Plan Area Soils within the Master Plan Area are predominantly sands and gravels that are not subject to shrink and swell because of changes in the moisture content. In addition, a final project design would be prepared for construction and operation of each Master Plan element., and all construction activities would comply with all applicable building codes and standards. In addition, Mitigation Measure GEO-1 would apply engineering practices to avoid potential impacts related to expansive soils if encountered during grading. Therefore, impacts related to expansive soils would be less than significant with incorporation of mitigation measures.

Descanso Gardens is supported by an existing septic system. Installation of the membrane bioreactor (MBR) wastewater treatment system, approved by the County in 2019, upgraded the wastewater system within the Master Plan Area relative to water protection and efficiency over the current on-site septic systems, and would not create significant impact related to on-site wastewater treatment systems.

The Master Plan Area would not conflict with the County's Hillside Management Area (HMA) Ordinance, and as determined by the Master Plan IS/MND, impacts would be less than significant.

3.7.2 PROPOSED PROJECT IMPACT ANALYSIS

Consistent with the analysis presented in the Master Plan IS/MND, as Descanso Gardens is not located in an Alquist-Priolo Earthquake Zone or active faults area, and the proposed Project site is located at the northern portion of Descanso Gardens within the Main and Auxiliary Parking Lots, no impact to earthquake fault zones would occur. The existing conditions on-site have not changed. Therefore, the Project would not create a new significant impact pertaining to earthquake fault zones that were not previously analyzed, and no mitigation measures are required.

In addition, although Descanso Gardens, including the Project site, could be subjected to strong ground shaking in the event of a nearby or more distant regional earthquake as this hazard is common in Southern California, the effects of ground shaking would be limited by proper engineering design and construction in conformance with current building codes and engineering practices as implemented by the Project. As such impacts related to seismic ground shaking would be less than significant. Therefore, the Project would not create a new significant impact pertaining to seismic ground shaking that were not previously analyzed, and no mitigation measures are required.

Related to liquefaction and landslides, Descanso Gardens, including the Project site overlaps with a liquefaction zone, and is not located within an earthquake zone. The existing conditions on-site have not changed. The Project would be required to prepare a site-specific geotechnical study and conform to all applicable seismic standards. The Project elements would be required to include applicable engineering practices and remedial recommendations to ensure impacts related to liquefaction and landslides would not result in a significant impact. Therefore, the Project would not create a new significant impact pertaining to liquefaction and landslides that were not previously analyzed, and no mitigation measures are required.

Regarding soil erosion, the Project would incorporate stormwater improvements as part of the Project design. Specifically related to the minor modifications from the Master Plan IS/MND, the Project would divert stormwater flows from the proximate Winery Canyon Channel to a proposed subsurface cistern for temporary storage and treatment prior to reuse as the landscape irrigation system; incorporate porous concrete gutters which provide shallow stormwater infiltration; and provide catch basins and pretreatment filters. The Project has been designed to meet the 85th percentile, 24-hour design storm criteria. Additionally, the Project would comply with the Project-specific SWPPP and implement BMPs during construction consistent with the requirements outlined in the Master Plan IS/MND. As such, the Master Plan Project would not result in substantial soil erosion. Therefore, the Project would not create a new significant impact pertaining to soil erosion that were not previously analyzed, and no mitigation measures are required.

Consistent with the Master Plan IS/MND, the Project would not result in lateral spreading, subsidence, or collapse as it does not include substantial excavation or subterranean structures, and thus, groundwater is not expected to be encountered during construction. The existing conditions on-site have not changed. Additionally, construction activities would comply with all applicable building codes and standards. Therefore, impacts related to geological failure, including lateral spreading, off-site landslides, liquefaction, or collapse, would be less than significant. Therefore, the Project would not create a new significant impact pertaining to landslides, liquefaction, or collapse that were not previously analyzed, and no mitigation measures are required.

Related to soils on-site, based on the site-specific Geotechnical Report for the Project and summarized in the Draft BODR, both prepared by Geosyntec Consultants, subsurface soils in the Main Parking Lot consist of relatively poor-draining soils, either fine-grained soils or sands with a high fines content, in the upper 38 to 40 feet bgs. CPTs in the Main Lot indicate soils from 5 to 32 feet bgs consist of sands and silty sands. Subsurface borings conducted in the Auxiliary Lot indicate subsurface soils in the upper 15 feet bgs consist of poor draining soils, clayey sands and silty sands, with fines content between 25 and 50 percent. Below a depth of 15 feet bgs, the subsurface soils consist of better draining soils, including silty sands and poorly graded sand with silt. CPTs in the Auxiliary Lot to depths ranging from 11 to 51 feet bgs indicate soils consist of very dense sand, silty sands, sands, and occasional thin layers of sandy silt. Groundwater elevations are assumed to be below 51 feet bgs for the Auxiliary Parking Lot and deeper than 61.5 feet bgs for the Main Parking Lot (Geosyntec 2024). Therefore, the Project site would not be underlain by soils with potential to be expansive due to the granular nature of the underlying sediments. Regardless, all construction activities would be required to comply with applicable building codes and standards related to all relevant soil engineering constraints. As such, there would be no impacts related to expansive soils and incorporation of Master Plan MM GEO-1 is not applicable. Therefore, the Project would not create a new significant impact pertaining to expansive soils that were not previously analyzed.

The Project does not involve improvements or impacts to the existing septic system at Descanso Gardens. The Project would not create significant impact related to on-site wastewater treatment systems. Therefore, the Project would not create a new significant impact pertaining to on-site wastewater treatment systems that were not previously analyzed, and no mitigation measures are required.

Consistent with the Master Plan IS/MND, Descanso Gardens, including the Project site, would not conflict with the County's HMA Ordinance, and impacts would be less than significant. Therefore, the Project would not create a new significant impact pertaining to conflict with the County HMA Ordinance that was not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

MM GEO-1 pertaining to expansive soils from the Master Plan IS/MND would not be applicable to implementation of the Project.

Conclusion

The geology and soils impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.8 GREENHOUSE GAS EMISSIONS

3.8.1 MASTER PLAN IS/MND

As stated in the Master Plan IS/MND, the CalEEMod outputs for the Master Plan Area determined that construction (based on an 11-year construction schedule) and operations emissions would be below the SCAQMD thresholds. The amortized annual GHG emissions are 538 MTCO2e per year, which are below the SCAQMD threshold of 3,000 MTCO2e per year. Additionally, the Master Plan includes improvement of ecological functions of existing gardens and facilities as well as the development of new and improved gardens, while establishing recycling practices and educational efforts that would encourage sustainability practices and reduce energy usage and GHG. More energy- and water-efficient buildings would reduce annual GHG emissions per square foot and per capita, and impacts related to generation of GHG emissions would be less than significant.

Additionally, the Master Plan Area would comply with the SCAG's 2016-2040 RTP/SCS and the Los Angeles County Community Climate Action Plan 2020 (CCAP), as it would bring recreation closer to where people live, enhance ecological functions, and improve existing facilities thereby reducing VMT and GHG emissions. As such, the Master Plan would not conflict with any applicable GHG emissions plan, policy or regulation.

3.8.2 PROPOSED PROJECT IMPACT ANALYSIS

Regarding the potential to generate greenhouse gas emissions that may have a significant impact on the environment on a Project level, the proposed Project contains minor modifications beyond what was discussed programmatically in the Master Plan IS/MND, including a change in the Winery Canyon Channel diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan. However, the construction emissions associated with these Project features would minimally increase overall construction emissions.

Effects from construction activities occur over a relatively short period of time, in this case a total construction period of 11 months from beginning of mobilization through demobilization with a 3-month period of intensive excavation and construction activity during cistern installation. The Main Parking Lot would be a much smaller footprint and

shorter duration as a separate component; however, as discussed in Section 2.0, this analysis assumes the cistern installation and the surface drainage features may be construction concurrently. The Project would involve an estimated 33,000 cy of cut/excavation. Approximately 14,100 cy of excavated soil would be used as backfill and approximately 22,250 cy of excess soil would be exported for reuse/disposal, including about 11,500 cy during cistern installation.[14]

Even with these assumptions, construction-related GHG emissions contribute a relatively small portion of the overall lifetime GHG emissions for any project. The SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG reduction measures address construction-related GHG emissions as part of the operational GHG reduction strategies. Additionally, as discussed in Section 3.3, Air Quality, and 3.17, Transportation, while installation of the underground cistern, in lieu of a treatment wetland, is the main modification from the Master Plan and is not a feature discussed in the Master Plan, the resulting construction activity would be within the assumptions used to calculate GHG emissions. Additionally, related to long-term operational emissions, public access to and use of Descanso Gardens with Project implementation would be largely the same as in the existing condition. As such, the modifications to the Master Plan IS/MND at the Project site would not substantially affect GHG emissions generated from the Project because GHG emissions are analyzed in a cumulative, global context. Consistent with the Master Plan IS/MND, this would include adherence to all current and future federal, State, and local policies adopted for the purpose of reducing GHG emissions, and the Project's construction and operational GHG emissions are anticipated to fall well below the SCAQMD's significance threshold. As such, construction and operational impacts would be less than significant. Therefore, the Project would not create a new significant impact pertaining to GHGs that were not previously analyzed, and no mitigation measures are required.

With respect to conflict with applicable plans, policies or regulations adopted for the purposes of reducing GHG emissions for the Project the Project is consistent with the findings in the Master Plan IS/MND. The Project, including the minor modifications to the Master Plan, would be consistent with the sustainability goals with respect to water supply and conservation in SCAG's most recent RTP/SCS, Connect SoCal 2024, as well as the current County of Los Angeles 2045 Climate Action Plan (CAP) (LACDRP 2024). The Project would provide stormwater runoff reductions, potable water conservation, and water quality improvements. The captured stormwater would be distributed for reuse in the Gardens as non-potable water supply and reduce the demand for potable water. Water conservation relates to GHG emissions as water conveyance and treatment are energy-intensive, and therefore GHG emissions-generation, efforts. While the proposed stormwater capture facilities would also demand energy, it would be comparatively less per volume of reused stormwater than typical municipal potable water supply. As such, the Project would not conflict with any applicable GHG plan, policy or regulation. Therefore, the Project would not create a new significant impact pertaining to applicable GHG plans, policies or regulations that were not previously analyzed, and no mitigation measures are required.

[14] Volumes of excavation and backfill/export do not add due to swell/shrinkage of soil.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to GHG emissions.

Conclusion

The GHG emissions impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.9 HAZARDS AND HAZARDOUS MATERIALS

3.9.1 MASTER PLAN IS/MND

As stated in the Master Plan IS/MND, the Master Plan would not increase the transportation, production, storage, or use of any hazardous materials through its construction activities or ongoing operation and maintenance activities, and operations would not significantly differ from the existing condition with respect to the transportation, storage, production, use, or disposal of hazardous materials. Based on the Phase I Environmental Site Assessment (ESA) conducted in 2019, recognized environmental concerns (RECs) would not constrain the development of the Master Plan Area, and there were no active remediation sites within a 0.25-mile radius of the Master Plan Area. Therefore, the Master Plan would not create a significant hazard through the routine storage, use of disposal of hazardous materials.

Related to reasonably foreseeable upset and accident conditions, Lead Based Paints (LBPs) may occur in pre-1970s buildings in the Master Plan Area. However, the exposed soils that might be disturbed by construction activities would first be tested and then the potentially contaminated soils would be addressed using standard protocols that would not constrain the proposed development. Asbestos Containing Materials (ACMs) may also occur in pre-1970s buildings in the Master Plan Area, but similarly, would be inspected and follow proper protocols prior to demolition. Pesticides and herbicides were phased out of use beginning in 2014, but they may still be present in the soil, and as such, prior to the initiation of construction activities, and follow proper protocols if detected. As such, the Master Plan Area would not create a significant hazard through reasonably foreseeable upset and accident conditions.

Descanso Gardens is not within 0.25 miles of any schools and would result in no impacts related to emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses, such as a school. Additionally, the Master Plan Area would not be located on hazardous material sites compiled pursuant to Government Code §65962.5, and impacts would be less than significant. As expressed further in the Master Plan IS/MND, the Master Plan Area is not included in any emergency response plan or any emergency evacuation plan, and

construction activities, including staging, would be limited to the Master Plan Area. Therefore, there would be no impact related to interference with an emergency plan.

The entire City of LCF is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Master Plan Area would involve minor improvements to the landscaping between the transmission towers and Winery Canyon Channel, while maintaining SCE access within the picnic area next to Winery Canyon Channel, and therefore would not result in inadequate access. Related to fire flow standards, the Master Plan Area is served by existing hydrants and the Project is intended to reduce the property's dependence on potable water with on-site treatment, a relined Lake (which provides emergency water), and bioswales to capture stormwater from the parking lot, which would result in less than significant impacts. As the Master Plan Area would be designed and constructed in accordance with the most recent CFC and subject to annual inspection, the Master Plan IS/MND determined less than significant impacts related to proximity to land uses with fire hazards.

3.9.2 PROPOSED PROJECT IMPACT ANALYSIS

Consistent with the Master Plan IS/MND analysis, the Project, including minor modifications over the Master Plan IS/MND, would not significantly differ from the existing condition with respect to the transportation, storage, production, use, or disposal of hazardous materials. The Master Plan and the Project may include the routine transportation and storage of fuels, chlorine, fertilizers, and other hazardous materials for use throughout the Project site, and the proposed Project would comply with all applicable regulations regarding hazardous materials. These chemicals are not acutely hazardous and would not result in a substantial increase in hazards at the Project site. Therefore, the Project would not create a new significant impact pertaining to the transport, storage, use and disposal of hazardous wastes that were not previously analyzed, and no mitigation measures are required.

Related to the reasonably foreseeable upset or accident conditions, the proposed Project would not demolish any structures or buildings and would therefore not have any impacts pertaining to ACMs or LBPs. However, based on the results of the Phase I Environmental Site Assessment prepared for the Master Plan, the IS/MND concludes that disturbance of soil in the specified locations would necessitate additional soil investigation and possibly remediation, including the following areas of the Gardens relevant to the Project:

- Southeastern area of the Auxiliary Parking Lot near the Rose Garden–evaluation for volatile organic compounds (VOCs);
- In and around the Rose Garden–evaluation for pesticide residue; and
- Within a 30-foot radius of the Auxiliary Parking Lot, Main Parking Lot, maintenance areas of the staff carts, and existing paths that served as parking/travel areas for gas-powered vehicles prior to 1991–evaluation for aerially deposited lead (ADL).

Consistent with the Master Plan IS/MND, there were no REC locations in or near the Master Plan Area that would constrain development, and as existing conditions on-site have not changed, the Project would not create a new significant impact pertaining to the reasonably

foreseeable upset or accident of hazardous materials that were not previously analyzed, and no mitigation measures are required.

Related to the hazardous emissions within 0.25 mile of a sensitive land use, a, Descanso Gardens, including the Project site, is not within 0.25 mile of any schools, and would result in no impacts. The existing conditions on-site have not changed. Therefore, the Project would not create a new significant impact pertaining to emissions half mile from sensitive land uses that were not previously analyzed, and no mitigation measures are required.

Consistent with the Master Plan IS/MND, Descanso Gardens, including the Project site, would not be located on hazardous material sites compiled pursuant to Government Code § 65962.5 or the Cortese List, and impacts would be less than significant. The existing conditions on-site have not changed. Therefore, the Project would not create a new significant impact pertaining to the Cortese List that was not previously analyzed, and no mitigation measures are required.

Consistent with the Master Plan IS/MND, Descanso Gardens, including the Project site, is not included in any emergency response plan or any emergency evacuation plan, and construction activities, including staging, would be limited to Descanso Gardens boundaries. The existing conditions on-site have not changed. As stated above, the Project would maintain access at the existing ingress and egress along Descanso Drive and implement a Construction Management Plan with traffic control measures. No impact would occur. Therefore, there would be no impact, and the Project would not create a new significant impact related to interference with an emergency plan that was not previously analyzed, and no mitigation measures are required.

Related to fire hazards, the City and Descanso Gardens, including the Project site, is located within a VHFHSZ. The minor modifications beyond what was discussed programmatically in the Master IS/MND include including a change in the Winery Canyon Channel diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan. The proposed components in the Auxiliary Lot would help improve the existing water infrastructure on-site. These modified Project features would capture stormwater for reuse on-site, including for emergency water, and would decrease Descanso's dependence on City/County potable water. Additionally, the Project would not alter access to the SCE site next to Winery Canyon Channel and would not result in inadequate access. The Project, as well as the Master Plan overall, would be designed and constructed in accordance with the most recent CFC and impacts would be less than significant related to proximity to land uses with fire hazards. Therefore, there would be no impact, and the Project would not create a new significant impact related to fire hazards that were not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to hazards and hazardous materials.

Conclusion

The hazards and hazardous materials impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.10 HYDROLOGY AND WATER QUALITY

3.10.1 MASTER PLAN IS/MND

As stated in the Master Plan IS/MND, the Descanso Gardens would implement a SWPPP as required by the Construction General Permit (CGP) and BMPs during construction to address water quality and place staging areas away from water sources to minimize pollutant runoff. Project-specific BMPs would be utilized accordingly to address pollutants as the Arroyo Seco Reach 2 Watershed is on the Clean Water Act (CWA) Total Max Daily Load (TDML) 303d List for excessive algal growth, indicator bacteria, and trash, As stated in the Descanso Gardens Water Quality Technical Report, the Project BMPs would reduce the release of sediment to receiving waters or reduce it such that sediments are considered less than significant during operations, and therefore the Project would not violate any water quality standards or degrade groundwater quality.

The Water Quality Technical Report found that the Master Plan would not deplete groundwater supplies or interfere with recharge, as it would not increase water consumption, and it includes objectives to reduce water consumption and improve infiltration within pervious areas. Hydrologic management strategies to address hydromodification would be incorporated into the Master Plan, and there is no sustainable groundwater management plan in the Master Plan Area, which would result in less than significant impacts regarding decreasing groundwater supplies.

The Master Plan Area would limit on-site erosion through BMPs and different hydrologic management strategies to ensure the Project would not result in substantial erosion or siltation, would not result in flooding or would not create runoff that would exceed planned stormwater capacities.

Additionally, the Master Plan Area is not located within the County Capital Flood floodplain mapping area and increases in impervious cover changes would not affect flood hydrology significantly enough to change the extent of FEMA FIMS's Zone X shaded areas. The Master Plan IS/MND determined that the Project would not expose housing or structures to risk of loss or damage involving flooding.

The Master Plan would be consistent with the County's LID Ordinance and LID site design and treatment control BMPs would be incorporated into the Master Plan to mimic the predeveloped hydrologic regime, as feasible, and to capture and treat stormwater quality

design volume (SWQDV). Proposed LID treatment control BMPs include bioretention facilities to capture runoff, new buildings to drain rainwater harvesting tanks for storage and use, retrofitting and lining the Lake to capture and use stormwater for irrigation, a treatment wetland to treat onsite runoff and harvested water, and expansion of the downgradient re-circulation pool, and the MND determined the Master Plan would not conflict with the LA County LID Ordinance.

Overall, the Master Plan would result in no impacts to hydrology and water quality in relation to using on-site wastewater treatment systems in areas with known geological limitations or near surface water. The County authorized an on-site wastewater and septic improvement project, including a new generator for the MBR. As the proposed location of the MBR is sufficiently far from surface water and would comply with wastewater discharge effluent limitations which would not impair surface or groundwater quality. Therefore, the Master Plan Area would result in no impacts regarding onsite wastewater treatment systems.

The Project site would not place structures within flood zones and would result in less than significant impacts in regard to flood hazard, tsunami, or seiche zones risking the release of pollutants due to project inundation.

The City of LCF is within the Enhanced Watershed Management Program (EWMP) for the Upper Los Angeles River Watershed, and with the incorporation of LID BMPs to improve water quality on-site, the Project would not obstruct any sustainable groundwater management plan implementation.

3.10.2 PROPOSED PROJECT IMPACT ANALYSIS

Related to violation of water quality standards or degradation of groundwater quality, the Project itself is a SCWP that is designed to achieve a water quality benefit of 80 percent pollutant load reduction for trash and bacteria as the reuse of diverted and treated water would remove these pollutants from flowing into downstream water bodies. The Project includes multiple stormwater BMPs, such as a permeable concrete gutter to provide shallow stormwater infiltration at a depth of approximately five feet and catch basins with pretreatment filter inserts, which were considered under the approved Master Plan, and would assist in stormwater quality management. Additionally, the minor modifications beyond what was discussed programmatically in the Master IS/MND include a change in the Winery Canyon Channel diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan. These proposed components would improve water quality of stormwater runoff from the local watershed by diverting flows from Winery Canyon Channel and reducing surface runoff pollutants of concern. This would benefit the City by meeting the ULAR EWMP performance As such, the Project would not violate any water quality standards or degrade groundwater quality. Therefore, the Project would not create a new significant impact related to water quality that was not previously analyzed, and no mitigation measures are required.

Pertaining to groundwater recharge and consistent with the Master Plan IS/MND, the Project would not deplete groundwater supplies or interfere with recharge, as it would not increase

water consumption, and it includes objectives to improve infiltration within pervious areas. The Project would implement stormwater BMPS such as a permeable concrete gutter to provide shallow stormwater infiltration at a depth of approximately 5 feet, which was considered under the approved Master Plan. The minor modifications would assist in stormwater management and would not interfere with groundwater recharge. As such, impacts would be less than significant. Therefore, the Project would not create a new significant impact related to groundwater that was not previously analyzed, and no mitigation measures are required.

Related to altering the existing drainage pattern, the Project itself would create stormwater management benefits as part of the Master Plan to reduce dependence on municipal water for landscape irrigation by diverting stormwater flows from the proximate Winery Canyon Channel to a proposed subsurface cistern for temporary storage and treatment prior to reuse as the landscape irrigation system. Additional stormwater improvements include treating surface runoff from the Main and Auxiliary Parking Lots through the implementation of infiltration and retention BMPs. The Master Plan considered the Project BMPs, such as the permeable gutter feature to reduce runoff and provide shallow infiltration, and the minor modifications beyond the Master Plan IS/MND include a change in the Winery Canyon Channel diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan. The Project proposes multiple components to capture, treat, and reuse stormwater to reduce erosion, manage flooding and runoff capacity. The Project components aim to capture 100percent of the 85th percentile, 24-hour storm event runoff. As such, the Project would not alter the existing drainage pattern in a manner that would result in erosion, flooding, or inadequate runoff capacity, and impact would be less than significant. Therefore, the Project would not create a new significant impact related to the drainage pattern that was not previously analyzed, and no mitigation measures are required.

Related to impeding flood flows, Descanso Gardens, including the Project site, is not located within the County Capital Flood floodplain mapping area and increases in impervious cover changes would not affect flood hydrology significantly enough to change the extent of FEMA FIRMS's Zone X shaded areas. The Project would aim to reduce flood flows through inclusion of the Master Plan approved BMPs (permeable gutters and catch basins), and the minor additions including the underground cistern system. The Project was designed specifically to capture 100 percent of the 85th percentile, 24-hour storm event runoff. As such, impacts related to impeding or redirecting flood flows would be less than significant. Therefore, the Project would not create a new significant impact related to flood flows that were not previously analyzed, and no mitigation measures are required.

Related to the County LID Ordinance, the Project itself proposes BMPs and hydrologic management strategies including a diversion from Winery Canyon Channel, pretreatment features, creation of the underground cistern for stormwater storage, and piping to connect these systems. Although these features were not originally considered under the Master Plan IS/MND, the capture and reuse of stormwater for irrigation was discussed as a major Master Plan goal. Additional stormwater BMPs, such as the permeable gutters and catch basins at the Parking Lots, which were considered under the Master Plan IS/MND, would also comply

with the County LID Ordinance. As such, the Project would not conflict with the LA County LID Ordinance. Therefore, the Project would not create a new significant impact related to the LID Ordinance that was not previously analyzed, and no mitigation measures are required.

Related to on-site wastewater treatment systems, the Project does not include any improvements to the existing wastewater treatment system, and therefore no impact would occur. Therefore, the Project would not create a new significant impact related to on-site wastewater systems that were not previously analyzed, and no mitigation measures are required.

Consistent with the Master Plan IS/MND, Descanso Gardens, including the Project site, would not place structures within flood zones, is not located within a tsunami zone or area subject to seiche and existing conditions on-site have not changed. As such, the Project would result in less than significant impacts regarding flood hazard, tsunami, or seiche zones risking the release of pollutants due to project inundation. Therefore, the Project would not create a new significant impact related to flood hazard, tsunami, or seiche were not previously analyzed, and no mitigation measures are required.

Related to conflict or obstruction of a water quality control plan or sustainable groundwater plan, the City and Descanso Gardens, including the Project site, are located within the EWMP for the Upper Los Angeles River Watershed. The Project itself would provide stormwater BMPs, as included in the Master Plan IS/MND, to improve water quality on-site. The minor modifications beyond what was considered in the Master Plan would also improve water quality and provide stormwater management. As such, the Project would not obstruct any sustainable groundwater management plan implementation and would not create a new significant impact not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to hydrology and water quality.

Conclusion

The hydrology and water quality impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.11 LAND USE AND PLANNING

3.11.1 MASTER PLAN IS/MND

As stated in the Master Plan IS/MND, Descanso Gardens would not physically divide the established community in the City of LCF, as all proposed improvements would be within the limits of the existing Descanso Gardens property, and no impact would occur.

The Master Plan Area facilities and programs would be consistent with the Parks and Recreation Element of the County General Plan 2035 or the City of LCF's O-S land use designation and would comply with the zoning and open space objectives. As such, it would not conflict with any County land use plan, policy or regulation and impacts would be less than significant.

Finally, portions of the Master Plan Area are located within HMA and would incorporate sensitive hillside design measures of the HMA Ordinance and retain at least 50 percent of the property as undeveloped open space, the Master Plan would not conflict with the goals and policies the General Plan related to HMAs. The Master Plan Area is not located within an SEA, and as determined by the Master Plan IS/MND, and impacts related to conflict with the HMA or SEA would be less than significant.

3.11.2 PROPOSED PROJECT IMPACT ANALYSIS

Consistent with the Master Plan IS/MND, Descanso Gardens, including the Project site, would not physically divide the established community in the City, as all proposed improvements would be within the limits of the existing Descanso Gardens property, and no impact would occur. Therefore, the Project would not create a new significant impact related to dividing an established community that was not previously analyzed, and no mitigation measures are required.

The Master Plan Area including the Project and minor modifications would be consistent with the Parks and Recreation Element of the County General Plan 2035 or the City's O-S land use designation and would comply with the zoning and open space objectives. As such, it would not conflict with any County land use plan, policy or regulation and impacts would be less than significant. Therefore, the Project would not create a new significant impact related to County land use plan, policy or regulation that was not previously analyzed, and no mitigation measures are required.

Although portions of the Master Plan Area, including parts of the Project site, are located within HMA, the Project would incorporate sensitive hillside design measures of the HMA Ordinance and retain at least 50 percent of the Descanso Gardens property as undeveloped open space. As such, the proposed Project would not conflict with the goals and policies of the General Plan related to HMAs. Additionally, Descanso Gardens, including the Project site, is not located within an SEA, and impacts related to conflict with the HMA or SEA would be less than significant. Therefore, the Project would not create a new significant impact related

to an HMA or SEA that was not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to land use and planning.

Conclusion

The land use and planning impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.12 MINERAL RESOURCES

3.12.1 MASTER PLAN IS/MND

Regarding mineral resources, the Master Plan IS/MND determined that Descanso Gardens is not located within a Mineral Resource Zone (MRZ), and the City of LCF is not classified as land which contains significant mineral deposits, a high likelihood for their presence, or active mines. As such, the Master Plan Area would have no impact related to mineral resources.

3.12.2 PROPOSED PROJECT IMPACT ANALYSIS

Consistent with the Master Plan IS/MND analysis, Descanso Gardens, including the Project site, is not located within an MRZ, and the City of LCF is not classified as land which contains significant mineral deposits, a high likelihood for their presence, or active mines. As existing conditions on-site have not changed, such, no impact would occur related to mineral resources. Therefore, the Project would not create a new significant impact related to mineral resources that were not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to mineral resources.

Conclusion

The mineral resources impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new

significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.13 NOISE

3.13.1 MASTER PLAN IS/MND

The Master Plan IS/MND determined that construction noise activities would be subject to the noise standards established by the City of LCF and the County Municipal Code. Implementation of MM NOISE-1 to install a temporary sound barrier would reduce the sound level experienced at the property line and bring construction noise levels into compliance with the 75-dBA requirement for sound levels at the nearest sensitive receptors abutting the northeast edge of the Master Plan Area. Operations at the site would be consistent with the interior and exterior noise standards and would result in less than significant impacts to noise.

Construction of the Master Plan would not require blasting, drilling, or other activities that would result in excessive groundborne vibration, and construction equipment would be operated over 250 feet from the residential parcels surrounding the Master Plan Area. Operational sources of vibration would not increase these uses of the Master Plan Area over the existing condition, and impacts related to vibration would be less than significant.

The Master Plan Area is not within an airport land use plan and would result in no impacts to noise regarding exposing people residing or working in the project area to excessive noise levels.

3.13.2 PROPOSED PROJECT IMPACT ANALYSIS

Related to construction noise and consistent with the Master Plan IS/MND analysis, the Project would be required to comply with the noise standards established by the City of LCF and the County Municipal Code. Per the City Municipal Code, construction hours would be restricted to weekdays from 7:00 AM to 6:00 PM; to Saturdays from 9:00 am to 5:00 pm; and no work on Sundays. Although the proposed Project would add components not previously addressed in Master Plan IS/MND, these components would still fall within the Descanso Gardens boundary, and the original limits to the Project site remain unchanged from the Master Plan IS/MND. Therefore, the changes made to the Master Plan IS/MND would not shift construction activity closer to nearby sensitive receptors. Construction of the new and additional facilities, such as the subsurface cistern, diversion, and piping, under the proposed Project would require construction equipment similar to the equipment identified in the Master Plan IS/MND. No additional types of equipment would be required in constructing the Project components, nor would construction activity hours and length of construction differ from the construction schedule provided in the Master Plan IS/MND. Implementation of MM NOI-1, as provided in the Master Plan IS/MND, would be adequate in reducing noise

levels to the nearby residences and no additional construction impacts are anticipated. As such, construction noise impacts would be less than significant. Related to operational noise, operations at the site would be consistent with the current interior and exterior noise standards. The addition of stormwater management features would not significantly alter the operations at the site, and therefore, would result in less than significant impacts to noise. Therefore, the Project would not create a new significant impact related to construction and operational noise that was not previously analyzed with implementation of MM NOI-1.

Related to vibration and similar to the Master Plan IS/MND, construction of the Project would not require blasting, drilling, or other activities that would result in excessive groundborne vibration, and construction equipment would be operated over 250 feet from the residential parcels surrounding the Master Plan Area. Operational sources of vibration would not increase these uses of the Master Plan Area over the existing condition, and impacts related to vibration would be less than significant. Therefore, the Project would not create a new significant impact related to construction and operational vibration that was not previously analyzed and no mitigation is required.

Related to airport land use, Descanso Gardens, including the Project site, is not within an airport land use plan, and would result in no impacts to noise regarding exposing people residing or working in the project area to excessive noise levels. Therefore, the Project would not create a new significant impact related to airport land use that was not previously analyzed and no mitigation is required.

Applicable Mitigation Measures

The following mitigation measure pertaining to noise from the Master Plan IS/MND would be applicable to implementation of the Project:

MM NOISE-1: To mitigate potential impacts of construction of Master Plan Elements on ambient noise levels, construction equipment shall be staged at sufficient distance from sensitive receptors or noise attenuating Best Management Practices shall be utilized to reduce noise to an acceptable 75 dBA at the property boundary. To mitigate noise levels during construction activities at sensitive receptors located within 21 feet of construction, sound walls shall be installed at the construction barrier by the contractor during the construction phase for the demolition of the two buildings and construction projects on the east edge of the Master Plan Area along the property boundary facing the existing residents. Mufflers, blankets, and baffles shall also be implemented to ensure the reduction of noise levels. The noise barriers shall provide noise level reductions up to 20 dBA depending upon the placement and structure of the sound wall to bring construction noise levels below 75 dBA, which is the requirement for sound levels at the nearest sensitive receptors.

Conclusion

The noise impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances

under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.14 POPULATION AND HOUSING

3.14.1 MASTER PLAN IS/MND

The Program MND determined that the Mater Plan Area would not include the development of new homes, businesses, roads, or utilities to serve Descanso Gardens and would therefore not induce substantial unplanned population growth, directly or indirectly, in the City of LCF. There is sufficient labor supply within the County to support construction, operation, and maintenance of the facilities and programs contemplated by the Project and not expected to induce population growth or demand for housing, and impacts would be less than significant.

In addition, the Master Plan Area would not require vacating existing residences, as no people reside in Boddy House or other structures within Descanso Gardens and therefore result in no impacts to population and housing in relation to the displacement of substantial amounts of existing people or housing.

3.14.2 PROPOSED PROJECT IMPACT ANALYSIS

Related to population and growth and consistent with the Master Plan IS/MND, Descanso Gardens, including the Project site, would not include the development of new homes, businesses, or roads, to serve Descanso Gardens and would therefore not induce substantial unplanned population growth, directly or indirectly, in the City of LCF. The minor modifications beyond what was discussed programmatically in the Master Plan IS/MND, including a change in the Winery Canyon Channel diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan, would also not create unplanned population growth. Additionally, as consistent with the Master Plan IS/MND, there is sufficient labor supply within the County to support construction, operation, and maintenance of the facilities and programs contemplated by the Project and not expected to induce population growth or demand for housing, and impacts would be less than significant. Therefore, the Project would not create a new significant impact related to population growth that was not previously analyzed and no mitigation is required.

Related to displacing people or housing, Descanso Gardens, including the Project site, would not require vacating existing residences, as no people reside in any structures within Descanso Gardens and therefore result in no impacts to population and housing in relation to the displacement of substantial amounts of existing people or housing. Therefore, the Project would not create a new significant impact related to displacing people or housing that was not previously analyzed and no mitigation is required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to population and housing.

Conclusion

The population and housing impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.15 PUBLIC SERVICES

3.15.1 MASTER PLAN IS/MND

The Master Plan IS/MND determined that Descanso Gardens would involve the expansion of structures, trails, and programming that would require additional fire protection services but not result in the requirement for additional or expanded fire protection facilities as the Project would not directly induce population growth. The three nearest County Fire and Rescue stations that would respond to the Master Plan Area during wildfires, in order of shortest distances, are Station 19 (0.6 miles/2 minutes), Station 82 (2.7 miles, 7 minutes), and Station 63 (2.7 miles, 8 minutes. As such, impacts related to fire protection services would be less than significant.

Similarly, there would be no increase of population; therefore, there would be no need for additional sheriff personnel, or new or expanded sheriff stations, and impacts related to police protection services would be less than significant.

The Master Plan Area would not be expected to induce population growth and would not be expected to affect the population of school age children in the City of LCF; as such, the Master Plan IS/MND determined impacts related to schools would be less than significant.

The Master Plan Area would not be expected to induce population growth and would not increase the level of demand on existing parks or recreation facilities in the City of LCF, in addition to guiding the development of an existing special use facility to preserve and enhance the facility's current use as a botanical garden over the next 15 years. Therefore, impacts related to schools would be less than significant.

The Master Plan Area would not induce population growth and would not increase the level of demand on existing libraries or other public facilities like the post office in the City of LCF, and impacts would be less than significant.

3.15.2 PROPOSED PROJECT IMPACT ANALYSIS

Related to fire protection services and consistent with the Master Plan IS/MND, the Project site would involve expansion of stormwater facilities and BMPs on-site. Additionally, the minor modifications not addressed programmatically in the Master Plan IS/MND would not significantly alter the number of Descanso Gardens visitors, and operations would remain largely the same as under existing conditions. The Project itself is intended to reduce the property's dependence on potable water with on-site treatment and would provide emergency water. Additionally, the Project would not result in the requirement for additional or expanded fire protection facilities as the Project would not directly induce population growth. As such, impacts related to fire protection services would be less than significant. Therefore, the Project would not create a new significant impact related to fire protection services that was not previously analyzed and no mitigation is required.

Related to sheriff protection, schools, recreation or other public facilities and consistent with the Master Plan IS/MND, the Project would not be expected to induce population growth and would not require additional sheriff, school, recreation or public services. Additionally, the Project itself is a recreational facility, and the stormwater management Project components would not substantially increase recreational use on-site. As such, impacts would be less than significant. Therefore, the Project would not create a new significant impact related to sheriff protection, schools, recreation and other public services that was not previously analyzed and no mitigation is required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to public services.

Conclusion

The public services impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.16 RECREATION

3.16.1 MASTER PLAN IS/MND

The Master Plan IS/MND determined that Descanso Gardens would entail improvements to an existing recreational facility and would not be expected to result in a significant increase in the number of people, residents, or visitors to existing park facilities. In addition, the Master Plan would provide improved recreational access to existing and new gardens and sustain operations at Descanso Gardens and would not require the construction or

expansion of recreational facilities because it would not directly result in population growth. As such, the Project would result in less than significant impacts to recreation.

As the Project would be limited to the Master Plan Area and not involve expansion into any protected public access open space, no impacts related to regional open space connectivity would occur.

3.16.2 PROPOSED PROJECT IMPACT ANALYSIS

Related to recreational facilities and consistent with the Master Plan IS/MND, Descanso Gardens, including the Project site, would involve improvements to an existing recreational facility and would not be expected to result in a significant increase in the number of people, residents, or visitors to existing park facilities. The Project itself aims to improve stormwater infrastructure within Descanso Gardens and would not require the construction or expansion of recreational facilities because it would not directly result in increased population growth. Therefore, impacts to recreational facilities would be less than significant and the Project would not create a new significant impact related to recreation that was not previously analyzed. No mitigation is required.

Additionally, Descanso Gardens, including the Project, would not involve expansion into any protected public access open space, and no impacts related to regional open space connectivity would occur. Therefore, the Project would not create a new significant impact related to open space connectivity that was not previously analyzed and no mitigation is required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to recreation.

Conclusion

The recreation impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.17 TRANSPORTATION

3.17.1 MASTER PLAN IS/MND

The Master Plan IS/MND determined that operation of Descanso Gardens with Master Plan buildout would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation systems, as it would comply with the Mobility Element of the County General Plan 2035 and other related plans.

Existing visitor vehicular access to Descanso Gardens is currently provided via one entry driveway in the northwestern corner of the Main Parking Lot. Two exit driveways are available: the main exit is in the northeastern corner of the Main Parking Lot and a secondary exit is available in the northwestern corner of the Auxiliary Parking Lot (mainly used for special events and as a service road). The Master Plan would provide additional parking spaces and a drop-off location to facilitate and further prevent traffic congestion, and approximately 85 percent of the existing path network at Descanso Gardens would remain as-is or be resurfaced for ADA accessibilities. During operations, the Master Plan is not anticipated to add additional traffic by motorized and nonmotorized transport to existing circulation system, given that the Master Plan involves improvements and upgrades at the same site.

During project construction phases, use of construction equipment is anticipated to add trips for full-time construction workers, but the additional trips would be temporary and not result in degradation of existing capacity of the roads. Additionally, the Transportation Assessment included an evaluation of construction trip generation. The CalEEMod (air quality model) data was used to derive daily traffic figures for each construction phase and each development phase of the Master Plan and forecast total daily trips and weekday AM and PM peak hour trips. Phase 2B was determined to be the Master Plan's most intensive development phase in terms of construction traffic generation, and this phase was used to analyze potential impacts to the adjacent street system. Based on the City's significance criteria, for both the existing plus construction traffic scenario and future plus construction traffic scenario, the Traffic Assessment determined that none of the ten study intersections in the City of LCF would be significantly impacted during any of the analyzed time periods by the peak construction trip generation (i.e., Phase 2B) (LLG 2020). As such, less than significant impacts would occur related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation systems.

The Master Plan is not anticipated to add more than 150 trips to a freeway segment during peak hours or 50 trips to Congestion Management Plan (CMP) intersections, as no increase in peak day attendance is planned, and impacts related to a CMP would be less than significant.

Descanso Gardens Master Plan does not include any changes to roads outside of the Master Plan Area. There are currently two main driveways that provide access to the Master Plan Area to/from Descanso Drive, and there would be no compatibility issues with proposed updates to the existing botanic gardens and two parking lots that would require traffic engineering design features or incompatible uses. Descanso Gardens would not change the land use at or surrounding the Master Plan Area; therefore, no hazards related to land use would occur. A traffic control plan would be prepared prior to construction as required. Therefore, the Master Plan IS/MND determined that the Master Plan would not substantially increase hazards due to a design feature or incompatible use.

The Master Plan Area would provide improved nonmotorized, public, bicycle, and pedestrian facilities by improving pedestrian accessibility, and there would be no change to capacity and service related to the public transit routes and capacity because of the Project. An enhancement to the existing auxiliary parking lot driveway is proposed that would better

serve existing bus access and result in improved circulation. A traffic control plan (CSTMP) would be prepared prior to construction as required, and construction would not impede any emergency response vehicles. As such, the Master Plan IS/MND would result in no impacts related to inadequate emergency access.

3.17.2 PROPOSED PROJECT IMPACT ANALYSIS

Project construction activities, including staging and parking, would be planned to minimize circulation and access limitations for Descanso Gardens visitors and staff as much as feasible. Visitor access to the main entrance would be maintained throughout the construction period, and construction would not interfere with emergency access for first responders. All equipment and material staging and parking would be on currently paved and disturbed surfaces within the Gardens. Private construction worker vehicles/pickup trucks, delivery vehicles, and haul trucks would access the Project site via Descanso Drive at the three vehicular ingress/egress points. Construction vehicles would also use the paved bridge over the Channel, except where limited by vehicle weight and/or size.

To determine whether construction of the Project may result in a new or substantially more severe impact to transportation, the Project's estimated range of peak daily truck trips (discussed above) is compared with the Master Plan's estimated peak daily truck trips (only) from Phase 2B, for an applies-to-apples comparison. The Transportation Assessment calculated that peak construction activities are forecast to generate 184 daily truck PCE vehicle trips and 236 daily worker trips. A PCE factor of 2.0 was applied; therefore, the peak construction would generate an estimated 62 daily truck trips plus 236 worker trips, or 298 vehicle trips per day (LLG 2020). As noted above, based on the City's significance criteria, for both the existing plus construction traffic scenario and future plus construction traffic scenario, the Traffic Assessment determined that none of the ten study intersections in the City of LCF would be significantly impacted during any of the analyzed time periods by the peak construction trip generation (i.e., Phase 2B) (LLG 2020).

During the most intensive construction activity, the cistern installation, the estimated daily export volume would range between 500 cy and 750 cy. Because of the Auxiliary Lot's proximity to Descanso Drive, the use of end dump trailers with a capacity of about 21 to 30 tons (or 16 to 22 cy of soil) trucks would be feasible for most of the Project's excess soil removal. Super 10 dump trucks have an 8 to 10 cy capacity and would also be used for some portion of soil export. It is expected that a mixture of smaller and larger payload haul trucks will be used. Assuming use of only Super 10 trucks, this would generate approximately 55 to 83 one-way haul truck trips per day. For comparison, use of end dump trailers carrying an average of 20 cy would generate approximately 25 to 38 one-way haul truck trips per day. Additionally, there would be an as-yet unknown quantity of worker trips and periodic materials delivery. Daily construction activity for all other Project components would be minimal in comparison. Based on an average daily export of 625 cy, the Project would generate from about 32 to 69 truck trips a day depending on the mix of haul truck types. This is similar in magnitude to Phase 2B's peak daily truck trips (62). Additionally, the Project would not involve 236 daily worker trips, as the geographic work areas in the Main and Auxiliary Lots are substantively smaller than the collective space and extent of improvements in the Phase 2B elements. As such, the Project's estimated, worst-case daily

construction traffic generation would be consistent with the peak daily trips estimated for Master Plan implementation.

As stated in the Master Plan IS/MND, preparation of a CSTMP would be required to ensure that impacts on State facilities and local roadways are minimized and remain less than significant. When finalized, the CSTMP would be submitted to the City of LCF by the County and Descanso Gardens for review and approval. Additionally, a Haul Route Permit approval from LCF would also be required for Project implementation. Large-sized trucks would utilize State highways during off-peak commute periods to the maximum extent feasible and comply with regulations pertaining to the use of oversized-transport vehicles on State highways. Accordingly, consistent with the IS/MND, there would be less than significant impacts to local intersections. The Project would not create a new significant impact related to conflict with an applicable plan, ordinance or policy related to the circulation system that was not previously analyzed and no mitigation is required.

Consistent with the Master Plan IS/MND, the Project would not obstruct the implementation of any of circulation related applicable plan, ordinance, or policies, as the Project is not anticipated to directly increase use of Descanso Gardens, as it is an existing high-use facility. The proposed Project would provide improved stormwater management features and physical facilities to the existing users of Descanso Gardens and would continue similar circulation and access. The Project would continue to provide site ingress/egress via the driveways located at the Main and Auxiliary Parking Lots. As such, trip generation from operation of the Project would be essentially the same as the existing condition.

Related to conflict with an applicable CMP, the Master Plan, including the Project site, is not anticipated to add more significant trips to a freeway segment during peak hours or to CMP intersections, as no increase in peak day attendance is planned. Minor modifications beyond what was programmatically analyzed in the Master Plan IS/MND, including a change in the diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan would not increase Descanso Gardens uses, and impacts related to a CMP would be less than significant. Therefore, the Project would not create a new significant impact related to conflict with an applicable plan, ordinance or policy related to the circulation system that was not previously analyzed and no mitigation is required. Therefore, the Project would not create a new significant impact related to conflict with a CMP that was not previously analyzed, and no mitigation is required.

Regarding hazards and incompatible uses and consistent with the Master Plan IS/MND, the Project would not alter the three driveways that provide access to the Gardens to/from Descanso Drive, and there would be no compatibility issues with proposed updates related to the additional stormwater management features. The Project would not substantially increase hazards due to a design feature or incompatible use. Therefore, the Project would not create a new significant impact related to hazards or incompatible uses that was not previously analyzed and no mitigation is required.

Consistent with the Master Plan IS/MND, the Descanso Gardens, including the Project site, is not included in any emergency response plan or any emergency evacuation plan, and construction activities, including staging, would be limited to Descanso Gardens boundaries. The existing conditions on-site have not changed. As stated above, the Project would maintain access at the existing ingress and egress along Descanso Drive and implement a CSTMP with traffic control measures and construction traffic information. Therefore, there would be no impact, and the Project would not create a new significant impact related to interference with an emergency plan that was not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to transportation.

Conclusion

The transportation impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.18 TRIBAL CULTURAL RESOURCES

3.18.1 MASTER PLAN IS/MND

The Master Plan IS/MND determined that potential impacts related to Tribal Cultural Resources (TCRs) would be less than significant with MMs TRIBAL-1 through TRIBAL-3. In accordance with AB 52, as part of IS/MND preparation invitations to consult for the Master Plan were sent to the California Native American tribes traditionally or culturally affiliated with the geographic area of the Master Plan as listed with the NAHC. One tribe responded, the Gabrieleño Band of Mission Indians - Kizh Nation, and consultation was completed as part of the CEQA process.

Regarding known TCRs listed or eligible for listing in the CRHR, or in a local register of historical resources, the Master Plan IS/MND stated the results of the Sacred Lands file search conducted at the NAHC used in conjunction with AB 52 consultation efforts indicate that the Master Plan Area is sensitive for TCRs. This potential impact to known TCRs would be less than significant with the incorporation of MM TRIBAL-1, which requires DPR to review construction plans prior to ground disturbing activities to ensure any known TCRs have been marked as off-limits for construction. In the event unknown TCRs are encountered during construction, the resources shall either be left in situ and avoided through redesign, or the resources shall be salvaged, recorded, and reposited at the Natural History Museum of Los Angeles County (NHM) or other repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan.

Regarding unknown TCRs, as noted above the IS/MND concluded the Master Plan Area is sensitive for TCRs. As such, implementation of the Master Plan was determined to result in a potential impact from causing an adverse change in the significance of a TCR determined by the County, as CEQA lead agency, to be significant. This potential impact to unknown TCRs would be less than significant with the incorporation of MM TRIBAL-2, which requires pre-construction review where ground disturbance is proposed in soils that have been in situ for 50 years; and TRIBAL-3, which requires handling of Native American human remains in accordance with State law.

3.18.2 PROPOSED PROJECT IMPACT ANALYSIS

The existing conditions on the Project site have not materially changed since the Master Plan IS/MND was adopted in October 2020. Therefore, the same potential for impacts to TCRs as established in the IS/MND would apply to the Project. Because an addendum to the Master Plan IS/MND is the appropriate environmental documentation for the proposed Project and requested approvals, as discussed further in Section 1.2 of this document, tribal consultation pursuant to AB 52 is not required. Pursuant to Section 21080.3.1(b) of the Public Resources Code, such consultation must take place "prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project".

Based on consultation with the Gabrieleño Band of Mission Indians - Kizh Nation as part of IS/MND preparation, MM TRIBAL-1 through TRIBAL-3 would be required for implementation of Master Plan projects throughout Descanso Gardens, including the Project site within the Main and Auxiliary Parking Lots. As such, consistent with the Master Plan IS/MND analysis, with incorporation of MM TRIBAL-1 through TRIBAL 3, impacts would be less than significant. Therefore, the Project would not create a new significant impact related to TCRs that was not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The following mitigation measures pertaining to tribal cultural resources from the Master Plan IS/MND would be applicable to implementation of the Project:

MM TRIBAL-1: *Tribal Resources – Avoidance and Monitoring.* To mitigate potential impacts to Tribal cultural resources associated with ground disturbance, DPR shall review the construction plans to ensure that any known TCRs that are required to be avoided have been marked as "off-limits" areas for construction and construction staging prior to the initiation of ground-disturbing activities. DPR shall require monitoring of all ground-disturbing activities by a Native American monitor within 60 feet of a known TCR. Prior to the initiation of ground-disturbing activities that are expected to affect native soils in association with the master plan elements Wilds Loop, the Nature Discovery Garden, the Nursery, and the New Service Yard. The County shall undertake consultation with the Native American local Tribal contacts designated by the NAHC and the Tribe to determine if a Native American monitor shall be present during all or a portion of the ground-disturbing activities within additional areas that are sensitive for TCRs. The County shall consult and move forward with the Mitigation Measure TRIBAL-1 as stated if a response is not received within 30 days.

In the event that previously unknown TCRs are encountered during construction, the resources shall either be left in situ and avoided through redesign, or the resources shall be salvaged, recorded, and reposited at the Natural History Museum of Los Angeles County (NHM) or other repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan.[15] The cultural resource management plan shall include further consultation with the Tribe. Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate adverse effects to cultural resources eligible or listed under Section 106 Criterion D/CRHR Criterion 4, as it preserves important information that will otherwise be lost.

MM TRIBAL-2: *Pre-Construction Surveys.* To mitigate potential impacts to tribal cultural resources from project construction activities resulting in ground disturbance, at the time that any construction activity is proposed for development that would require ground-disturbing activities in soils that have been predominantly in situ during the past 50 years, records and archival information shall be reviewed to determine if there are any recorded TCRs as defined by AB 52 in the project footprint.[16] At a minimum, the records and archival review shall include a search of the South Central Coastal Information Center if more than five years have passed since the previous records search, a request for Sacred Lands File from the NAHC, and a request for information regarding TCRs from the Native American local Tribal contacts designated by NAHC and the Tribe. The appropriate course of action shall be undertaken in light of the results of the records search:

(A) Where the project study area has been subject to a Phase I Walkover Survey within two years of the proposed activity and no TCRs are known within the project footprint, work shall proceed per the provision of Mitigation Measure TRIBAL-1.

(B) Where all or a portion of the project footprint has not been surveyed for cultural resources within two years of a proposed ground-disturbing activity, a qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology and shall conduct a Phase I Walkover Survey to ascertain the presence or absence of TCRs, as defined in Section 15064.5(a) of the CEQA Guidelines.

a. If the survey and record searches determine no potential TCRs, then the work shall proceed consistent with the provisions of Mitigation Measure TRIBAL-1.

b. If the survey determines potential TCRs, then one of two courses of action shall be employed:

i. Where avoidance is feasible, the construction shall avoid the potentially significant TCRs, and the work shall then proceed consistent with the provisions of Mitigation Measure TRIBAL-1. The project area shall be surveyed by a qualified archaeologist who meets the Professional Qualification Standards of the Secretary of the Interior. DPR shall require monitoring of all ground-disturbing activities by a

[15] It is standard procedure to list the NHM as a receptacle for fossils. There is a curation fee associated, and a curation agreement must be established, but that is between the firm/individual performing the monitoring and the NHM.

[16] Fifty years or older is the standard cutoff age for "historic" age resources.

Native American monitor within 60 feet of a known TCR.[17] In addition, consultation shall be undertaken with the Native American local Tribal contacts designated by the Native American Heritage Commission and the Tribe to determine if a Native American monitor shall be present during all or a portion of the ground-disturbing activities within additional areas that are sensitive for TCRs.

ii. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken by a qualified archaeologist who meets the Professional Qualification Standards of the Secretary of the Interior to determine the significance of the cultural resource. If the Phase II investigation identifies a unique/eligible TCR within the area proposed for ground-disturbing work, the County shall in consultation with the Tribe, determine whether to avoid the resource through redesign or to proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of Mitigation Measure TRIBAL-1.

MM TRIBAL-3: *Regulatory Requirements – Human Remains. To* mitigate potential impacts to tribal cultural resources from ground disturbance associated with construction activities in regards to destroying or disturbing Native American human remains, in accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

If the County Coroner determines that the remains are or are believed to be Native American, s/he shall notify the NAHC in Sacramento within 24 hours. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC shall immediately notify the person(s) it believes to be the most likely descendant (MLD) of the deceased Native American. The descendants shall complete their inspection and make a recommendation within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with DPR, the disposition of the human remains. The MLD's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If DPR rejects the MLD's recommendations, the agency shall rebury the remains with appropriate dignity on the property within a time frame agreed upon between the County and the MLD's in a location that would not be subject to further subsurface disturbance (14 California Code of Regulations §15064.5(e)).

[17] County of Los Angeles Department of Parks and Recreation. 2018. Parks and Recreation Facilities Project Cultural Resources Management Plan.

Conclusion

The tribal cultural resources impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.19 UTILITIES AND SERVICE SYSTEMS

3.19.1 MASTER PLAN IS/MND

The Master Plan IS/MND determined that the Project would not create the need nor induce substantial population growth directly or indirectly and any accompanying requirements for the relocation or construction of new or expanded water, wastewater treatment, storm water draining, electric power, natural gas, or telecommunication facilities, and all utility improvements and connections would be constructed and installed on-site. As such, impacts related to utilities would be less than significant.

Related to water supply, the Master Plan would not involve major infrastructure system extensions (such as roads, highways, bridges, utility lines, major drainage improvements, or grading) that would make accessible a previously inaccessible area to support population growth and accompanying need for large quantities of water, and proposed water supply improvements are intended to greatly reduce or eliminate the use of Hall Beckley Canyon water per request from Los Angeles County. To replace this supply, the Lake would be lined, and stormwater currently captured in the Lake would be used as irrigation water while stormwater captured elsewhere on the site, along with recycled wastewater and "fugitive" water harvested seasonally from Winery Canyon Channel, would be directed through a treatment wetland to a recirculation pond, where it would be pumped to the Lake for use as irrigation water. Additionally, the Master Plan is not expected to involve a heavy usage of water compared to the existing condition. Based on current water supply provided by Valley Water Company and no anticipated expansion of use under the Master Plan, impacts related to sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years would be less than significant.

Related to wastewater capacity, the on-site MBR would treat and recycle site wastewater for use as irrigation, and the Project would include recycled wastewater and "fugitive" water harvested seasonally from Winery Canyon Channel would be directed through a treatment wetland to a recirculation pond, where it would be pumped to the Lake for use as irrigation water. The Master Plan would not induce substantial population growth directly or indirectly that would result in an increase in wastewater and therefore the Master Plan Area would not exceed the capacity limits of the Master Plan Area with impacts being less than significant.

Related to solid waste, construction generated solid waste would be subject to the County of Los Angeles Construction and Demolition Debris Recycling and Reuse Ordinance as well as the County's Green Building Standards Code and would be recycled to the maximum extent feasible meeting the County's solid waste diversion, reduction and minimum recycle and/or salvage mandates. During operations, no expansion of use is expected within the Master Plan Area and the solid waste facility that services the site would continue to have adequate capacity. Impacts related to solid waste would be less than significant.

Finally, as stated in the Master Plan IS/MND, Descanso Gardens would be required to comply with federal, state, and local statues and regulations to reduce the amount of solid waste during construction and operations and no impact would occur.

3.19.2 PROPOSED PROJECT IMPACT ANALYSIS

Consistent with the Master Plan IS/MND, the Project would not create the need nor induce substantial population growth directly or indirectly and any accompanying requirements for the relocation or construction of new or expanded water, wastewater treatment, storm water draining, electric power, natural gas, or telecommunication facilities, and all utility improvements and connections would be constructed and installed on-site. The Project itself proposes stormwater improvements by diverting stormwater flows from the proximate Winery Canyon Channel to a proposed subsurface cistern for temporary storage and treatment prior to reuse as the landscape irrigation system. Additional stormwater improvements include treating surface runoff from the Main and Auxiliary Parking Lots through the implementation of infiltration and retention BMPs. The Master Plan considered the Project BMPs, such as the permeable gutter feature to reduce runoff and provide shallow infiltration, and the minor modifications beyond the Master Plan IS/MND include a change in the Winery Canyon Channel diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan. However, all of the stormwater improvements would exist within the Master Plan Area and would not require relocation or expansion of facilities elsewhere. As such, impacts related to utilities would be less than significant. Therefore, the Project would not create a new significant impact related to relocation or construction of new utility improvements that was not previously analyzed and no mitigation is required.

Related to water supply, the Project itself was introduced as part of the Master Plan to reduce dependence on municipal water for landscape irrigation by diverting stormwater flows from the proximate Winery Canyon Channel to a proposed subsurface cistern for temporary storage and treatment prior to reuse as the landscape irrigation system. Additional stormwater improvements include treating surface runoff from the Main and Auxiliary Parking Lots through the implementation of infiltration and retention BMPs that were considered under the Master Plan. The minor modifications beyond what was discussed programmatically in the Master IS/MND include a change in the Winery Canyon Channel diversion point, installing an underground cistern, and expanded piping and infrastructure for distribution of captured stormwater, rather than utilize a treatment wetland with recirculating pumps to connect to the lake. The proposed modifications also include parking lot drainage features that are similar, but not identical, to what was discussed in the Master

Plan to improve management of runoff from these asphalt-paved surfaces. Additionally, the Master Plan, including the Project site, is not expected to involve a heavy usage of water compared to the existing condition, and based on current water supply provided by Valley Water Company, there are sufficient water supplies available to serve the entire Descanso Gardens, including the Project site, and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant. Therefore, the Project would not create a new significant impact related to water supply that was not previously analyzed and no mitigation is required.

Related to wastewater capacity and as stated above, the Project would divert stormwater flows from the proximate Winery Canyon Channel to a proposed subsurface cistern for temporary storage and treatment prior to reuse as the landscape irrigation system, which was discussed under the Master Plan IS/MND. Descanso Gardens, including the project sit4e and proposed stormwater improvements would not induce substantial population growth directly or indirectly that would result in an increase in wastewater and Area would not exceed the capacity limits of the Master Plan Area. Impacts would be less than significant. Therefore, the Project would not create a new significant impact related to wastewater capacity that was not previously analyzed and no mitigation is required.

Related to solid waste and consistent with the Master Plan IS/MND, construction generated solid waste would be subject to the County of Los Angeles Construction and Demolition Debris Recycling and Reuse Ordinance as well as the County's Green Building Standards Code and would be recycled to the maximum extent feasible meeting the County's solid waste diversion, reduction and minimum recycle and/or salvage mandates. During operations, no expansion of use is expected due to the Project site stormwater improvements, and the solid waste facility that services Descanso Gardens would continue to have adequate capacity. Impacts related to solid waste would be less than significant. Impacts would be less than significant. Therefore, the Project would not create a new significant impact related to solid waste that was not previously analyzed and no mitigation is required.

As consistent with the Master Plan IS/MND, Descanso Gardens, including the Project site, would be required to comply with federal, state, and local statues and regulations to reduce the amount of solid waste during construction and operations and no impact would occur. Therefore, the Project would not create a new significant impact related to solid waste statues and regulations that was not previously analyzed and no mitigation is required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to utilities and service systems.

Conclusion

The utilities and service system impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in

the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.20 WILDFIRE

3.20.1 MASTER PLAN IS/MND

The Master Plan IS/MND stated that the entire City of LCF, including the Master Plan Area, is designated a VHFHSZ. The Master Plan Area would improve vehicular and pedestrian access and is not included as part of a disaster route or evacuation center in any emergency response plan or any emergency evacuation plan. Therefore, the Master Plan would not substantially impair an adopted emergency response plan and impacts would be less than significant.

Related to slopes, the Master Plan projects in the steeper areas would have a limited footprint affecting the slopes because they would be composed of predominantly trails (such as the Wilds Loop), oak woodland restoration, the Elevated Canopy Walk, and widening of the existing service road to facilitate fire truck access. Prevailing winds sources primarily include the marine layer from the Pacific and offshore Santa Ana winds, which can result in high conditions for wildfire. The County includes guidance for vegetation management for the reduction of fuel and in preparation for future wildfire events, and the Service Route, which currently provides staff with a paved vehicular access loop through the developed gardens, would be widened to 20 feet wide to better facilitate vehicular access to conduct fuel management efforts along the edge of the developed gardens. Therefore, the Master Plan would result in less than significant impacts to wildfire in relation to exacerbated wildfire risk due to slope, prevailing winds, and other factors and thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

The Project would not require the installation of new roads, fuel breaks, emergency water sources, aboveground power lines, or other utilities and would involve enhancements to an existing emergency water source (relining the Lake) and upgrades to critical infrastructure within the developed gardens, including installation of new infrastructure. Furthermore, the Master Plan is intended to reduce the property's dependence on potable water with on-site treatment, a relined Lake (which provides emergency water), and bioswales to capture stormwater from the parking lots. In addition, the Master Plan Area has ongoing fuel vegetation maintenance and brush clearance efforts on an annual basis from May 1 through August 1 in addition to Descanso Gardens' maintenance of the fuel management zones around structures and SCE's maintenance of trees within the utility corridor, thus reducing the vegetation fuel loads along the slopes surrounding the Master Plan Area. New utilities would be installed below ground and would not be expected to exacerbate fire risk because they would sustain an existing reservoir (the Lake) and replace the temporary generators that are currently used to provide nighttime lighting at several locations in the developed gardens with underground infrastructure. As such, the Project would not exacerbate fire risk and impacts would be less than significant.

The Master Plan would not impede or redirect flood flows; substantially create, contribute, increase the rate, amount or depth of runoff; or place structures within the flood hazard area, and would implement hydraulic management strategies to reduce surface runoff. Additionally, due to the presence of landslide hazard areas, additional design-level analyses would be prepared for construction and operation of each proposed Project element to include applicable engineering practices to avoid impacts. As such, the Master Plan would result in less than significant impacts to wildfires related to exposure of people or structures to significant risks because of runoff, postfire slope instability, or drainage changes.

Finally, as determined by the Master Plan IS/MND, vegetation management would be incorporated and although new buildings and structures would be constructed on-site, the Project would not cause significant exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

3.20.2 PROPOSED PROJECT IMPACT ANALYSIS

Consistent with the Master Plan IS/MND, Descanso Gardens, including the Project site, is located in a VHFHSZ and not included in any emergency response plan or any emergency evacuation plan, and construction activities, including staging, would be limited to Descanso Gardens boundaries. The existing conditions on-site have not changed. As stated above, the Project would maintain access at the existing ingress and egress along Descanso Drive and implement a Construction Management Plan with traffic control measures. No impact would occur. Therefore, there would be no impact, and the Project would not create a new significant impact related to interference with an emergency plan that was not previously analyzed, and no mitigation measures are required.

Related to slopes and prevailing winds on-site, the Project site is located on a portion of Descanso Gardens with a gentle slope. The Main and Auxiliary Lots are asphalt-paved and developed as existing parking areas serving Descanso Gardens. The Auxiliary Lot is largely unvegetated but there are areas of both scattered and dense tree cover along the edges. The Project would be required to provide adequate access on the site to facilitate emergency access. The minor modifications beyond what was discussed programmatically in the Master IS/MND would not create any additional hazards beyond existing conditions. Impacts would be less than significant. Therefore, there would be no impact, and the Project would not create a new significant impact related slopes, prevailing winds or other factors that were not previously analyzed, and no mitigation measures are required.

Related to installation or maintenance of associated infrastructure, the Project would not require the installation of new roads, fuel breaks, power lines, or other utilities that would exacerbate fire risks. The Project itself, as analyzed under the Master Plan IS/MND is intended to reduce the property's dependence on potable water with on-site stormwater diversion, treatment, storage and reuse for irrigation and water features. The minor modifications beyond what was discussed programmatically in the Master IS/MND include a change in the Winery Canyon Channel diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan. These facilities would help improve the existing water infrastructure on-site and would be located largely underground. Consistent with Descanso Gardens' protocols, maintenance at

the Main and Auxiliary Parking Lots would include the ongoing fuel vegetation maintenance and brush clearance efforts on an annual basis. As such, the Project would not exacerbate fire risk and impacts would be less than significant. Therefore, there would be no impact and the Project would not create a new significant impact related to the installation or maintenance of associated infrastructure that was not previously analyzed, and no mitigation measures are required.

Related to flood, landslide hazards, or instability, the Project itself would aim to provide hydraulic management strategies to reduce surface runoff leading on-site. The Project would aim to reduce flood flows through inclusion of the Master Plan approved BMPs (permeable gutters and catch basins), and the minor additions beyond what was addressed in the Master Plan, including the underground cistern system. The Project was designed specifically to capture 100percent of the 85th percentile, 24-hour storm event runoff. As such, impacts related to impeding or redirecting flood flows would be less than significant. Therefore, the Project would not create a new significant impact related to flood or instability that were not previously analyzed, and no mitigation measures are required.

Finally, as consistent with the Master Plan IS/MND, vegetation management would be incorporated throughout operations and would not include the development of any buildings. The minor modifications beyond what was discussed programmatically in the Master IS/MND include a change in the Winery Canyon Channel diversion point, installing an underground cistern, expanded piping and infrastructure for distribution of captured stormwater, and parking lot drainage features that are similar, but not identical, to what was discussed in the Master Plan. These facilities would help improve the existing water infrastructure on-site. These modified Project features would capture stormwater for reuse on-site, including for emergency water, and would decrease Descanso's dependence on City/County potable water. Additionally, the Project would not alter access to the SCE site next to Winery Canyon Channel and would not result in inadequate access. The Project, as well as the Master Plan overall, would be designed and constructed in accordance with the most recent CFC and impacts would be less than significant related to proximity to land uses with fire hazards. Therefore, there would be no impact, and the Project would not create a new significant impact related to fire hazards that were not previously analyzed, and no mitigation measures are required.

Applicable Mitigation Measures

The Master Plan IS/MND did not include mitigation measures related to wildfire.

Conclusion

The wildfire impacts of the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

3.21.1 MASTER PLAN IS/MND

With incorporation of MMs BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, CULTURAL-1, CULTURAL-2, CULTURAL-3, CULTURAL-4, NOISE-1, TRIBAL-1, TRIBAL-2, and TRIBAL-3, the Master Plan would not result in significant impacts regarding degrading the quality of the environment, substantially reducing the habitat of a fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, threatening to eliminate a plant or animal community, substantially reducing the number or restricting the range of a rare or endangered plant or animal or eliminating important examples of the major periods of California history or prehistory.

The Master Plan is a long-term plan intended to increase the Master Plan Area's water and energy efficiency with upgraded infrastructure, and would result in no impact regarding the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.

There are 19 cumulative projects that may overlap with the construction, operation, and maintenance of the Master Plan, and the Project would result in less than significant impacts regarding impacts that are individually limited but cumulatively considerable. However, the impacts of the Master Plan would be limited in scope and intensity due to the scattered locations, small scale, extended time frame for construction of all Master Plan elements, and types of improvements proposed. As project impacts would be less than significant after mitigation, impacts associated with the Master Plan are not expected to be cumulatively considerable when added to the impacts of related projects in the vicinity of the Master Plan Area.

Finally, as determined in the Master Plan IS/MND, potential environmental impacts associated with the Master Plan regarding human health and safety during construction, operations, and maintenance would be less than significant through consistency BMPs, development of a Traffic Control Plan for construction period, and implementation of Mitigation Measure NOISE-1 to reduce construction noise levels near sensitive receptors. Therefore, the Master Plan would result in less than significant impacts regarding having environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

3.21.2 PROPOSED PROJECT IMPACT ANALYSIS

The Project would incorporate the Master Plan IS/MND mitigation measures, including MMs BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, CULTURAL-1, CULTURAL-2, CULTURAL-3, CULTURAL-4, NOISE-1, TRIBAL-1, TRIBAL-2, and TRIBAL-3, which would ensure the Project would not result in significant impacts regarding degrading the quality of the environment, substantially reducing the habitat of a fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, threatening to eliminate a plant or animal community, substantially reducing the number or restricting the range of a rare or

endangered plant or animal or eliminating important examples of the major periods of California history or prehistory. With mitigation, impacts would be less than significant. Therefore, the Project would not create a new significant impact related to California history or pre-history that were not previously analyzed.

The Project is a Master Plan project that would continue to ensure the Descanso Garden's long-term sustainability. The Master Plan considered the stormwater improvement Project to provide long-term water efficiency and reduce Descanso Garden's dependence on municipal water for landscape irrigation. As such, the Project would result in no impact regarding the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. Therefore, the Project would not create a new significant impact related to long term goals that were not previously analyzed.

Consistent with the Master Plan IS/MND, the 19 cumulative projects that may overlap with the construction, operation, and maintenance of the Master Plan, including the Project. Existing conditions on-site have not changed, and as the Project impacts would be less than significant after mitigation, impacts associated with the proposed Project are not expected to be cumulatively considerable when added to the impacts of related projects in the vicinity of the Master Plan Area. Therefore, the Project would not create a new significant impact related to cumulatively considerable projects that were not previously analyzed.

Finally, as consistent with the Master Plan IS/MND, potential environmental impacts associated with the proposed Project in regard to human health and safety during construction, operations, and maintenance would be less than significant through consistency BMPs, development of a Traffic Control Plan for construction period, and implementation of Mitigation Measure NOISE-1 to reduce construction noise levels near sensitive receptors. Therefore, the Project would result in less than significant impacts regarding having environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly. Therefore, the Project would not create a new significant impact related to adverse health on human beings that were not previously analyzed.

Applicable Mitigation Measures

The Project would implement the following mitigation measures from the Master Plan IS/MND: MMs BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, CULTURAL-1, CULTURAL-2, CULTURAL-3, CULTURAL-4, NOISE-1, TRIBAL-1, TRIBAL-2, and TRIBAL-3.

Conclusion

The impacts pursuant to the mandatory findings of significance from the proposed Project would be consistent with the analysis presented in the Master Plan IS/MND. The proposed Project would not result in any new significant or substantially more severe environmental impacts than disclosed in the adopted IS/MND. There are no substantial changes in the approved Master Plan scope or the circumstances under which the Project is being undertaken, or any new information of substantial importance that was not known to the County, as Lead Agency, at the time the Master Plan IS/MND was adopted in 2020.

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Appendix A

Jurisdictional Delineation

Draft Jurisdictional Delineation Report

Stormwater Capture and Reuse Project
La Cañada Flintridge, California

Prepared for

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October 8, 2024

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EXHIBITS

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EXECUTIVE SUMMARY

The purpose of this Jurisdictional Delineation Report is to provide baseline data concerning the type and extent of jurisdictional resources that occur on the site of Descanso Gardens' Stormwater Capture and Reuse Project (hereinafter referred to as the "Project"), located in the City of La Cañada Flintridge, California and the potential impacts to these resources that would occur from proposed construction activities at the Project site. Jurisdictional resources considered for this report include wetlands and non-wetland "waters of the United States" regulated by the U.S. Army Corps of Engineers (USACE); "waters of the State" regulated by the Regional Water Quality Control Board (RWQCB); and the bed, bank, and channel of all lakes, rivers, and/or streams (and associated riparian vegetation), as regulated by the California Department of Fish and Wildlife (CDFW).

The jurisdictional delineation field work was performed by Psomas Regulatory Specialist Trevor Bristle on March 15, 2024. Based on the results of the jurisdictional delineation field work, it was determined that the total amount of jurisdictional resources on the Project site and the anticipated impacts are as follows:

- **USACE Jurisdictional "waters of the U.S.":**

  Wetlands: 0.000 acre

  Non-wetland waters: 0.096 acre (approximately 0.001 acre of permanent impacts and 0.005 acre of temporary impacts)

- **RWQCB Jurisdictional "waters of the State":**

  Wetlands: 0.000 acre

  Non-wetland waters: 0.136 acres (approximately 0.002 acre of permanent impacts and 0.006 acre of temporary impacts)

- **CDFW Jurisdictional Streambeds:**

  Streambeds: 0.158 acres (approximately 0.002 acre of permanent impacts and 0.006 acre of temporary impacts)

1.0 INTRODUCTION

This Jurisdictional Delineation Report has been prepared to provide baseline data concerning the type and extent of resources under the jurisdiction of the U.S. Army Corps of Engineers (USACE), Los Angeles Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) for the Stormwater Capture and Reuse Project site (hereinafter referred to as the "Project site" or "site").

1.1 PROJECT LOCATION

Descanso Gardens is located at 1418 Descanso Drive in the City of La Cañada Flintridge, California (Exhibit 1); and is bound on the northwest by Wishing Hill Drive and single-family residences, on the northeast by Descanso Drive, on the east by single-family residences on Encinas Drive, and on the south and west by undeveloped open space. The Project site for this report is located in Descanso Gardens' auxiliary parking lot and is shown on the U.S. Geological Survey's (USGS') Pasadena 7.5-minute topographic quadrangle of the San Bernardino Meridian in Township 1 North, Range 13 West, Section 2 (Exhibit 2). There are no potential jurisdictional waters located in the main parking lot of Descanso Gardens and as such the site of Project components in this parking lot are not addressed as part of this Jurisdictional Delineation Report.

1.2 EXISTING CONDITIONS

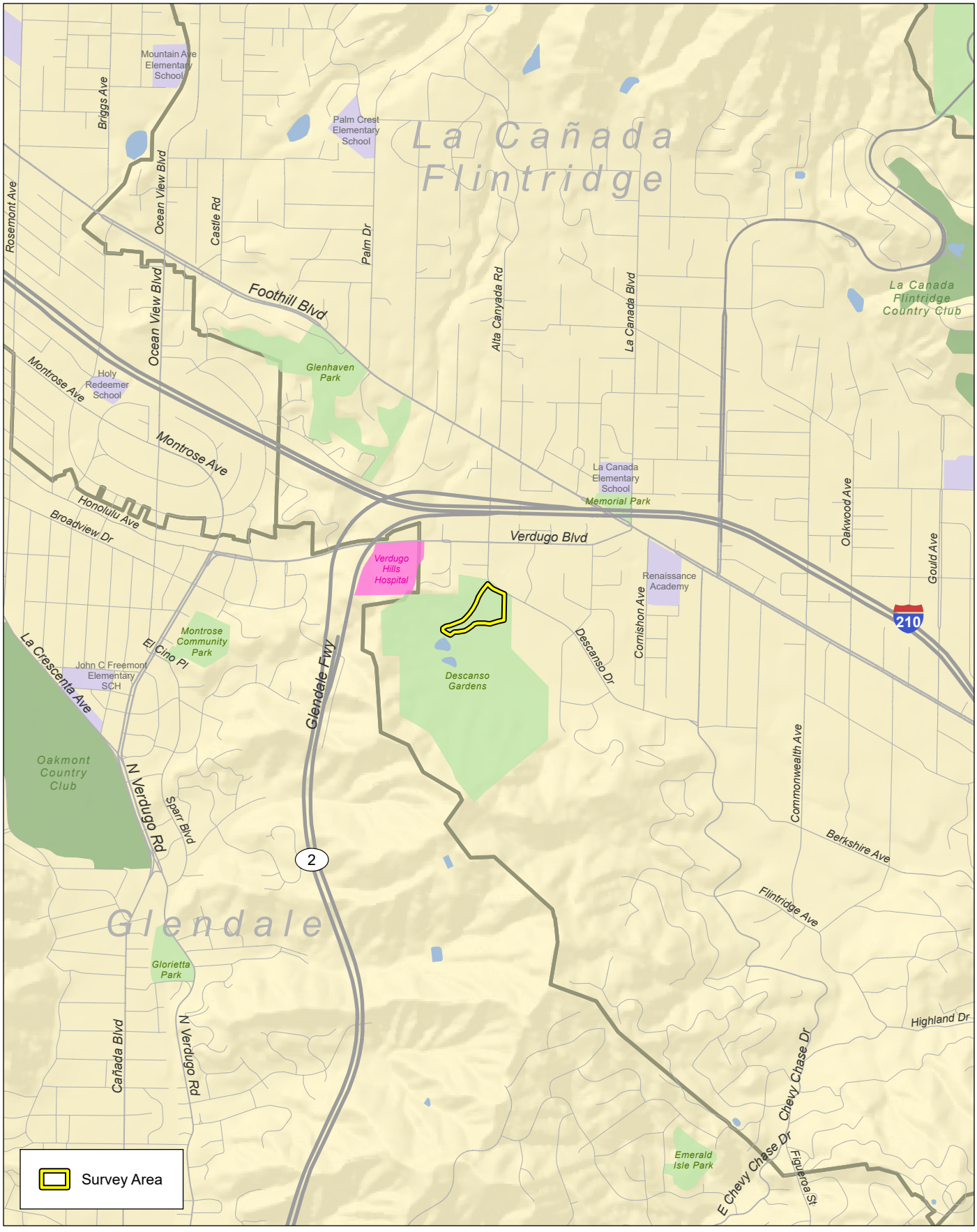
Winery Canyon Channel, a concrete-lined storm drain with vertical side walls, is the principal drainage feature on the Project site. The remainder of the Project site consists of hardscape, disturbed and landscaped areas with a paved parking lot, driveway, maintenance buildings, and an artificial channel. Disturbed and landscaped areas are generally located along the perimeter of the hardscape. Maintenance buildings are located along the southern edge of the Project site with the artificial channel running north to south on the eastern edge (Exhibit 3).

1.3 PROJECT DESCRIPTION

The *Descanso Gardens Master Plan* (hereinafter referred to as "Master Plan"), approved by the County of Los Angeles in 2020, included several, often interrelated, water conservation concepts to improve both water quality and non-potable supply. The Project's main objective is to offset potable water use by capturing, treating, and reusing stormwater runoff diverted from Winery Canyon Channel and captured from parking lot runoff to reduce dependence on municipal water for landscape irrigation and water features. The overall premise and result of the Project is the same as described in the Master Plan with some modifications, including a different diversion point, installing an underground cistern, and expanded piping and infrastructure for distribution. These modifications are being analyzed in an Addendum to the adopted *Descanso Gardens Master Plan Initial Study/Mitigated Negative Declaration*, which evaluated the environmental impacts associated with full implementation of the Master Plan at a program level.

The Project is considered by Descanso Gardens as critical to the facility's water conservation and environmental stewardship efforts. This Project is designed to achieve a water quality benefit of 80 percent pollutant load reduction for trash and bacteria as the proposed treatment of diverted flows would remove these pollutants from downstream water bodies. The proposed Winery Canyon Channel diversion will capture 100 percent of the 85th-percentile, 24-hour storm event for the 311-acre drainage area.

The stormwater diversion components will include (1) a gravity flow collection system consisting of a gate and valve structure in Winery Canyon Channel; (2) a baffle-box pretreatment system; (3) a precast, 4.5-acre-foot cistern; (4) an 18-inch gravity pipe connecting these components; and (5) distribution infrastructure, including an electrical conduit, pump station, and 4-inch-diameter



Local Vicinity

Exhibit 1

Jurisdictional Delineation Report for the Descanso Gardens Stormwater Capture and Reuse Project

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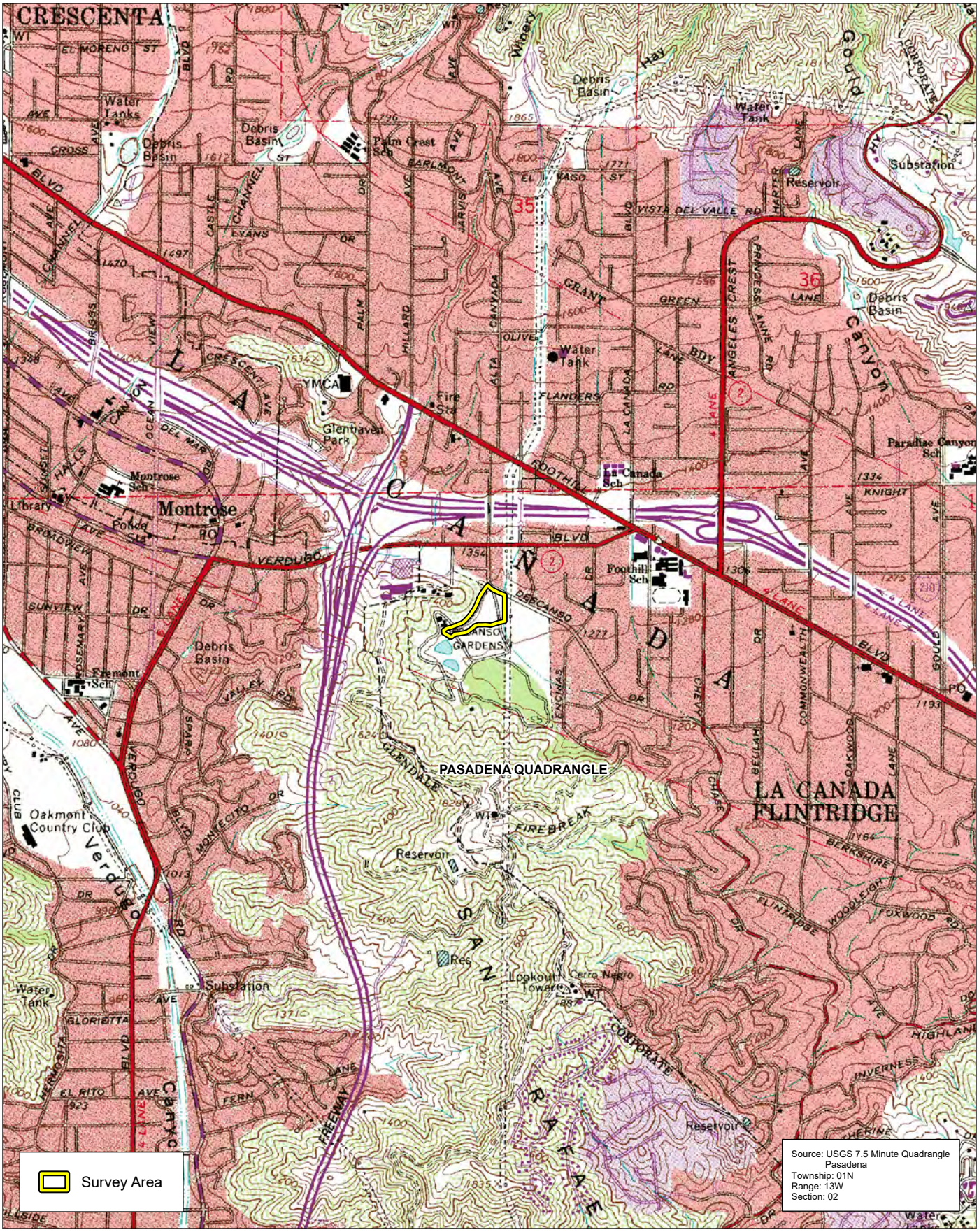

USGS 7.5-Minute Digital Quadrangle

Exhibit 2

Jurisdictional Delineation Report for the Descanso Gardens Stormwater Capture and Reuse Project

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Project Site

Exhibit 3

Jurisdictional Delineation Report for the Descanso Gardens Stormwater Capture and Reuse Project

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force main that will connect to the wet well and housing (not part of this Project), where diverted stormwater would have additional treatment to meet spray irrigation requirements.

Within the auxiliary parking lot, the Project will construct a longitudinal concrete gutter to collect surface drainage and gravity flow towards the manhole and discharge into the proposed cistern. Additionally, two proposed catch basins will collect and pretreat runoff via insert filters before discharging the water into the gutter and ultimately the cistern.

1.4 REGULATORY AUTHORITY

This section summarizes the federal and State agencies' regulatory jurisdiction over activities that have a potential to impact jurisdictional resources. A detailed explanation of each agency's regulatory authority is provided in Attachment A.

1.4.1 U.S. Army Corps of Engineers

Clean Water Act Section 404

The USACE Regulatory Branch regulates activities that discharge dredged or fill materials into "waters of the United States" (WOTUS) under Section 404 of the Federal Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Its authority applies to all WOTUS where the material (1) replaces any portion of a WOTUS with dry land or (2) changes the bottom elevation of any portion of any WOTUS. Activities that result in fill or dredge of WOTUS require a permit from the USACE.

On January 18, 2023, the United States Environmental Protection Agency (USEPA) published a final Water Rule in the Federal Register that took effect on March 20, 2023. To conform to the May 25, 2023, ruling by the U.S. Supreme Court (Sackett *v. EPA*), the USEPA issued a revised definition of WOTUS that was published in the Code of Federal Regulations (CFR) on September 8, 2023. The updated definition of WOTUS is provided in Title 40 §120.2(a) of the CFR and identifies federal jurisdiction under the CWA as:

1. Traditional Navigable Waters (TNWs), the territorial seas, and interstate non-wetland waters ("paragraph (a)(1) waters");
2. Impoundments of "waters of the United States" ("paragraph (a)(2) impoundments");
3. Tributaries to paragraph (a)(1) waters or (a)(2) impoundments when the tributaries are relatively permanent, standing or continuously flowing bodies of waters ("jurisdictional tributaries");
4. Wetlands that have a continuous surface connection to paragraph (a)(1) waters, or relatively permanent, standing or continuously flowing jurisdictional tributaries that have a continuous surface connection to paragraph (a)(1) waters; and
5. Intrastate lakes and ponds not identified in paragraphs (a)(1) through (4) that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to paragraph (a)(1) waters or jurisdictional tributaries.

U.S. Code Section 408

The USACE Civil Works Branch reviews projects that propose to occupy or use an existing USACE civil works project. The authority for the USACE to grant permission for temporary or permanent alterations to a civil works project is contained in Section 14 of the Rivers and Harbors Act of 1899 and codified in U.S. Code Title 33, Section 408 (Section 408). Examples of civil works projects include levees, dams, sea walls, jetties, dikes, wharfs, piers, and wetland restoration

projects funded by or built by the USACE. Areas subject to USACE review for a Section 408 permit extend outward from the facility itself to include an associated maintenance easement. The USACE may grant such permission if it determines the alteration proposed will not be "injurious to the public interest" and "will not impair the usefulness" of the civil works project. Under USACE policy, a Section 408 permission will not be issued before the USACE Regulatory Branch provides a decision on a Section 404 permit.

1.4.2 Regional Water Quality Control Board

The State Water Resources Control Board (SWRCB), in conjunction with the nine RWQCBs, is the primary agency responsible for protecting water quality in California through the regulation of discharges to surface waters under the CWA and the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act). The SWRCB's and RWQCBs' jurisdictions extend to all WOTUS as well as waters of the State that are outside federal jurisdiction, including wetlands.

The Porter-Cologne Act broadly defines "waters of the State" as any surface water or groundwater, including saline waters, within the boundaries of the State." On August 28, 2019, the Office of Administrative Law approved the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to waters of the State. The procedures went into effect on May 28, 2020. Under these new regulations, the SWRCB and its nine RWQCBs assert jurisdiction over all existing WOTUS, and all waters that would have been considered WOTUS under any historical definition. Impacts to WOTUS are authorized by the RWQCBs through a Water Quality Certification per Section 401 of the CWA.

Waters not under federal jurisdiction fall under the jurisdiction of the SWRCB and the RWQCBs. Impacts to "waters of the State" that are not considered WOTUS would be authorized by Waste Discharge Requirements issued by the RWQCB, pursuant to California's Porter-Cologne Act.

1.4.3 California Department of Fish and Wildlife

The CDFW regulates activities that may affect rivers, streams, and lakes pursuant to the *California Fish and Game Code* (§§1600–1616). According to Section 1602 of the *California Fish and Game Code,* the CDFW has jurisdictional authority over any work that will (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or (3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. A Lake or Streambed Alteration (LSA) Agreement would be required for the aforementioned activities.

2.0 METHODS

2.1 LITERATURE REVIEW

Prior to conducting the delineation and during the course of report preparation, Psomas reviewed the following documents to identify areas that may fall under agency jurisdiction: the USGS' Pasadena 7.5-minute topographic quadrangle map; color aerial photography provided by Google Earth (flown in May 2023); soil data provided by the U.S. Department of Agriculture's Natural Resources Conservation Service (USDA NRCS 2024a); the National Hydric Soils List (USDA NRCS 2024b); the National Wetlands Inventory's Wetland Mapper (USFWS 2024); and the Water Quality Control Plan for the Los Angeles Region (Los Angeles RWQCB 1994).

2.2 FIELD SURVEY

The analysis contained in this report is based on a field survey conducted by Psomas Regulatory Specialist Trevor Bristle on March 15, 2024. Jurisdictional features were delineated using an aerial photograph uploaded onto a hand-held tablet device.

2.3 JURISDICTIONAL DELINEATION

2.3.1 Non-Wetlands

Non-wetland WOTUS are delineated based on the limits of the Ordinary High Water Mark (OHWM), which can be determined by a number of factors, including the presence of a clear, natural line impressed on the bank; shelving; changes in the character of the soil; destruction of terrestrial vegetation; and the presence of litter and debris. Identification of the OHWM limits (i.e., active floodplain) that occur on the Project site are based on methods contained in *A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States*, *A Delineation Manual* (Lichvar and McColley 2008) and the *Updated Datasheet for the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States* (Curtis and Lichvar 2010).

It should be noted that the RWQCB shares USACE jurisdiction unless drainage features are isolated (i.e., lacking a surface connection to a Traditional Navigable Waterway) or the features do not convey relatively permanent flows. If these conditions are present, the RWQCB takes jurisdiction using the USACE's definition of the OHWM and/or the three-parameter wetlands method pursuant to the 1987 Wetlands Manual. The CDFW's jurisdiction is defined as the top of the bank on either side of a stream, channel, or basin or to the outer limit of riparian vegetation located within or immediately adjacent to the river, stream, creek, pond, lake, or other impoundment.

2.3.2 Wetlands

Technical methods and guidelines to determine the presence and extent of wetlands are described by the USACE in the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (USACE 2008). The presence of wetlands is determined by a three-parameter approach requiring evidence of (1) wetland hydrology, (2) hydrophytic vegetation, and (3) hydric soils.

Wetland hydrology is determined by the presence of indicators such as observed surface water; presence of past surface flow; and the depth to saturated soils or free water in soil test pits.

Procedures for determining whether the hydrophytic vegetation criterion is met are based on three potential indicators as described in *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (USACE 2008). These include the "Dominance Test", using the "50/20 Rule"; the "Prevalence Index"; or the presence of "Morphological Adaptation" of vegetation that is present. These indicators are based on determining the presence and relative abundance of plant species that are categorized as Obligate Wetland (typically associated with wetland conditions); Facultative Wetland (predominantly present in wetland conditions); Facultative (equally likely to occur in wetland or non-wetland areas); Facultative Upland (predominantly found in non-wetland areas); or Upland (typically found in mesic to xeric non-wetland habitats). Plant species are categorized in the National Wetland Plant List, created by the USEPA, the U.S. Fish and Wildlife Service, and the U.S. Department of Agriculture.

Soils are determined to be hydric when they form under conditions of saturation, flooding, or ponding that occurs long enough during the growing season to develop anaerobic conditions (or conditions of limited oxygen) at or near the soil surface and that favor the establishment of hydrophytic vegetation (USDA NRCS 2024c). The presence of hydric soil conditions is determined where various indicators are observed by digging soil test pits to a depth of approximately 20 inches. Common hydric soil indicators include presence of redoximorphic features (i.e., areas where iron is reduced under anaerobic conditions and oxidized following a return to aerobic conditions); buried organic matter; organic streaking; reduced soil conditions; or sulfuric odor.

3.0 LITERATURE REVIEW

This section provides a summary of literature review results that were reviewed prior to the field survey and during report preparation that have helped inform the analysis provided in this report.

3.1 USGS TOPOGRAPHIC QUADRANGLE

The USGS topographic quadrangle maps show geological formations and their characteristics; they describe the physical settings of an area through topographic contour lines and other major surface features. These features include lakes, streams, rivers, buildings, roadways, landmarks, and other features that may fall under the jurisdiction of one or more regulatory agencies. In addition, the USGS maps provide topographic information that is useful in determining elevations, latitude and longitude, and Universal Transverse Mercator (UTM) Grid coordinates.

The Project site occurs on the USGS' Pasadena 7.5-minute topographic quadrangle map. The Project site has rolling hills in the western section, generally sloping east with elevations ranging from approximately 1,295 to 1,310 feet above mean sea level.

3.2 SOIL SURVEY

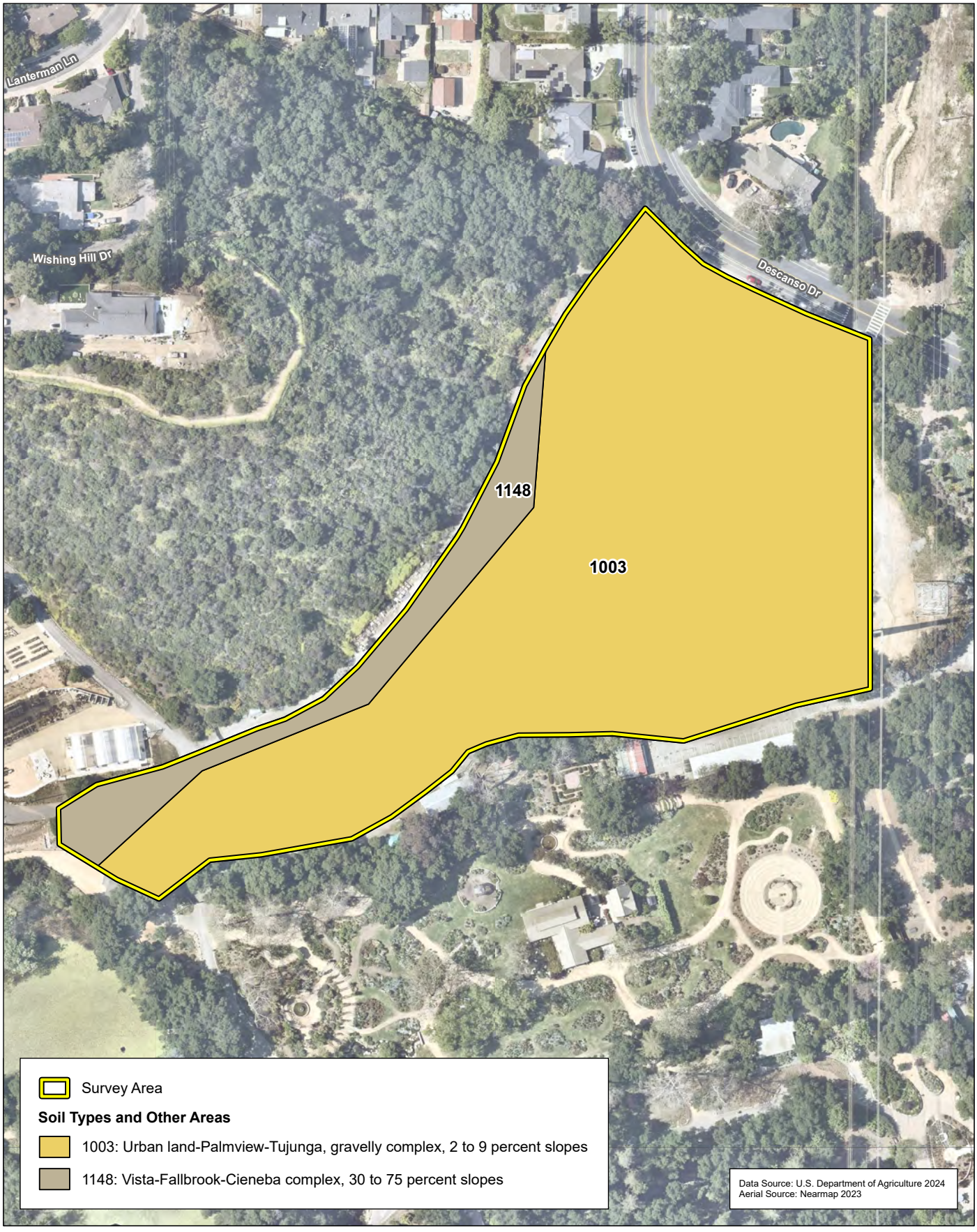
The presence of hydric soils is one of the chief indicators of jurisdictional wetlands. The Project site is within the Southeastern Los Angeles County Soil Survey Area. Psomas reviewed the USDA's soil data (Exhibit 4) associated with the Project site and determined that the following soil types are present:

- **Urban land-Palmview-Tujunga, gravelly complex, 2 to 9 percent slopes.** The Urban land component is a manufactured soil type that is the result of past grading. The Palmview component is a soil type that is comprised of sandy loam to a depth of approximately 79 inches. The Tujunga, gravelly complex component is a soil type that is comprised of loamy sand to a depth of 6 inches; gravelly loamy sand to a depth of 6 to 9 inches; and gravelly sand from a depth of 9 to 79 inches. None of these components are listed as a hydric soil on the National Hydric Soils List (USDA NRCS 2024c).
- **Vista-Fallbrook-Cieneba complex, 30 to 75 percent slopes.** The Vista component is a soil type that is comprised of sandy loam to a depth of approximately 25 inches; sand to a depth of 25 to 31 inches; and bedrock to a depth of 31 to 41 inches. The Fallbrook component is a soil type that is comprised of sandy loam to a depth of 19 inches; sandy clay loam to a depth of 19 to 58 inches; and bedrock to a depth of 58 to 68 inches. None of these components are listed as a hydric soil on the National Hydric Soils List (USDA NRCS 2024c).

A detailed summary of the characteristics of these soil types is provided in Attachment B of this report.

3.3 NATIONAL WETLANDS INVENTORY

The U.S. Fish and Wildlife Service's Wetland Mapper (USFWS 2024) shows wetland resources available from the Wetlands Spatial Data Layer of the National Spatial Data Infrastructure. This resource provides the classification of known wetlands following the Classification of Wetlands and Deepwater Habitats of the United States (FGDC 2013). This classification system is arranged in a hierarchy of (1) Systems that share the influence of similar hydrologic, geomorphologic, chemical, or biological factors (i.e., Marine Estuarine, Riverine, Lacustrine, and Palustrine); (2) Subsystems (i.e., Subtidal and Intertidal; Tidal, Lower Perennial, Upper Perennial, and Intermittent; or Littoral and Limnetic); (3) Classes, which are based on substrate material and



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Soil Map

Exhibit 4

Jurisdictional Delineation Report for the Descanso Gardens Stormwater Capture and Reuse Project

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flooding regime or on vegetative life forms; (4) Subclasses; and (5) Dominance Types, which are named for the dominant plant or wildlife forms. In addition, there are modifying terms applied to Classes or Subclasses. Winery Canyon Channel appears on the National Wetland Inventory (Exhibit 5). This channel is listed as R4SBAx (Riverine, Intermittent, Streambed, Temporary Flooded, Excavated). The description for this code is as follows:

- **R: System RIVERINE.** The Riverine System includes all wetlands and deepwater habitats contained within a channel, with two exceptions: (1) wetlands dominated by trees, shrubs, persistent emergent, emergent mosses, or lichens, and (2) habitats with water containing ocean-derived salts of 0.5 parts per thousand (ppt) or greater. A channel is an open conduit either naturally or artificially created which periodically or continuously contains moving water, or which forms a connecting link between two bodies of standing water.
    - **4: Subsystem INTERMITTENT:** This Subsystem includes channels that contain flowing water only part of the year. When the water is not flowing, it may remain in isolated pools or surface water may be absent.
        - **SB: Class STREAMBED.** Includes all wetlands contained within the Intermittent Subsystem of the Riverine System and all channels of the Estuarine System or of the Tidal Subsystem of the Riverine System that are completely dewatered at low tide.
            - **A: Water Regime TEMPORARY FLOODED.** Surface water is present for brief periods (from a few days to a few weeks) during the growing season, but the water table usually lies well below the ground surface for most of the season.
                - **x: Special Modifier EXCAVATED**: This Modifier is used to identify wetland basins or channels that were excavated by humans.

3.4 REGIONAL WATER QUALITY CONTROL PLAN

There are nine Regional Water Quality Control Boards in California. The Project site is located within Regional Water Quality Control Board Region 4, the Los Angeles Region. The SWRCB and the Los Angeles RWQCB have adopted a Water Quality Control Plan (or “Basin Plan”) for the region. The Basin Plan contains goals and policies, descriptions of conditions, and proposed solutions to surface and groundwater issues. The Basin Plan also establishes water quality standards for surface and groundwater resources and includes beneficial uses and levels of water quality that must be met and maintained to protect these uses. These water quality standards are implemented through various regulatory permits pursuant to CWA Section 401 for Water Quality Certifications and Section 402 for Report of Waste Discharge permits.

The Project site is located within the Upper Los Angeles River Hydrologic Unit. More specifically, the Project site is located within the Arroyo Seco Reach 2 Hydrologic Subarea (Watershed Boundary Dataset [WBD] 180701050209). Drainage features that occur on the Project site and nearby vicinity have hydrologic connectivity to the Arroyo Seco which is a tributary of the Los Angeles River. Because water flowing through the Project site contributes to the water quality of the Arroyo Seco, the following Beneficial Uses are associated with the on-site waters: Municipal and Domestic Supply (MUN); Warm Freshwater Habitat (WARM); Wildlife Habitat (WILD); and Rare, Threatened, or Endangered Species (RARE). Intermittent Beneficial Uses include Water Contact Recreation (REC1); and Non-Contact Water Recreation (REC2). A summary of these Beneficial Uses is provided in Table 1.

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National Wetlands Inventory

Exhibit 5

Jurisdictional Delineation Report for the Descanso Gardens Stormwater Capture and Reuse Project

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TABLE 1
SUMMARY OF BENEFICIAL USES

WBD	Beneficial Uses					
	MUN	**WARM**	**WILD**	**RARE**	**REC1**	**REC2**
180701050209 Arroyo Seco Reach 2	P	P	P	E	Im	I

WBD: Watershed Boundary Dataset; I: Intermittent Beneficial Use; P: Potential Beneficial Use; E: Existing Beneficial Use; m: Access prohibited by the Los Angeles County Department of Public Works in the concrete-channelized areas

MUN: Municipal Water Supply; WARM: Warm Freshwater Habitat; WILD: Wildlife Habitat; RARE: Rare, Threatened, or Endangered Species; REC1: Limited Water Contact Recreation; REC2: Non-Contact Water Recreation

Source: Los Angeles RWQCB 1994.

Descriptions of the various Beneficial Uses are provided in Attachment B.

4.0 JURISDICTIONAL ANALYSIS

During the field survey, a total of three features were identified, including two ephemeral drainages (identified as Drainages A and B) and Winery Canyon Channel, a concrete-lined storm drain channel.

- Winery Canyon Channel is a man-made box channel traveling north to south through the survey area. This drainage conveys runoff from the surrounding neighborhoods and hills and discharges to Devil's Gate Reservoir immediately upstream of Devil's Gate Dam approximately 2.5 miles southeast of the Project site. No vegetation is present within this channel.
- Drainage A is a small, ephemeral drainage originating from an outlet pipe located at the northern edge of the survey area. This drainage travels southeast through disturbed areas and into Winery Canyon Channel. Vegetation in the vicinity of Drainage A consists of a mix of upland species, consisting mainly of eucalyptus (*Eucalyptus* sp.) and coast live oak (*Quercus agrifolia*). This vegetation is part of a larger disturbed area and is not directly associated with the drainage. Therefore, no riparian vegetation is present.
- Drainage B is a small, ephemeral drainage that originates from runoff from the adjacent parking lot. This drainage travels roughly southeast through disturbed areas and into Winery Canyon Channel. Surrounding vegetation consists of a mix of upland species, consisting mainly of eucalyptus and coast live oak. This vegetation is part of a larger disturbed area and is not directly associated with the drainage. Therefore, no riparian vegetation is present.

A summary of the above-referenced features is provided in Table 2 and photographs are provided in Attachment C that illustrate the conditions on the Project site.

TABLE 2
SUMMARY OF JURISDICTIONAL RESOURCES IN THE PROJECT SITE

Feature	Latitude/Longitude (decimal degrees)		Feature Length (linear feet)	OHWM Width Range (feet)	Area of USACE Jurisdiction (acres)		Area of RWQCB Jurisdiction (acres)		CDFW Jurisdiction Width Range (feet)	Area of CDFW Jurisdiction (acres)[a]
	Upstream End	Downstream End			Wetland	Non-wetland	Wetland	Non-wetland		
Ephemeral Drainages										
Drainage A	34.203785°, -118.211835°	34.202950°, -118.210933°	432	2-6	0.000	0.000	0.000	0.037	3-9	0.055
Drainage B	34.202905°, -118.211189°	34.202804°, -118.210936°	98	1.5	0.000	0.000	0.000	0.003	3	0.007
				Subtotal	***0.000***	***0.000***	***0.000***	***0.040***		***0.062***
Intermittent Channels										
Winery Canyon Channel	34.203505°, -118.210910°	34.202078°, -118.210800°	490	8.5	0.000	0.096	0.000	0.096	8.5	0.096
				Subtotal	***0.000***	***0.096***	***0.000***	***0.096***		***0.096***
				Total	**0.000**	**0.096**	**0.000**	**0.136**		**0.158**

OHWM: Ordinary High Water Mark; USACE: U.S. Army Corps of Engineers; RWQCB: Regional Water Quality Control Board; CDFW: California Department of Fish and Wildlife

[a] Represents the maximum extent of CDFW jurisdiction as indicated by top of bank or outer edge of riparian dripline, whichever is wider.

4.1 "WATERS OF THE UNITED STATES" DETERMINATION

This section discusses the extent of WOTUS on the Project site based on the current definition using the 2023 Water Rule which conforms to the recent U.S. Supreme Court decision in *Sackett v. USEPA*.

Relatively Permanent Standard

The relatively permanent standard identifies drainage features that convey surface water flows for a period that is at least seasonal (i.e., surface water must be continuously present for a minimum period of 3 months). Based on a review of historical aerial photos and observations during the survey, Winery Canyon Channel appears to satisfy the relatively permanent standard with seasonal flows from storm water and urban runoff from the adjacent neighborhoods.

Drainages A and B are ephemeral streambeds that do not convey flows on a relatively permanent basis. Therefore, these drainages do not meet the relatively permanent standard and are not considered WOTUS.

Significant Nexus Standard

Winery Canyon Channel flows into the Arroyo Seco Watershed, which in turn flows into the Los Angeles River, which has been designated a TNW by the USACE. Due to this surface connection with a TNW, Winery Canyon Channel meets the significant nexus standard.

Limits of "Waters of the U.S."

The USACE asserts jurisdiction over non-navigable tributaries of TNWs that have relatively permanent flows and/or have a direct hydrological connection to a TNW. Therefore, Winery Canyon Channel would be under the regulatory authority of the USACE. The limits of WOTUS were mapped to encompass the entire width of the flat bottom channel. Therefore, approximately 0.096 acres of non-wetland WOTUS under the regulatory authority of the USACE occur in the survey area (Table 2; Exhibit 6).

Wetlands Determination

As indicated above, Winery Canyon Channel is a concrete-lined storm drain so that no soil test pits could be excavated to check for hydric soil indicators. Furthermore, the channel is unvegetated and no hydrophytic plant species are present. Similarly, Drainages A and B do not contain any hydrophytic vegetation and contain water for very short periods of time. Therefore, it is assumed that no wetland conditions are present on the Project site.

4.2 REGIONAL WATER QUALITY CONTROL BOARD JURISDICTION

Though the ephemeral drainages on site are not considered WOTUS, the California Water Code and Porter-Cologne Act gives the RWQCB much wider latitude to assert jurisdiction. The RWQCB asserts jurisdiction over all "waters of the State", which consists of surface or ground water, which includes both ephemeral drainages and the man-made channel on the Project site.

Limits of "Waters of the State"

The limits of non-wetland "waters of the State" were delineated in the field based on the presence of the OHWM. For Drainages A and B, the OHWM was based on changes in soil texture and evidence of drainage patterns. Arid West Ephemeral and Intermittent Streams OHWM Datasheets

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Jurisdictional Resources

Exhibit 6

Jurisdictional Delineation Report for the Descanso Gardens Stormwater Capture and Reuse Project

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were completed to document the OHWM for these areas (see Attachment D). The OHWM within Winery Canyon Channel coincides with the width of the channel bottom.

In all, a total of approximately 0.136 acres of RWQCB non-wetland "waters of the State" occur on the Project site (Table 2; Exhibit 6).

Wetlands Determination

Due to a lack of observed hydrology and hydrophytic vegetation in the ephemeral drainages and the previously described hardscape nature of the man-made channel, no soil test pits were excavated to test for the presence of hydric soils. Therefore, it is assumed that wetland conditions are absent from the Project site.

4.3 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE JURISDICTION

The limits of CDFW jurisdiction at the Project site were mapped to the top of the bank of the slope for the ephemeral drainages and man-made channel on-site. Because Winery Canyon Channel has vertical side walls, the aerial extent of CDFW jurisdiction is equal to that of the USACE and RWQCB (0.096 acre) (i.e., the width of the concrete channel). The CDFW jurisdictional limits in Drainages A and B extend slightly beyond that of the RWQCB, so that Drainage A contains 0.055 acre of CDFW jurisdiction and Drainage B contains 0.007 acre.

In all, a total of approximately 0.158 acre of CDFW jurisdictional areas occur on the Project site (Table 2; Exhibit 6).

5.0 IMPACT ANALYSIS

Activities on the Project site will involve installation of an underground cistern with an associated channel diversion, pre-treatment unit, and four-inch force main to transport the water to the wet well and housing associated with a separate project at Descanso Gardens; construction of a longitudinal concrete gutter to collect and direct surface runoff into the cistern; and two catch basins with filter inserts that will discharge into the cistern. Most of the Project construction activities, including staging, will occur within pre-disturbed areas (paved parking lots) with the channel diversion being installed within Winery Canyon Channel.

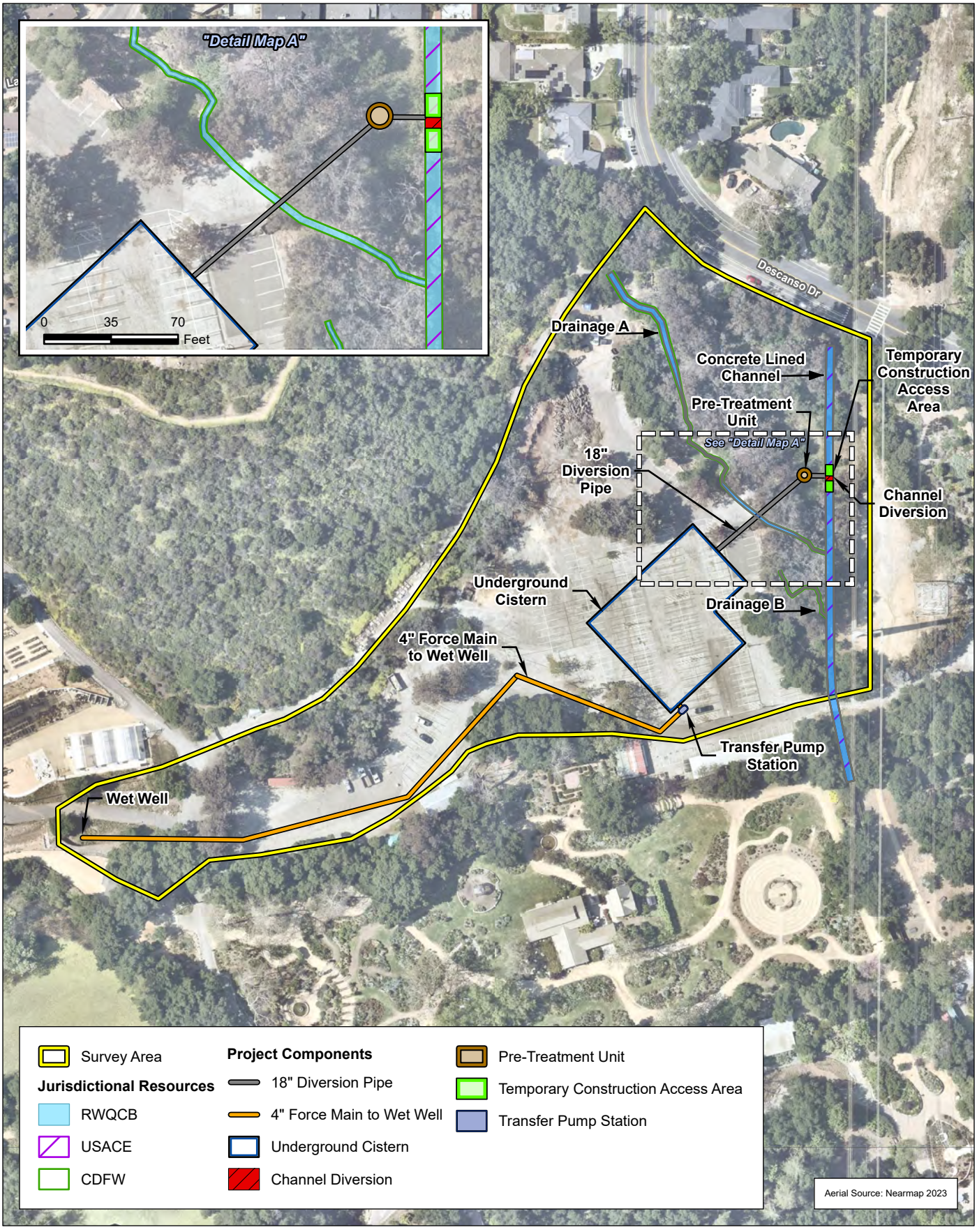
Installation of the 18-inch gravity pipe from the Channel to the pretreatment device and cistern will require trenching through Drainage A. The installation of the water diversion structure in Winery Canyon Channel is considered a permanent impact, while trenching through Drainage A is considered to be a temporary impact. General construction activity will occur within Winery Canyon Channel related to the construction of the diversion structure, which is considered a temporary impact.

As summarized in Table 3 and shown in Exhibit 7, the Project will result in permanent impacts to 0.001 acre of USACE WOTUS, 0.002 RWQCB "waters of the State", and 0.002 acre of CDFW jurisdictional waters. Temporary impacts will consist of 0.005 acre of USACE WOTUS, 0.006 RWQCB "waters of the State", and 0.006 acre of CDFW jurisdictional waters.

TABLE 3
IMPACTS ON JURISDICTIONAL RESOURCES WITHIN THE PROJECT SITE

Jurisdictional Features	Existing at Project site (acres)	Project Impacts (acres)	
		Permanent	Temporary
Ephemeral Drainages A and B			
RWQCB "waters of the State"	0.040	0.001	0.001
CDFW Jurisdictional Waters	0.062	0.001	0.001
Winery Canyon Channel			
USACE "waters of the United States"	0.096	0.001	0.005
RWQCB "waters of the State"	0.096	0.001	0.005
CDFW Jurisdictional Waters	0.096	0.001	0.005
Total			
USACE "waters of the United States"	**0.096**	**0.001**	**0.005**
RWQCB "waters of the State"	**0.136**	**0.002**	**0.006**
CDFW Jurisdictional Waters	**0.158**	**0.002**	**0.006**

USACE: United States Army Corps of Engineers; RWQCB: Regional Water Quality Control Board; CDFW: California Department of Fish and Wildlife



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Project Impacts

Exhibit 7

Jurisdictional Delineation Report for the Descanso Gardens Stormwater Capture and Reuse Project

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6.0 REGULATORY APPROVAL PROCESS

This section summarizes the various permits, agreements, and certifications that may be required prior to initiation of the proposed Project activities that involve impacts to jurisdictional waters, including:

- USACE Section 404/408 Permits
- RWQCB Section 401 Water Quality Certification
- CDFW Section 1602 Notification of Lake or Streambed Alteration

It should be noted that all regulatory permit applications can be processed concurrently.

6.1 U.S. ARMY CORPS OF ENGINEERS

Prior to construction in WOTUS, a Section 404 permit from the USACE may be required. Regulatory authorization in the form of a Nationwide Permit (NWP) or regional permit is provided for certain categories of activities. If the NWP conditions cannot be met, an Individual Permit (IP) is required.

The proposed Project would likely fall under NWP 59 (Water Reclamation and Reuse Facilities), which authorizes discharges into non-tidal WOTUS for the construction and maintenance of water reclamation and reuse facilities including vegetation areas and constructed wetlands to improve water quality.

Issuance of the USACE Section 404 permit would be contingent upon the approval of a Section 401 Water Quality Certification from the Los Angeles RWQCB, discussed below.

6.2 REGIONAL WATER QUALITY CONTROL BOARD

As noted above, issuance of the USACE Section 404 permit would be contingent upon the approval of a Section 401 Water Quality Certification from the Los Angeles RWQCB. The RWQCB requires the Applicant to address urban stormwater runoff during and after construction in the form of Best Management Practices (BMPs). These BMPs are intended to address the treatment of pollutants carried by stormwater runoff and are required in all complete applications. The notification/application for a CWA Section 401 Water Quality Certification must also address compliance with the Basin Plan. Please note that the application would also require the payment of an application fee, which would be based on the Project's temporary and permanent impacts to "waters of the State".

6.3 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

As with the RWQCB, consultation with the CDFW is recommended to determine if a Notification of a Lake or Streambed Alteration (LSA) should be submitted. The CDFW requires a LSA to be issued to authorize substantial changes to the bed or bank of a drainage feature or to authorize impacts to aquatic or riparian habitat. As discussed in Section 4.0, Jurisdictional Analysis, this delineation concludes that no riparian vegetation is present in Drainages A and B. Confirmation from the CDFW would be recommended to confirm that a LSA would not be required.

6.4 RECOMMENDATIONS

Based on the conclusions of this Jurisdictional Delineation Report, the following recommendations are identified:

1. A pre-filing meeting should be scheduled with RWQCB staff to discuss site conditions; the proposed Project; biological and jurisdictional resources and impacts to these resources resulting from the Project; proposed minimization measures and the mitigation program to offset these impacts; and the regulatory permit process.
2. The following should be prepared and processed: a USACE Section 404 Permit Application; a RWQCB *Application for Discharges of Dredged or Fill Material to Waters of the State*; and a CDFW Section 1602 Notification of LSA.

7.0 REFERENCES

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ATTACHMENT A

SUMMARY OF REGULATORY AUTHORITY

REGULATORY AUTHORITY

This attachment summarizes the regulatory authority of the U.S. Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Wildlife (CDFW) over activities that have potential to impact jurisdictional resources.

U.S. Army Corps of Engineers

The USACE Regulatory Branch regulates activities that discharge dredged or fill materials into "waters of the United States" (WOTUS) under Section 404 of the Federal Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. This permitting authority applies to all WOTUS where the material (1) replaces any portion of WOTUS with dry land or (2) changes the bottom elevation of any portion of any WOTUS. These fill materials would include sand, rock, clay, construction debris, wood chips, and materials used to create any structure or infrastructure in these waters.

Waters of the United States

Regulations surrounding WOTUS have undergone several revisions over the past several years, including new Water Rules put forth by the Obama Administration in 2015 and the Trump Administration in 2020, which was vacated by the U.S. District Court for the District of Arizona in August 2021. Most recently, the United States Environmental Protection Agency (USEPA) and the USACE published a new Water Rule in the *Federal Register* on January 18, 2023 which became effective on March 20, 2023.

On May 25, 2023, the U.S. Supreme Court overruled the USEPA's interpretation of the CWA pursuant to the definition of WOTUS in the case of *Sackett v. U.S. Environmental Protection Agency*. To conform to the Supreme Court decision, the USEPA issued a revised definition of WOTUS that was published in the Code of Federal Regulations on September 8, 2023.

The current definition of WOTUS includes:

1. Waters which are:
   (i) Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
   (ii) The territorial seas; or;
   (iii) Interstate waters
2. Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph 5 of this section;
3. Tributaries of waters identified in paragraphs 1 or 2 that are relatively permanent, standing or continuously flowing bodies of water;
4. Wetlands adjacent to the following waters:
   (i) Waters identified in paragraph 1; or
   (ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph 2 or 3 and with a continuous surface connection to those waters.
5. Intrastate lakes and ponds not identified in paragraphs 1 through 4
   (i) That are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraphs 1 or 3.

The regulatory text for this rule specifically identifies several features that are non-jurisdictional by definition. These include:

- waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;
- prior converted cropland designated by the Secretary of Agriculture;
- ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;
- artificially irrigated areas that would revert to dry land if the irrigation ceased;
- artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;
- artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;
- waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of WOTUS; and
- swales and erosional features (e.g., gullies, small washes) characterized by low volume, infrequent, or short duration flow.

Ordinary High Water Mark

The landward limit of tidal "waters of the U.S." is the high-tide line. In non-tidal waters where adjacent wetlands are absent, the lateral limits of USACE jurisdiction extend to the ordinary high water mark (OHWM).[1] The OHWM is defined as "that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of the soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas".[2] When wetlands are present, the lateral limits of USACE jurisdiction extend beyond the OHWM to the limits of the adjacent wetlands.[3]

Wetlands

A wetland is a subset of jurisdictional waters and is defined by the USACE and the USEPA as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances, do support a prevalence of vegetation typically adapted for life in saturated soil conditions".[4] Wetlands generally include swamps, marshes, bogs, and areas containing similar features.

The definition and methods for identifying wetland resources can be found in the USACE's *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region*,[5]

1 U.S. Army Corps of Engineers (USACE). 2005 (December 7). Regulatory Guidance Letter. Ordinary High Water Mark Identification. Washington, D.C.: USACE.
2 *Code of Federal Regulations* (CFR), Title 33, §3278.3(e)
3 USACE 2005
4 33 CFR §328.3(b)
5 USACE. 2008a. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0)*. (J.S. Wakeley, R.W. Lichvar, and C.V. Noble, Eds.). Vicksburg, MS: U.S. Army Engineer Research and Development Center.

a supplement to the 1987 *Corps of Engineers Wetlands Delineation Manual*.[6] Both the 1987 Wetlands Manual and the 2008 Arid West Supplement to the manual provide technical methods and guidelines for determining the presence of wetland "waters of the U.S.". Pursuant to these manuals, a three-parameter approach is used to identify wetlands and requires evidence of wetland hydrology, hydrophytic vegetation, and hydric soils. In order to be considered a wetland, an area must exhibit one or more indicators of all three of these parameters. However, problem areas may periodically or permanently lack certain indicators for reasons such as seasonal or annual variability of rainfall, vegetation, and other factors. Atypical wetlands lack certain indicators due to recent human activities or natural events. Guidance for determining the presence of wetlands in these situations is presented in the regional supplement.

Section 404 Permit

Except as specified in Section 323.4 of the CFR, impacts to "waters of the U.S." require a Section 404 Permit. Permit authorization may be in the form of (1) a "general permit" authorizing a category of activities in a specific geographical region or nationwide or (2) an "individual permit" (IP) following a review of an individual application form (to be obtained from the district office having jurisdiction over the waters in which the activity is proposed to be located).

Regulatory authorization in the form of a Nationwide Permit (NWP) is provided for certain categories of activities such as repair, rehabilitation, or replacement of a structure or fill which was previously authorized; utility line placement; or bank stabilization. NWPs authorize only those activities with minimal adverse effects on the aquatic environment and are valid only if the conditions applicable to the permits are met or waivers to these conditions are provided in writing from the USACE. Please note that waivers may require consultation with affected federal and State agencies, which can be a lengthy process with no mandated processing time frames. Certain activities do not require submission of an application form but may require a separate notification. If the NWP conditions cannot be met, an IP will be required. "Waters of the U.S." temporarily filled, flooded, excavated, or drained but restored to pre-construction contours and elevations after construction are not included in the measurement of loss of "waters of the U.S.". The appropriate permit authorization will be based on the amount of impacts to "waters of the U.S.", as determined by the USACE. There is no filing fee for the Section 404 Permit.

Approximately three or four months are typically required to process a routine permit application; large or complex activities may take longer to process. When a permit application is received, it will be assigned an identification number and reviewed for completeness by the District Engineer. If an application is incomplete, additional information will be requested within 15 days of receipt of the application. If an application is complete, the District Engineer will issue a public notice within 15 days unless specifically exempted by provisions of the CFR. Public comments will be accepted no more than 30 days but not less than 15 days from the date of public notice; these will become part of the administrative record of the application. Generally, the District Engineer will decide on the application no later than 60 days after receipt of the completed application. Additional permit situations may increase the permit processing time (e.g., projects involving a Section 401 Water Quality Certification, a coastal zone management consistency analysis, historic properties, a federal agency, and/or Endangered species). The Project Applicant will be given time, not to exceed 30 days, to respond to requests of the District Engineer.

On January 31, 2007, the USACE published a memorandum clarifying the Interim Guidance for Amendments to the National Historic Preservation Act and the Advisory Council on Historic

[6] Environmental Laboratory. 1987. Cor*ps of Engineers Wetlands Delineation Manual (Technical Report Y-87-1)*. Vicksburg, MS: U.S. Army Engineer Waterways Experiment Station.

Preservation (ACHP) implementing regulations.[7] The Interim Guidance applies to all Department of the Army requests for authorization/verification, including Individual Permits (IPs, i.e., standard permits and letters of permission) and all Regional General Permits (RGPs) and Nationwide Permits (NWPs). The State or Tribal Historic Preservation Officer (SHPO/THPO) has 30 days to respond to a determination that a proposed activity, which otherwise qualifies for an NWP or an RGP, has no effect or no adverse effect on a historic property. If the SHPO/THPO does not respond within 30 days of notification, the Los Angeles District may proceed with verification. If the SHPO/THPO disagrees with the District's determination, the District may work with the SHPO/THPO to resolve the disagreement or request an opinion from the ACHP. The USACE will submit the Draft Jurisdictional Delineation Report to the SHPO/THPO for review prior to initiating the actual regulatory process.

Please note that, if the USACE determines that the drainages/waterbodies are jurisdictional and would be impacted by project implementation, the Applicant will be required to obtain a CWA Section 401 Water Quality Certification from the RWQCB before the USACE will issue the Section 404 Permit. If the USACE determines that the impacted drainage/waterbody is not jurisdictional, the Applicant will be required to obtain RWQCB authorization under the provisions of a Report of Waste Discharge (ROWD).

Jurisdictional Determinations

Pursuant to USACE Regulatory Guidance Letter (RGL) 08-02 (dated June 26, 2008), the USACE can issue two types of jurisdictional determinations to implement Section 404 of the CWA: Approved Jurisdictional Determinations and Preliminary Jurisdictional Determinations.[8] An Approved Jurisdictional Determination is an official USACE determination that jurisdictional "waters of the U.S.", "Navigable Waters of the U.S.", or both are either present or absent on a site. An Approved Jurisdictional Determination also identifies the precise limits of jurisdictional waters on a project site.

The USACE will provide an Approved Jurisdictional Determination when (1) an Applicant requests an official jurisdictional determination; (2) an Applicant contests jurisdiction over a particular water body or wetland; or (3) when the USACE determines that jurisdiction does not exist over a particular water body or wetland. The Approved Jurisdictional Determination then becomes the USACE's official determination that can then be relied upon over a five-year period to request regulatory authorization as part of the permit application.

In addition, an Applicant may decline to request an Approved Jurisdictional Determination and instead obtain a USACE IP or General Permit Authorization based on a Preliminary Jurisdictional Determination or, in certain circumstances (e.g., authorizations by non-reporting nationwide general permits), with no Jurisdictional Determination.

Preliminary Jurisdictional Determinations are non-binding, advisory in nature, and may not be appealed. They indicate that there may be "waters of the U.S." on a project site. An Applicant may elect to use a Preliminary Jurisdictional Determination to voluntarily waive or set aside questions regarding CWA jurisdiction over a site, usually in the interest of expediting the permitting process. The USACE will determine what form of Jurisdictional Determination is appropriate for a particular project site.

The USACE Regulatory Branch Offices will coordinate with the USEPA Regional Office and USACE Headquarters (HQ), as outlined in its January 28, 2008, memorandum entitled "Process

[7] USACE. 2007 (January 31). Memorandum: Interim Guidance for Amendments to the National Historic Preservation Act and the Advisory Council on Historic Preservation (ACHP) Implementing Regulations. Washington, D.C.: USACE.

[8] USACE. 2008b (June 26). Regulatory Guidance Letter. Jurisdictional Determinations. Washington, D.C.: USACE.

for Coordinating Jurisdictional Determinations Conducted Pursuant to Section 404 of the CWA in Light of the *Rapanos* and *SWANCC* Supreme Court Decisions".[9] The guidance provided in this memorandum is quoted as follows:

> 1. Effective immediately, unless and until paragraph 5(b) of the June 5, 2007, Rapanos guidance coordination memorandum is modified by a joint memorandum from Army and EPA, we will follow these procedures:
>
>   a. For jurisdictional determinations involving significant nexus determinations, USACE districts will send copies of draft jurisdictional delineations via e-mail to appropriate EPA regional offices. The EPA regional office will have 15 calendar days to decide whether to take the draft jurisdictional delineation as a special case under the January 19, 1989, "Memorandum of Agreement Between the Department of the Army and the USEPA Concerning the Determination of the Section 404 Program and the Application of the Exceptions under Section 404(f) of the Clean Water Act." If the EPA regional office does not respond to the district within 15 days, the district will finalize the jurisdictional determination.
>
>   b. For jurisdictional determinations involving isolated waters determinations, the agencies will continue to follow the procedure in paragraph 5(b) of June 5, 2007, coordination memorandum, until a new coordination memorandum is signed by USACE and EPA. (In accordance with paragraph 6 of the June 5, 2007, coordination memorandum, this is a 21-day timeline that can only be changed through a joint memorandum between agencies).
>
> 2. Approved JDs are not required for non-reporting NWPs, unless the project proponent specifically requests an approved JD. For proposed activities that may qualify for authorization under a State Programmatic General Permit (SPGP) or RGP, an approved JD is not required unless requested by the project proponent.
>
> 3. The USACE will continue to work with EPA to resolve the JDs involving significant nexus and isolated waters determinations that are currently in the elevation process.
>
> 4. USACE districts will continue posting completed Approved JD Forms on their web pages.

Regional Water Quality Control Board

The RWQCB is the primary agency responsible for protecting water quality in California through the regulation of discharges to surface waters under the CWA and the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act). The RWQCB's jurisdiction extends to all "waters of the State" and to all "waters of the U.S.", including wetlands (isolated and non-isolated).

Section 401 of the CWA provides the RWQCB with the authority to regulate, through a Water Quality Certification, any proposed, federally permitted activity that may affect water quality. Among such activities are discharges of dredged or fill material permitted by the USACE pursuant to Section 404 of the CWA. Section 401 requires the RWQCB to provide certification that there is reasonable assurance that an activity which may result in discharge to navigable waters will not violate water quality standards. Water Quality Certification must be based on a finding that the

[9] USACE. 2008c (January 28). *Memorandum for Commander, Major Subordinate Commands and District Commands. Process for Coordinating Jurisdictional Determinations Conducted Pursuant to Section 404 of the Clean Water Act in Light of the Rapanos and SWANCC Supreme Court Decisions.* Washington, D.C.: USACE.

proposed discharge will comply with water quality standards, which contain numeric and narrative objectives that can be found in each of the nine RWQCBs' Basin Plans.

The Porter-Cologne Act provides the State with very broad authority to regulate "waters of the State" (which are defined as any surface water or groundwater, including saline waters). The Porter-Cologne Act has become an important tool in the post-SWANCC (Solid Waste Agency of Northern Cook Counties vs. Unites States Army Corps of Engineers) and Rapanos era with respect to the State's authority over isolated waters. Generally, any person proposing to discharge waste into a water body that could affect its water quality must file an ROWD when there is no federal nexus, such as under Section 404(b)(1) of the CWA. Although "waste" is partially defined as any waste substance associated with human habitation, the RWQCB interprets this to include fill discharge into water bodies.

Section 401 Water Quality Certification

Issuance of the USACE Section 404 Permit would be contingent upon the approval of a Section 401 Water Quality Certification from the RWQCB. Also, the RWQCB requires certification of the project's California Environmental Quality Act (CEQA) documentation before it will approve the Section 401 Water Quality Certification or ROWD. The RWQCB, as a responsible agency, will use the project's CEQA document to satisfy its own CEQA-compliance requirements.

On June 1, 2020, the USEPA finalized the "Clean Water Act Section 401 Certification Rule" to implement the water quality certification process consistent with the text and structure of the CWA. The final rule establishes procedures that promote consistent implementation of CWA section 401 and regulatory certainty in the federal licensing and permitting process. The new regulation includes reviews and approvals by the USACE prior to the RWQCB issuing a 401 Certification and reviews and approvals by the EPA prior to the USACE issuing a 404. The new 401 rule went into effect on September 11, 2020.

The new certification rule defines a discharge subject to 401 Certification as a discharge from a point source into a water of the United States. The new rule also states that States with additional water quality regulations cannot use these to expand the certification request.

The new rule requires all project proponents to request a pre-filing meeting with the RWQCB at least 30 days prior to filing a 401 "Certification Request". The filing procedure has been simplified to require the filing of a "Certification Request", rather than the acceptance of a "complete application". The certification request has nine mandatory components:

1. identify the project proponent(s) and a point of contact;
2. identify the proposed project;
3. identify the applicable federal license or permit;
4. identify the location and nature of any potential discharge that may result from the proposed project and the location of receiving waters;
5. include a description of any methods and means proposed to monitor the discharge and the equipment or measures planned to treat, control, or manage the discharge;
6. include a list of all other federal, interstate, tribal, state, territorial, or local agency authorizations required for the proposed project, including all approvals or denials already received;
7. include documentation that a pre-filing meeting request was submitted to the certifying authority at least 30 days prior to submitting the certification request;

8. contain the following statement: 'The project proponent hereby certifies that all information contained herein is true, accurate, and complete, to the best of my knowledge and belief; and
9. contain the following statement: 'The project proponent hereby requests that the certifying authority review and take action on this CWA 401 certification request within the applicable reasonable period of time.'

There is a mandatory 30 day wait period between a pre-filing meeting request and the filing of a Certification Request. A Certification Request must be filed with the RWQCB and the USACE concurrently. USACE reviews the Certification Request for the nine required components. The USACE has 15 days to review the Certification Request. The USACE then notifies the RWQCB that request is complete. And concurrently notifies the RWQCB of the reasonable time period to act on the Certification Request. The reasonable time period is not to exceed 1 year. Within 15 days of receipt of the Certification Request, the RWQCB must provide the applicant with the following: 1) date of receipt; 2) applicable reasonable period of time to act on the Certification Request; and 3) date upon which waiver will occur if the certifying authority fails or refuses to act on the Certification Request.

Once the RWQCB issues the 401 Certification, the USACE has 5 days to notify the USEPA that the 401 Certification has been issued. The USEPA then has 30 days to notify neighboring jurisdictions of the 401 Certification. Neighboring jurisdictions have 60 days to respond. If there are no objections to the 401 Certification, then the USACE would issue the 404 permit.

On June 2, 2021, the USEPA published a notice of intention to reconsider and revise the CWA Section 401 Certification Rule. At this time, they are currently accepting public comment. Until a new rule goes into effect, the current 401 Certification Rule stands.

The RWQCB is required under the *California Code of Regulations* (CCR) to have a "minimum 21-day public comment period" before any action can be taken on the Section 401 application.[10] This period closes when the RWQCB acts on the application. Since projects often change or are revised during the Section 401 permit process, the comment period can remain open. The public comment period starts as soon as an application has been received. Generally, the RWQCB Section 401, USACE Section 404, and CDFW Section 1602 permit applications are submitted at the same time.

The RWQCB requires the Applicant to address urban storm water runoff during and after construction in the form of Best Management Practices (BMPs). These BMPs are intended to address the treatment of pollutants carried by storm water runoff and are required in all complete applications. The notification/application for a CWA Section 401 Water Quality Certification must also address compliance with the Basin Plan. Please note that filing an application would also require the payment of an application fee which would be based on project impacts. The fee schedule is available at https://www.waterboards.ca.gov/resources/fees/water_quality/#wqc.

California Department of Fish and Wildlife

The CDFW has jurisdictional authority over wetland resources associated with rivers, streams, and lakes pursuant to the *California Fish and Game Code*.[11] Activities of State and local agencies as well as public utilities that are project proponents are regulated by the CDFW under Section 1602 of the *California Fish and Game Code.* This section regulates any work that will (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any

[10] 23 CCR §3858(a)
[11] See §§1600–1616.

material from the bed, channel, or bank of any river, stream, or lake; or (3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. Section 1602 of the *California Fish and Game Code* applies to all perennial, intermittent, and ephemeral rivers, streams, and lakes in the State.

The CDFW jurisdictional limits are not as clearly defined by regulation as those of the USACE. While they closely resemble the limits described by USACE regulations, they include riparian habitat supported by a river, stream, or lake regardless of the presence or absence of hydric and saturated soils conditions. In general, the CDFW takes jurisdiction from the top of a stream bank or to the outer limits of the adjacent riparian vegetation (outer drip line), whichever is greater. Notification is generally required for any project that will take place within or in the vicinity of a river, stream, lake or within or in the vicinity of tributaries to a river, stream, or lake. This includes rivers or streams that flow at least periodically or permanently through a bed or channel with banks that support fish and other aquatic plant and/or wildlife species. It also includes watercourses that have a surface or subsurface flow that support or have supported riparian vegetation.

Section 1602 Lake or Streambed Alteration Agreement

The CDFW enters into a Lake or Streambed Alteration (LSA) Agreement with a project proponent to ensure protection of wildlife and habitat values and acreages.

Prior to construction, a Notification of an LSA must be submitted to the CDFW that describes any proposed lake or streambed alteration that would occur with implementation of a project. The Notification of an LSA must address the initial construction and long-term operation and maintenance of any structures (such as a culvert or a desilting basin) included in the project design that are located within any river, stream, or lake and that may require periodic maintenance. In addition to the formal application materials and the fee, a copy of the appropriate environmental document (e.g., a Mitigated Negative Declaration) should be included in the submittal, consistent with CEQA requirements. The complete notification package must be completed on CDFW's Environmental Permit Information Management System (EPIMS). This notification will serve as the basis for the CDFW's issuance of a Section 1602 LSA Agreement. Note that notification is not required before beginning emergency work, but the CDFW must be notified in writing within 14 days after beginning the work.

After receiving Notification of an LSA Agreement, the CDFW will determine whether an LSA Agreement will be required for the proposed activity. An LSA Agreement will be required if the activity could substantially adversely affect an existing fish and wildlife resource. If an LSA Agreement is required, the CDFW may want to conduct an on-site inspection.

If the CDFW does not respond in writing concerning the completeness of the Notification within 30 days of its submittal, the Notification automatically becomes complete. If the CDFW does not submit a draft LSA Agreement to the Applicant within 60 days of the determination of a completed Notification package, the CDFW will issue a letter that either (1) identifies the final date to transmit a draft LSA Agreement or (2) indicates that an LSA Agreement was not required. The CDFW will also indicate that it was unable to meet this mandated compliance date and that, by law, the Applicant is authorized to complete the project without an LSA Agreement as long as the Applicant constructs the project as proposed and complies with all avoidance, minimization, and mitigation measures described in the submitted Notification package. Please note that, if the project requires revisions to the design or project construction, the CDFW may require submittal of a new Notification/application with an additional 90-day permit process.

If determined to be necessary, the CDFW will prepare a draft LSA Agreement, which will include standard measures to protect fish and wildlife resources during project construction and during

ongoing operation and maintenance of any project element that occurs within a CDFW jurisdictional area. The draft Agreement must be transmitted to the Applicant within 60 calendar days of the CDFW's determination that the notification is complete. It should be noted that the 60-day timeframe might not apply to long-range agreements.

Following receipt of a draft LSA Agreement from the CDFW, the Applicant has 30 calendar days to notify the CDFW concerning the acceptability of the proposed terms, conditions, and measures. If the Applicant agrees with these terms, conditions and measures, the Agreement must be signed and returned to the CDFW. The Agreement becomes final once the CDFW executes it and an LSA Agreement is issued. Please note that all application fees must be paid and the final certified CEQA documentation must be provided prior to the CDFW's execution of the Agreement.

ATTACHMENT B

LITERATURE REVIEW DETAILS

ATTACHMENT B1 - DESCRIPTIONS OF SOILS IN THE PROJECT SITE

LOS ANGELES COUNTY, CALIFORNIA, SOUTHEASTERN PART

Urban land-Palmview-Tujunga, gravelly complex, 2 to 9 percent slopes

Map Unit Setting

- National map unit symbol: 2qds7
- Elevation: 200 to 2,240 feet
- Mean annual precipitation: 17 to 27 inches
- Mean annual air temperature: 63 to 66 degrees F
- Frost-free period: 350 to 365 days
- Farmland classification: Not prime farmland

Map Unit Composition

- Urban land: 45 percent
- Palmview and similar soils: 20 percent
- Tujunga, gravelly, and similar soils: 20 percent
- Minor components: 15 percent
- Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Urban Land

Setting

- Landform: Alluvial fans

Properties and qualities

- Slope: 2 to 9 percent
- Depth to restrictive feature: 0 inches to manufactured layer
- Runoff class: Very high

Interpretive groups

- Land capability classification (irrigated): None specified
- Land capability classification (nonirrigated): 8
- Ecological site: R019XG911CA - Loamy Fan
- Hydric soil rating: No

Description of Palmview

Setting

- Landform: Alluvial fans
- Landform position (three-dimensional): Base slope
- Down-slope shape: Linear
- Across-slope shape: Linear
- Parent material: Discontinuous human-transported material over alluvium derived from granite

Typical profile

- ^A1 - 0 to 4 inches: sandy loam
- ^A2 - 4 to 14 inches: sandy loam
- 2C1 - 14 to 28 inches: sandy loam
- 2C2 - 28 to 79 inches: sandy loam

Properties and qualities

- Slope: 2 to 9 percent
- Depth to restrictive feature: More than 80 inches
- Drainage class: Well drained
- Runoff class: Very low
- Capacity of the most limiting layer to transmit water (Ksat): High (2.00 to 6.00 in/hr)
- Depth to water table: More than 80 inches
- Frequency of flooding: None
- Frequency of ponding: None
- Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
- Available water supply, 0 to 60 inches: Moderate (about 7.8 inches)

Interpretive groups

- Land capability classification (irrigated): None specified
- Land capability classification (nonirrigated): 3e
- Hydrologic Soil Group: A
- Ecological site: R019XG911CA - Loamy Fan
- Hydric soil rating: No

Description of Tujunga, Gravelly

Setting

- Landform: Alluvial fans
- Landform position (three-dimensional): Base slope
- Down-slope shape: Linear
- Across-slope shape: Linear
- Parent material: Discontinuous human-transported material over alluvium derived from granite

Typical profile

- ^Au - 0 to 6 inches: loamy sand
- ^A - 6 to 9 inches: gravelly loamy sand
- 2C1 - 9 to 30 inches: gravelly sand
- 2C2 - 30 to 79 inches: gravelly sand

Properties and qualities

- Slope: 2 to 9 percent
- Depth to restrictive feature: More than 80 inches
- Drainage class: Somewhat excessively drained
- Runoff class: Low
- Capacity of the most limiting layer to transmit water (Ksat): High to very high (5.95 to 19.98 in/hr)
- Depth to water table: More than 80 inches
- Frequency of flooding: None
- Frequency of ponding: None
- Maximum salinity: Nonsaline (0.0 to 1.0 mmhos/cm)
- Available water supply, 0 to 60 inches: Low (about 3.1 inches)

Interpretive groups

- Land capability classification (irrigated): None specified
- Land capability classification (nonirrigated): 4e
- Hydrologic Soil Group: A
- Ecological site: R019XG912CA - Sandy Fan
- Hydric soil rating: No

Minor Components

Soboba

- Percent of map unit: 10 percent
- Landform: Alluvial fans
- Landform position (three-dimensional): Base slope
- Down-slope shape: Linear
- Across-slope shape: Linear
- Hydric soil rating: No

Tujunga

- Percent of map unit: 5 percent
- Landform: Alluvial fans
- Landform position (three-dimensional): Base slope
- Down-slope shape: Linear
- Across-slope shape: Linear
- Hydric soil rating: No

Vista-Fallbrook-Cieneba complex, 30 to 75 percent slopes

Map Unit Setting

- National map unit symbol: 2rshp
- Elevation: 590 to 2,610 feet
- Mean annual precipitation: 18 to 23 inches
- Mean annual air temperature: 62 to 66 degrees F
- Frost-free period: 350 to 365 days
- Farmland classification: Not prime farmland

Map Unit Composition

- Vista and similar soils: 45 percent
- Fallbrook and similar soils: 25 percent
- Cieneba and similar soils: 15 percent
- Minor components: 15 percent
- Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Vista

Setting

- Landform: Hillslopes
- Landform position (two-dimensional): Backslope
- Landform position (three-dimensional): Side slope
- Down-slope shape: Convex
- Across-slope shape: Convex
- Parent material: Colluvium and/or residuum weathered from diorite

Typical profile

- A1 - 0 to 4 inches: sandy loam
- A2 - 4 to 9 inches: sandy loam
- Bw - 9 to 21 inches: sandy loam
- C1 - 21 to 25 inches: sandy loam
- C2 - 25 to 31 inches: sand
- Cr - 31 to 41 inches: bedrock

Properties and qualities

- Slope: 35 to 75 percent
- Depth to restrictive feature: 20 to 35 inches to paralithic bedrock
- Drainage class: Well drained
- Runoff class: Medium
- Capacity of the most limiting layer to transmit water (Ksat): Very low to moderately low (0.00 to 0.06 in/hr)
- Depth to water table: More than 80 inches
- Frequency of flooding: None
- Frequency of ponding: None
- Maximum salinity: Nonsaline (0.0 to 1.0 mmhos/cm)
- Available water supply, 0 to 60 inches: Low (about 3.5 inches)

Interpretive groups

- Land capability classification (irrigated): None specified
- Land capability classification (nonirrigated): 7e
- Hydrologic Soil Group: B
- Ecological site: F019XG913CA - Loamy Hills <30"ppt
- Hydric soil rating: No

Description of Fallbrook

Setting

- Landform: Hillslopes
- Landform position (two-dimensional): Backslope
- Landform position (three-dimensional): Side slope
- Down-slope shape: Convex
- Across-slope shape: Convex
- Parent material: Residuum weathered from diorite

Typical profile

- A1 - 0 to 4 inches: sandy loam
- A2 - 4 to 19 inches: sandy loam
- Bt1 - 19 to 31 inches: sandy clay loam
- Bt2 - 31 to 43 inches: sandy clay loam
- Bt3 - 43 to 58 inches: sandy clay loam
- Cr - 58 to 68 inches: bedrock

Properties and qualities

- Slope: 30 to 75 percent
- Depth to restrictive feature: 37 to 65 inches to paralithic bedrock
- Drainage class: Well drained
- Runoff class: High
- Capacity of the most limiting layer to transmit water (Ksat): Very low to moderately low (0.00 to 0.06 in/hr)
- Depth to water table: More than 80 inches
- Frequency of flooding: None
- Frequency of ponding: None
- Maximum salinity: Nonsaline (0.0 to 1.0 mmhos/cm)
- Available water supply, 0 to 60 inches: Moderate (about 8.4 inches)

Interpretive groups

- Land capability classification (irrigated): None specified
- Land capability classification (nonirrigated): 7e
- Hydrologic Soil Group: C
- Ecological site: F019XG913CA - Loamy Hills <30"ppt
- Hydric soil rating: No

Description of Cieneba

Setting

- Landform: Hillslopes
- Landform position (two-dimensional): Shoulder, summit
- Landform position (three-dimensional): Crest
- Down-slope shape: Convex
- Across-slope shape: Convex
- Parent material: Colluvium and/or residuum weathered from diorite

Typical profile

- A - 0 to 6 inches: sandy loam
- C - 6 to 13 inches: sandy loam
- Cr - 13 to 23 inches: bedrock

Properties and qualities

- Slope: 15 to 75 percent
- Depth to restrictive feature: 10 to 17 inches to paralithic bedrock
- Drainage class: Well drained
- Runoff class: Medium
- Capacity of the most limiting layer to transmit water (Ksat): Very low to moderately low (0.00 to 0.06 in/hr)
- Depth to water table: More than 80 inches
- Frequency of flooding: None
- Frequency of ponding: None
- Maximum salinity: Nonsaline (0.0 to 1.0 mmhos/cm)
- Available water supply, 0 to 60 inches: Very low (about 1.7 inches)

Interpretive groups

- Land capability classification (irrigated): None specified
- Land capability classification (nonirrigated): 7e
- Hydrologic Soil Group: D
- Ecological site: F019XG913CA - Loamy Hills <30"ppt
- Hydric soil rating: No

Minor Components

Rock outcrop

- Percent of map unit: 5 percent
- Landform: Hillslopes
- Landform position (three-dimensional): Side slope
- Hydric soil rating: No

Urban land

- Percent of map unit: 5 percent
- Landform: Hillslopes
- Hydric soil rating: No

Exchequer

- Percent of map unit: 5 percent
- Landform: Hillslopes
- Landform position (two-dimensional): Summit, shoulder
- Landform position (three-dimensional): Crest
- Down-slope shape: Convex
- Across-slope shape: Convex
- Hydric soil rating: No

ATTACHMENT B2 - DESCRIPTION OF BENEFICIAL USES ASSOCIATED WITH ON-SITE WATERS OF THE STATE

The *Basin Plan for the Lahontan Region: North and South Basins* (Lahontan RWQCB, 1995) identifies a number of beneficial uses, some or all of which may apply to a specific hydrologic subarea (HSA), including the following:

- MUN – Municipal and Domestic Supply. Beneficial uses of waters used for community, military, or individual water supply systems including, but not limited to, drinking water supply.

- WARM – Warm Freshwater Habitat. Beneficial uses of water that support warm water ecosystems including, but not limited to: preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.

- WILD – Wildlife Habitat. Beneficial uses of waters that support wildlife habitats including, but not limited to, the preservation and enhancement of vegetation and prey species used by wildlife, such as waterfowl.

- RARE – Rare, Threatened, or Endangered Species. Beneficial uses of waters that support habitat necessary for the survival and successful maintenance of plant or animal species established under state and/or federal law as rare, threatened or endangered.

- REC-1 – Water Contact Recreation. Beneficial uses of waters used for recreational activities involving body contact with water where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing, and use of natural hot springs.

- REC-2 – Non-contact Water Recreation. Beneficial uses of waters used for recreational activities involving proximity to water, but not normally involving body contact with water where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, and aesthetic enjoyment in conjunction with the above activities.

ATTACHMENT C

SITE PHOTOGRAPHS

March 15, 2024. Representative view of conditions within Drainage A.

March 15, 2024. View of south end of Drainage A connecting to the Concrete-Lined Channel.

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March 15, 2024. Representative view of conditions within Drainage B.

March 15, 2024. View of south end of Drainage B connecting to the Concrete-Lined Channel.

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March 15, 2024. Representative view of conditions within the Concrete-Lined Channel, facing south.

March 15, 2024. Representative view of conditions within the Concrete-Lined Channel, facing north.

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ATTACHMENT D

ORDINARY HIGH WATER MARK DATASHEET

Arid West Ephemeral and Intermittent Streams OHWM Datasheet

Project: Descanso Gardens Stormwater Capture and Reuse Project
Date: 3/15/2024 **Time:** 1100
Project Number: 3GEO010400 **Town:** La Canada Flintridge **State:** CA
Stream: Drainage A **Photo begin file#:** **Photo end file#:**
Investigator(s): Trevor Bristle

Y ☑ / N ☐ Do normal circumstances exist on the site?

Y ☐ / N ☑ Is the site significantly disturbed?

Location Details:
In disturbed area north of parking lot.

Projection: **Datum:**
Coordinates: 34.203364, -118.211436

Potential anthropogenic influences on the channel system:
Originates from culvert inlet to north. Likely from runoff of nearby road.

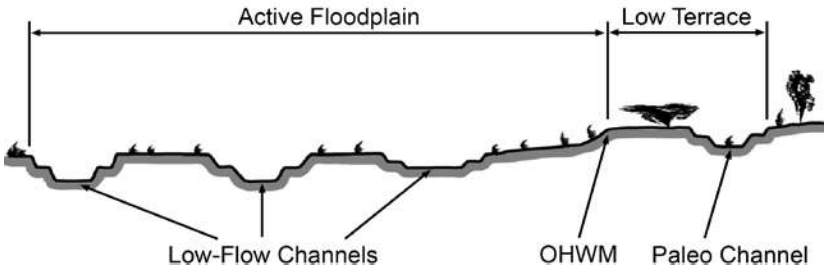
Brief site description:
Disturbed area with minimal depression. Ends at concrete channel.
Ephemeral, no water present at time of survey.

Checklist of resources (if available):

☑ Aerial photography
Dates:
☐ Topographic maps
☐ Geologic maps
☐ Vegetation maps
☐ Soils maps
☐ Rainfall/precipitation maps
☐ Existing delineation(s) for site
☐ Global positioning system (GPS)
☐ Other studies

☐ Stream gage data
Gage number:
Period of record:
☐ History of recent effective discharges
☐ Results of flood frequency analysis
☐ Most recent shift-adjusted rating
☐ Gage heights for 2-, 5-, 10-, and 25-year events and the most recent event exceeding a 5-year event

Hydrogeomorphic Floodplain Units

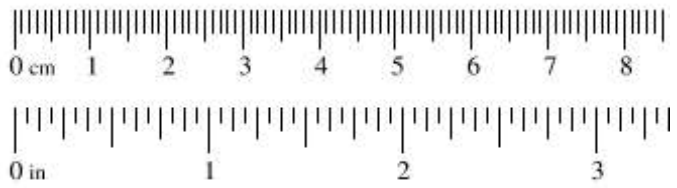


Procedure for identifying and characterizing the floodplain units to assist in identifying the OHWM:

1. Walk the channel and floodplain within the study area to get an impression of the geomorphology and vegetation present at the site.
2. Select a representative cross section across the channel. Draw the cross section and label the floodplain units.
3. Determine a point on the cross section that is characteristic of one of the hydrogeomorphic floodplain units.
   a) Record the floodplain unit and GPS position.
   b) Describe the sediment texture (using the Wentworth class size) and the vegetation characteristics of the floodplain unit.
   c) Identify any indicators present at the location.
4. Repeat for other points in different hydrogeomorphic floodplain units across the cross section.
5. Identify the OHWM and record the indicators. Record the OHWM position via:
   ☑ Mapping on aerial photograph ☐ GPS
   ☐ Digitized on computer ☐ Other:

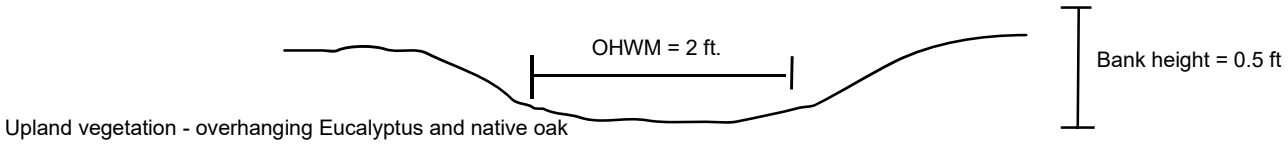
Wentworth Size Classes

Inches (in)	Millimeters (mm)	Wentworth size class	
10.08	256	Boulder	
		Cobble	Gravel
2.56	64		
0.157	4	Pebble	
		Granule	
0.079	2.00		
0.039	1.00	Very coarse sand	
0.020	0.50	Coarse sand	
1/2 0.0098	0.25	Medium sand	Sand
1/4 0.005	0.125	Fine sand	
1/8 0.0025	0.0625	Very fine sand	
1/16 0.0012	0.031	Coarse silt	
1/32 0.00061	0.0156	Medium silt	Silt
1/64 0.00031	0.0078	Fine silt	
1/128 0.00015	0.0039	Very fine silt	
		Clay	Mud



Project ID: 3DES020105 **Cross section ID:** Drainage A **Date:** 8/23/2023 **Time:** 1100

Cross section drawing:



OHWM

GPS point: See location on front.

Indicators:

- ☑ Change in average sediment texture
- ☐ Change in vegetation species
- ☐ Change in vegetation cover
- ☑ Break in bank slope
- ☐ Other: _____
- ☐ Other: _____

Comments:

Floodplain unit: ☑ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace

GPS point: See location on front.

Characteristics of the floodplain unit:

Average sediment texture: Silt/cobble

Total veg cover: 40 % Tree: 30 % Shrub: 0 % Herb: 10 %

Community successional stage:

- ☐ NA
- ☐ Early (herbaceous & seedlings)
- ☐ Mid (herbaceous, shrubs, saplings)
- ☑ Late (herbaceous, shrubs, mature trees)

Indicators:

- ☐ Mudcracks
- ☐ Ripples
- ☑ Drift and/or debris
- ☑ Presence of bed and bank
- ☐ Benches
- ☐ Soil development
- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

Comments:

Representative of ephemeral drainages on-site.

Project ID: **Cross section ID:** **Date:** **Time:**

Floodplain unit: ☐ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace

GPS point: _____

Characteristics of the floodplain unit:

Average sediment texture: _____

Total veg cover: _____ % Tree: _____% Shrub: _____% Herb: _____%

Community successional stage:

- ☐ NA
- ☐ Early (herbaceous & seedlings)
- ☐ Mid (herbaceous, shrubs, saplings)
- ☐ Late (herbaceous, shrubs, mature trees)

Indicators:

- ☐ Mudcracks
- ☐ Ripples
- ☐ Drift and/or debris
- ☐ Presence of bed and bank
- ☐ Benches
- ☐ Soil development
- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

Comments:

Floodplain unit: ☐ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace

GPS point: _____

Characteristics of the floodplain unit:

Average sediment texture: _____

Total veg cover: _____ % Tree: _____% Shrub: _____% Herb: _____%

Community successional stage:

- ☐ NA
- ☐ Early (herbaceous & seedlings)
- ☐ Mid (herbaceous, shrubs, saplings)
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- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

Comments: